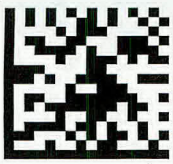

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NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

September 7, 1995

Mr. John Spellman
Bureau of Construction Services
Division of Hazardous Waste Remediation
New York State Department of Environmental Conservation
50 Wolf Road Albany, NY 12233

Re: Former Gloversville MGP Site
Response to Comments
Storm Sewer IRM Work Plan

Dear John:

The purpose of this letter is to respond to your letter dated August 1, 1995 on the Storm Sewer Interim Remedial Measure (IRM) Work Plan [Blasland, Bouck & Lee, Inc. (BBL), July 1995] for the Former Gloversville MGP Site. Your letter dated August 28, 1995 regarding construction dewatering has also been factored into our comment responses.

As discussed in our August 14, 1995 meeting, we will address most of the comments in the Special Conditions appendix to the Storm Sewer IRM Work Plan. We have addressed the remainder of your comments in this response and have included revised Contract Drawings as appropriate.

Comment:

> **"...the department considers the work plan to be deficient because it fails to indicate that the proposed work will occur in an area contaminated with hazardous substances and fails to account for the management of hazardous wastes in an environmentally sound manner. The plans and specifications must clearly define contaminated areas. There must be explicit provisions for the handling, storage, and disposal of any contaminated materials. In addition, air monitoring will be required during handling or intrusive work. Furthermore, there must be decontamination of any equipment that contacts contaminated materials."**

Response:

> Prior to the construction of the Storm Sewer IRM, the Contractor selected by Niagara Mohawk Power Corporation (NMPC) will be required to submit an Operations Plan to NMPC and BBL, and then to the NYSDEC for review. The Operations Plan will define health and safety, materials handling and staging, and dewatering procedures that will be employed by the contractor during construction. The requirements of this Operations Plan are part of the Special Conditions, to be incorporated into the Storm Sewer IRM Work Plan as Appendix E, that are included as Attachment 1 to this letter.

Comment:

"1. The plans should indicate a general sequence of events. Erosion and sediment control will likely be one of the first steps followed by clearing and grubbing."

Response:

The construction sequence will be at the discretion of the Contractor. However, the Contractor will be required to submit a schedule describing the construction sequence as a component of the Operations Plan. The schedule will be reviewed by NMPC and BBL to ensure that it presents an appropriate sequence of events prior to submittal to NYSDEC.

Comment:

"2. Define what areas are considered clean and what areas are considered contaminated. The Department suggests all surface and subsurface soil and sediment in the area bounded by the drainage ditch top-of-slope and Cayadutta Creek be considered contaminated. Any other area should be considered MGP-impacted at depths greater than two feet. Any vegetation removed from these zones must also be considered contaminated and handled accordingly."

Response:

We are in general agreement with the comment with the exception of the statement regarding vegetation. Vegetation that is in direct contact with soils in the area bounded by the top-of-slope and Cayadutta Creek should be considered contaminated. This requirement should not apply to tree trunks and canopies which are not actually in contact with the soil.

Comment:

"3. Is the geomembrane going to be welded in-place? Dewatering of the ditch, regrading and removal of some MGP residue will likely be necessary. The engineer or contractor will need to develop a written water management plan for Department approval."

Response:

The geomembrane can either be welded in place or pre-welded and placed in the excavation. The drainage ditch in the area of the excavation will have to be dewatered in either case. The contractor will be required to submit a Water Management Plan as a component of the Operations Plan. The Water Management Plan will account for both surface water and ground water as defined in your August 28, 1995 letter regarding construction dewatering.

Comment:

"4. The compaction requirements for the settling basin and access road should be more obvious."

Response:

The compaction requirements for the access road are defined in the Material and Performance Specification Section 02200 entitled "Earthwork". Fill for general site grading (access road subbase) will be compacted to a minimum of 90 percent of the Standard Proctor Value (ASTM D-1557). This requirement has been noted on the revised Contract Drawings (see Attachment 2).

There are no minimum compaction requirements for the settling basin base since it will be cut into in-situ soils. If the in-situ soils are determined to have insufficient density to hold the basin, they will be cut to a depth of one foot below the base of the basin and replaced with soil fill material underlain with a geotextile.

Comment:

"5. Erosion and Sedimentation Control structures are needed downslope of all areas to be disturbed."

