



61 EDSON STREET LLC

*CORRECTIVE MEASURES WORK PLAN
SEDIMENT BASINS - WARD PRODUCTS SITE
61 EDSON STREET, AMSTERDAM, NY*

DEC Site No. 429004

28 April 2026 REV. 8 JULY 2026; 27 JULY 2026

Prepared for:

61 Edson Street, LLC
336 Forest Avenue
Amsterdam, NY 12010

Prepared by:

James Environmental Management
134 Greenridge Drive
Manlius, NY 13104

JEM Project No. 260403

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1.0 INTRODUCTION

This Sediment Basin Corrective Measures Work Plan (CMWP) is based on the findings of an evaluation of sediment control features (a.k.a. ‘sediment basins’) located downslope of the Ward Products Site. The Ward Products Site, located at 61 Edson Street in Amsterdam, Montgomery County, NY (the Site), is a NYS Inactive Hazardous waste Site (No. 429004) subject to the terms of a Record of Decision (ROD) issued by New York State Department of Environmental Conservation (NYSDEC) dated March 2007. The Site is a ‘Class 4’ Inactive Hazardous Waste Site, meaning remediation is complete but ongoing actions are required as described in a Site Management Plan (SMP) dated February 2011, updated 23 January 2017. One of those ongoing actions is the inspection and maintenance of three sediment basins located downslope of the Site at estimated ‘straight-line’ distances of 0.2 mile, 0.4 miles and 0.5 miles from the Site.

The most recent sediment basin inspection and sampling was conducted in May 2025 with the results presented in a Sediment Evaluation Report prepared by James Environmental Management (JEM) dated 13 August 2025. For each of the three basins, the severe exposure limit (SEL) concentrations as presented in the SMP were exceeded for at least one metal and the sediment thicknesses exceeded the action criteria. As such, NYSDEC issued a letter dated 16 December 2025 requiring a CMWP.

This CMWP presents the approach to sediment basin cleanout and restoration.

2.0 SITE BACKGROUND AND SETTING

2.1 SITE LOCATION

The Site is located within the City of Amsterdam, Montgomery County, New York (Figure 1) and is identified as parcel 56.10-2-34 on the Montgomery County Tax Map. The Site is an 8.6-acre parcel within the Edson Street Industrial Park located on the southeast side of the City of Amsterdam (approximately 1.25 miles east of ‘downtown’ Amsterdam). The Site is located approximately 3,300 feet northeast of the Mohawk River and includes an approximately 69,500-square-foot single story building, lawn areas, a paved parking lot and an undeveloped portion north of the Site building. A drainage ditch on the eastern side of the property directs surface water flow to the southwest towards and under Edson Street. Site features are depicted in Figure 2.

2.2 SURROUNDING PROPERTY USAGE

The Site is bounded by various retail and manufacturing businesses including Saratoga Horseworks (west), FGI Fibers, Inc. (east), Bush Products, Inc. and Town & Country Bridge & Rail (south, across Edson Street). The northern side of the Site is bounded by vacant land. The surrounding area also consists of retail, manufacturing, and distribution businesses. Surrounding properties located at the upper portion of the East Branch Drainage Path and north of the start of the West Branch Drainage Path are shown on Figure 3.

2.3 SITE HISTORY

The Site building was initially constructed in 1957 and expanded thereafter, and was first occupied by the Gabriel Corporation, which manufactured car antennas. Ward Products, subsequently New Water Realty Corporation (NWR), purchased Gabriel’s operation and the Site in 1959. As part of the manufacturing process, small metal parts were cleaned

with solvents using vapor degreasing prior to plating, resulting in releases as summarized below.

Between 1957 and 1973, untreated electroplating bath solutions containing chromium, zinc, cadmium, and nickel, and the degreasing solvent TCE were reportedly discharged to the nearby drainage ditch east of the Ward Products building. From 1973 through 1985, operations pretreated the plating solutions from the nickel/chromium line and dried the resulting sludge on an outdoor concrete pad prior to removal for off-site disposal. The spent cadmium/cyanide plating solution was discharged to an outdoor tank for both natural and mechanical evaporation and off-site disposal of the remaining sludges. The zinc/cyanide line was discontinued in 1973. Soil from the former sludge drying pad area was significantly excavated during the building expansion, stockpiled, and then removed from the Site during subsequent Interim Remedial Measures (IRMs).

Ward Products connected to Amsterdam's sewer system in 1983 and then discontinued the vapor degreasing system. All electroplating operations at the Site were discontinued in 1985. In 1988 and 1989, the plant expanded with a new grinding shop built over the former sludge drying pad and a new warehouse area built to the north. The expansion of the manufacturing building over this area eliminated some of the contaminant mass and reduced the potential for migration of, or exposure to, remaining residuals.

As a result of the releases and remaining residuals in soil and groundwater, NYSDEC listed the Site as a Class 2a site in the Registry in 1985. Subsequent investigations and remediations addressed contamination at the Site, resulting in its current status as a Class 4 Hazardous Waste Site. In 2019, the Site was purchased by the current owner, 61 Edson Street, LLC (Owner).

2.4 SUMMARY OF SEDIMENT BASIN EXCAVATION AND CONSTRUCTION

Sediment basins were remediated and reconstructed as needed to allow for sediment capture as part of overall Site remediation. Approximately 3,475 tons of metals-impacted sediments were removed from the drainage ways downgradient from the Ward Product

Site from December 2008 to February 2009 resulting in the creation of sediment collection basins as described below.

The Sam Stratton Road Basin was created by excavating an area approximately 10 feet wide by 35 feet long in the northwest corner of the existing Sam Stratton basin. Excavation continued to one to two feet deep until verification samples documented that metals concentrations were below SELs. Upon completion of excavation, the Sam Stratton Road Removal Area was left ‘as excavated’ and was not backfilled, as the basin owner indicated that they had planned to dredge the basin in the near term.

Upon completion of sediment removal, the Chapman Drive Basin was restored by placing an estimated two feet of stone over the bottom of the excavation. The basin was completed by installing a steel riser with debris trap installing a perforated 42-inch-diameter corrugated metal riser pipe with crushed stone mounded around the outside of the riser, to the rim elevation. The riser pipe drains into an existing laid up stone culvert located beneath the railroad spur. A trash rack was constructed atop the riser to prohibit debris from washing into and clogging the pipe.

Upon completion of sediment removal, the Route 5 Area Basin was completed by creating a ‘pond’ within the stream as follows:

- A minimum of six inches of light stone was placed at the base of the excavation;
- Geofabric was installed over the light stone;
- A minimum of six inches of fine stone was placed over the geofabric;
- The area was backfilled to grade with one to three feet of common fill as needed.

A weir constructed of crushed stone was installed on the downgradient end of the basin. A culvert with a drop inlet was installed immediately downstream of the stone spillway to convey the stormwater beneath the CSX railroad.

Locations of sediment basins are shown on Figure 4. As-built drawings for each sediment basin are provided as Figures 5-7

2.5 SMP REQUIREMENTS RELATED TO SEDIMENT BASINS

The SMP requires that each of the three sediment basins be monitored and inspected annually (inspection frequency is subject to change with the approval of the NYSDEC). If the annual accumulation in a basin exceeds 4 inches or if there is a total accumulation in the basin exceeding 18 inches (all measured from the basin bottom at the end of the 2009 sediment projects, or any subsequent documented removal), then sediment samples will be collected from the top four inches of sediment. The sediment samples will be analyzed for cadmium, chromium, nickel and zinc with results compared to the lowest effect limits (LEL) and severe exposure limits (SEL) for the four main COCs in sediments listed below.

Sediments Cleanup Guidance, Contaminant of Concern (ppm)

Cadmium	LEL 0.6	SEL 9
Chromium	LEL 26	SEL 110
Nickel	LEL 16	SEL 50
Zinc	LEL 120	SEL 270

The SMP requires that all sediment be removed from the smaller basins (Route 5 Basin and Chapman Drive Basin), and sediments from the zone sampled will be removed from the bigger basin (Sam Stratton) if:

1. There is 18 inches of accumulated sediment and the sample results are above LEL, or;
2. Sample results are above SEL.

Any necessary sediment removal will follow the procedures set forth in the SMP.

3.0 MAY 2025 FIELD OBSERVATIONS AND ANALYTICAL RESULTS

On 19 May 2025, JEM conducted inspections of the three sediment basins including the Sam Stratton Road Sediment Basin and Retention Pond, the Chapman Drive Sediment Basin, and the Route 5 Sediment Basin.

JEM inspected the Sam Stratton Road Sediment Basin by first measuring from the five-foot diameter spillway to the approximate center of the limit of backfill materials and the limit of excavation boundary noted in the As-Built drawings documented in the SMP. Three test pits were excavated by hand in the approximate central portion until refusal was met when stone was encountered. JEM measured the depth of the sediment to be approximately 25 inches thick over the observed gravel layer. JEM also installed a new sediment depth gauge.

JEM inspected and documented the condition of Chapman Drive Sediment Basin. Three test pits were excavated in the central portion of the basin and the influent area of the basin. The stone backfill was confirmed at each test pit. Geotextile fabric was observed at the ground surface near the inlet area of the basin. The condition and positioning of the existing sediment gauges was confirmed and the depth of the sediment at the time of inspection was recorded. Sediment depth was measured to be 17 inches at the Chapman Drive Sediment Basin.

During inspection of the Route 5 Sediment Basin, JEM located and uncovered the grated drop inlet noted from previous inspection and identified in the As-Built drawings from the SMP. Sediment accumulation above the grated drop inlet was approximately 30 inches. JEM also excavated two test pits to confirm sediment depth and stone cover. Sediment thickness at the two test pits were measured at approximately 28 inches and 25 inches. A sediment accumulation gauge was installed by JEM next to the grate drop inlet.

Five sediment samples were collected by JEM on 19 May 2025 using the scoop and trowel method described in Section 3.5.3 of the SMP. One five-point composite sediment sample was collected from the top four inches of sediment from each sediment basin.

Sediment samples were submitted to PACE Analytical, along with one duplicate, one matrix spike sample and one matrix spike duplicate for a total of eight analyses.

The table below summarizes measured sediment thickness and sample locations; all samples were analyzed for cadmium, chromium, nickel and zinc.

	RT5-05192025	CHAPMAN-05192025	SS-05192025
Location	Rte. 5 Basin	Chapman Rd. Basin	Sam Stratton Rd. Basin
Sed. Thickness	30 in.	17 in.	25 in.

Analytical results, along with SEL and LEL values, are presented on the table below (**bold** values exceed the LEL only, highlighted values exceed the LEL and the SEL).

	LEL/SEL (mg/Kg)	RT5- 05192025	CHAPMAN- 05192025	SS- 05192025
Cadmium	0.6/9	6.18 mg/Kg	18.2 mg/Kg	9.26 mg/Kg
Chromium	26/110	68.0 mg/Kg	108 mg/Kg	118 mg/Kg
Nickel	16/50	63.0 mg/Kg	97.8 mg/Kg	64.0 mg/Kg
Zinc	120/270	63.6 mg/Kg	125 mg/Kg	87.8 mg/Kg

4.0 MATERIAL CHARACTERIZATION

Three sediment samples were collected by JEM on 19 March 2026, one from each of the sediment basins (Sam Stratton Sediment Basin, Chapman Road Sediment Basin, and Route 5 Sediment Basin). Sediment samples were collected using the scoop/trowel method as described in Section 3.5.3 of the SMP. A stainless-steel sampler was used to manually dig into the sediment at five locations per basin within the approximate center of the deepest portion of each sediment basin. The five samples were then transferred into a stainless-steel bowl and homogenized resulting in one composite sample per basin. Each homogenized sediment sample was then transferred to laboratory-provided containers, labeled and packed in coolers with a complete Chain-of-Custody and shipped to Phoenix Environmental Laboratories in Manchester Connecticut.

The three sediment samples were analyzed for Toxicity Characteristic Leaching Procedure (TCLP) Metals, TCLP Volatiles, TCLP Semi-volatiles, Pesticides, Herbicides, pH, % solid & paint filter. In all three samples, analytes were either ‘not detected’ or were detected below hazardous classification concentration, documenting that the material is not hazardous. Analytical reports are provided as Appendix A.

