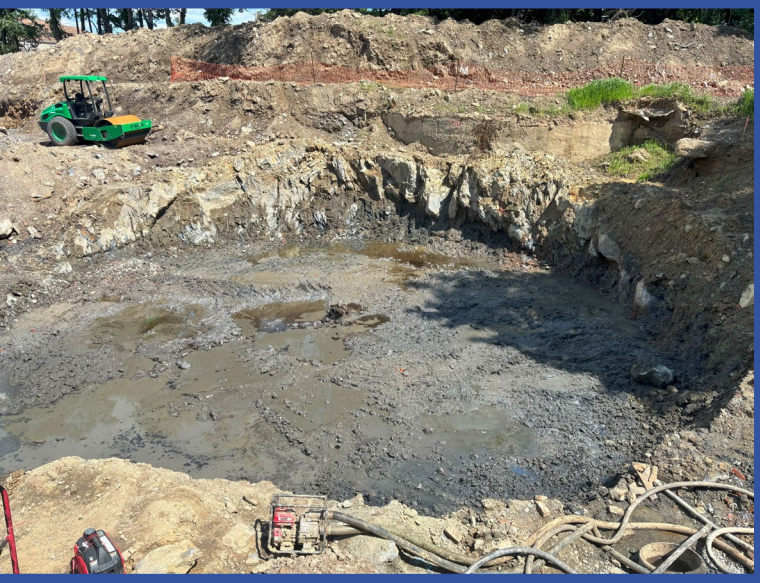
Corrective Action Plan



135 Main Street
Poughkeepsie, NY

PREPARED FOR:

PATHS CONSTRUCTION
909 THIRD AVENUE, 21ST FLOOR
New York, NY 10022

HK PROJECT NUMBER: HK2710

September 17, 2025

HK ENGINEERING & GEOLOGY, D.P.C.

Contents

HK ENGINEERING & GEOLOGY, D.P.C.

CERTIFICATION

I, Kristen E. Brink, certify that I am currently a Qualified Environmental Professional as defined in 6 NYCRR Part 375] and that this Corrective Action 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).

Kristen Brink

9-18-25

Kristen E. Brink, P.E. ***Date***

1.0 INTRODUCTION

HK Engineering and Geology, D.P.C. (HK) has prepared this Corrective Action Plan (CAP) for submittal to the New York State Department of Environmental Conservation (NYSDEC), in response to the recent unearthing of two former gas holders during construction of the Admiral Halsey II apartment complex at the above-referenced Site. The gas holders are known to be associated with the former Bayeaux Street Manufactured Gas Plant (MGP) site, which was investigated previously under NYSDEC oversight via soil borings in 1990 and 2006, with the Site having achieved a status of "No Further Action" based on the lack of any significant impacts identified. Upon the discovery of the gas holders and associated impacted soil in May 2025, HK reported spill No. 25-02121 to the NYSDEC.

This CAP outlines the procedures to be followed during the remedial excavation, stockpiling, and disposal of MGP-impacted material at the Site associated with the unknown holder at the Site (Holder#1), as well as details regarding the collection and analysis of confirmatory soil samples.

2.0 WORK SCOPE OVERVIEW

A large former gas holder (Holder#1), measuring 63 feet in diameter, has been demolished to date, with the bottom and sidewalls removed. The sidewalls of the holder were initially encountered at approximately 7 feet below grade (ft bg), and the bottom of the holder was at 16 ft bg. The bottom of this holder was determined to be sitting directly on bedrock. Impacted soil and brick associated with the holder has been stockpiled and covered with plastic awaiting disposal. A second smaller gas holder, measuring 50 feet in diameter, has been partially uncovered to date starting at approximately 2 ft bg but remains intact, and will be the subject of a forthcoming Remedial Action Work Plan (RAWP), which will address both the second holder and potential impacts to other areas of the Site that are identified during a Remedial Investigation to be completed in advance of the RAWP.

Confirmatory soil sampling as proposed in this CAP will occur following impacted soil removal, unless bedrock is encountered first. The former gas holders and proposed confirmatory soil sample locations associated with the removal of Holder#1 MGP-impacted soil are shown on Figure 1, and the planned soil excavation areas associated with the redevelopment of the property are shown on Figure 2.

Project Contacts

The table below includes a site contact list of key personnel involved in the implementation of this work plan:

Role	Organization	Contact Name	Contact Info
General Contractor	Paths Construction	Jesus Montoya	917-658-5324
Remediation Contractor	C2G Environmental	Paul Bany	631-682-3074
Environmental Consultant	HK Engineering & Geology	Chris Hirschmann	908-688-7800
Remedial Engineer	HK Engineering & Geology	Kristen E. Brink	908-688-7800
Project Manager	NYSDEC	Sarah Saucier	518-402-9675

A Site-specific health and Safety Plan (HASP) is attached as Appendix A.

3.0 SOIL HANDLING PROCEDURES

3.1 Soil Screening Procedures

Visual, olfactory and PID soil screening and assessment will be performed by a qualified professional during all remedial excavations. Soil screening will be performed regardless of when the invasive work is done and will include all excavation and invasive work performed during the remedy, such as excavations for foundations and utility work. Soil will be screened for indications of MGP impacts, including visible contamination like staining, sheen, or oil/tar, etc., and olfactory indications including tar or naphthalene odors. If non-aqueous phase liquid (NAPL) is suspected, a shake test can be performed to indicate if dense NAPL or light NAPL is present.

3.2 Contaminated Soil Stockpiling Procedures

Stockpiles will be kept covered at all times with appropriately anchored tarps. Stockpiles will be routinely inspected, and damaged tarp covers will be promptly replaced. Soil stockpiles will be encircled with silt fences or silt socks. Hay bales will be used as needed near catch basins, surface waters and other discharge points. Stockpiles of contaminated materials will be inspected at a minimum once each week and after every storm event.

Accumulated sediment behind silt fencing will be removed, when needed, to refresh the silt fences. The removed sediments will be treated as contaminated and will be sampled for off-site disposal. Results of inspections will be recorded in a logbook and included in the next daily report that will be provided to NYSDEC. Daily Reports will be included in the Construction Completion Report (CCR).

3.3 Materials Load Out

The Remediation Engineer or a qualified environmental professional under his/her supervision will oversee all invasive work and the excavation and load-out of excavated material. The developer and its contractors are solely responsible for safe execution of invasive and other work performed under this Plan.

Loaded vehicles leaving the Site will be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with appropriate Federal, State, local, and NYSDOT requirements (and all other applicable transportation requirements).

A truck wash associated with construction activities will be operational during construction. Truck wash water will be pumped from the wash basin into the onsite Frac tank for offsite treatment and disposal. The Remediation Engineer will be responsible for ensuring that outbound trucks are not causing any off-site tracking of the contaminated soils. Locations where vehicles enter or exit the Site will be inspected daily for evidence of off-Site sediment tracking.

The Remediation Engineer will ensure that egress points for truck and equipment transported from the Site will be clean of dirt and other materials derived from the Site during Site remediation and development. Inspection will be conducted daily for the egress points. Cleaning of the adjacent streets will be performed via sweeping or shoveling as needed to maintain a clean condition with respect to site-derived materials.

Site-derived materials that are tracked off-site to the adjacent street will be collected and returned to the site for proper disposal.

The developer and associated parties preparing the remedial documents submitted to the State, and parties performing this work, are completely responsible for the safe performance of invasive work, the structural integrity of excavations, and for structures that may be affected by excavations (such as building foundations).

The Remedial Engineer will ensure that Site development activities will not interfere with, or otherwise impair or compromise, remedial activities proposed in this workplan.

3.4 Materials Transport Off Site

Transport of materials 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.

The in-bound and out-bound truck routes to the Site will take into account: (a) limiting transport through residential areas and past sensitive sites; (b) use of city mapped truck routes; (c) limiting off-site queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; and (f) overall safety in transport. Trucks will be prohibited from stopping and idling in the neighborhood outside the project Site.

Egress points for truck and equipment transport from the Site will be kept clean of dirt and other materials during Site remediation and development. Queuing of trucks will be performed on N. Bridge Street in order to minimize disturbance to local residents. Trucks will enter through Gate #1 from the on-site parking lot, and exit through Gate #2 onto N. Perry Street, where they will turn left towards Main Street.

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.

3.5 Material Disposal Offsite

Approval from appropriate disposal facilities will be received prior to start of disposal. Copies of all facility acceptance letters and a list of transporters will be provided to the NYSDEC Division of Environmental Remediation (DER) project manager. Soil/fill/solid waste excavated and removed from the Site will be treated as contaminated and regulated material and will be disposed in accordance with all local, State (including 6NYCRR Part 360) and Federal regulations. An appropriate facility will be determined to meet project requirements. Unregulated off-Site management of materials from this Site will not be undertaken without formal NYSDEC approval. Material that does not meet Track 1 unrestricted SCOs is prohibited from being taken to a New York State recycling facility (6NYCRR Part 360-16 Registration Facility).

The following documentation will be obtained and reported by the Remedial Engineer for each disposal location used in this project to fully demonstrate and document that the disposal of material derived from the Site conforms with all applicable laws: (1) a letter from the Remedial Engineer or Generator to the receiving facility describing the material to be disposed and requesting formal written acceptance of the material. This letter will state that material to be disposed is contaminated material generated at an environmental remediation Site in New York State. The letter will provide the project identity and the name and phone number of the Remedial Engineer. The letter will include as an attachment a summary of all chemical data for the material being transported (including Site Characterization data); and (2) a letter from all receiving facilities stating it is in receipt of the correspondence (above) and is approved to accept the material. These documents will be included in the CCR.

Non-hazardous historic fill and contaminated soils taken off-Site will be handled, at minimum, as a Municipal Solid Waste per 6NYCRR Part 360-1.2. Historical fill and contaminated soils from the Site are prohibited from being disposed at Part 360-16 Registration Facilities (also known as Soil Recycling Facilities).

Soils that are contaminated but non-hazardous and are being removed from the Site are considered by the Division of Materials Management (DMM) in NYSDEC to be Construction and Demolition (C/D) materials. These soils may be sent to a permitted Part 360 landfill. They may be sent to a permitted C/D processing facility without permit modifications only upon prior notification to the NYSDEC. This material is prohibited from being sent or redirected to a Part 360-16 Registration Facility. In this case, special procedures will include, at a minimum, a letter to the C/D facility that provides a detailed explanation that the material is derived from a remediation Site, that the soil material is contaminated and that it must not be redirected to on-site or off-site Soil Recycling Facilities. The letter will provide the project identity and the name and phone number of the Remedial Engineer. The letter will include as an attachment a summary of all chemical data for the material being transported.

The CCR will include an accounting of the destination of material removed from the Site during the Remedial Action, including excavated soil, contaminated soil, historic fill, solid waste, and hazardous waste, non-regulated material, and fluids. Documentation associated with disposal of material must also include records and approvals for receipt of the material. This information will also be presented in a tabular form in the CCR.