Response:

The contractor will be responsible for providing erosion and sedimentation control structures as required during the construction of the Storm Sewer IRM (See Contract Drawing 2). The contractor will be required to submit an Erosion and Sedimentation Control Plan as a component of the Operations Plan.

Comment:

"6. The anchor trench should be larger."

Response:

The anchor trench dimensions shown are minimum dimensions. The anchor trench has been designed solely as a termination for the edge of the geomembrane. It will not be required to anchor long side slopes or side slope overburden soil.

Comment:

"7. The geomembrane may bubble in the corners making placement of the paving block difficult."

Response:

The contractor is required to control wrinkles (see Materials and Performance Specification Section 02234 entitled "Geomembrane"). Any wrinkle that has a height equal to one half of its base width must be either cut and patched or extruded to prevent bubbling.

Comment:

"8. On the silt fence detail show the minimal dimensions of the silt fence and how the silt fence is attached to the chainlink fence. The silt fence should be placed upstream of the chain link fence."

Response:

The Contract Drawings have been modified to reflect this comment (see Attachment 2).

Comment:

"9. The work plan needs to indicate that a post-construction monitoring program is required including frequency of inspection and actions item such as boom changes and basin pump-out."

Response:

NMPC will develop a schedule for inspection and maintenance of the Storm Sewer IRM once six months operating experience has been gained. During this initial six month period, the constructed facility will be inspected weekly to determine the most appropriate maintenance schedule.

Comment:

"10. The final specifications must be signed by a professional engineer."

Response:

The signature and seal of a professional engineer for the Material and Performance Specification is included in Attachment 3.

Comment:

"11. The final Health and Safety Plan must be signed by a certified health safety professional."

Response:

The revised Health and Safety Plan, which is signed by a Certified Industrial Hygienist, is included in Attachment 4.

Please call me at your convenience at (315) 428-5652 to discuss this matter further.

Sincerely,

Steven P. Stucker
Project Manager

cc: Mr. Daniel Steenberge, P.E., NYSDEC, Ray Brook
Mr. Robert Griffiths, NYSDOH, Albany

Attachment 1

Special Conditions

Storm Sewer Interim Remedial Measure Work Plan

Former Gloversville MGP Site
Gloversville, New York

Niagara Mohawk Power Corporation
Syracuse, New York

July 1995
Revised September 1995

BLASLAND, BOUCK & LEE, INC.
ENGINEERS & SCIENTISTS

6723 Towpath Road
Syracuse, New York 13214
(315) 446-9120

Table of Contents

Appendix E

Storm Sewer Interim Remedial Measure Work Plan Special Conditions

Former Gloversville MGP Site
Gloversville, New York

Niagara Mohawk Power Corporation
Syracuse, New York

September 1995

BLASLAND, BOUCK & LEE, INC.
ENGINEERS & SCIENTISTS

6723 Towpath Road
Syracuse, New York 13214
(315) 446-9120

A. Contractor's Responsibilities

The Contractor shall carefully study and compare the Contract Documents and shall at once report to the Engineer any error, inconsistency, or omission they may discover. The Contractor shall perform no portion of the work at any time without Engineer-approved shop drawings, product data, or samples for such portion of the work.

The Contractor shall supervise and direct the work, using their best skill and attention. They shall be solely responsible for all construction means, methods, techniques, sequences, and procedures and for coordinating all portions of the work.

B. Job Site Administration

The Contractor shall keep a competent and authorized supervisory representative at the work location during all working hours who shall act as the agent of the Contractor. If, in the opinion of NMPC or the Engineer, the supervisory representative or any of their successors proves incompetent, not conscientious, or not industrious, then the Contractor shall replace them upon written request by NMPC. Whenever NMPC or the Engineer notify the Contractor in writing that, in their opinion, any person on the job, whether employed by the Contractor or any of the subcontractors, is incompetent, unfaithful, unsafe, disorderly, or otherwise unsatisfactory, such persons shall be immediately discharged from the contract work and shall not be employed on it, except with the written consent of NMPC.

C. Clearing and Site Preparation

Only that portion of the working area which is absolutely necessary and essential for execution of this contract shall be cleared for construction. All clearing should be performed to provide minimum practical exposure of soils. The Contractor shall make every effort to avoid the destruction of common native plants, trees, or shrubs outside the area of construction so as not to unduly disturb the ecological or environmental quality of the area.