5.0 CORRECTIVE MEASURES APPROACH

Based on sediment thickness, analytical results, and basin construction, sediment from a portion of each basin (as shown on Figures 5-7, attached) will be excavated and disposed of as non-hazardous industrial waste. The areas shown on Figure 5-7 are estimated; per the SMP all accumulated sediment will be removed from the Route 5 Basin and Chapman Drive Basin and for the Straton Road Basin sediments from the zone sampled will be removed. Work will not penetrate, encounter or disturb the residual contamination or the existing cover system located in areas restricted under the site-related Easement as all work will be performed outside the limits of the Site. Access agreements will be obtained from all property owners that will be affected by remedial activities.

The Owner plans to retain Abscope Environmental, Inc. (Contractor) to conduct sediment removal. JEM will provide a Qualified Environmental Professional (QEP) to document compliance with this CMWP under direct contract to the Owner. Work to be conducted by the Contractor is summarized below.

Pre-Remediation Activities/Roles and Responsibilities

Contractor will complete the pre-remedial activities before mobilizing crew and equipment to the site as listed below.

- Contractor will participate in the pre-construction coordination meetings.
- DigSafe will be notified to locate and mark all public utilities.
- A private utility locator will also be conducted to locate and mark out underground obstructions in the excavation area.
- Contractor will prepare and supply required submittals

Roles and Responsibilities of the project participants are provided below.

Linette Coolong, Owner Representative (518-620-1905 linette@stickermule.com)
Jake Merritt, Facility Contact (518-448-9515 jake.merritt@printbear.net)
Adam Giangreco, Access Coordinator (303-317-5605 adam.giangreco@printbear.net)
Jolene Lozewski, DEC Project Manager (518 402-8805 jolene.lozewski@dec.ny.gov)
Justine Deming, DOH Project Manager (518-402-7860 justin.deming@health.ny.gov)
Rob Gray, Abscope, Const. Project Director (315-345-9151 rgray@abscope.com)
Mike Smith, Abscope, Const. Project Manager (518-779-9425 msmith@abscope.com)
Scott Mudge, Abscope, Constr. Site Supervisor (386- 847-1073 smudge@abscope.com)
James Blasting, JEM, Env. Project Director (315-263-3388 jfblasting@james-em.com)

Jake Guy, JEM, Site Qualified Professional (315-877-0092 jtguy@james-em.com)
Kyle Thomas, Independent NYS PE (315-425-9347 kthomas@naturalsystemsengineering.com)

Survey

Contractor will perform pre-excavation and post-excavation surveys at each site, including documenting excavation limits and locating any post-excavation sampling locations (if any) utilizing a Trimble GPS system.

Mobilization

Contractor will mobilize all personnel, equipment and materials to complete the scope of work. The anticipated equipment that will be mobilized will include (but not be limited to) the following:

- 34,000 lb. excavator
- Skid steer
- 11-ton Morooka tracked carrier
- One four-inch-diameter dry primed diesel pump (bypass pumping)
- Portable sanitary units

Sediment Removal

Work to be performed at each individual sediment basin is summarized below. Assuming DEC approval of this CMWP, work will be conducted in August or September 2026 ; based on past observations the sediment basins will be dry at the time of excavation. However, if excavated sediment is too wet to load, it will be piled within, and along the edge of, the excavation area and allowed to ‘gravity drain’ back into the excavation area prior to loading.

Sam Stratton Basin (178 tons)

- This location will be accessed from Sam Stratton Drive.
- Contractor will prepare the work area by removing various trees and shrubs that exist inside the removal and access area and install approximately 300 linear feet (lf) of silt fence to contain any erosion.
- Contractor will install and remove an access road into the site to allow for direct loading of contaminated soils.
- Contractor will install a sump upstream of the work area and install a bypass pump as needed to handle any dewatering required due to the stream flow (it is estimated that a four-inch dri-prime diesel pump will be sufficient).
- Contractor will reseed and mulch the disturbed areas (not the basin itself) with a

contractor seed mix.

Chapman Road Basin (69 tons)

- This location will be accessed from Sam Stratton Drive utilizing an existing haul road that runs from Sam Stratton along a National Grid easement. This access will need to be approved by the owner, and the owner will need to provide any access permission required by National Grid.
- Contractor will provide all brush clearing and tree removal along the access road to allow for clear transport between the basin and Sam Stratton Drive. Additionally, any erosion control required will be installed (300' has been estimated).
- Contractor proposes to utilize a 34,000 lb. tracked excavator, a tracked skid steer with a brush mower and an 11-ton Morooka tracked carrier to transport the contaminated material to a bermed, plastic-lined contained temporary storage area along Sam Stratton Drive as close to the excavation areas as practical (Figure 8). From this storage area, the soil will be loaded for transportation and disposal. Overnight staging of material is not anticipated as material will be loaded out the same day.; If material needs to be staged overnight, it will be placed in a bermed, plastic lined staging area and covered with secured plastic sheeting at a location pre-approved by NYSDEC.
- Contractor will install a sump upstream of the work area and install a bypass pump as needed to handle any dewatering required due to the stream flow (it is estimated that a four-inch-diameter dry prime diesel pump will be sufficient).
- Contractor will reseed and mulch the disturbed areas (not the basin itself) with a contractor seed mix.

Rte. 5 Area Basin (178 tons)

- This location will be accessed via railroad tracks located to the south of the site. Permission to use this access will be obtained by the Owner. Any specialty railroad insurance, railroad flaggers or specialty permits will be obtained by the Owner.
- Contractor will provide brush and tree clearing in the work area for all work to be completed. Erosion control measures will be installed to minimize any migration of soil into the existing culvert. The culvert is covered by approximately three feet of silt. This will be cleaned out first and the outlet will be protected as best management practice allows.
- The estimated removal area is approximately 40'x40'; as such, the work area is estimated to be from the culvert to 40 feet upstream of the culvert in order to remove all accumulated sediment to the extent practical.
- Contractor proposes to utilize a 34,000 lb. tracked excavator, a tracked skid steer with a brush mower and a 11-ton Morooka tracked carrier to transport the contaminated material to a bermed, plastic-lined contained temporary storage area located along the railroad tracks as close to the excavation areas as practical (Figure 8). From this storage area, the soil will be loaded for transportation and disposal the same day. This storage area will also be built to allow the soil to drain in the event the moisture is too high to transport. Overnight staging of

material is not anticipated; if material needs to be staged overnight it will be placed in a bermed, plastic lined staging area and covered with secured plastic sheeting at a location pre-approved by NYSDEC.

- Contractor will install a sump upstream of the work area and install a bypass pump as needed to handle any dewatering required due to the stream flow (it is estimated that a four-inch-diameter dry prime diesel pump will be sufficient).
- Contractor will reseed and mulch the disturbed areas (not the basin itself) with a contractor seed mix.

Excavation:

- Soil will be excavated to various depths as instructed by the QEP.
- The soil will be directly loaded into trucks for disposal at the Sam Stratton site, stockpiled and reloaded the same day from storage locations at Chapman and Rte. 5 sites.
- The need to replace or backfill any of the areas with clean fill or topsoil is not anticipated as each area contains eroded silt.
- Contractor will transport and dispose of non-hazardous soils to the Colonie Landfill.

Decontamination

- Equipment that comes in contact with the contaminated soil will be cleaned. Methods used to decontaminate heavy equipment may include cleaning all loose debris with a brush, broom or spade. Power washing or water rinsing is not anticipated. It is anticipated that the excavator bucket will be scrubbed with water over the dump bed of a sediment-containing truck for cleaning to contain the limited amount of wash water and minimize waste generation.
- Trucks loaded with soil for transport will be visually inspected and decontaminated as necessary while on plastic sheeting. Loose material will be removed by brush, broom or spade as necessary and collected directly onto plastic sheeting for subsequent disposal.
- Trucks will not enter the excavation area and will not encounter contaminated materials; therefore, a decontamination pad and power-washing will not be necessary.
- If investigation-derived water is generated (not anticipated) it will be properly containerized in labeled 55-gallon drums, sampled, and properly stored in a secured location until disposal based on analytical results can be arranged and accomplished.

Dewatering

- Work will be conducted in late July/early August during a 'dry period' such that dewatering and water bypass is not anticipated. If water management is needed, Contractor only intends to utilize a bypass pump to manage surface water centralized to the small streams that run through each location, only as necessary. Any pumped water will be passed through a sediment collection bag filter prior to

discharge back to the drainage system. The need for additional water treatment or disposal is not anticipated.

Transportation of Excavated Sediment

All excavated material will be transported directly to the Colonie Landfill located at 4 Arrowhead Lane, Cohoes, NY (the Landfill). Transportation through residential areas and past sensitive sites will be minimized. Off-site queuing of trucks will be minimized. As practical, city-mapped truck routes will be utilized while inside City of Amsterdam limits. The anticipated local truck routes from each sediment basin area are shown on Figure 9.

Restoration

- The site will be restored “like for like” with grades being blended and no backfill imported.
- All disturbed soils (excluding sediment basins) will be seeded and mulched. No erosion control blankets are expected or included.

Demobilization

- At completion of the work, Contractor will conduct a thorough walk-through of the site with the owner or owner’s representative and will perform a punch list of work as needed. Any defective/unfinished work items identified during the walk-through will be corrected and completed by Contractor prior to demobilization from the site.
- Upon completion of all remediation activities, Contractor will demobilize the site. Demobilization includes the removal of personnel, equipment, materials, construction entrance and material decontamination pads from the jobsite. All final reporting will be submitted upon completion of the work.

Any soil that is temporarily stockpiled will be encircled with a berm and/or silt fence. Hay bales will be used as needed near catch basins, surface waters and other discharge points. Stockpiles will be placed on a liner and will be kept covered with an appropriately anchored liner. Overnight staging of sediment is not anticipated.

It is estimated that a total of 425 tons of excavated material will be disposed of at the Colonie Landfill. Waste acceptance documentation will be provided prior to mobilization. The project will not include the importing and placement of backfill material.

It is estimated that sediment excavation will proceed vertically until original construction material are encountered and the original final construction grade is realized. As such, confirmation sampling will not be required.

The QEP 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.

All 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. Material transported by trucks will be secured with tight-fitting covers.

6.0 *REPORTING*

Daily reports and photographs will be submitted to the DEC and DOH by the end of the following workday and will include applicable information specified in Part 375 1.6(3) including:

- an update of progress made during the reporting day;
- the locations of work/site activities identified on a site map;
- quantities and descriptions of materials exported from the site;
- a summary of any and all complaints with relevant details (names, phone numbers);
- an explanation of notable site conditions; and
- any deviations from the approved work plan.

A Construction Completion Report (CCR) will be prepared upon completion of the work; the report will describe all completed work and will include waste profiles, test results (if any), facility acceptance letters, bills of lading, facility receipts, and photo-documentation of activities. The CCR will be prepared by, or under the direction of, an independent NYS-licensed Professional Engineer (PE) retained directly by the Owner. As such, the certifying PE will be on-site to observe field activities as much as necessary for the PE to certify the CCR.