Bill of Lading system or equivalent will be used for off-Site movement of non-hazardous wastes and contaminated soils. This information will be reported in the CCR.

Hazardous wastes, if any, derived from on-site will be stored, transported, and disposed of in full compliance with applicable local, State, and Federal regulations.

Appropriately licensed haulers will be used for material removed from this Site and will be in full compliance with all applicable local, State and Federal regulations.

Waste characterization will be performed for off-site disposal in a manner suitable to the receiving facility and in conformance with applicable permits. Sampling and analytical methods, sampling frequency, analytical results and quality assurance/quality control will be reported in the CCR. All data available for soil/material to be disposed at a given facility must be submitted to the disposal facility with suitable explanation prior to shipment and receipt.

All transport permits and disposal facility approval documentation will be provided to the NYSDEC Project Manager before the materials are transported off-site.

3.6 Backfill From Off Site Sources

Backfill must meet the requirements of 6 NYCRR 375-6.7(d) and meet the following criteria in accordance with Division of Environmental Remediation, Technical Guidance for Site Investigation and Remediation (DER-10):

- Be free of extraneous debris or solid waste;
- Be recognizable soil or other unregulated material as set forth in 6 NYCRR Part 360 and materials for which NYSDEC has issued a beneficial use determination;
- Not exceed the allowable constituent levels for imported fill or soil; and
- Be tested as described below.

The imported material, if needed, will be sampled in accordance with DER-10 Section 5.4 (e) Table 5.4 (e)10 and paragraph 10. The samples will be analyzed for Target Compound List (TCL) VOCs, TCL SVOCs, pesticides, PCBs, and Target Analyte List (TAL) metals including cyanide. The soil may be used as cover material provided that all parameters meet the RRSCOs, per the NYSDEC regulatory requirements. In addition, composite samples will be collected for emerging contaminants in accordance with the NYSDEC Sampling, Analysis, and Assessment of Per-and- Polyfluoroalkyl Substances (April 2023).

All materials proposed for importing onto the Site will meet the lesser of the restricted residential soil cleanup objectives (RRSCOs) or the Protection of Groundwater Soil Cleanup Objectives (PGWSCOs), and will be approved by the Remedial Engineer prior to receipt at the Site. A “Request to Import/Reuse Fill or Soil” form (Updated February 2025) will be submitted to the NYSDEC for pre-approval prior to importing any soils on-Site. Following import of backfill material, bills of Lading or equivalent documentation will be obtained to track the amount of soil arriving onto the Site and verify the source of soil being imported.

Material from industrial sites, spill sites, other environmental remediation sites or other potentially contaminated sites will not be imported to the Site. All imported soils will meet NYSDEC approved backfill or cover soil quality objectives for this Site. Non-compliant soils will not be imported onto the Site without prior approval by NYSDEC. Nothing in the approved Remedial Action Work Plan or its approval by NYSDEC will be construed as an approval for this purpose.

Soils that meet ‘exempt’ fill requirements under 6 NYCRR Part 360, but do not meet backfill or cover soil objectives for this Site, will not be imported onto the Site without prior approval by NYSDEC. Nothing in the approved Corrective Action Plan will be construed as an approval for this purpose. Solid waste will not be imported onto the Site. Trucks entering the Site with imported soils will be securely covered with tight fitting covers.

4.0 AIR MONITORING

Community air monitoring is being performed during the implementation of the remedial action to protect the health and safety of Site workers and to confirm that air impacts from Site-related activities are not migrating off-Site. The monitoring program includes monitoring for VOCs and dust from four (4) stations including one (1) upwind and two (2) downwind of the excavation area, as well as a fourth station within 20 feet of the Admiral Halsey Senior Village building. Upwind and downwind locations are subject to change based upon wind direction. The CAMP data will be provided to DEC for the duration of ground activities. Monitoring will be completed during materials loadout and during placement of backfill material. A community air monitoring plan (CAMP) which provides additional detail is attached to this work plan as Appendix A.

4.1 Odor Control

Odor control/suppression is currently being implemented via the application of BioSolve® Pinkwater via a misting system to the open excavation or impacted soil stockpile. During MGP soil disposal activities, application of Atmos® odor suppression foam will be implemented as an alternative odor suppression method. A sufficient quantity of odor suppression materials and equipment will be available onsite at all times when ground-intrusive work is ongoing and/or impacted material is being staged or loaded. Odor controls may additionally be applied as directed by NYSDEC.

5.0 DEWATERING

All groundwater encountered within the gas holder area will be treated as contaminated groundwater, and is being pumped into a Frac tank. Once filled, the contaminated groundwater is pumped out by Clean Water of New York, a water treatment facility that accepts contaminated groundwater. All non-hazardous manifests from Clean Water of New York will be provided in the CCR.

6.0 CONFIRMATORY SOIL SAMPLING PROCEDURES

Bottom confirmation sampling will be conducted at a frequency of one sample per approximately 900 square feet of excavation area within the former gas holders (4 samples from the large gas holder) unless bedrock is encountered either directly beneath the holders or before clean soil is encountered. The frequency of bottom sampling proposed for this alternative is consistent with the guidance provided in NYSDEC DER-10 Section 5.4. Following disposal of all MGP-impacted soil, several additional bottom endpoint soil samples will be collected from the area beneath the former impacted soil stockpile and soil ramp, at the same frequency as noted above.

Sidewall confirmation sampling will be required to confirm the removal of MGP-impacted soils in the vicinity of the gas holder. Sidewall samples will be collected at a frequency of one sidewall sample per 30 linear feet and will be placed around the perimeter of the excavation of Holder#1, unless bedrock is encountered first. The frequency of sidewall sampling proposed for this alternative is consistent with the guidance provided in NYSDEC DER-10 Section 5.4.

Confirmatory samples will be collected following completion of on-Site excavation of Holder#1 to properly document the remaining on-Site soil quality, and the results will be compared to RRSCOs as directed during discussions with NYSDEC. Confirmation samples will be analyzed for TCL VOCs, TCL SVOCs, TAL metals, and cyanide. Quality Assurance/Quality Control (QA/QC) sample collection procedures are also outlined below. Following receipt of sample data, a data usability summary report (DUSR) will be prepared by a third-party data validator.

The table below summarizes the sampling areas, frequency, analyses and QA/QC samples to be collected during remedial activities:

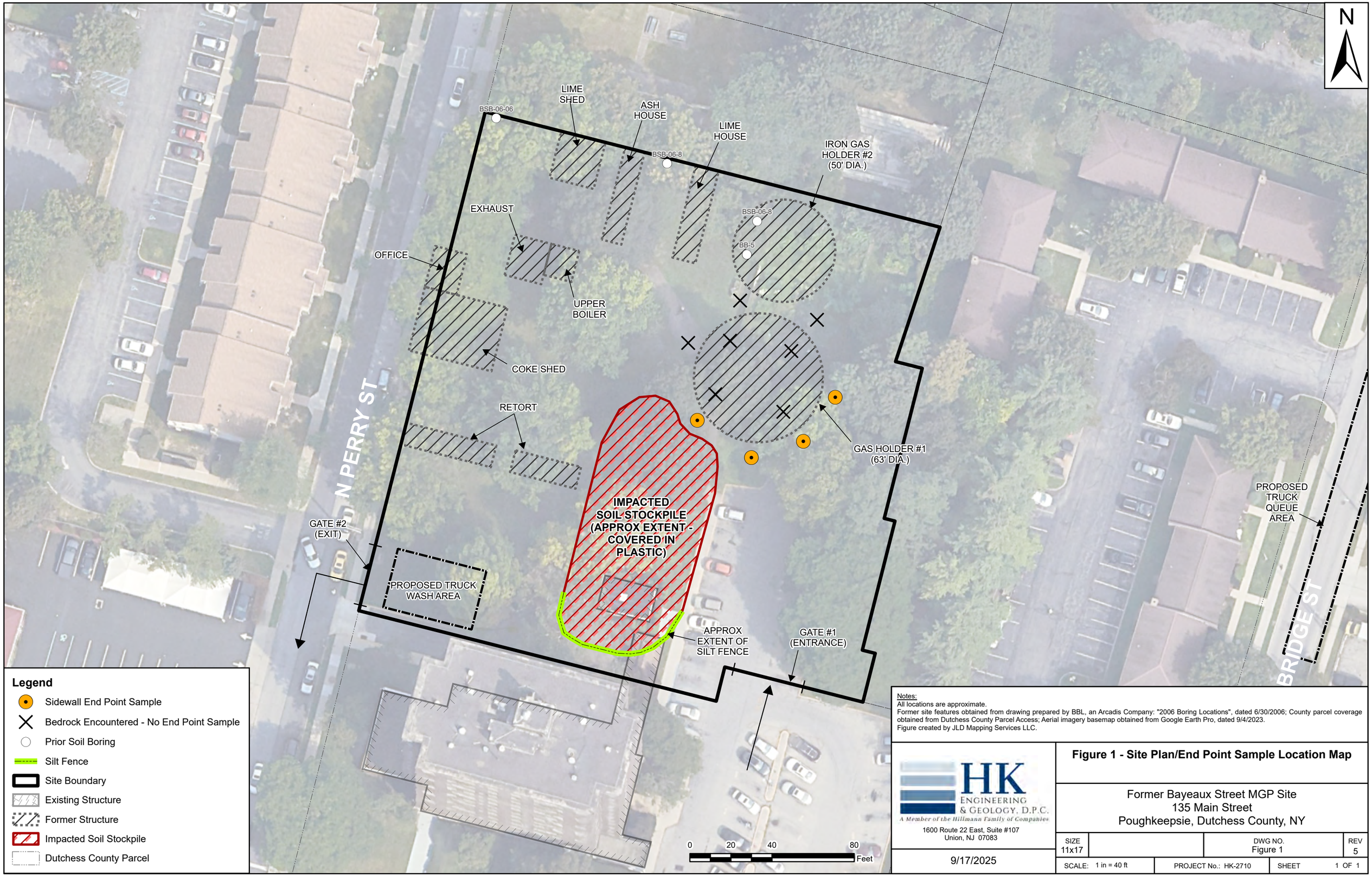
Remedial Area	Frequency	Required Analytes
Gas Holder Bottoms	1 per 900 SF	TCL VOCs, TCL SVOCs, TAL Metals, Cyanide
Gas Holder Sidewalls	1 per 30 LF	TCL VOCs, TCL SVOCs, TAL Metals, Cyanide
Under Contaminated Soil Pile	1 per 900 SF	TCL VOCs, TCL SVOCs, TAL Metals, Cyanide
Field Blank	1 per day	TCL VOCs, TCL SVOCs, TAL Metals, Cyanide
Trip Blank	1 per shipment	TCL VOCs
Duplicate	1 per 20 samples	TCL VOCs, TCL SVOCs, TAL Metals, Cyanide

Figure 1 depicts an approximation of the locations of each bottom and sidewall confirmation sample as part of the proposed remedial action.