7.0 *SCHEDULE*

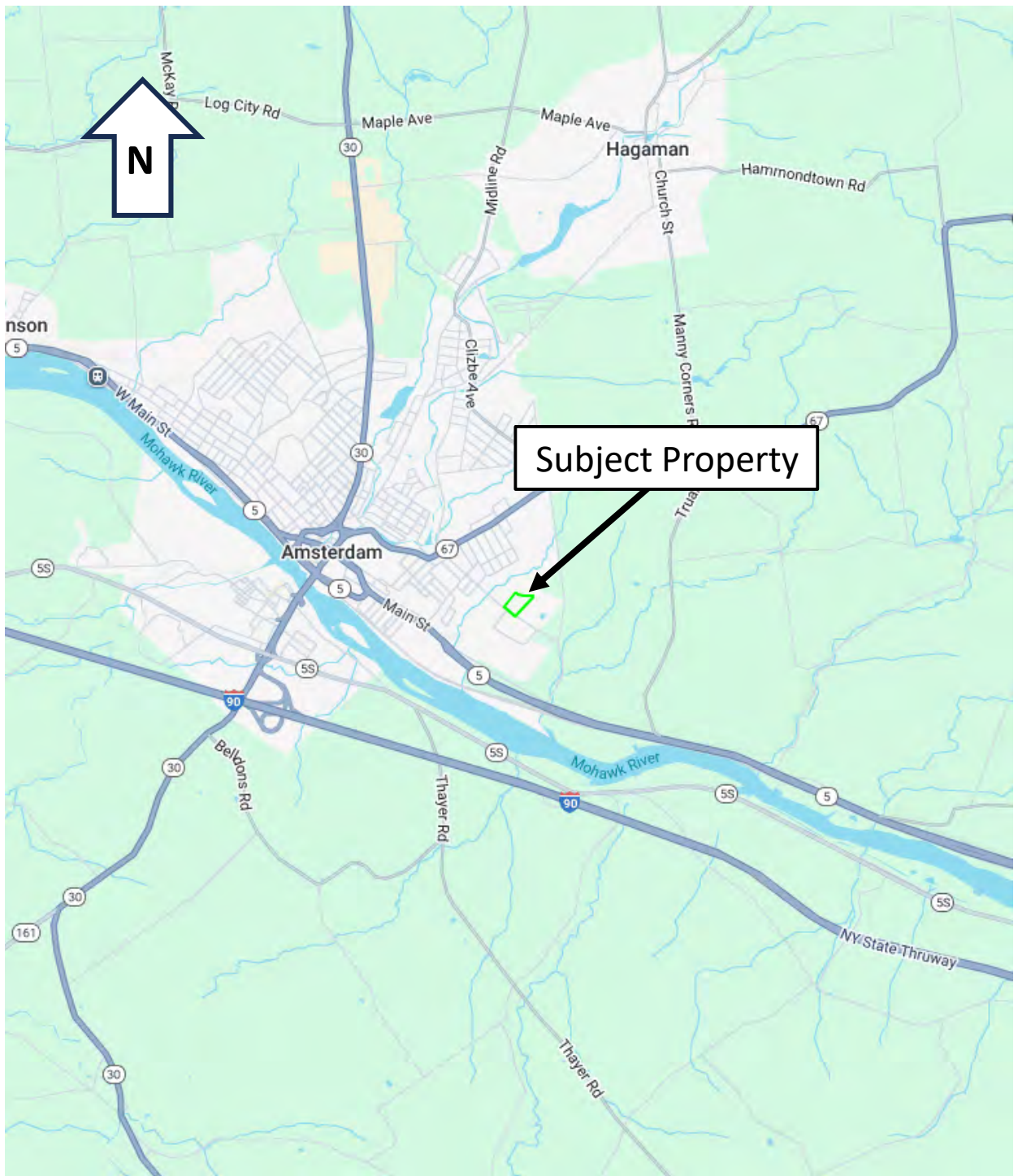
Work will be conducted in late July/early August depending on site conditions. Project time frames are presented below.

Project Schedule:

Item of Work	Duration
Mobilization	2 days
Sam Stratton Basin	5 days
Chapman Road Basin	5 days
Rte. 5 Basin	5 days
Restoration	1 days
Demobilization	2 days
Total Field Work	20 days

The Construction Completion report will be provided within 45 days of fieldwork completion.

FIGURES



Ward Products Site
61 Edson Street Amsterdam, NY

Date: 8/14/2025

Client: 61 Edson Street, LLC

Figure 1
Site Location



Ward Products Site **61 Edson Amsterdam, NY**

Date: 8/14/2025

Client: 61 Edson Street, LLC

Figure 2
 Site Features



Ward Products Site
61 Edson Amsterdam, NY

Date: 8/14/2025

Client: 61 Edson Street, LLC

Figure 3
Surrounding Properties



**Ward Products Site
61 Edson Amsterdam, NY**

Date: 8/14/2025

Client: 61 Edson Street, LLC

Figure 4
Sediment Basin
Locations

Plotted By: MeisterK
Plot File Date Created: Jul/27/2010 7:25 AM
Layout--Sheet Name: A1
Filename: L:\WORK\107297\CADD\AECOM--CADD\SITE_MANAGEMENT\WARDS_PRODUCTS_SITE_MANAGEMENT.DWG



REFERENCE:

ALL DATA COLLECTED AND DISPLAYED IN NAD83 NEW YORK STATE PLANE, EAST ZONE, US FOOT.

MAPPING PROVIDED BY H2H ASSOCIATES, TROY N.Y.

TOPOGRAPHIC SURVEY CONDUCTED BY MATSON LAND SURVEYING.

LEGEND:

- 245 EXCAVATION GRADE MAJOR CONTOUR (DASHED WHERE INFERRED)
- 244 EXCAVATION GRADE MINOR CONTOUR (DASHED WHERE INFERRED)
- VEGETATION BOUNDARY
- LIMIT OF EXCAVATION BOUNDARY (AS SURVEYED BY H2H ON 12/13/08 & 1/14/09)
- WATERWAY BOUNDARY AT 1/14/09
- SOIL BACKFILL
- STONE BACKFILL
- APPROX. AREA OF EXCAVATION 2026

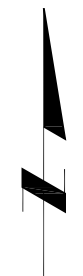


FIGURE 5

FORMER WARD PRODUCTS SITE MANAGEMENT PLAN AMSTERDAM, NEW YORK		AECOM 40 British American Blvd. Lisle, NY 12110 T: 518.951.2200 F: 518.951.2300 WWW.AECOM.COM		PROJECT START DATE (M / Y) JULY 2010	
ROUTE 5 AREA SEDIMENT BASIN		PROJECT NO. 60134119		FILENAME WARD PRODUCTS.DWG	
		SHEET NO.		FIGURE NO. A1	
		DRN BY: DES BY: CHK BY: APP BY:		KAM DJW 10/09/2009	
		1 REV		ADDED SOIL CONCENTRATIONS DESCRIPTION DRN CHK DATE (M/D/Y)	

Plotted By: MeisterK
Plot File Date Created: Jul/27/2010 7:29 AM
Layout-Sheet Name: A2
Filename: L:\WORK\107297\CADD\AECOM-CADD\

**WOODED
AREA**

**WOODE
AREA**

LIMIT OF BACKFILL MATERIALS

**WOODED
AREA**

LIMIT OF EXCAVATION BOUNDARY

LEGEND:

	EXCAVATION GRADE MAJOR CONTOUR (DASHED WHERE INFERRED)
	EXCAVATION GRADE MINOR CONTOUR (DASHED WHERE INFERRED)
	VEGETATION BOUNDARY
	LIMIT OF EXCAVATION BOUNDARY (AS SURVEYED BY H2H ON 12/13/08 & 1/14/09)
	WATERWAY BOUNDARY AT 1/14/09
	STONE BACKFILL
	APPROX. AREA OF EXCAVATION 2026

REFERENCE

ALL DATA COLLECTED AND DISPLAYED IN NAD83 NEW YORK STATE PLANE, EAST ZONE, US
FOOT.

MAPPING PROVIDED BY H2H ASSOCIATES, TROY N.Y

TOPOGRAPHIC SURVEY CONDUCTED BY MATSON LAND SURVEYING

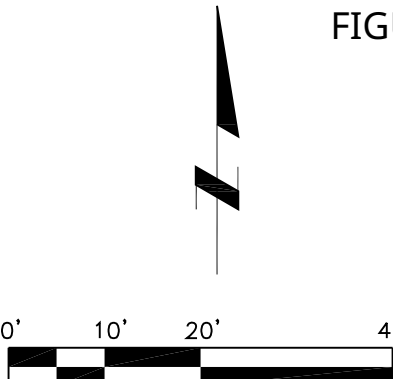


FIGURE 6

**FORMER WARD PRODUCTS
SITE MANAGEMENT PLAN
AMSTERDAM, NEW YORK**

CHAPMAN DRIVE SEDIMENT BASIN

AECOM

40 British American Blvd.
Latham, New York 12110
T 518.951.2200 F 518.951.2300
WWW.AFCOM.COM

[illegible]



Title: Figure 8, Sediment Removal Staging Areas

Location: Ward Products Site
Address: 61 Edson Street Amsterdam, NY

Date: 7/7/2026
Author: JG

Legend

 Sediment Staging Areas

APPENDIX A

TCLP DATA



Monday, March 30, 2026

Attn: Mr James F Blasting, P.G.
James Environmental Management
134 Greenridge Drive
Manlius, NY 13104

Project ID: 61 EDSON SEDIMENT BASINS
SDG ID: GCV57151
Sample ID#s: CV57151 - CV57153

This laboratory is in compliance with the NELAC requirements of procedures used except where indicated.

This report contains results for the parameters tested, under the sampling conditions described on the Chain Of Custody, as received by the laboratory. This report is incomplete unless all pages indicated in the pagination at the bottom of the page are included.

All soils, solids and sludges are reported on a dry weight basis unless otherwise noted in the sample comments.

A scanned version of the COC form accompanies the analytical report and is an exact duplicate of the original.

The contents of this report cannot be discussed with anyone other than the client listed above without their written consent.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Phyllis Shiller".

Phyllis Shiller

Laboratory Director

NELAC - #NY11301
CT Lab Registration #PH-0618
MA Lab Registration #M-CT007
ME Lab Registration #CT-007
NH Lab Registration #213693-A,B

NJ Lab Registration #CT-003
NY Lab Registration #11301
PA Lab Registration #68-03530
RI Lab Registration #63
VT Lab Registration #VT11301



Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823



Sample Id Cross Reference

March 30, 2026

SDG I.D.: GCV57151

Project ID: 61 EDSON SEDIMENT BASINS

Client Id	Lab Id	Matrix	Col Date
SS-03192026	CV57151	SEDIMENT	03/19/26 11:30
CHAPMAN-03192026	CV57152	SEDIMENT	03/19/26 12:00
RTS-03192026	CV57153	SEDIMENT	03/19/26 12:30



Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel. (860) 645-1102



Analysis Report

March 30, 2026

FOR: Attn: Mr James F Blasting, P.G.
James Environmental Management
134 Greenridge Drive
Manlius, NY 13104

Sample Information

Matrix: SEDIMENT
Location Code: JAMES-ENV
Rush Request: Standard
P.O.#:

Custody Information

Collected by:
Received by: B
Analyzed by: see "By" below

Date

03/19/26
03/23/26

Time

11:30
14:35

Laboratory Data

SDG ID: GCV57151
Phoenix ID: CV57151

Project ID: 61 EDSON SEDIMENT BASINS
Client ID: SS-03192026

Parameter	Result	RL/ PQL	Units	Dilution	Date/Time	By	Reference
TCLP Silver	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Arsenic	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Barium	0.55	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Cadmium	0.115	0.050	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Chromium	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Mercury	< 0.0002	0.0002	mg/L	1	03/24/26	ZT	SW846 1311/7470
TCLP Lead	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Selenium	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010D
TCLP Metals Digestion	Completed				03/24/26	GW/SD	SW3010A
Percent Solid	69		%		03/23/26	CV	SW846-%Solid
Corrosivity	Negative		Pos/Neg	1	03/23/26	KL1	SW846-Corr
pH at 20.5C - Soil	7.64	1.00	pH Units	1	03/23/26 23:13	KL1	SW846 9045D
Paint Filter Test	Passed		PASS/FAIL		03/23/26	O	SW9095B
TCLP Digestion Mercury	Completed				03/24/26	GW/SD	SW7470A
TCLP Herbicides Extraction	Completed				03/24/26	CV/D	SW8150 MOD
TCLP Extraction for Metals	Completed				03/23/26	GW	SW1311
TCLP Extraction for Organics	Completed				03/23/26	GW	SW1311
TCLP Pesticides Extraction	Completed				03/24/26	T/T	SW3510C
TCLP Semi-Volatile Extraction	Completed				03/27/26	T/T	SW3510C
TCLP Extraction Volatiles	Completed				03/23/26	CV	SW1311

TCLP Herbicides

2,4,5-TP (Silvex)	ND	50	ug/L	10	03/25/26	JRB	SW846 1311/8151
2,4-D	ND	100	ug/L	10	03/25/26	JRB	SW846 1311/8151

QA/QC Surrogates

% DCAA	78		%	10	03/25/26	JRB	30 - 150 %
% DCAA (Confirmation)	66		%	10	03/25/26	JRB	30 - 150 %

Parameter	Result	RL/ PQL	Units	Dilution	Date/Time	By	Reference
<u>TCLP Pesticides</u>							
4,4' -DDD	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
4,4' -DDE	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
4,4' -DDT	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
a-BHC	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Alachlor	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Aldrin	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
b-BHC	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Chlordane	ND	5.0	ug/L	10	03/25/26	AW	SW8081B
d-BHC	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Dieldrin	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
Endosulfan I	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Endosulfan II	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
Endosulfan Sulfate	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
Endrin	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
Endrin Aldehyde	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
g-BHC (Lindane)	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Heptachlor	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Heptachlor epoxide	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Methoxychlor	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Toxaphene	ND	20	ug/L	10	03/25/26	AW	SW8081B
<u>QA/QC Surrogates</u>							
%DCBP (Surrogate Rec)	94		%	10	03/25/26	AW	30 - 150 %
%DCBP (Surrogate Rec) (Confirmation)	89		%	10	03/25/26	AW	30 - 150 %
%TCMX (Surrogate Rec)	77		%	10	03/25/26	AW	30 - 150 %
%TCMX (Surrogate Rec) (Confirmation)	85		%	10	03/25/26	AW	30 - 150 %
<u>TCLP Volatiles</u>							
1,1-Dichloroethene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
1,2-Dichloroethane	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
1,4-Dichlorobenzene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Benzene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Carbon tetrachloride	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Chlorobenzene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Chloroform	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Methyl ethyl ketone	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Tetrachloroethene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Trichloroethene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Vinyl chloride	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
<u>QA/QC Surrogates</u>							
% 1,2-dichlorobenzene-d4 (10x)	101		%	10	03/24/26	V	70 - 130 %
% Bromofluorobenzene (10x)	98		%	10	03/24/26	V	70 - 130 %
% Dibromofluoromethane (10x)	100		%	10	03/24/26	V	70 - 130 %
% Toluene-d8 (10x)	99		%	10	03/24/26	V	70 - 130 %
<u>TCLP Acid/Base-Neutral</u>							
1,4-Dichlorobenzene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
2,4,5-Trichlorophenol	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
2,4,6-Trichlorophenol	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270

Parameter	Result	RL/ PQL	Units	Dilution	Date/Time	By	Reference
2,4-Dinitrotoluene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
2-Methylphenol (o-cresol)	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
3&4-Methylphenol (m&p-Cresol)	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Hexachlorobenzene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Hexachlorobutadiene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Hexachloroethane	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Nitrobenzene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Pentachlorophenol	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Pyridine	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
<u>QA/QC Surrogates</u>							
% 2,4,6-Tribromophenol	185		%	1	03/28/26	MR	15 - 110 %
% 2-Fluorobiphenyl	67		%	1	03/28/26	MR	30 - 130 %
% 2-Fluorophenol	74		%	1	03/28/26	MR	15 - 110 %
% Nitrobenzene-d5	68		%	1	03/28/26	MR	30 - 130 %
% Phenol-d5	78		%	1	03/28/26	MR	15 - 110 %
% Terphenyl-d14	96		%	1	03/28/26	MR	30 - 130 %

1 = This parameter is not certified by the primary accrediting authority (NY NELAC) for this matrix. NY NELAC does not offer certification for all parameters at this time.

3 = This parameter exceeds laboratory specified limits.

RL/PQL=Reporting/Practical Quantitation Level (Equivalent to NELAC LOQ, Limit of Quantitation) ND=Not Detected at RL/PQL
BRL=Below Reporting Level L=Biased Low

QA/QC Surrogates: Surrogates are compounds (preceded with a %) added by the lab to determine analysis efficiency. Surrogate results(%) listed in the report are not "detected" compounds.

Comments:

The regulatory hold time for pH is immediately. This pH was performed in the laboratory and may be considered outside of hold-time.

Corrosivity is based solely on the pH analysis performed above.

Paint Filter Test:

Pass = no free liquids were detected. Fail = free liquids were detected.

Semi-Volatile Comment:

One of the surrogate recoveries was above the upper range due to sample matrix interference. The other surrogates associated with this sample were within QA/QC criteria. No significant bias is suspected.

All soils, solids and sludges are reported on a dry weight basis unless otherwise noted in the sample comments.

If you are the client above and have any questions concerning this testing, please do not hesitate to contact Phoenix Client Services at ext.200. The contents of this report cannot be discussed with anyone other than the client listed above without their written consent.



Phyllis Shiller, Laboratory Director

March 30, 2026

Reviewed and Released by: Anil Makol, Project Manager



Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel. (860) 645-1102



Analysis Report

March 30, 2026

FOR: Attn: Mr James F Blasting, P.G.
James Environmental Management
134 Greenridge Drive
Manlius, NY 13104

Sample Information

Matrix: SEDIMENT
Location Code: JAMES-ENV
Rush Request: Standard
P.O.#:

Custody Information

Collected by:
Received by: B
Analyzed by: see "By" below

Date

03/19/26 12:00
03/23/26 14:35

Time

Laboratory Data

SDG ID: GCV57151
Phoenix ID: CV57152

Project ID: 61 EDSON SEDIMENT BASINS
Client ID: CHAPMAN-03192026

Parameter	Result	RL/ PQL	Units	Dilution	Date/Time	By	Reference
TCLP Silver	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Arsenic	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Barium	0.51	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Cadmium	0.057	0.050	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Chromium	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Mercury	< 0.0002	0.0002	mg/L	1	03/24/26	ZT	SW846 1311/7470
TCLP Lead	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Selenium	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010D
TCLP Metals Digestion	Completed				03/24/26	GW/SD	SW3010A
Percent Solid	47		%		03/23/26	CV	SW846-%Solid
Corrosivity	Negative		Pos/Neg	1	03/23/26	KL1	SW846-Corr
pH at 20.5C - Soil	7.75	1.00	pH Units	1	03/23/26 23:13	KL1	SW846 9045D
Paint Filter Test	Passed		PASS/FAIL		03/23/26	O	SW9095B
TCLP Digestion Mercury	Completed				03/24/26	GW/SD	SW7470A
TCLP Herbicides Extraction	Completed				03/24/26	CV/D	SW8150 MOD
TCLP Extraction for Metals	Completed				03/23/26	GW	SW1311
TCLP Extraction for Organics	Completed				03/23/26	GW	SW1311
TCLP Pesticides Extraction	Completed				03/24/26	T/T	SW3510C
TCLP Semi-Volatile Extraction	Completed				03/27/26	T/T	SW3510C
TCLP Extraction Volatiles	Completed				03/23/26	CV	SW1311

TCLP Herbicides

2,4,5-TP (Silvex)	ND	50	ug/L	10	03/25/26	JRB	SW846 1311/8151
2,4-D	ND	100	ug/L	10	03/25/26	JRB	SW846 1311/8151

QA/QC Surrogates

% DCAA	84		%	10	03/25/26	JRB	30 - 150 %
% DCAA (Confirmation)	70		%	10	03/25/26	JRB	30 - 150 %

Parameter	Result	RL/ PQL	Units	Dilution	Date/Time	By	Reference
<u>TCLP Pesticides</u>							
4,4' -DDD	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
4,4' -DDE	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
4,4' -DDT	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
a-BHC	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Alachlor	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Aldrin	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
b-BHC	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Chlordane	ND	5.0	ug/L	10	03/25/26	AW	SW8081B
d-BHC	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Dieldrin	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
Endosulfan I	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Endosulfan II	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
Endosulfan Sulfate	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
Endrin	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
Endrin Aldehyde	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
g-BHC (Lindane)	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Heptachlor	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Heptachlor epoxide	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Methoxychlor	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Toxaphene	ND	20	ug/L	10	03/25/26	AW	SW8081B
<u>QA/QC Surrogates</u>							
%DCBP (Surrogate Rec)	93		%	10	03/25/26	AW	30 - 150 %
%DCBP (Surrogate Rec) (Confirmation)	91		%	10	03/25/26	AW	30 - 150 %
%TCMX (Surrogate Rec)	76		%	10	03/25/26	AW	30 - 150 %
%TCMX (Surrogate Rec) (Confirmation)	85		%	10	03/25/26	AW	30 - 150 %
<u>TCLP Volatiles</u>							
1,1-Dichloroethene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
1,2-Dichloroethane	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
1,4-Dichlorobenzene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Benzene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Carbon tetrachloride	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Chlorobenzene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Chloroform	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Methyl ethyl ketone	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Tetrachloroethene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Trichloroethene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Vinyl chloride	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
<u>QA/QC Surrogates</u>							
% 1,2-dichlorobenzene-d4 (10x)	100		%	10	03/24/26	V	70 - 130 %
% Bromofluorobenzene (10x)	99		%	10	03/24/26	V	70 - 130 %
% Dibromofluoromethane (10x)	98		%	10	03/24/26	V	70 - 130 %
% Toluene-d8 (10x)	100		%	10	03/24/26	V	70 - 130 %
<u>TCLP Acid/Base-Neutral</u>							
1,4-Dichlorobenzene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
2,4,5-Trichlorophenol	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
2,4,6-Trichlorophenol	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270

Parameter	Result	RL/ PQL	Units	Dilution	Date/Time	By	Reference
2,4-Dinitrotoluene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
2-Methylphenol (o-cresol)	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
3&4-Methylphenol (m&p-Cresol)	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Hexachlorobenzene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Hexachlorobutadiene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Hexachloroethane	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Nitrobenzene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Pentachlorophenol	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Pyridine	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
<u>QA/QC Surrogates</u>							
% 2,4,6-Tribromophenol	108		%	1	03/28/26	MR	15 - 110 %
% 2-Fluorobiphenyl	70		%	1	03/28/26	MR	30 - 130 %
% 2-Fluorophenol	59		%	1	03/28/26	MR	15 - 110 %
% Nitrobenzene-d5	70		%	1	03/28/26	MR	30 - 130 %
% Phenol-d5	59		%	1	03/28/26	MR	15 - 110 %
% Terphenyl-d14	97		%	1	03/28/26	MR	30 - 130 %

1 = This parameter is not certified by the primary accrediting authority (NY NELAC) for this matrix. NY NELAC does not offer certification for all parameters at this time.

RL/PQL=Reporting/Practical Quantitation Level (Equivalent to NELAC LOQ, Limit of Quantitation) ND=Not Detected at RL/PQL
BRL=Below Reporting Level L=Biased Low

QA/QC Surrogates: Surrogates are compounds (preceded with a %) added by the lab to determine analysis efficiency. Surrogate results(%) listed in the report are not "detected" compounds.

Comments:

The regulatory hold time for pH is immediately. This pH was performed in the laboratory and may be considered outside of hold-time.

Corrosivity is based solely on the pH analysis performed above.

Paint Filter Test:

Pass = no free liquids were detected. Fail = free liquids were detected.

All soils, solids and sludges are reported on a dry weight basis unless otherwise noted in the sample comments.

If you are the client above and have any questions concerning this testing, please do not hesitate to contact Phoenix Client Services at ext.200. The contents of this report cannot be discussed with anyone other than the client listed above without their written consent.