7.0 VAPOR BARRIER AND SSDS

As a precaution to prevent future soil vapor intrusion, a Yellow Guard® 20-mil vapor barrier will be installed beneath the entire building footprint, which will be underlain by a sub-slab depressurization system (SSDS) consisting of runs of horizontal perforated pipe within a layer of crushed stone. The vapor barrier specification and SSDS design will be provided under separate cover.

FIGURES



Legend

- Sidewall End Point Sample
- Bedrock Encountered - No End Point Sample
- Prior Soil Boring
- Silt Fence
- Site Boundary
- Existing Structure
- Former Structure
- Impacted Soil Stockpile
- Dutchess County Parcel

Notes:
All locations are approximate.
Former site features obtained from drawing prepared by BBL, an Arcadis Company: "2006 Boring Locations", dated 6/30/2006; County parcel coverage obtained from Dutchess County Parcel Access; Aerial imagery basemap obtained from Google Earth Pro, dated 9/4/2023.
Figure created by JLD Mapping Services LLC.

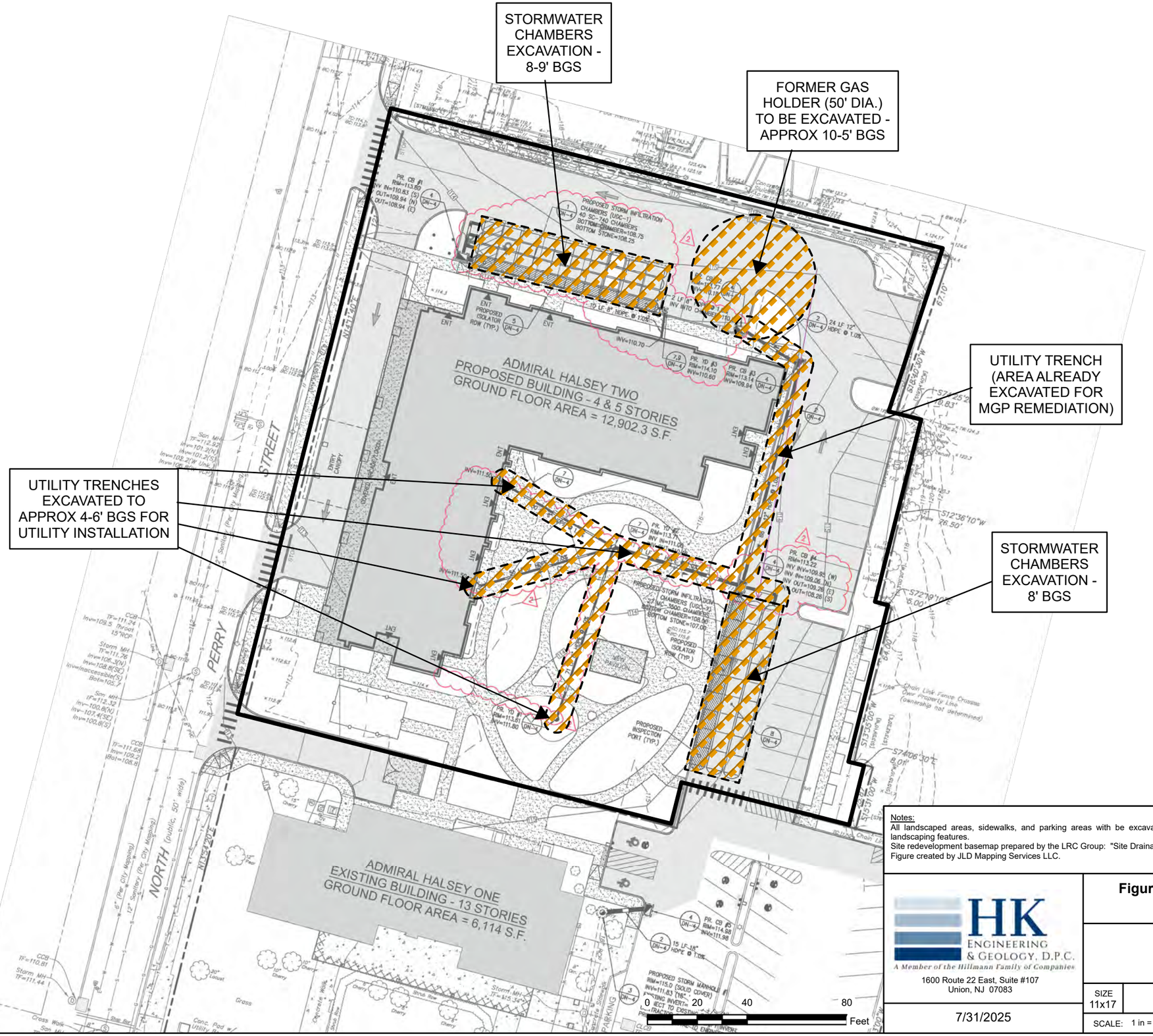
HK ENGINEERING & GEOLOGY, D.P.C.
A Member of the Hillmann Family of Companies
1600 Route 22 East, Suite #107
Union, NJ 07083

9/17/2025

Figure 1 - Site Plan/End Point Sample Location Map

Former Bayeaux Street MGP Site
135 Main Street
Poughkeepsie, Dutchess County, NY

SIZE		DWG NO.	REV
11x17		Figure 1	5
SCALE: 1 in = 40 ft	PROJECT No.: HK-2710	SHEET	1 OF 1



N

Legend

- Site Boundary
- Proposed Excavation

Notes:
All landscaped areas, sidewalks, and parking areas with be excavated 1-2' bgs (below ground surface) for installation of concrete, asphalt, and landscaping features.
Site redevelopment basemap prepared by the LRC Group: "Site Drainage Plan", drawing no. SD-1, dated 8/16/2024, last revised 12/2/2024.
Figure created by JLD Mapping Services LLC.

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7/31/2025

Figure 2 - Proposed Excavation Locations Map

Former Bayeaux Street MGP Site
135 Main Street
Poughkeepsie, Dutchess County, NY

SIZE		DWG NO.	REV
11x17		Figure 2	0
SCALE: 1 in = 40 ft	PROJECT No.: HK-2710	SHEET	1 OF 1

ATTACHMENT A

HEALTH AND SAFETY PLAN

HK ENGINEERING & GEOLOGY, D. P.C.
1600 Route 22 East
Union, New Jersey 07083
(908) 688-7800 • (908) 688-2636 – Fax

HEALTH AND SAFETY PLAN

Address: 135 Main Street
Poughkeepsie, New York

Project Number: HK2710

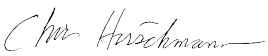
Number	Date	Initials
Jesse Mausner Plan Preparer/Site Supervisor		10/1/25
Chris Hirschmann Site Health & Safety Officer		10/1/25

Table of Contents

FORMS

Site Information

Location: 135 Main Street
Poughkeepsie, New York

Historical/Current Site Information: The Site is currently a vacant overgrown vegetated parcel.

Location/Class: [ ] Industrial [ ] Commercial [X] Urban/Residential
[ ] Suburban [ ] Rural

Site Regulatory Status: [ ] CERCLA/SARA [ ] US EPA [ ] NJDEP
[ ] NPL [ ] RCRA [ ] NYCOER
[X] NYSDEC [ ] Not Regulated [ ] Due Diligence

Operations or Tasks to be Performed, and Approximate Duration of Each:

1- Soil Excavation & Transport

Surrounding Population/Structures:

Urban mixed use residential and commercial

Site and Surrounding Topography:

Generally Flat Terrain

Known or Suspected Pathways of Contaminant Dispersion:

Soil, groundwater, and soil vapor

Emergency Shower, Eyewash and First Aid Equipment Located at:

Eyewash and emergency shower will not be available.

First aid provided by emergency services (911).

Personnel On-Site trained in First Aid:

1. Ryan K. Powell
2. Chris Hirschmann
3. Dominick Aponte
4. Jesse Mausner
5. _____
6. _____
7. _____
8. _____

Introduction

This Health and Safety Plan (HASP) has been prepared by HK Engineering and Geology D.P.C. (HK) to summarize the health and safety hazards at the subject site and the requirements and procedures to protect its employees from them. Site is located at 135 Main Street, Poughkeepsie, New York. This plan meets or exceeds the requirements of Occupational Safety and Health Administration (OSHA), 29 CFR 1910.120, for a site-specific health and safety plan.

This plan was designed to reduce the potential for occupational illness or injury resulting from working at this site. The purpose of the HASP is to inform HK's employees and subcontractors of the health and safety risks present at this site, and the proper methods of protecting themselves from those risks. Each worker must be fully aware of the risks associated with the work to be accomplished, and be dedicated to completing that work safely.

Existing and potential hazards at this site have been identified. As new information becomes available, this HASP will be revised. Standard practices and procedures of industrial hygiene, occupational health, safety, and environmental protection are prescribed in this plan, which was prepared and reviewed by experienced professionals.

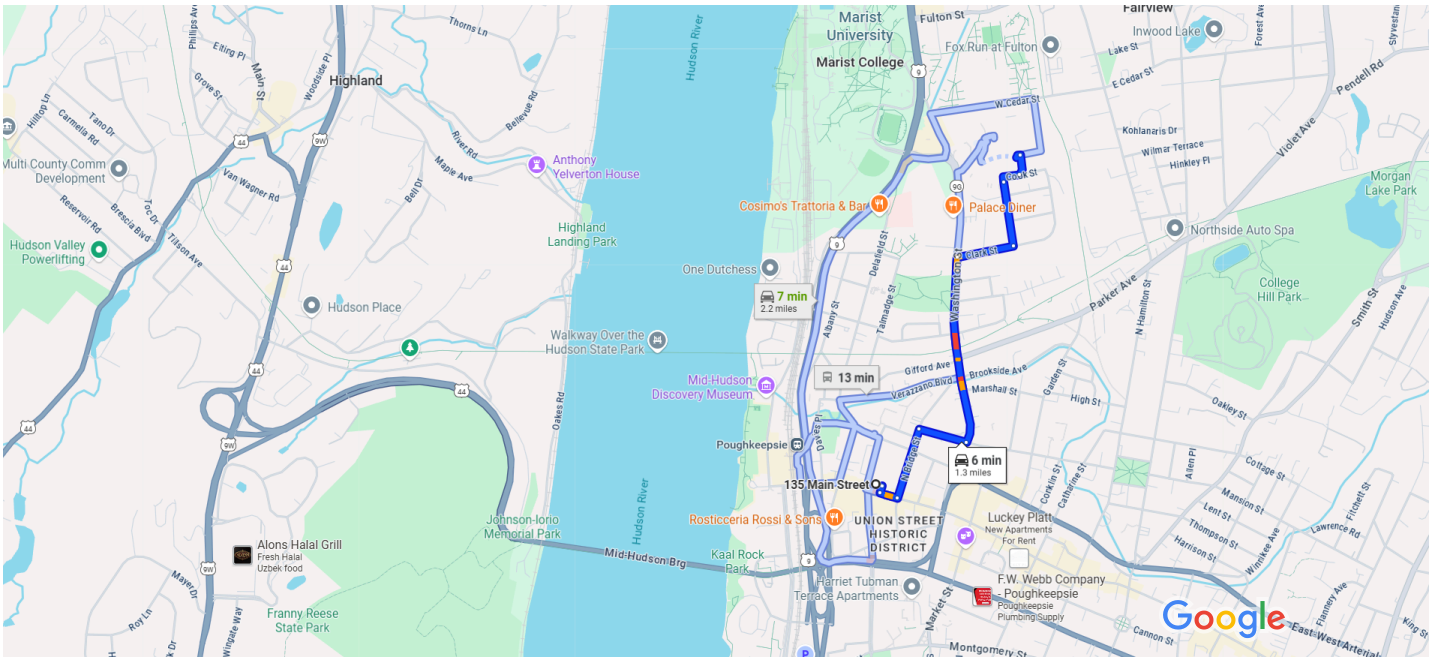
HK employees who work on this site must read the HASP and sign the form included in this plan, to indicate that they understand the plan's contents, and agree to comply with its provisions. Anyone who cannot, or will not comply with this HASP will be excluded from on-site activities. Violations of this HASP or any applicable federal, state, or local health and safety regulations should be reported immediately to the Site Health and Safety Supervisor (SHSO), or to HK's Director, Health & Safety (DHS).