Phyllis Shiller, Laboratory Director

March 30, 2026

Reviewed and Released by: Anil Makol, Project Manager



Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel. (860) 645-1102



Analysis Report

March 30, 2026

FOR: Attn: Mr James F Blasting, P.G.
James Environmental Management
134 Greenridge Drive
Manlius, NY 13104

Sample Information

Matrix: SEDIMENT
Location Code: JAMES-ENV
Rush Request: Standard
P.O.#:

Custody Information

Collected by:
Received by: B
Analyzed by: see "By" below

Date

03/19/26
03/23/26

Time

12:30
14:35

Laboratory Data

SDG ID: GCV57151
Phoenix ID: CV57153

Project ID: 61 EDSON SEDIMENT BASINS
Client ID: RTS-03192026

Parameter	Result	RL/ PQL	Units	Dilution	Date/Time	By	Reference
TCLP Silver	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Arsenic	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Barium	0.58	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Cadmium	0.087	0.050	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Chromium	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Mercury	< 0.0002	0.0002	mg/L	1	03/24/26	ZT	SW846 1311/7470
TCLP Lead	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010
TCLP Selenium	< 0.10	0.10	mg/L	1	03/24/26	TH	SW846 1311/6010D
TCLP Metals Digestion	Completed				03/24/26	GW/SD	SW3010A
Percent Solid	76		%		03/23/26	CV	SW846-%Solid
Corrosivity	Negative		Pos/Neg	1	03/23/26	KL1	SW846-Corr
pH at 20.5C - Soil	7.81	1.00	pH Units	1	03/23/26 23:13	KL1	SW846 9045D
Paint Filter Test	Passed		PASS/FAIL		03/23/26	O	SW9095B
TCLP Digestion Mercury	Completed				03/24/26	GW/SD	SW7470A
TCLP Herbicides Extraction	Completed				03/24/26	CV/D	SW8150 MOD
TCLP Extraction for Metals	Completed				03/23/26	GW	SW1311
TCLP Extraction for Organics	Completed				03/23/26	GW	SW1311
TCLP Pesticides Extraction	Completed				03/24/26	T/T	SW3510C
TCLP Semi-Volatile Extraction	Completed				03/27/26	T/T	SW3510C
TCLP Extraction Volatiles	Completed				03/23/26	CV	SW1311

TCLP Herbicides

2,4,5-TP (Silvex)	ND	50	ug/L	10	03/25/26	JRB	SW846 1311/8151
2,4-D	ND	100	ug/L	10	03/25/26	JRB	SW846 1311/8151

QA/QC Surrogates

% DCAA	68		%	10	03/25/26	JRB	30 - 150 %
% DCAA (Confirmation)	60		%	10	03/25/26	JRB	30 - 150 %

Parameter	Result	RL/ PQL	Units	Dilution	Date/Time	By	Reference
<u>TCLP Pesticides</u>							
4,4' -DDD	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
4,4' -DDE	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
4,4' -DDT	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
a-BHC	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Alachlor	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Aldrin	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
b-BHC	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Chlordane	ND	5.0	ug/L	10	03/25/26	AW	SW8081B
d-BHC	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Dieldrin	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
Endosulfan I	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Endosulfan II	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
Endosulfan Sulfate	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
Endrin	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
Endrin Aldehyde	ND	1.0	ug/L	10	03/25/26	AW	SW8081B
g-BHC (Lindane)	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Heptachlor	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Heptachlor epoxide	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Methoxychlor	ND	0.50	ug/L	10	03/25/26	AW	SW8081B
Toxaphene	ND	20	ug/L	10	03/25/26	AW	SW8081B
<u>QA/QC Surrogates</u>							
%DCBP (Surrogate Rec)	90		%	10	03/25/26	AW	30 - 150 %
%DCBP (Surrogate Rec) (Confirmation)	83		%	10	03/25/26	AW	30 - 150 %
%TCMX (Surrogate Rec)	76		%	10	03/25/26	AW	30 - 150 %
%TCMX (Surrogate Rec) (Confirmation)	84		%	10	03/25/26	AW	30 - 150 %
<u>TCLP Volatiles</u>							
1,1-Dichloroethene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
1,2-Dichloroethane	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
1,4-Dichlorobenzene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Benzene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Carbon tetrachloride	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Chlorobenzene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Chloroform	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Methyl ethyl ketone	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Tetrachloroethene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Trichloroethene	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
Vinyl chloride	ND	50	ug/L	10	03/24/26	V	SW846 1311/8260
<u>QA/QC Surrogates</u>							
% 1,2-dichlorobenzene-d4 (10x)	100		%	10	03/24/26	V	70 - 130 %
% Bromofluorobenzene (10x)	98		%	10	03/24/26	V	70 - 130 %
% Dibromofluoromethane (10x)	94		%	10	03/24/26	V	70 - 130 %
% Toluene-d8 (10x)	99		%	10	03/24/26	V	70 - 130 %
<u>TCLP Acid/Base-Neutral</u>							
1,4-Dichlorobenzene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
2,4,5-Trichlorophenol	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
2,4,6-Trichlorophenol	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270

Parameter	Result	RL/ PQL	Units	Dilution	Date/Time	By	Reference
2,4-Dinitrotoluene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
2-Methylphenol (o-cresol)	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
3&4-Methylphenol (m&p-Cresol)	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Hexachlorobenzene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Hexachlorobutadiene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Hexachloroethane	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Nitrobenzene	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Pentachlorophenol	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
Pyridine	ND	83	ug/L	1	03/28/26	MR	SW-846 1311/8270
<u>QA/QC Surrogates</u>							
% 2,4,6-Tribromophenol	105		%	1	03/28/26	MR	15 - 110 %
% 2-Fluorobiphenyl	76		%	1	03/28/26	MR	30 - 130 %
% 2-Fluorophenol	70		%	1	03/28/26	MR	15 - 110 %
% Nitrobenzene-d5	78		%	1	03/28/26	MR	30 - 130 %
% Phenol-d5	63		%	1	03/28/26	MR	15 - 110 %
% Terphenyl-d14	96		%	1	03/28/26	MR	30 - 130 %

1 = This parameter is not certified by the primary accrediting authority (NY NELAC) for this matrix. NY NELAC does not offer certification for all parameters at this time.

RL/PQL=Reporting/Practical Quantitation Level (Equivalent to NELAC LOQ, Limit of Quantitation) ND=Not Detected at RL/PQL
BRL=Below Reporting Level L=Biased Low

QA/QC Surrogates: Surrogates are compounds (preceded with a %) added by the lab to determine analysis efficiency. Surrogate results(%) listed in the report are not "detected" compounds.

Comments:

The regulatory hold time for pH is immediately. This pH was performed in the laboratory and may be considered outside of hold-time.

Corrosivity is based solely on the pH analysis performed above.

Paint Filter Test:

Pass = no free liquids were detected. Fail = free liquids were detected.

All soils, solids and sludges are reported on a dry weight basis unless otherwise noted in the sample comments.

If you are the client above and have any questions concerning this testing, please do not hesitate to contact Phoenix Client Services at ext.200. The contents of this report cannot be discussed with anyone other than the client listed above without their written consent.



Phyllis Shiller, Laboratory Director

March 30, 2026

Reviewed and Released by: Anil Makol, Project Manager



Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel. (860) 645-1102



QA/QC Report

March 30, 2026

QA/QC Data

SDG I.D.: GCV57151

Parameter	Blank	Blk RL	Sample Result	Dup Result	Dup RPD	LCS %	LCSD %	LCS RPD	MS %	MSD %	MS RPD	% Rec Limits	% RPD Limits
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QA/QC Batch 831763 (mg/L), QC Sample No: CV57433 (CV57151, CV57152, CV57153)

Mercury - Water	BRL	0.0002	<0.0002	<0.0002	NC	103			102			80 - 120	20
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Comment:

Additional Mercury Criteria: LCS acceptance range is 80-120% for aqueous and for soils the acceptance range is set by vendor limits. MS acceptance range is 75-125% for aqueous and 80-120% for soils.

QA/QC Batch 831766 (mg/L), QC Sample No: CV57086 (CV57151, CV57152)

ICP Metals - TCLP Extraction

Arsenic	BRL	0.01	<0.01	<0.01	NC	99.4	99.1	0.3	100			80 - 120	20
Barium	BRL	0.01	0.04	0.04	NC	98.8	98.9	0.1	98.8			80 - 120	20
Cadmium	BRL	0.005	0.021	0.021	NC	94.5	94.8	0.3	92.0			80 - 120	20
Chromium	BRL	0.010	24.0	24.0	0	96.1	96.7	0.6	NC			80 - 120	20
Lead	BRL	0.010	2.90	2.88	0.70	96.1	96.2	0.1	97.5			80 - 120	20
Selenium	BRL	0.04	<0.04	<0.04	NC	105	105	0.0	104			80 - 120	20
Silver	BRL	0.010	<0.005	<0.010	NC	102	102	0.0	103			80 - 120	20

Comment:

Additional Criteria: LCS acceptance range is 80-120% for aqueous and for soils the acceptance range is set by vendor limits. MS acceptance range 75-125%.

QA/QC Batch 831767 (mg/L), QC Sample No: CV57349 (CV57153)

ICP Metals - TCLP Extraction

Arsenic	BRL	0.10	<0.10	<0.10	NC	106	107	0.9	103			80 - 120	20
Barium	BRL	0.10	0.51	0.44	NC	102	103	1.0	101			80 - 120	20
Cadmium	BRL	0.050	<0.050	<0.050	NC	101	103	2.0	102			80 - 120	20
Chromium	BRL	0.10	<0.10	<0.10	NC	101	103	2.0	102			80 - 120	20
Lead	BRL	0.10	<0.10	<0.10	NC	101	103	2.0	103			80 - 120	20
Selenium	BRL	0.10	<0.10	<0.10	NC	110	112	1.8	103			80 - 120	20
Silver	BRL	0.10	<0.10	<0.10	NC	105	107	1.9	102			80 - 120	20

Comment:

Additional Criteria: LCS acceptance range is 80-120% for aqueous and for soils the acceptance range is set by vendor limits. MS acceptance range 75-125%.



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QA/QC Report

March 30, 2026

QA/QC Data

SDG I.D.: GCV57151

Parameter	Blank	Blk RL	Sample Result	Dup Result	Dup RPD	LCS %	LCSD %	LCS RPD	MS %	MSD %	MS RPD	% Rec Limits	% RPD Limits
QA/QC Batch 831735 (PH), QC Sample No: CV57345 (CV57151, CV57152, CV57153)													
pH			6.27	6.31	0.60	101						85 - 115	20



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QA/QC Report

March 30, 2026

QA/QC Data

SDG I.D.: GCV57151

Parameter	Blank	Blk RL	LCS %	LCSD %	LCS RPD	MS %	MSD %	MS RPD	% Rec Limits	% RPD Limits
QA/QC Batch 831761 (ug/L), QC Sample No: CV56864 (CV57151, CV57152, CV57153)										
<u>TCLP Herbicides</u>										
2,4,5-TP (Silvex)	ND	50	101	107	5.8	102			40 - 140	20
2,4-D	ND	100	97	105	7.9	100			40 - 140	20
% DCAA	74	%	73	77	5.3	76			30 - 150	20
% DCAA (Confirmation)	62	%	65	61	6.3	61			30 - 150	20

Comment:

8151 additional criteria: (LCS/LCSD)10% of compounds can be outside of acceptance criteria as long as recovery is at least 10%. LCS acceptance range is 40-140% MS acceptance range 30-150%.

QA/QC Batch 831983 (ug/L), QC Sample No: CV57153 (CV57151, CV57152, CV57153)

Pesticides

4,4' -DDD	ND	0.25	87	83	4.7	97			40 - 140	20
4,4' -DDE	ND	0.25	88	83	5.8	93			40 - 140	20
4,4' -DDT	ND	0.25	83	81	2.4	88			40 - 140	20
a-BHC	ND	0.15	108	105	2.8	103			40 - 140	20
Alachlor	ND	0.50	NA	NA	NC	NA			40 - 140	20
Aldrin	ND	0.15	85	77	9.9	86			40 - 140	20
b-BHC	ND	0.15	117	105	10.8	116			40 - 140	20
Chlordane	ND	5.0	90	88	2.2	96			40 - 140	20
d-BHC	ND	0.50	110	97	12.6	109			40 - 140	20
Dieldrin	ND	0.15	92	86	6.7	97			40 - 140	20
Endosulfan I	ND	0.50	85	87	2.3	87			40 - 140	20
Endosulfan II	ND	0.50	93	96	3.2	100			40 - 140	20
Endosulfan sulfate	ND	0.50	92	91	1.1	98			40 - 140	20
Endrin	ND	0.50	89	80	10.7	84			40 - 140	20
Endrin aldehyde	ND	0.50	91	95	4.3	102			40 - 140	20
g-BHC	ND	0.15	104	92	12.2	101			40 - 140	20
Heptachlor	ND	0.50	98	88	10.8	99			40 - 140	20
Heptachlor epoxide	ND	0.50	93	90	3.3	100			40 - 140	20
Methoxychlor	ND	0.50	85	88	3.5	87			40 - 140	20
Toxaphene	ND	20	NA	NA	NC	NA			40 - 140	20
% DCBP	95	%	93	91	2.2	101			30 - 150	20
% DCBP (Confirmation)	84	%	88	84	4.7	92			30 - 150	20
% TCMX	76	%	82	72	13.0	78			30 - 150	20
% TCMX (Confirmation)	84	%	88	80	9.5	87			30 - 150	20

Comment:

8081 additional criteria: (LCS/LCSD)10% of compounds can be outside of acceptance criteria as long as recovery is at least 10%. LCS acceptance range is 40-140% MS acceptance range 30-150%.

QA/QC Batch 832640 (ug/L), QC Sample No: CV57151 (CV57151, CV57152, CV57153)

Semivolatiles - TCLP

1,4-Dichlorobenzene	ND	17	53	50	5.8	64			40 - 140	20
2,4,5-Trichlorophenol	ND	17	78	68	13.7	91			40 - 140	20

QA/QC Data

SDG I.D.: GCV57151

Parameter	Blank	Blk RL	LCS %	LCSD %	LCS RPD	MS %	MSD %	MS RPD	% Rec Limits	% RPD Limits
2,4,6-Trichlorophenol	ND	17	76	68	11.1	93			30 - 130	20
2,4-Dinitrotoluene	ND	58	79	75	5.2	96			30 - 130	20
2-Methylphenol (o-cresol)	ND	17	71	69	2.9	86			40 - 140	20
3&4-Methylphenol (m&p-cresol)	ND	17	74	68	8.5	89			30 - 130	20
Hexachlorobenzene	ND	58	73	68	7.1	92			40 - 140	20
Hexachlorobutadiene	ND	58	63	52	19.1	73			40 - 140	20
Hexachloroethane	ND	58	55	52	5.6	62			40 - 140	20
Nitrobenzene	ND	58	65	62	4.7	85			40 - 140	20
Pentachlorophenol	ND	58	71	70	1.4	86			30 - 130	20
Pyridine	ND	83	62	54	13.8	68			40 - 140	20
% 2,4,6-Tribromophenol	95	%	87	81	7.1	111			15 - 110	20 m
% 2-Fluorobiphenyl	75	%	66	60	9.5	79			30 - 130	20
% 2-Fluorophenol	65	%	55	52	5.6	60			15 - 110	20
% Nitrobenzene-d5	78	%	63	61	3.2	75			30 - 130	20
% Phenol-d5	58	%	56	73	26.4	61			15 - 110	20 r
% Terphenyl-d14	89	%	80	72	10.5	92			30 - 130	20

Comment:

Additional 8270 criteria: 10% of compounds can be outside of acceptance criteria as long as recovery is at least 10%. (Acid surrogates acceptance range for aqueous samples: 15-110%, for soils 30-130%)

QA/QC Batch 832010 (ug/L), QC Sample No: CV57153 (CV57151 (10X) , CV57152 (10X) , CV57153 (10X))

Volatiles - TCLP

1,1-Dichloroethene	ND	5.0	103	100	3.0	108	109	0.9	70 - 130	20
1,2-Dichloroethane	ND	0.60	98	99	1.0	103	102	1.0	70 - 130	20
1,4-Dichlorobenzene	ND	1.0	98	98	0.0	100	100	0.0	70 - 130	20
Benzene	ND	0.70	101	99	2.0	106	105	0.9	70 - 130	20
Carbon tetrachloride	ND	5.0	102	102	0.0	108	108	0.0	70 - 130	20
Chlorobenzene	ND	1.0	98	98	0.0	102	102	0.0	70 - 130	20
Chloroform	ND	5.0	102	100	2.0	103	105	1.9	70 - 130	20
Methyl ethyl ketone	ND	5.0	97	103	6.0	101	105	3.9	70 - 130	20
Tetrachloroethene	ND	1.0	100	97	3.0	106	106	0.0	70 - 130	20
Trichloroethene	ND	5.0	102	100	2.0	106	106	0.0	70 - 130	20
Vinyl chloride	ND	5.0	99	99	0.0	108	110	1.8	70 - 130	20
% 1,2-dichlorobenzene-d4	101	%	101	103	2.0	102	99	3.0	70 - 130	20
% Bromofluorobenzene	98	%	100	101	1.0	101	99	2.0	70 - 130	20
% Dibromofluoromethane	102	%	103	102	1.0	107	105	1.9	70 - 130	20
% Toluene-d8	99	%	100	99	1.0	102	99	3.0	70 - 130	20

Comment:

Additional 8260 criteria: 10% of LCS/LCSD compounds can be outside of acceptance criteria as long as recovery is 40-160%.

m = This parameter is outside laboratory MS/MSD specified recovery limits.

r = This parameter is outside laboratory RPD specified recovery limits.

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

- RPD - Relative Percent Difference
- LCS - Laboratory Control Sample
- LCSD - Laboratory Control Sample Duplicate
- MS - Matrix Spike
- MS Dup - Matrix Spike Duplicate
- NC - No Criteria
- Intf - Interference
- (ISO) - Isotope Dilution


Phyllis Shiller, Laboratory Director
March 30, 2026

Monday, March 30, 2026

Criteria: None
State: NY

Sample Criteria Exceedances Report

GCV57151 - JAMES-ENV

SampNo	Acode	Phoenix Analyte	Criteria	Result	RL	Criteria	RL Criteria	Analysis Units
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*** No Data to Display ***

Phoenix Laboratories does not assume responsibility for the data contained in this exceedance report. It is provided as an additional tool to identify requested criteria exceedences. All efforts are made to ensure the accuracy of the data (obtained from appropriate agencies). A lack of exceedence information does not necessarily suggest conformance to the criteria. It is ultimately the site professional's responsibility to determine appropriate compliance.



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Analysis Comments

March 30, 2026

SDG I.D.: GCV57151

The following analysis comments are made regarding exceptions to criteria not already noted in the Analysis Report or QA/QC Report:

PEST Narration

AU-ECD90 03/25/26-1: CV57151, CV57152, CV57153

The following Continuing Calibration compounds did not meet % deviation criteria:

Samples: CV57151, CV57152, CV57153

Preceding CC 325B027 - Endrin 33%L (20%)

Succeeding CC 325B037 - Endrin 28%L (20%), Endrin aldehyde 26%H (20%), Methoxychlor 25%L (20%)

A low "1A" standard was run after the samples to demonstrate capability to detect any compounds outside of the CC acceptance criteria. All reported samples were ND for the affected compounds.

SVOA Narration

CHEM28 03/28/26-1: CV57151, CV57152, CV57153

For 8270 full list, the DDT breakdown and pentachlorophenol & benzidine peak tailing were evaluated in the DFTPP tune and were found to be in control.

For 8270 BN list, benzidine peak tailing was evaluated in the DFTPP tune and was found to be in control.

The following Continuing Calibration compounds did not meet % deviation criteria: % 2-Fluorophenol 27%L (20%)

The following Continuing Calibration compounds did not meet Maximum % deviation criteria: None.

Up to eight compounds can be outside of ICAL %RSD criteria and up to sixteen compounds can be outside of CCAL %Dev criteria if less than 40%.



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NY Temperature Narration

March 30, 2026

SDG I.D.: GCV57151

The samples in this delivery group were received at 13.6°C.
(Note acceptance criteria for relevant matrices is above freezing up to 6°C)

APPENDIX B
HEALTH AND SAFETY PLAN

*HEALTH & SAFETY PLAN
CORRECTIVE MEASURE WORK PLAN
FORMER WARD PRODUCTS SITE
61 EDSON STREET, AMSTERDAM, NEW YORK
NYSDEC SITE NO. 429004*

28 April 2026

Prepared for:

61 Edson Street, LLC
61 Edson Street
Amsterdam, NY

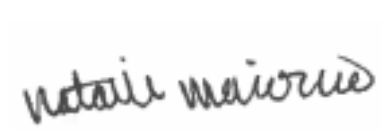
Prepared by:

James Environmental Management
134 Greenridge Drive
Manlius, NY 13104

JEM Project No. 260403

HEALTH AND SAFETY PLAN

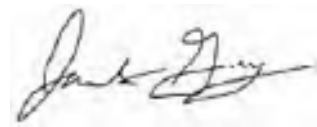
PREPARED BY:



Date: 4/28/26

Health and Safety Officer

APPROVED BY:



Date: 4/28/26

Project Manager

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1.0 INTRODUCTION

This document represents the Health and Safety Plan (HASP), which is Appendix B of the Corrective Measures Work Plan (CMWP) for sediment basin cleanout related to the Former Ward Products Site on Edson Street in Amsterdam, NY (hereinafter the “Site”).

This HASP summarizes the intended field activities at the Site and chemicals of concern expected to be present. The HASP then describes the procedures to be followed in conducting the field operations, given the existing data concerning the Site.

2.0 FIELD ACTIVITIES AND CHEMICALS OF CONCERN

A description of the field activities to be conducted is described in the associated CMWP. Planned Site activities include removal and off-site disposal of sediment in three basins located downslope of the 61 Edson property. Site activities are planned for summer 2026.

Previous activities performed at the Site identified metals as the only chemicals of concern related to this corrective measure.

Identified metals of concern in basin sediments are cadmium, chromium, nickel and zinc.

3.0 POTENTIAL CHEMICAL AND PHYSICAL HAZARDS

Metals are the only concern related to field activities. Since the field activities involve disturbance of sediment, inhalation, dermal contact and ingestion are considered the potential pathways of concern.

A **‘no visible dust’** requirement has been established for site activities. Dust generation is not expected as the sediment is contained to sediment basins and is wet. If any visible dust is observed, the area will be sprayed with water to eliminate dust generation. Monitoring, other than constant visual monitoring, is not required.

To address potential dermal contact & ingestion, a **“No Skin Contact Policy”** will also be followed for all site activities to avoid direct skin contact with sediments including items or equipment that may have contacted sediments unless they have been properly decontaminated. Gloves and other protective equipment (pants, long-sleeved shirts, etc.), based on specific activities, shall be worn whenever there is a potential for contact or contamination. Additionally, no potentially contaminated or soiled items, PPE, or footwear shall be taken off site unless properly decontaminated. It is anticipated that rubber over boots or disposable shoe covers will be worn by all on-site personnel within established work zones.

Physical hazards may also be encountered at the Site during mobilization and excavation activities (including establishing access routes). Table 3-1 lists potential physical hazards that may be encountered during the field activities. This list has been compiled based on planned activities and potential site conditions.

Table 3-1
Physical Safety Concerns
Former Ward Products Site, Edson Street, Amsterdam, NY

Hazard	Description	Location	Procedures Used to Monitor/Reduce Hazard
Underground Utilities	Electric, Gas, Sanitary and Storm Sewer	Throughout	Verify number and location of all utilities prior to site operations.
Heat Stress	Hot Weather Activities	Throughout	Protections and monitoring as designated in this HASP
Cold Weather	Frost-bite, Hypothermia	Throughout	Wear appropriate clothing. Provide warm shelter area and liquids. Monitor worker physical conditions.
Heavy Equipment	Excavator	Select Areas	All personnel should be cautious around heavy equipment. Make eye contact with operator prior to entering the work area.
Weather	Lightning, Heavy Rain or Snow	Throughout	During lightning, cease all heavy equipment activities. During cold weather, beware of wet and slippery conditions.
Noise	Heavy Equipment	Select Areas	Use appropriate earplugs or earmuffs, during equipment operation.
Overhead Electrical Equipment	Overhead Lines	Select Areas with Heavy Equipment	Maintain at least ten feet of clearance from any overhead lines.
Struck by Vehicle	Work in Traffic Areas	Parking Lots	Block all work areas off with reflective cones.

4.0 HAZARDS EVALUATION

The primary compounds of concern in the work areas are metals. Visual monitoring and good work practices will be used during the field activities to ensure that appropriate protection is used and to minimize potential exposures. Constant visual monitoring for dust will be conducted and if any dust is generated, water will be applied to the work area to eliminate dust generation. Dust is not anticipated since sediments are located in basins and are wet.