This HASP will be readily available on site so workers can reference it when necessary.

Google Maps

135 Main St, Poughkeepsie, NY 12601 to MidHudson Regional Hospital Emergency Department, 241 North Rd, Poughkeepsie, NY 12601

Drive 1.3 miles, 6 min



Map data ©2025 Google 1000 ft

135 Main St
Poughkeepsie, NY 12601

Take N Bridge St and Mansion St to Washington St

2 min (0.4 mi)

1. Head south toward Main St

102 ft

2. Turn left onto Main St

253 ft

3. Turn left onto N Bridge St

0.2 mi

4. Turn right onto Mansion St

0.1 mi

5. Turn left onto Washington St

2 min (0.5 mi)

Continue on Clark St to your destination in Fairview

2 min (0.4 mi)

6. Turn right onto Clark St

0.2 mi

7. Turn left onto Poplar St

0.2 mi

8. Continue onto Cook St

312 ft

9. Turn left onto Webster Ave

282 ft

10. Turn left

82 ft

MidHudson Regional Hospital Emergency Department
241 North Rd, Poughkeepsie, NY 12601

Emergency Medical Care

Hospital #1

Hospital Name: Mid Hudson Regional Hospital

Telephone # 845-483-5000/911

Address: 241 North Road, Poughkeepsie, NY

Contact: N/A

Type of Service (X) Physical Trauma Only

( ) Physical Trauma and Chemical Exposure

(X) Available 24 Hours

Hospital Route:

See attached map

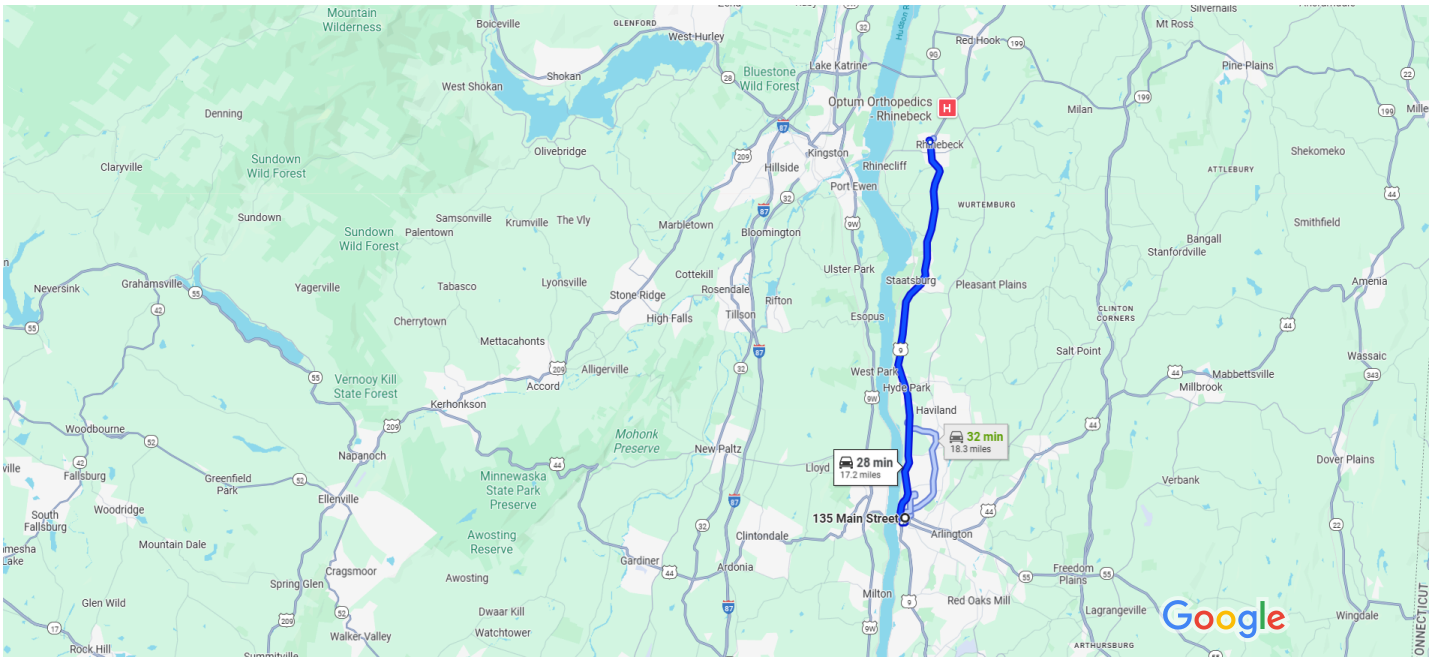
Hospital route information has been provided to satisfy OSHA requirements (29 CFR 1910.120). **However, where 911-emergency service and/or transport is available, HK personnel are strictly prohibited from transporting accident victims in either company or personal vehicles.

Transporting the injured in non-emergency vehicles increases the potential for motor vehicle accidents during transit to the hospital and further injury to the victim. Also, the victims' condition can worsen during transit. As a result, transportation in non-emergency vehicles can delay or even prevent treatment by trained emergency personnel during a critical time. Employees must remain at the site of the accident, administer appropriate first aid, and await the arrival of **trained emergency and/or rescue personnel.**

Google Maps

135 Main St, Poughkeepsie, NY 12601 to Northern Dutchess Hospital, 6511 Spring Brook Ave, Rhinebeck, NY 12572

Drive 17.2 miles, 28 min



Map data ©2025 Google 2 mi

135 Main St
Poughkeepsie, NY 12601

Take S Perry St to Church St

1 min (0.2 mi)

1. Head south toward Main St

102 ft

2. Turn right onto Main St

177 ft

3. Turn left onto S Perry St

0.1 mi

4. Continue onto Jefferson St

187 ft

Follow US-9 N to Montgomery St in Rhinebeck

25 min (16.9 mi)

5. Turn right onto Church St

0.1 mi

6. Slight right to merge onto US-9 N toward Hyde Park/Wappingers Falls

Pass by Dairy Queen Grill & Chill (on the right in 5.2 mi)

16.8 mi

7. Turn left onto Montgomery St

15 sec (463 ft)

Northern Dutchess Hospital
6511 Spring Brook Ave, Rhinebeck, NY 12572

Emergency Medical Care

Hospital #2

Hospital Name: Northern Dutchess Hospital

Telephone # 845-876-3001/911

Address: 6511 Spring Brook Avenue, Rhinebeck, NY

Contact: N/A

Type of Service (X) Physical Trauma Only

( ) Physical Trauma and Chemical Exposure

(X) Available 24 Hours

Hospital Route:

See attached map

Hospital route information has been provided to satisfy OSHA requirements (29 CFR 1910.120). **However, where 911-emergency service and/or transport is available, HK personnel are strictly prohibited from transporting accident victims in either company or personal vehicles.

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Emergency Contacts

Agency	**Name**	**Phone**
Fire Department	City of Poughkeepsie FD	911
Police Department	City of Poughkeepsie PD	911
Site Contact	Jesse Mausner	(908) 341-3211
First Aid/EMS	NA	911
Federal Agency Representative	NA	NA
State Agency Representative	NA	NA
Local Agency Representative	NA	NA
NYSDEC- Region 3	New York	(718) 482-4995
Pesticide Poisoning	NA	NA
Poison Control	U.S.A.	(800) 222-1222
CHEM TREC	Washington, DC	(800) 424-9300
Utility	**Company Name**	**Phone**
Water Supply	City of Poughkeepsie	845-451-4173
Sewer	NYC.	845-451-4111
Power	Central Hudson	845-452-2700
Gas	Central Hudson	845-452-2700
NY One Call	NY	811

HK Emergency Contact List
Cell Phone Numbers

Chris Hirschmann	(908) 377-8909
Dominick Aponte	(908) 335-6048
Jesse Mausner	(908) 341-3211

Key Project Personnel

The following describes the project position assignments, associated responsibilities, and reporting relationships.

Position	Job Description	Interactions
Director	Responsible for technical and administrative performance of the project. Supports Site Supervisor and is available to him at all times. Will visit the site periodically, or as necessary. Reports progress of project on a regular basis. Assigns key personnel, and identifies, requests, secures, and monitors use of resources for project. Approves program expenditures and invoices.	Reports directly to President. Works closely with Site Supervisor.
Site Supervisor	Acts as point of contact for client and client's representative(s). Supervises all on-site personnel and subcontractors. Coordinates daily site-specific work efforts, and ensures all activities are in strict compliance with site-specific health and safety plan. Has authority to suspend all work that possesses any health and safety risk. Briefs subordinate technical personnel on task requirements. Identifies and resolves technical problems. Provides periodic review of project progress.	Reports directly to Project Manager.
Site Health & Safety Officer (SHSO)	Assures compliance with HASP. Instructs site personnel in health and safety procedures through daily pre-work meetings. Performs any monitoring activities as required. Has authority to discontinue site operations if safety violations exist.	Reports directly to Project Manager. Works closely with Director, Health & Safety, and Site Supervisor.
Director, Health & Safety (DHS)	Develops, implements, and enforces the on-site safety program. Oversees all health and safety aspects of project, conducts periodic audits to ensure compliance. Available at all times to discuss project progress and health and safety related issues.	Reports directly to President. Works closely with Project Manager, Site Supervisor, and SHSO.