4.1 PHYSICAL HAZARDS

To minimize hazards, standard safety procedures will be followed at all times. The primary physical safety hazards for this project include, but are not limited to:

- common slip, trip, and fall hazards;
- overhead and buried hazards;
- heavy equipment operation;
- excavation safety;
- electrical and power equipment;
- vehicular traffic;
- lifting excessive weights;
- sampling hazards;
- excessive noise levels;
- heat and cold stress; and
- other hazards.

4.1.1 Common Slip, Trip, Fall Hazards

Personnel should be aware of common slip, trip or fall hazards that are encountered frequently in industrial and project environments. Heightened awareness and emphasis on good housekeeping are the most effective ways to prevent accidents.

4.1.2 Overhead and Buried Hazards

Utility lines, both above and below ground, may pose a safety hazard for site personnel during soil boring or other heavy equipment operations. If overhead utilities have been identified on site as a hazard, the equipment operator must maintain a safe clearance between the lines and the equipment at all times during work operations. High voltage lines require greater clearance distances. As a safe work practice, equipment operators will maintain a 10-foot clearance between equipment and power lines or other energized sources unless the source is greater than 350 KV, in which case 29CFR 1910.180(j) must be applied. The location of buried utilities lines must be determined prior to the start of work activities. Overhead and buried utility and electrical lines may be a concern during all activities. These concerns will be addressed as part of the daily safety meeting.

4.1.3 *Heavy Equipment Operation*

Heavy equipment presents multiple hazards while in operation. Excessive noise, boom raising, lowering and swing, cable and hook damage and operator error may result in injuries. To minimize potential accidents, the following safety measures will be required for all operations:

- All operators of equipment used on-site will be familiar with the requirement for inspection and operation of such equipment. The operator will be required to demonstrate proficiency in safe operation of the equipment.
- All excavation shall be performed from a stable ground position, if unable to locate on level ground, the equipment shall be appropriately checked, blocked and braced prior to operation.
- Daily inspections of the excavation area shall be made by a person competent in heavy equipment safety. The inspector shall note the safety of the area and confirm the location of utilities.
- Before excavation, the existence and location of utility lines (electric and gas) will be determined by the Site owner. If the knowledge is not available, an appropriate device, such as a cable avoiding tool, will be used to locate the services line(s).
- If equipment is located in the vicinity of overhead power lines, a distance of ten-feet must be maintained between the lines and any point on the equipment.
- Daily inspection of heavy machinery must be conducted and documented by the operator prior to each day's operation.

4.1.4 Tools - Hand and Power

Hand and power tools may be utilized as part of this work. All tools used during field activities will conform to the standards set both in OSHA 29CFR-1926.300 - 1926.305.

To minimize the potential for any safety related accidents, the following measures will be required:

- All hand and power tools shall be maintained in a safe condition;
- Power-operated tools shall be equipped with protective guard when in use;
- All hand-held power tools shall be equipped with a constant pressure switch that will shut off the power when the pressure is released;
- Hand tools shall be kept free of splinters or cracks;
- Electrical power tools shall have double-insulated type grounding;
- Electrical tools used in wet environments should have ground fault circuit interrupters (GFCI) in place;
- Electrical cords are not permitted for hoisting or lowering tools;
- All fuel powered tools shall be stopped while being refueled or maintained; and,
- When fuel powered tools are used in enclosed spaces the JEM air will be measured for oxygen and toxic gases.

4.1.5 Vehicular Traffic

Vehicular traffic in and around the facility may pose a hazard to project personnel. Precaution, including reflector vests and cones, should be taken when fieldwork is occurring near traveled areas.

4.1.6 Lifting Excessive Weights

Personnel should exercise caution when lifting any object that weighs greater than 50 pounds. For objects which weigh less than 50 pounds, proper lifting technique is essential to minimize the potential for injury. No excessively bulky objects should be lifted without assistance.

4.1.7 Excessive Noise Levels

Noise generated by heavy equipment may present a hazard during site operations. Excessive noise can physically damage the ear, hinder communications and startle or annoy the workers. All on-site personnel will wear hearing protection (earplugs or earmuffs) when working near heavy equipment and when noise levels may exceed 85dBA.

4.1.8 Heat Stress

Heat stress is the aggregate of environmental and physical work factors that make up the total heat load imposed on the body. The environmental factors of heat stress include air temperatures, humidity, radiant heat exchange, wind and water vapor pressure (related to humidity). Physical work adds to the total heat stress by producing metabolic heat in the body, proportional to the intensity of work.

Heavy physical labor can greatly increase the likelihood of heat fatigue, heat exhaustion and heatstroke, the latter being a life-threatening condition. Heat stress monitoring of personnel shall commence when the JEM temperature is 80°F (70°F if chemical protective clothing is worn) or above. Frequency of monitoring shall increase as the JEM temperature rises. Various control measures shall be employed if heat stress becomes a problem. These include:

- Provision for liquids to replace lost body fluids;
- Establishment of a work/rest schedule that allows for rest periods to cool down; and
- Training workers in the recognition and prevention of heat stress.

Specific steps to implement should JEM temperatures pose a hazard include:

- Site workers will be encouraged to drink plenty of water (or nutrient replacement drinks, such as Gatorade) throughout the day.
- On-site drinking water will be kept cool (50°-60°F) to encourage personnel to drink frequently;
- A work/rest schedule that will provide adequate rest periods for cooling down will be established as required;

- All personnel will be advised of the dangers and symptoms of heat stroke, heat exhaustion and heat cramps;
- Employees should be instructed to monitor themselves and co-workers for signs of heat stress and to take breaks as necessary;
- A shaded rest area must be provided. All breaks should take place in the shaded area;
- Employees shall not be assigned to other tasks during breaks;
- All employees shall be informed of the importance of adequate rest, acclimation and proper diet in the prevention of heat stress disorders; and
- The buddy system shall be practiced at all times on site.

The signs of heat stress disorders are described below.

Heat Cramps

Heat cramps are caused by heavy sweating and inadequate electrolyte replacement. Signs and symptoms include muscle spasms and pain in the hands, feet, and abdomen.

Heat Exhaustion

Heat exhaustion occurs from increased stress on various body organs, signs and symptoms include:

- Pale, cool, moist skin;
- Heavy sweating; and
- Dizziness, nausea, fainting.

Heat Stroke

Heat stroke is the most serious form of heat stress and should always be treated as a medical emergency. The body's temperature regulation system fails and the body temperature rapidly rises to critical levels. Immediate action must be taken to cool the body before serious injury or death occurs. Signs and symptoms of heat stroke include:

- Red, hot, unusually dry skin;
- Lack of, or reduced, perspiration;
- Nausea;

- Dizziness and confusion;
- Strong, rapid pulse and confusion; and,
- Coma.

4.1.9 Cold Stress

Cold and/or wet environmental conditions can place workers at risk of cold-related illness. Hypothermia can occur whenever temperatures are below 45°F. It is most common during wet, windy conditions, with temperatures between 40°F to 30°F. The principal cause of hypothermia in these conditions is loss of insulating properties of clothing due to moisture, coupled with heat loss due to wind and evaporation of moisture on the skin.

Frostbite, the other hazard associated with exposure to the cold, is the freezing of body tissue, which ranges from superficial freezing of surface skin layers to deep freezing of underlying tissue. Frostbite will only occur when JEM temperatures are below 32°F. The risk of frostbite increases as the temperature drops and the wind speed increases. Most cold-related worker fatalities have resulted from failure to escape low environmental temperatures or from immersion in low temperature water. The single most important aspect of life-threatening hypothermia is a fall in the deep core temperature of the body.

Site workers should be protected from exposure to cold so that the deep core temperature does not fall below 97°F. Lower body temperatures will very likely result in reduced mental alertness, reduction in rational decision making or loss of consciousness with the threat of fatal consequences. To prevent such occurrence, the following measures are recommended:

- Site workers shall wear warm clothing, such as mittens, heavy socks, etc. when the air temperature is below 45°F. Protective clothing or coveralls may be used to shield employees from the wind;
- When the air temperature is below 35°F, clothing for warmth, in addition to chemical protective clothing, will be worn by employees. This will include:
- Insulated suits, such as whole body thermal underwear;

- Wool socks or polypropylene socks to keep moisture off the feet;
- Insulated gloves and boots;
- Insulated head cover such as hard hat winter liner or knit cap; and
- Insulated jacket with wind and water-resistant outer layer.

At air temperatures below 35°F the following work practices are recommended:

- If the clothing of a site worker might become wet on the job site, the outer layer of clothing should be water impermeable;
- If a site worker's underclothing becomes wet in any way, they should change into dry clothing immediately. If the clothing becomes wet from sweating (and the employee is not comfortable) the employee may finish the task at hand prior to changing into dry clothing;
- Site workers should be provided with a warm (65°F or above) break area;
- Hot liquids such as soups or warm drinks should be provided in the break area. The intake of coffee and tea should be limited, due to their circulatory and diuretic effects;
- The buddy system shall be practiced at all times on site. Any site worker observed with severe shivering shall leave the work area immediately; and
- Site workers should be dressed in layers, with thinner lighter clothing next to the body.

5.0 PERSONNEL RESPONSIBILITIES

A Health and Safety Management Team has been developed for the site investigation field activities. The following responsibilities will be assigned to designated project personnel for all activities.

The Site Manager will act in a supervisory capacity over all employees who participate in the field activities specified in the CMWP. The Site Manager is responsible for ensuring that health and safety responsibilities are carried out in conjunction with the work plan. As part of these responsibilities, the Site Manager will distribute the HASP to all field team personnel and discuss the HASP prior to the start of field activities. All field personnel will sign the Health and Safety Plan Review Record shown in Figure 5-1, verifying that they have read and are familiar with the contents of this HASP.

The Site Safety Officer (SSO) will be responsible for oversight, implementation and compliance of applicable health and safety regulations on-site. The SSO has the following authority and responsibilities:

- responsibility for the field implementation, evaluation and any necessary field modifications of this HASP;
- responsibility for maintaining adequate supplies of all personal protective equipment, as well as calibration and maintenance of all HASP monitoring instruments;
- authority to suspend field activities due to imminent danger situations;
- responsibility to initiate emergency response activities;
- presentation and documentation of field safety briefings;
- maintain daily log of all on-site safety activities; and
- oversight of health and safety practices for subcontractors,
- The SSO shall conduct daily tailgate safety meetings with site personnel and contractors prior to commencement of each day's activities.

Figure 5-1
HASP Plan Review Record
Former Ward Products Site, Edson Street, Amsterdam, NY
HEALTH AND SAFETY PLAN REVIEW RECORD

I have read the Health and Safety Plan for the Site and have been briefed on the nature, level and degree of exposure likely as a result of participation in this project. I agree to follow all the requirements in the Health and Safety Plan.

Employee Signature

Date

Name

Site Manager Signature

Date

Name

Subcontractors will be provided with a copy of this HASP and will be informed of health and safety concerns, as well as environmental monitoring data collected during field activities. This information will be shared with the subcontractors to assist them in implementing the appropriate health and safety measures. Contractors may be required to prepare and implement their own HASP that is at least as stringent as this project HASP. The contractor is not responsible for the health and safety of subcontractors or other site or facility personnel.

6.0 *HEALTH AND SAFETY TRAINING*

All personnel working at the Site will participate in daily safety briefings. The SSO will also conduct daily briefings with all site employees covering the activities and safety procedures. The daily briefings shall review the day's planned activities and discuss potential hazards and proper controls to minimize hazards. The content of briefings and personnel present shall be documented in field notes.

7.0 PERSONAL PROTECTIVE EQUIPMENT

7.1 PURPOSE/APPROACH

A critical aspect of field crew safety is appropriate personal protective equipment (PPE). PPE refers to the types of footwear, headwear, eyewear, ear wear, coveralls, gloves and respiratory protection each individual will wear while performing a specific task(s) and exposed to a particular chemical(s) at a given concentration(s). The levels of PPE are referred to as Level D, Level C and Level B; with Level D requiring the least amount of PPE and Level B the most.