HK is the entity responsible for managing health and safety at this site. Key project personnel are as follows:

Director:	Chris Hirschmann Name	908-688-7800 / 908-377-8909 Telephone / Cellular Number
Site Supervisor:	Jesse Mausner Name	908-688-7800 / 908-341-3211 Telephone / Cellular Number
SHSO:	Chris Hirschmann Name	908-688-7800 / 908-377-8909 Telephone / Cellular Number
DHS:	Jill Asch Name	908-688-7800 / 908-377-5639 Telephone / Cellular Number

Medical Surveillance and Training Dates for Authorized Personnel

Employee	Medical Exam	OSHA 8-Hr.	Site Supervisor Training	Respirator Fit Test
Dominick Aponte	09/2024	09/2024		
Ryan Powell	09/2024	09/2024		
Jesse Mausner	04/2025	04/2025		

Task Identification

Tasks covered under this plan:

Task #	Description
1	Soil Excavation, Stockpiling and Transport

Off-site tasks planned? No

Describe:

Chemical Hazards

Task No.(s)	Chemical Name (or class)	PEL	TLV	Other Pertinent Limits (specify)	Primary Hazard			SDS Attached
					Ingestion	Dermal	Inhalation	Y/N
1	**Semi volatiles:**							
	Benzo(a)anthracene	0.2 mg/m³	**		X	X	X	Y
	Benzo(a)pyrene	0.2 mg/m³	0.2 mg/m³		X	X	X	Y
	Benzo(b)fluoranthene	0.2 mg/m³	0.2 mg/m³		X	X	X	Y
	Benzo(k)fluoranthene	**	**		X	X	X	Y
	Chrysene	0.2 mg/m³	**		X	X	X	Y
	Dibenz(a,h)anthracene	**	**		X	X	X	Y
	Indeno(1,2,3-cd) pyrene	**	**		X	X	X	Y
1	**Volatiles:**							
	1,1-Dichloroethene	**	**		X	X	X	Y
	1,1,1 - Trichloroethane	350 ppm	350 ppm		X	X	X	Y
	cis - 1,2 dichloroethene	200 ppm	200 ppm		X	X	X	Y
	Benzene	10 ppm	0.5 ppm		X	X	X	Y
	Carbon Tetrachloride	10 ppm	5 ppm		X	X	X	Y
	Ethylbenzene	100 ppm	0.5 ppm		X	X	X	Y
	Methylene Chloride	25 ppm	100 ppm		X	X	X	Y
	Tetrachloroethene (PCE)	100 ppm	25 ppm		X	X	X	Y
	Toluene	200 ppm	20 ppm		X	X	X	Y
	Trichloroethylene (TCE)	100 ppm	10 ppm		X	X	X	Y

	Vinyl Chloride	1 ppm	1 ppm		X	X	X	Y
	Xylenes	100 ppm	100 ppm		X	X	X	Y
1	**Metals:**							
	Antimony	0.5 mg/m³	0.5 mg/m³		X	X	X	Y
	Arsenic	0.01 mg/m³	0.01 mg/m³		X	X	X	Y
	Barium	0.5 mg/m³	0.5 mg/m³		X	X	X	Y
	Beryllium	0.0002 mg/m³	0.00005 mg/m³		X	X	X	Y
	Cadmium	0.005 mg/m³	0.01 mg/m³		X	X	X	Y
	Chromium	1 mg/m³	0.003 mg/m³		X	X	X	Y
	Copper	0.1 mg/m³	0.2 mg/m³		X	X	X	Y
	Lead	50 mg/m³	0.05 mg/m³		X	X	X	Y
	Mercury	0.1 mg/m³	0.025 mg/m³		X	X	X	Y
	Nickel	1 mg/m³	1.5 mg/m³		X	X	X	Y
	Selenium	0.2 mg/m³	0.2 mg/m³		X	X	X	Y
	Silver	0.01 mg/m³	0.01 mg/m³		X	X	X	Y
	Thallium	0.1 mg/m³	0.02 mg/m³		X	X	X	Y
	Zinc	5 mg/m³	**		X	X	X	Y
1	**Pesticides:**							
	4,4' DDD	260 mg/m³	328 mg/m³		X	X	X	Y
	4,4' DDE	70 mg/m³	34 mg/m³		X	X	X	Y
	4,4' DDT	2,350 mg/m³	1,401 mg/m³		X	X	X	Y
	Dieldrin	0.25 mg/m³	0.1 mg/m³		X	X	X	Y

PEL – OSHA Permissible Exposure Limit: the maximum allowable 8-hour time weighted average (TWA) exposure concentration.
TLV – ACGIH Threshold Limit Value: the recommended 8-hour TWA exposure concentration.
** – Exposure limits not available

Physical and Biological Hazards

Hazard	Yes	No	Task No.(s)	Hazard	Yes	No	Task No.(s)
Electrical (overhead lines)	X		1	Uneven Terrain	X		1
Electrical (underground lines)	X		1	Unstable Surfaces	X		1
Gas Lines	X		1	Elevated Surfaces		X	
Water Lines	X		1	Lightning	X		1
Drilling Equipment		X		Rain	X		1
Excavation Equipment	X		1	Snow	X		1
Power Tools	X		1	Liquefied/Pressurized Gases		X	
Heat Exposure	X		1	Lifting Equipment	X		1
Cold Exposure	X		1	Vermin	X		1
Oxygen Deficiency		X		Insects	X		1
Confined Spaces		X		Disease-causing organisms	X		1
Noise	X		1	Others, e.g., marine sampling (specify)		X	
Ionizing Radiation		X					
Non-Ionizing Radiation		X					
Fire		X					
Explosive Atmospheres		X					
Shoring	X		1				
Scaffolding		X					
Holes/Ditches	X		1				
Steep Grades	X		1				
Slippery Surfaces	X		1				

Risk Analysis

Task #	Substance	Concentration (if known)	Risk*
1	VOCs	Low	0-1
1	SVOCs	Low	0-1
1	Metals	Low	0-1
1	Pesticides	Low	0-1

*Risk 0 – No Risk
1 – Slight Risk
2 – Moderate Risk
3 – Dangerous Conditions/Caution
4 – High Risk
5 – Extremely Dangerous

General Safety Rules

1. If an employee must work alone, he/she must call his/her supervisor twice a day. If the supervisor is unavailable, that supervisor's supervisor must be contacted.
2. Workers must wear all personal protective equipment required for the tasks to be performed.
3. Horseplay, scuffling, or practical jokes are forbidden on the job.
4. Compressed air must not be used to blow dirt from clothing, or played with or blown at another person. In addition, compressed air tools should be checked periodically for hose leaks, faulty valves and tank pressurization issues as a precursor for potential injury.
5. Drinking of alcoholic beverages or the use drugs on the job is prohibited. Their use will cause immediate dismissal.
6. All areas must be continually cleaned to maintain good housekeeping. Trash is to be piled neatly and removed promptly. All tools and work areas are to be kept in clean and safe condition. Hard floor surfaces should be kept as dry as possible and free to debris in walking zones to prevent potential slips, trips and falls. If an area of flooring will be slippery for an extended period of time, efforts should be taken provide caution signs or high visibility cones/barricades to warn and prevent entrance into the zone.
7. Competent workers must do welding and cutting. Anyone who is required to work in "hot" zones must wear or be provided with proper eye protection and warning that welding will be taking place.
8. A. Ladders are to be of proper design and tied off while in use. Do not go up or down a ladder without the free use of both hands. Use a rope to lift or lower materials or tools. Always face a ladder when climbing or descending. Ladders with structural defects should be discontinued from use and placed aside with a label to warn others not to use until serviced or replaced. Defects include, but are not limited to, bent or broken ladder rung/step, bent or cracked frame rails defected foot holds etc.

   B. Extreme caution must be used with operating with ladders to avoid overhead hazards such as unstable roofing materials or over-head utility lines. Before setting up your ladder, always asses for over-head power lines and avoid operating within those areas. If you have any doubts, don't do it.
9. Every work site must have a qualified first aid person and a complete first aid kit. All first aid materials are to remain clean, unused and non-expired. The first aid materials should remain with a competent first aid responder or in an inconspicuous area for all to use if needed. Eye wash stations or portable bottles should be readily on hand to field personnel in the event of an eye irritant or splashing occurrence. Eye protection should be used to further prevent eye injuries.
10. **ALL** accidents must be investigated and reported. Use the Accident Investigation Form in the back section of this plan.
11. Injuries sustained while on duty must be reported to supervisor immediately, or as soon as possible after injury is sustained.
12. Explosives must be handled and transported by licensed people only. Any doubts of explosive materials should be handled with extreme caution and the project manager notified for further instruction.
13. All tools and electrical equipment must be in proper working order. If a tool is broken/near broken or a piece of electrical equipment has frayed/exposed wiring, sparks generated or missing screws or parts, make sure to disengage use of tool. Faulty tools should be labeled with a "Do NOT use" label and placed in a safe location until it can be serviced or replaced.
14. Clothing appropriate to the duties performed shall be work by all workers. Large pockets, loose jewelry, cuffed trousers and loose or torn clothing are dangerous and should not be worn around machinery, or when climbing ladders, or working on structures.

Employee Training Program

All personnel performing work in areas on this site covered by this HASP must have completed the appropriate training requirements specified in 29 CFR 1910.120(e). Each individual must have completed an 8-hour refresher-training course and/or initial 40-hour training course within the last year prior to performing any intrusive work on this site covered by this HASP. Also, on-site managers must have completed the specified 8-hour supervisor's training course. Records that demonstrate that all persons subject to the training requirements have actually met them will be maintained on site. The Project Manager is responsible for verifying compliance of the project team with these rules.

Prior to commencement of on-site activities, a site safety meeting will be held to review the specific information and requirements of this HASP. HASP sign-off sheets will be collected at this meeting.

Site Specific Training will include:

- Explanation of the overall site CHASP.
- Health and safety personnel and organization.
- Brief site history.
- Special attention to signs and symptoms of overexposure to known and suspected site contaminants.
- Health effects of site contaminants.
- Air monitoring description.
- Physical hazards associated with the project.
- Selection, use and limitations of available safety.
- Personal hygiene and decontamination.
- Respirator facepiece fit testing.
- PPE use and maintenance.
- Site rules and regulations.
- Work zone establishment and markings.
- Site communication.
- Emergency preparedness procedures.
- Equipment decontamination.
- Medical monitoring procedures.
- Contingency plan.

Prior to work, each HK employee will attend the contractor's health and safety orientation, if applicable. In addition, HK's employees will review health and safety items specific to the tasks to be performed that were not covered in the contractor's orientation.

Site Health and Safety Meetings

In addition, the SHSO will meet daily with all HK employees prior to beginning work on site. The agenda of the meeting will include a review of important elements of this plan, any special safety items, and a discussion of the emergency response procedures. Also, everyone will agree on a schedule for periodic meetings, (for example, before beginning work each day), to review the effectiveness of this plan and make changes as necessary. If significant changes at the site occur, special meetings will be scheduled. (If HK is a subcontractor, all HK employees on site will participate in the contractor's daily safety meetings.)

Training Records

The SHSO will complete a report of the daily safety meetings, using the form in the back section of this plan, and all attending the meeting will sign the Daily Safety Meeting Log.

The training status of contractor and subcontractor employees has been verified, and their training criteria meet the requirements specified in 29 CFR 1910.120(e). A copy of all training certificates will be kept at the job site for each person working at the site.

Personal Protective Equipment (PPE) Requirements

Task No.(s)	Level of Protection (A – D)*	Level of Upgrade	PPE Suit	PPE Gloves	PPE Feet	PPE Head	PPE Eye	PPE Ear	PPE Respirator	Additional PPE for Upgrade
1	D	When necessary	Std	N	Steel	When needed	Glasses	Plugs	NA	None

SUIT

Std = Standard Work Clothes
Tyvek = Uncoated Tyvek Disposal Coverall
PE Tyvek = Polyethylene-coated Tyvek
Saranex = Saranex-laminated Tyvek
PVC Suite = PVC Raingear

GLOVES

Work = Work Gloves (canvas, leather)
Neo = Neoprene Gloves
PVC = PVC Gloves
N = Nitrile Gloves
V = Vinyl Gloves
L = Latex Gloves

FEET

Steel = Steel-toe shoes or boots
Steel+ = Steel-toe PVC boots
Booties = PVC booties

HEAD

HH = Hardhat

EYE

Glasses = Safety glasses
Goggles = Goggles
Shield = Face shield

EAR

Plugs = Earplugs
Muff = Ear muffs

RESPIRATOR

APR = Air purifying respirator
Full APR = Full face APR
Half APR = Half face APR
SAR = Airline supplied air respirator
SCBA = Self contained breathing apparatus
Escape = Escape SCBA
OV = Organic Vapor Cartridge
AG = Acid Gas Cartridge
OV/AG = Organic Vapor/Acid Gas Cartridge
AM = Ammonia Cartridge
Dust/Mist = Dust/Mist pre-filter and cover for cartridge
HEPA = High efficiency particulate air filter cartridge

- For unspecified volatile organics (based on 1-minute breathing zone measurement using PID or OVA):
-

Up to 1 ppm above background	Level D
1 – 5 ppm above background	Level C
5 – 500 ppm above background	Level B
500 ppm above background	Level A

Suggested Levels of Protection

Level "D" Protection

1. Coveralls
2. Gloves
3. Boots/shoes – steel toe
4. Boots (outer) chemical resistant (disposable)
5. Safety glasses or chemical splash goggles
6. Hard hat (safety shield)
7. High visibility vest

Level "C" Protection

1. Full-face, air-purifying, canister-equipped respirator (NIOSH/MSHA approved)
2. Chemical resistant clothing (coveralls; hooded, two-piece, chemical splash suit; chemical resistant hood & apron; disposable, chemical-resistant coveralls)
3. Coveralls
4. Gloves (outer) chemical-resistant
5. Gloves (inner) chemical-resistant
6. Boots (outer) chemical-resistant
7. Boots (inner) chemical-resistant
8. Hard hat (face shield)
9. Escape mask
10. Two-way radio

Level "B" Protection

1. Pressure/Demand SCBA (MSHA-NIOSH approved)
2. Chemical resistant clothing (overalls and long-sleeved jacket; coveralls; hooded, one- or two-piece chemical splash suite; disposable, chemical-resistant coveralls)
3. Coveralls
4. Gloves (outer) chemical-resistant
5. Gloves (inner) chemical-resistant
6. Boots (outer) chemical-resistant
7. Boots (inner) chemical-resistant
8. Hard hat (face shield)
9. Two-way radio

Level "A" Protection

1. Pressure/Demand SCBA (MSHA-NIOSH approved)
2. Fully encapsulating, chemical-resistant suit
3. Coveralls
4. Gloves (outer) chemical-resistant
5. Gloves (inner) chemical-resistant
6. Boots, chemical-resistant, steel toe (depending on suit construction, work over or under suit boot)
7. Hard hat (under suit)
8. Two-way radio

Medical Surveillance

Requirements

All HK employees covered by this HASP, who engage in on site activities governed by 29 CFR 1910.120 for 30 or more days per year, must meet the medical surveillance requirements specified in 1910.120(f). Therefore, such personnel must have completed occupational medical baseline or surveillance examination, performed by a licensed physician, within the last 24 months. The medical examination includes the following components:

- Personal Medical Questionnaire
- Occupational Exposure History
- Physical Examination
- Vision Testing
- Spirometry
- Audiometry
- Blood Chemistry Panel (e.g., SMAC-20)
- Complete Blood Count with Differential
- Urinalysis
- Chest X-Ray (every two years at a minimum)
- Electrocardiogram (at physician's discretion)

Examinations are required upon hiring, termination, and exposure to substances at or above the PEL.

Results of the examinations are communicated directly from the physician to the employee. Medical records for HK's employees are kept by the physician:

Washington Occupational Health
1120 19th Street, Suite 410
Washington, DC 20036
800-777-9642 – office
800-865-6525 – fax

Monitoring Requirements

Monitoring is to be conducted by the SHSO, or his/her designee. The results will be interpreted by the SHSO and the DHS. Copies of monitoring results and calibration logs will be filed with the HASP.

Monitoring is designed to assess exposure to employees during site activities, and to determine if PPE is required and adequate to assure protection. Because investigation and remediation activities at hazardous waste sites are of an inconsistent nature, it is not possible to assign a monitoring protocol that excludes, or is not directly dependent upon, professional judgment in determining when monitoring is required to assess exposure. Thus, the following generic protocol must be followed at a minimum, and should be modified to be more conservative (e.g., require more monitoring) if deemed necessary by the SHSO or DHS. Under no conditions will the required frequency be decreased.

At a minimum, air monitoring will be conducted before and during each task or activities for which air monitoring has been designated. If airborne concentrations of contaminants reach action levels based on observations with the direct reading instruments, then the appropriate PPE upgrade or work stoppage order will be enforced by the SHSO. In case a work stoppage order is given, the area must be cleared of all personnel immediately.

The use of action levels and the basis for the selection of monitoring equipment is explained as follows:

Action levels determine:

(1) the PPE to be used by site workers
(2) their ability to remain and work in the exclusion zone

The selection of the specified monitoring equipment is based on

(1) the nature of the contaminants
(2) the likely concentrations of the contaminants
(3) the probable duration of exposure
(4) the relative sensitivity of the monitoring equipment to the specific contaminants

The following summarizes the calibration requirements for the air monitoring instruments used at the site:

Instrument	Calibration Frequency
PID: Mini RAE-QRAE	Beginning of each work shift

Air Monitoring and Contaminant Action Levels

Task No.(s)	Location	Contaminant	Monitoring Equipment	Monitoring Frequency	Action Level Concentration	
					Mandatory Respirator Use	Mandatory Work Stoppage
1	Work Areas	All analyzed compounds	PID: Multi-Rae	Periodically during all tasks/activities.	--	10 ppm

PID = Photoionization Detector (HNU, TIP, OVM)
FID = Flame Ionization Detector (OVA)
LEL-O_2 = Explosivity and Oxygen Meter

Name(s) of individual(s) responsible for performing the monitoring, and certifying the results:

All HK personnel

Type, make and model of instruments used: Multi-Rae PID Gas Monitor

Method and frequency of calibration: 100 ppm isobutylene-calibration gas. Calibrated prior to each day's use according to manufacturer's instruction.

Procedures for Handling Anticipated Wastes

Waste Generation

Anticipated: Yes: X No:_____

Types: NA ___ Liquid _____ Solid __X__ Sludge_____ Gas _

Quantity: Expected volume of each type:

This project __X__ will ___will not generate non-hazardous, contaminated wastes. These wastes will be:

_____ stored _____ treated
__X__ transported __X__ manifested in the following manner:

Packaging requirements for waste material:

___Waste material will be packaged in accordance with applicable laws and regulations.

Decontamination Procedures

All personnel that may be exposed to contaminated soil will wear modified level D Personal Protective Equipment to include disposable gloves. Gloves will be changed after handling potentially impacted material or equipment and placed in a plastic garbage bag for proper disposal. All personnel will wash their hands before eating or drinking and no smoking will be allowed on site.

All equipment brought onto the site will be cleaned of any contaminants prior to accessing the site to prevent offsite cross-contamination or the need to decontaminate prior to the start of field activities. After each borehole is completed, all drilling equipment used for the soil boring (augers, etc.) will be decontaminated with soap (Alconox® or equivalent) and water followed by a water rinse, using a brush as necessary, to remove soil and contaminants. At the conclusion of daily project activities, all equipment will again be decontaminated with soap and water and a water rinse. All equipment will be handled with clean gloves after cleaning to minimize cross-contamination.

Spill Prevention and Response

Potentially hazardous spill situations can be mitigated by using containment devices and materials in work areas. If site conditions are suitable, earthen berms will be constructed around specific areas. If site conditions are not suitable for this, or the potential spill is smaller, barriers will be constructed with sorbent materials such as “speedi-dry”, sorbent booms and/or straw bales. Dikes and berms will also be used to divert stormwater run-on and run-off away from critical zones.

Because a spill cleanup must be conducted under crisis conditions, it is important that the methods used for dealing with a spill be thought out beforehand. However, the steps followed cannot be inflexible, because no two spills are identical. Factors that will be assessed in the event of any and all spills include:

1. The volume of the hazardous substance released and the rate of release.
2. The nature of the spill material.
3. What danger exists to personnel in the immediate area.
4. Nature of damage and possibilities of repair.
5. If the transfer of material to an alternate containment is advisable.
6. Feasibility of the construction of a containment dike.
7. Nature of spill area.
8. Whether the spilled substance has reached a watercourse or sewer.
9. Danger of explosion or fire.
10. Equipment and supplies necessary to confine the material and carry out the cleanup.

In most cases, the success of a cleanup operation is dependent upon the time it takes to contain the spill. Therefore, HK’s first attempt at spill containment will be at the point of discharge. This can often be accomplished by closing valves, reinforcing or repairing damaged containers, moving or changing the position of fallen or ruptured containers, or emptying the container by pumping to a temporary storage or holding vessel. Pumps, suction hoses and containers will be available to recover spilled materials when directed to do so by the Site Supervisor.

Handling and transport of drummed waste always must be conducted in a controlled and safe manner, which will minimize damage to structurally sound drums, repacks and overpacks. If leakage or spillage of waste occurs, the drum must immediately be placed within an overpack unit. Overpack units must be provided at each staging area, at areas of existing drums, and along all site roadways.