The SSO will decide when it is necessary to upgrade, downgrade or modify the existing level of protection based on field monitoring and action levels described in Section 4.0. The SSO will make entries in the health and safety field book detailing each day's PPE, task, if the level of PPE is modified and the reason for each change. Each level's PPE requirements may be modified by the SSO as needed. The different levels of PPE and equipment required at each level are described in the following sections and is based on 29 CFR 1910.120.

7.2 LEVEL D PROTECTION

Minimum level of protection for any field activities.

Level D PPE will consist of the following:

- Coveralls or a work uniform affording protection for nuisance contamination.
- Steel-toe, steel-shank work boots.
- Safety glasses
- Hard hat (if working around equipment or machinery).

Note: Hand washing is imperative following any contact with soil, water and waste.

Optional Equipment or as Required by the SSO

- Disposal Tyvek® or rubber outer boots.
- Chemical resistant gloves (recommend nitrile or neoprene).
- Disposable outer chemical coveralls, such as Tyvek®, poly coated Tyvek® or Saranex®.
- Hearing protection.

No site activities where there is potential for contacting soils, waste or water may be conducted without proper gloves and/or other PPE as necessary.

7.3 LEVEL C PROTECTION

Minimum level of protection when respirators required (not anticipated).

Level C PPE will consist of:

- Full-face air purifying respirator (APR) equipped with appropriate P100 (HEPA equivalent) cartridges. Note: All personnel requiring respiratory protection must be medically approved and "fit-tested" with the respirator to be used. Appropriate powered air-purifying respirators (PAPR) may be utilized if specified by the SSO. Only with the approval of the SSO can half-mask air purifying respirators be donned. Chemical cartridges will be changed on a daily basis.
- Chemical-resistant clothing such as Tyvek®, poly-coated Tyvek® or Saranex®.
- Outer chemical-resistant (recommend nitrile or neoprene) gloves and inner latex surgical gloves. Outer gloves should be taped to the clothing sleeve.
- Steel-toe, steel-shank work boots with Tyvek® or rubber boot coverings. Over boots should be taped to clothing leg.
- Hard hat (if working around equipment or machinery).

8.0 SITE OPERATION AREAS AND DECONTAMINATION

Site operation areas will be formally set up for all field activities. Personal decontamination procedures will be closely adhered to upon entering or leaving all work areas. Section 8.1 describes the three zones used to control site operation areas and Section 9.0 describes decontamination procedures.

8.1 SITE OPERATION AREAS

A three-zone control system will be used during activities as determined necessary by the SSO. The purpose of the zones is to control the flow of personnel to or from potentially contaminated work areas. Guidelines for establishing these zones/areas are as follows:

Exclusion Zone (EZ): Primary exclusion zones will be established around each field activity and, at a minimum, this zone will radiate to a distance of 25 feet from the point of operations. Appropriate personal protective equipment must be worn in this zone. This zone will be separated from the contaminant reduction zone by cones or barrier tape to prevent personnel from entering the exclusion zone boundary without appropriate protective equipment or leaving without proper decontamination.

Contaminant Reduction Zone (CRZ): The CRZ is the transition area between the EZ and the Support Zone (clean area). All personnel and equipment must be decontaminated in the CRZ upon exiting the EZ and before entering the Support Zone. The CRZ will be set up along the perimeter of the EZ at a point upwind of field activities.

Support Zone (SZ): The support zone is considered to be uncontaminated; as such, protective clothing and equipment are not required but should be available for use in emergencies. All equipment and materials are stored and maintained within this zone. Protective clothing is donned in the support zone before entering the contaminant reduction zone.

9.0 DECONTAMINATION GUIDELINES

In the situation where work areas are controlled using the three-zone concept, all personnel must exit the EZ through an established CRZ. At a minimum, CRZ provisions will include a potable water supply, wash buckets or sprayers, cleaning tools, hand soap and clean towels. The applicable CRZ sequence of events should include:

- Wash outer boots, coveralls and outer gloves;
- Remove any outer boot or glove tape;
- Remove outer boots. Either store or properly dispose of outer boots;
- Re-clean and remove outer gloves. If gloves will be reused, inspect and stage the gloves; otherwise, properly dispose of the gloves;
- Remove chemical-resistant coveralls with care so that hands or inner clothing do not come in contact with any contaminated surfaces. Properly dispose of coveralls;
- Remove and dispose of inner gloves; and
- Thoroughly wash hands and face.

All contaminated equipment (such as the excavator/back-hoe, tools and sampling equipment, etc.) will be thoroughly decontaminated prior to leaving the EZ. The extent of the decontamination will be determined by the SSO. The SSO will be responsible for inspecting the decontamination of all equipment prior to leaving the EZ and the Site.

For fieldwork not using the three-zone concept (e.g., soil and sediment sampling with hand-operated equipment), portable wash stations will be utilized for easy and efficient access. The wash station shall consist of a potable water supply, hand soap and clean towels. Portable sprayer units filled with Alconox® solution and potable water will also be available to wash and rinse off grossly contaminated boots, gloves and equipment. The SSO will monitor decontamination procedures to ensure their effectiveness. Modifications of the decontamination procedure may be necessary as determined by the SSO.

9.1 MANAGEMENT OF GENERATED WASTES

All discarded health and safety equipment and discarded sampling equipment will be segregated and placed in appropriate containers, as required. These containers will be properly labeled and stored in a secure area on-site while arrangements are made for disposal.

10.0 SITE ACCESS AND SITE CONTROL

Access to site activities will be limited to authorized personnel and should be coordinated with the Site owner. Such authorized personnel include contractor's employees, subcontractors and representatives of the Site owner. However, access into the established contaminant reduction and exclusion zones will be limited to those authorized personnel with required certifications and wearing appropriate personal protective equipment. The exclusion zones will be monitored by the SSO to ensure personnel do not enter without proper personal protection equipment.

All work zones will be clearly marked with barrier tap, cones or other means to ensure that non-authorized personnel are kept at a safe distance.

11.0 EMERGENCY RESPONSE

In the event of an emergency, the SSO will coordinate response activities. Appropriate authorities will be notified immediately of the nature and extent of the emergency. Table 11-1 provides emergency telephone numbers that will be posted within the support zone or any other visible location. Directions to the nearest hospital are also included on Table 11-1.

11.1 RESPONSIBILITIES

The SSO will be responsible for initiating response to all emergencies, and will:

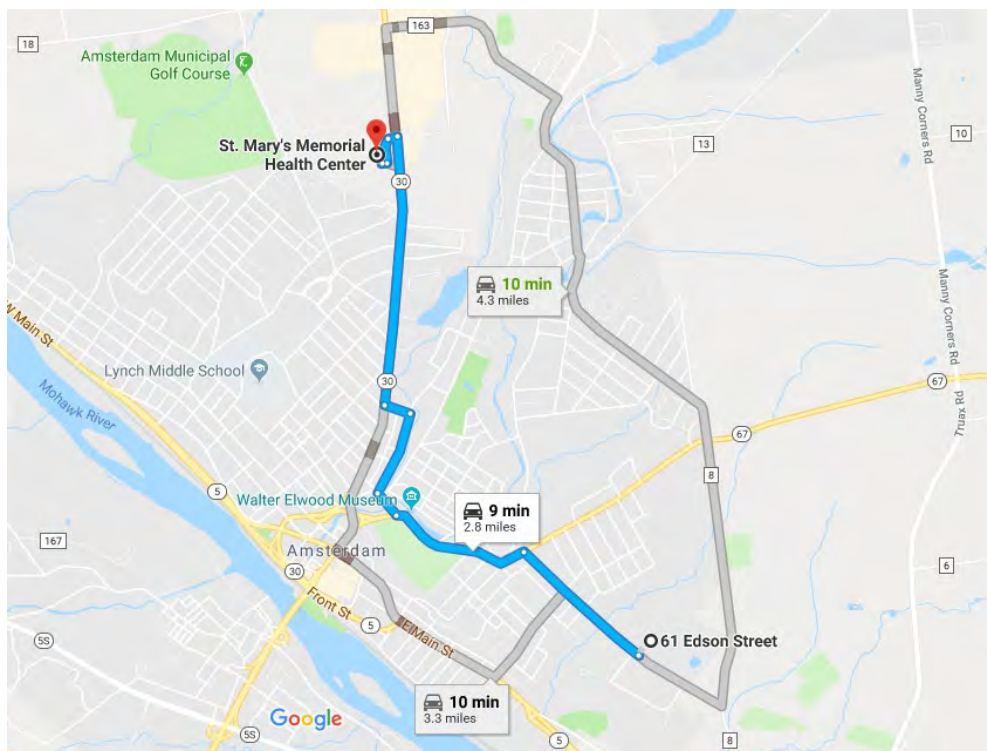
1. Notify appropriate individuals, authorities and health care facilities of the activities and hazards of the field activities.
2. Ensure that the following safety equipment is available: eyewash provisions, first aid supplies and fire extinguisher.
3. Have working knowledge of all safety equipment.
4. Ensure that directions of the most direct route to the nearest hospital is present with the emergency telephone numbers.
5. For a release incident or major vapor emission, determine safe distances and places of refuge.
6. For a release incident or major vapor emission, contact the local emergency response coordinator (Fire Department) and NYSDEC Spill Response (if appropriate).

Table 11-1
Emergency Contacts
Former Ward Products Site, Edson Street, Amsterdam, NY

Project Health and Safety Coordinator: Natalie Maiorano	(315) 350-4780
Project Director: James F. Blasting, P.G.	(315) 263-3388
Project Manager: Jake Guy	(315) 877-0092
Ambulance	911
Hospital (St. Mary's Memorial Hospital)	(518) 842-3100
Fire Dept.	911
NYSDEC Spill Hotline.....	1-800-457-7362
Police.....	911

Directions to Hospital: From Site

Figure 11-1 Directions to Hospital



61 Edson St

Amsterdam, NY 12010

1. Head northwest on Edson St toward Sam Stratton Rd

1 min (0.6 mi)

2. Turn left onto Church St

2 min (0.5 mi)

Take Brookside Ave to NY-30 N/Market St

2 min (0.5 mi)

3. Turn right onto Prospect St

0.1 mi

4. Turn right onto Brookside Ave

0.3 mi

5. Turn left onto Meadow St

0.1 mi

6. Turn right onto NY-30 N/Market St

1. Continue to follow NY-30 N

2 min (1.0 mi)

Take Memorial Hospital Rd to your destination

2 min (0.2 mi)

7. Turn left at Tessiero Square

157 ft

8. Turn left onto Memorial Hospital Rd

479 ft

9. Turn right

100 ft

10. Turn right

1. Destination will be on the left

95 ft

St. Mary's Memorial Health Center

4903 N I-30, Amsterdam, NY 12010

11.2 ACCIDENTS AND INJURIES

In case of a safety or health emergency at the Site, appropriate emergency measures will immediately be taken to assist those who have been injured or exposed to protect others from hazards. The SSO will be immediately notified and will respond according to the seriousness of the injury.

11.3 SITE COMMUNICATIONS

Field personnel will use mobile ('cellular') telephones as the primary communication tools.

11.4 RESPONSE EVALUATION

The effectiveness of response actions and procedures will be evaluated by the SSO. Improvements will be identified and incorporated into this and future plans.

12.0 ADDITIONAL SAFETY PRACTICES

The following safety precautions will be enforced during the field activities:

1. Eating, drinking, chewing gum or tobacco, smoking or any practice that increases potential hand-to-mouth transfer and possible ingestion of material is prohibited in areas designated as contaminated by the SSO.
2. Hands and face must be thoroughly washed upon leaving the work area and before eating, drinking or any other activity.
3. Even when wearing protective clothing, contact with potentially contaminated surfaces should be avoided when possible. One should not walk through puddles; mud or other discolored surfaces; kneel on ground; lean, sit or place equipment on drums, containers, vehicles or the ground.
4. Medicine and alcohol can enhance the effect from exposure to certain compounds. Alcoholic beverages will not be consumed during work hours by personnel involved in the project. Personnel using prescription drugs during the project may be precluded from performing specific tasks (e.g. operating heavy equipment) without authorization from a physician.
5. Personnel and equipment in the work areas will be minimized.
6. Work areas and decontamination procedures will be established based on prevailing site conditions.