In the event of a spill, the drum handling team must immediately contact the SHSO, who will have all personnel evacuated from the immediate spill area. Only personnel trained in spill response procedures shall isolate and contain the spill. Where possible, spilled waste material must be collected and placed in repack containers for ultimate disposal. Following containment and collection of spilled waste, the area must be surveyed by the SHSO, who will decide if it is safe to permit re-entry of work teams.

Task/Work Area	Potential Spill or Discharge	Equipment, Materials, and Procedures for Spill Cleanup
1	Oil & Hydraulic Fluids from excavation equipment	Use of Sorbent Pads for cleanup

Emergency Procedures

Potential emergencies that may arise are most likely to be associated with physical hazards from heavy equipment operation and/or lifting and loading of debris. Emergency response will, in most cases, be performed in Level D protection.

Modifications to these emergency procedures may be necessary after the actual site set-up, based on prevailing conditions. Periodic reviews of these procedures will be performed by the SHSO to ensure that they are appropriate for all anticipated emergencies.

Responsibilities

The Site Supervisor has the authority and responsibility to commit company resources to appropriately respond to an emergency, and to exclude all personnel not directly responding to the emergency.

Prior to beginning work at the site, HK will designate an employee, usually the SHSO, to be responsible for initiating any emergency response actions. In the event an injury or illness requires more than first aid treatment, the SHSO (or alternate) will accompany the injured person to the hospital, and will remain with the person until release or admittance is decided.

Evacuation Plan

The basic elements of an emergency evacuation plan include employee training, escape routes, escape procedures, critical operations or equipment, rescue and medical duty assignments, designation of responsible parties, emergency reporting procedures and methods to account for all employees after evacuation.

When appropriate, wind indicators visible to all on-site personnel will be provided by the SHSO to indicate possible routes of upwind escape. Work-area entrance and exit routes will be planned, and emergency escape routes will be delineated by the SHSO. The discovery of any condition that would suggest the existence of a situation more hazardous than anticipated, should result in the evacuation of the team and a re-evaluation of the hazard and the level of protection required. This re-evaluation will be conducted by appropriate on-site health and safety personnel.

In the highly unlikely event that barrels, canisters, or chemical gases or vapors are uncovered during site work, the following procedures shall be followed:

1) In the event that barrels, canisters, or any other vessels are encountered during excavation, all work shall immediately cease and all workers to be removed from the area. The SHSO shall be immediately notified, and he/she shall identify vessel contents, handling procedures and storage and disposal techniques prior to starting work.

2) In the event that high concentrations of gases or vapors are detected, the following actions will be taken:

    - Remove all workers from the area
    - Monitor gas or vapor concentrations to determine the type of respiratory protection that will be required before workers reenter the area.

3) In the highly unlikely event of a major leak of toxic gas, such as might occur if a compressed gas cylinder were ruptured during excavation or drilling, all on-site personnel will be evacuated to a safe distance. The risk will be assessed prior to restarting work.

Training

Employees will be instructed in the specific aspects of emergency evaluation applicable to the site as part of the site safety meeting prior to the commencement of all on-site activities. On-site refresher or update training is required anytime escape routes or procedures are modified or personnel assignments are changed. During

the site safety meeting, all employees will be trained in, and reminded of, the location of this plan, the procedures outlined in this plan, and the communication systems and evacuation routes used during an emergency.

On a continuous basis, individual employees should be constantly alert for indicators of potentially hazardous situations, and for signs and symptoms in themselves and others that warn of hazardous conditions and exposures. Rapid recognition of dangerous situations can avert an emergency. In the event of any emergency that necessitates an evaluation of the site, on-site personnel will be notified by the use of car horns sounded in regularly spaced, repeated blasts, as detailed in the next section of this procedure. The Site Supervisor in conjunction with the SHSO will control the site until the appropriate local or state agency representatives arrive, if required.

Alarm Systems Emergency Signals

The simplest and most effective emergency communication system, in any situation, is direct voice communications. Voice communications will be supplemented anytime voices cannot be clearly perceived above ambient noise levels (e.g., noise from heavy equipment, drilling rigs or backhoes, and anytime a clear line-of-sight cannot be easily maintained among all site personnel because of distance, terrain, or other obstructions. When voice communications must be supplemented, the following emergency signals, using car horns, will be used.

- One Horn Blast: General Warning

  One blast is used to signal relatively minor, but important events on site. An example would be a minor chemical spill where there is no immediate damage to life or health, yet personnel working on site should be aware of the situation so unnecessary problems are avoided. If one horn blast is sounded, personnel must stop all activity and equipment on site and await further instruction from the SHSO.

- Two Horn Blasts: Medical Emergency

  Two blasts are used to signal a medical emergency where immediate first aid or emergency medical care is required. If two horn blasts are sounded, all first aid and CPR trained personnel should respond, as appropriate. All other activity and equipment should stop, and personnel should await further instructions from the SHSO.

- Three Horn Blasts Followed by One Continuous Blast: Immediate Danger to Life or Health

  Three blasts followed by another extended or continuous horn blast signals a situation that could present an immediate danger to the life or health (IDLH) to all employees on site. Examples of possible IDLH situations could include fires, explosions, hazardous chemical spills or releases, hurricanes, tornadoes, blizzards or floods. If three horn blasts followed by a continuous blast are sounded, all activity and equipment must stop, and all personnel must evacuate the site to an appropriately designated site located outside the site gate, or further off site if necessary. (Note: unless otherwise specified, all decontamination procedures must be implemented.) All personnel must be accounted for by the SHSO or Site Supervisor, and other response actions determined by the SHSO or Site Supervisor must be followed.

Employees on site will use the “buddy” system (pairs). Buddies should pre-arrange hand signals or other means of emergency communication in case radios cannot be used, or if the radios no longer operate. The following had signals are suggested:

1. Hand gripping throat: out of air, can’t breathe.
2. Grip partner’s wrist or place both hands around waste: leave area immediately, no debate.
3. Hand on top of head: need assistance.
4. Thumbs up: OK, I’m alright, I understand.
5. Thumbs down: No, negative.

Visual contact will be maintained between employee pairs. Team members will remain in close proximity to each other in order to provide assistance in case of emergencies, and will inform each other of any of the following effects of exposure to site contamination:

- Headaches
- Dizziness
- Blurred vision
- Cramps
- Irritation of eyes, skin or respiratory tract

If any member of the work crew experiences any adverse symptoms while on site, the entire work crew will immediately stop work and follow the instructions provided by the SHSO.

Medical Treatment/First Aid

Eyewash stations will be available at the work activity locations, the outside of the personal decontamination facility and at the equipment decontamination area. Community emergency services (EMS, fire, and police) will be notified immediately if their resources are needed on site. If necessary, the injured or sick party shall be taken to the nearest hospital.

Fire Extinguishers

Equipment – All heavy equipment will be supplied with ABC fire extinguishers are also located in all vehicles.

Emergency Reporting

Any incident (other than minor first aid treatment) resulting in injury, illness or property damage will be reported to HK. An incident investigation will be initiated as soon as emergency conditions are under control. The purpose of this investigation is not to attribute blame but to determine the pertinent facts so that repeat or similar occurrences can be avoided.

The investigations will begin while details are fresh in the mind of all involved. The person administering first aid may be able to start the fact gathering process if the injured are able to speak. Pertinent facts must be determined. Questions beginning with who, what, when, where, and how are usually most effective to discover ways to improve job performance in terms of efficiency, quality of work, as well as safety and health concerns.

On-Site Evacuation Plan – An emergency evacuation alarm (air horn, etc.) will be on site at all times. This alarm should be of sufficient power to be heard by personnel operating heavy equipment. A series of repeated blasts is the signal for all HK personnel and subcontractors to evacuate the site and assemble at:

To be determined at the beginning of each field event:

The criteria for activating the alarm will be the first sign of any serious problem that requires assistance or evacuation.

Should either a fire or explosion occur, all personnel will proceed immediately to the evacuation assembly point and await further instructions. At that time a personnel check will be conducted to determine if anyone is missing, and the local fire and police departments will be called for assistance. Once on site, the acting officer of the fire department and the Site Supervisor will determine if further evacuations are necessary. No HK personnel will re-enter the site without clearance from the SHSO.

Subcontractor Safety

It has been and shall continue to be the policy of HK that employees of all subcontractors are required to adhere to all applicable company, local, state, and federal safety rules and regulations.

When an infraction of a local, state, federal, or company safety regulation is observed, the SHSO will request verbally that the subcontractor's supervisory personnel correct the infraction immediately. If correction is not made, then the project director will request in writing that proper corrective action be taken. Subcontractors who continue to ignore proper safety procedures present a danger for all workers around them. A Stop-work call should be initiated until compliance with safety protocols are achieved; subcontractors will have payments withheld until compliance is achieved.

Subcontractors are required to hold safety meetings for their employees when they are working on HK projects, and submit documentation of such meetings to the Project Manager. Subcontractor employees are not required to attend HK's safety meetings.

Job Safety & Health Protection

The Occupational Safety and Health Act of 1970 provides job safety and health protection for workers by promoting safe and healthful working conditions throughout the Nation. Provisions of the Act include the following:

Employers

All employers must furnish to employees' employment and a place of employment free from recognized hazards that are causing or are likely to cause death or serious harm to employees. Employers must comply with occupational safety and health standards issued under the Act.

Employees

Employees must comply with all occupational safety and health standards, rules, regulations and orders issued under the Act that apply to their own actions and conduct on the job.

The Occupational Safety and Health Administration (OSHA) of the U.S. Department of Labor has the primary responsibility for administering the Act. OSHA issues occupational salary and health standards, and its Compliance Safety and Health Officers conduct job site inspections to help ensure compliance with the Act.

Inspection

The Act requires that a representative of the employer and a representative authorized by the employees be given an opportunity to accompany the OSHA inspector for the purpose of aiding the inspection.

Complaint

Employees or their representatives have the right to file a complaint with the nearest OSHA office requesting an inspection. If they believe unsafe or unhealthful conditions exist in their workplace. OSHA will withhold, on request, names of employees complaining.

The Act provides that employees may not be discharged or discriminated against in any way for filing safety and health complaints or for otherwise exercising their rights under the Act.

Employees who believe they have been discriminated against may file a complaint with their nearest OSHA office within 30 days of the alleged discriminatory action.

Citation

If upon inspection OSHA believes an employer has violated the Act, a citation alleging such violations will be issued to the employer. Each citation will specify a time period with which the alleged violation must be corrected.

The OSHA citation must be prominently displayed at or near the place of alleged violation for three days, or until it is corrected, whichever is later, to warn employees of dangers that may exist there.

Proposed Penalty

The Act provides for mandatory penalties against employers of up to $1,000 for each serious violation and for optional penalties of up to $1,000 for each non-serious violation. Penalties of up to $1,000 per day may be proposed for failure to correct violations within the proposed time period. Also, any employer who willfully or repeatedly violates the Act may be assessed penalties of up to $10,000 for each such violation.

There are also provisions for central penalties. Any willful violation resulting in death of an employee, upon conviction, is punishable by a fine of up to $250,000 (or $500,000 if the employer is a corporation), or by imprisonment for up to six months or both. A second conviction of an employer doubles the possible term of imprisonment.

Voluntary Activity

While providing penalties for violation, the Act also encourages efforts by labor and management before an OSHA inspection, to reduce workplace hazards voluntarily and to develop and improve safety and health programs in all workplaces and industries. OSHA's Voluntary Protection Programs recognize outstanding efforts of this nature.

OSHA has published Safety and Health Program Management Guidelines to assist employers in establishing or perfecting programs to prevent or control employee exposure to workplace hazards. There are many public and private organizations that can provide information and assistance in this effort if requested. Also, your local OSHA office can provide considerable help and advice on saving safety and health problems or can refer you to other sources for help such as training.

Consultation

Free assistance in identifying and correcting hazards and in improving safety and health management is available to employers, without citation or penalty, through OSHA-supported programs in each State. These programs are usually administered by the State of Labor or Health Department or a State University.

Under provisions of Title 29, Code of Federal Regulations, part 1903.2(s)(1) employers must post this notice (or facsimile) in a conspicuous place where notices to employees are customarily posted.

Equipment Calibration Log

Operator Name:_____ Instrument Notice:_____

Signature:_____ Serial Number:_____

Date	Time	Concentration	Comments

Sampling Log

Operator Name:_____ Instrument Notice:_____

Signature:_____ Serial Number:_____

Was the equipment calibrated? _____ Yes _____ No

Date	Time	Concentration	Comments

Daily Sign In/Sign Out Form

(to be completed on site)

Site Name: 135 Main St, Poughkeepsie, NY

Location: 135 Main St, Poughkeepsie, NY

Employee Name	Company Name	Purpose	Time In	Time Out

Signature of SHSO (or designee) Date

Daily Safety Meeting Log

(to be completed on site)

Site Name 135 Main St, Poughkeepsie, NY

Location 135 Main St, Poughkeepsie, NY

Weather _____

Topics _____

_____

_____

_____

_____

_____

_____

Employee Names:	Signatures
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

_____ _____

Signature of SHSO (or designee) Date

ACCIDENT INVESTIGATION REPORT

Place Accident Occurred:		Name of Person Involved:	
Site Location		Age / Sex	Job Title
		Yrs in This Job	Yrs with Company
Date & Time of Incident AM __/__/_____:__ PM		Date & Time of Investigation AM __/__/___:__ PM	
Date Incident Reported __/__/	Reported to Whom	Investigated By:	
Regulatory Agencies or Insurance Carriers Contacted:		Witness(es):	
Description from injured or witnesses (use reverse side of form for more space): Signature Date			

Select one or more in each column. Don't hesitate to write in your own words (continue on reverse side, if necessary).

When completing the following task:
- ☐Operating (what machine)_____
- ☐Using (what tool)_____
- ☐Handling (what material)_____
- ☐Maintenance or repair (of what)_____
- ☐Office or sales task_____
- ☐Other -- Provide details_____

The following occurred:
- ☐Amputation (total or partial)_____
- ☐Burn (thermal)_____
- ☐Burn (chemical)_____
- ☐Electric shock_____
- ☐Concussion/unconscious_____
- ☐Crushing injury (contusion, crush, bruise) -- intact skin_____
- ☐Cut, laceration, puncture, abrasion_____
- ☐Fracture or dislocation_____
- ☐Sprain/strain_____
- ☐Cumulative trauma_____
- ☐Occupational illness or disease_____
- ☐Internal injuries_____
- ☐None -- Near accident_____
- ☐Other -- Provide details_____
- ☐Respiratory_____

To the (explain details):
- ☐Head, face, neck_____
- ☐Eye_____
- ☐Trunk, abdomen_____
- ☐Back (upper, lower)_____
- ☐Arm, shoulder_____
- ☐Fingers_____
- ☐Leg, hip, knee_____
- ☐Ankle, foot_____
- ☐Toes_____
- ☐Internal Injuries_____
- ☐Body System:_____
- ☐Circulatory_____
- ☐Digestive_____
- ☐Musculoskeletal_____
- ☐Nervous_____
- ☐Other_____
- ☐Other (specify)_____

Person was, or got:
- ☐Struck against (not including falls)_____
- ☐Struck by_____
- ☐Fell from (from a higher level)_____
- ☐Slipped, tripped, fell on (in the same level)_____
- ☐Foreign body in eye_____
- ☐Contacted electrical energy from_____
- ☐Exposure to (substance)_____
  - from inhalation_____
  - ingestion_____
  - skin absorption_____
- ☐Vehicle accident_____
- ☐Caught in, under or between_____
- ☐Repetitive_____
- ☐Other_____

While (taking what position) Where (or What):
- ☐Carrying_____
- ☐Climbing_____
- ☐Bending_____
- ☐Driving_____
- ☐Jumping_____
- ☐Kneeling_____
- ☐Lifting - below waist, give weight)_____
- ☐Lifting - above waist, give weight)_____
- ☐Pulling_____
- ☐Pushing_____
- ☐Reaching or stretching_____
- ☐Riding_____
- ☐Running_____
- ☐Sitting_____
- ☐Standing_____
- ☐Throwing_____
- ☐Twisting or turning_____
- ☐Walking_____
- ☐Other_____

Medical Treatment (check as many as apply)
- ☐The injured employee was able to return to work the same day.
- ☐The injured employee was sent home
- ☐The injured employee was sent to a doctor/ clinic; list the doctor/clinic name, address, and phone:_____

- ☐The employee was hospitalized.

List name and address of hospital:

Attending physician:_____

What conditions contributed
- ☐Awkward job procedure
- ☐Inadequate guard/safety device
- ☐Inadequate warning/labeling system
- ☐Fire/explosion hazard
- ☐Not secured against moving
- ☐Poor housekeeping
- ☐Protruding object
- ☐Close clearance/congestion
- ☐Hazardous arrangement/storage
- ☐Defective tools/equipment
- ☐Inadequate ventilation
- ☐Atmospheric condition: gases,

What unsafe procedures contributed
- ☐Operating without training/authority
- ☐Failure to follow proper procedure
- ☐Failure to secure
- ☐Operating at unsafe speed
- ☐Failure to warn/signal
- ☐Congestion
- ☐Used defective equipment
- ☐Used equipment improperly/unsafely
- ☐Improper loading or placement
- ☐Horseplay/distraction
- ☐Improper protective equipment
- ☐Improper lifting or carrying

The underlying causes of the incident are:
- ☐Unaware of job hazards
- ☐Inattention to hazard
- ☐Unaware of how to avoid incident
- ☐Not enough time to act
- ☐Person motivated to use unsafe procedure
- ☐Emotional/mental/physical stress
- ☐Equipment failed to perform as expected
- ☐Intoxicant/drugs
- ☐Failure to report/correct unsafe condition
- ☐Illness/medical condition
- ☐Work procedure not ergonomically correct
- ☐Substandard design

Classification (check as many as apply)
- ☐Fatality
- ☐Medical treatment other than First Aid
- ☐Occupation illness or disease
- ☐First Aid
- ☐Environmental Release
- ☐Property Damage
- ☐Near-accident

dusts, fumes, vapors
☐Repetitive motion
☐Illumination/noise hazard
☐Other

☐Taking unsafe or awkward position
☐Servicing moving equipment
☐Other

☐Other

What steps have already been taken to prevent similar incidents?_____

_____

_____

_____

What else can be done (engineering controls, training, enforcement, process changes) to eliminate the hazard?_____

_____

_____

_____
SHSO's Signature Date

Health and Safety Review: Is proposed action appropriate? Yes ☐ No ☐ Comments_____

_____

_____

_____

_____

_____
DHS's Signature Date

VEHICLE ACCIDENT REPORT

EMPLOYEE NAME:_____ DRV LIC NO.:_____

COMPANY ADDRESS:_____ INSURANCE COMPANY_____

POLICY NO.:_____

DESCRIPTION OF ACCIDENT

DATE:_____ TIME:_____ SPEED LIMIT_____:

LOCATION:_____

DIRECTION OF TRAVEL:_____

HOW DID IT HAPPEN?_____

_____

USE SPACE BELOW TO INDICATE VEHICLE PATHS - INDICATE NORTH BY ARROW

POLICE REPORT

NAME OF OFFICER: _____ BADGE #: _____

DEPARTMENT: _____ LOCATION: _____

SUMMONS ISSUED? Y [ ] N [ ] TO WHOM? _____

YOUR VEHICLE

YEAR/MAKE: _____ REGIST #: _____

DRIVEN BY: _____ AGE: ___ TEL #: _____

ADDRESS: _____ CITY: _____ STATE: _____

NATURE OF DAMAGE: _____

OTHER DRIVER
(continue below for additional drivers and witnesses)

NAME: _____ DRV LIC NO.: _____

ADDRESS: _____ VEHICLE REGISTRATION: _____

_____ INSURANCE COMPANY _____

POLICY NO.: _____

HASP Sign-Off Form

INSTRUCTIONS: Site personnel are required to read, understand, and agree to the provision of the plan. Personnel are required to sign this form indicating agreement. The original of this form is maintained by the Project Manager, and becomes part of the permanent site project files upon completion of site work.

Site Name: 135 Main Street, Poughkeepsie, NY

Location: 135 Main Street, Poughkeepsie, NY

Project Name and Number: HK2710

I have read, understand, and agree to comply with the provisions of this HASP for work activities on this site.

Name	Signature	Company/Agency	Date

ATTACHMENT B

COMMUNITY AIR MONITORING PLAN

Community Air Monitoring Plan

Real-time air monitoring for volatile organic compounds (VOCs) and particulate levels at the perimeter of the exclusion zone or work area will be performed. Continuous monitoring will be performed for all ground intrusive activities and during the handling of contaminated or potentially contaminated media. Ground intrusive activities include, soil excavation and stockpiling, soil handling and disposal.

Periodic monitoring for VOCs will be performed during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. Periodic monitoring during sample collection, for instance, will consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or overturning soil, monitoring during well bailing/purging, and taking a reading prior to leaving a sample location. Depending upon the proximity of potentially exposed individuals, continuous monitoring may be performed during sampling activities.

VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) will be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis during invasive work. Upwind concentrations will be measured at the start of each workday and periodically thereafter to establish background conditions. The monitoring work will be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment will be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment will 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 in excess of 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 shutdown.

All 15-minute readings must be recorded and be available for review. Instantaneous readings, if any, used for decision purposes will also be recorded.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations will be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring will 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 will 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 (mcg/m3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques will be employed. Work will continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/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 mcg/m3 above the upwind level, work will be stopped and a re-evaluation of activities initiated. Work will resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m3 of the upwind level and in preventing visible dust migration.