After interfering vegetation has been removed, the Contractor shall strip topsoil from the area to be excavated and stockpile it for future use.

D. Spoil and Borrow

Excavated material which, in the Engineer's opinion, is unfit to be used as backfill or embankment or which is in excess of the amount required under this contract shall be disposed of off-site at the Contractor's expense at a location to be approved by NMPC and the Engineer. All spoil areas shall be graded and seeded to match the surrounding area.

E. Protection of Existing Utilities

During the course of this contract, it will be necessary to work adjacent to existing utilities, pipelines, structures and equipment. The Contractor shall take all necessary precautions to protect existing facilities from damage.

Locations of utilities as shown on the Contract Drawings are approximate only. The Contractor shall excavate or otherwise locate to verify existing utilities in advance of his operations.

A sanitary sewer pipe and easement has been identified in the Contract Drawings. The Contractor shall verify the location of the sanitary sewer pipe and easement prior to construction and place a temporary fence along both limits of the easement, adjacent to the limits of work. The Contractor shall not work within or travel across the easement.

F. Noise and Dust Control

It shall be the responsibility of the Contractor to take adequate measures for controlling dust produced by drilling, excavation, backfilling, loading, or other means. The use of calcium chloride or petroleum-based materials for dust control is prohibited.

It shall be the responsibility of the Contractor to take adequate measures for keeping noise levels, as produced by construction equipment, to safe and tolerable limits as set forth by the Occupational Safety and Health Administration (OSHA), and the New York State Industrial Code Guidelines and Ordinances. All construction equipment presenting a potential noise nuisance shall be provided with noise-muffling devices.

G. Soil Erosion and Silt Control

Erosion control procedures shall be utilized on the Site, as required. Erosion control shall occur, as required, immediately following completion of site clearing.

Plastic filter fabrics and/or haybales shall be used, where necessary, to protect vegetation and allow sediment to settle out of runoff waters that come in contact with construction areas before such water enters any surface waters.

H. Protection of the Environment

The Contractor shall implement construction procedures that protect the environment in accordance with all pertinent federal and state regulations. Construction procedures that are prohibited in the undertaking of work associated with this contract include, but are not limited to:

1. Dumping of spoil material into any stream corridor, any wetlands (as defined by federal and state regulations), any surface waters, or at unspecified locations.

2. Indiscriminate, arbitrary, or capricious operation of equipment in any stream corridors, any wetlands, or any surface waters.

3. Pumping of any silt-laden water from trenches or other excavations into any stream corridors, wetlands, or surface waters.

4. Damaging vegetation beyond the extent necessary for construction of the facilities.

5. Disposal of trees, brush, and other debris in any stream corridors, wetlands, surface waters, or at unspecified locations.

6. Permanent or unspecified alteration of the flow line of a stream.

7. Open burning of project debris.

I. Replacement of Property

The Contractor shall replace all culverts, sanitary sewers, pavements, driveways, shrubs, lawns, fences, and any other property either public or private which is damaged as a result of the work of this contract. All such replacement shall be made according to the applicable specifications and at no additional cost to NMPC.

J. Contractor's Personnel

The Contractor shall restrict his personnel to only those areas of the Site necessary for the performance of the work of this contract. The Contractor shall instruct his personnel to observe caution when working in the vicinity of mechanical equipment. The Contractor's personnel shall not operate or tamper with any valves, switches, or other devices or equipment. The Contractor shall be solely responsible for any damage or disruption caused by their personnel.

K. Cleanup

The Contractor shall be responsible for cleanup and removal from the Site of any and all rubbish and debris resulting from their operation.

L. Submittals

For several elements of construction, the Technical Specifications (which are given on the Contract Drawings and the Material and Performance Specifications) require that the Contractor prepare technical data and submit this information for review by NMPC, the NYSDEC, and the Engineer. This requirement allows for monitoring of the Contractor's understanding of the design and prevention of any misinterpretation of the Technical Specifications that may otherwise impact the design objectives or construction schedule. The submittal of technical data, also referred to as shop drawing submittals, encompasses many elements of the construction activity.

All submittals shall comply with the Storm Sewer IRM Work Plan. The submittal review process will be an essential activity for monitoring Construction Quality Assurance before construction is initiated. The Contractor's submittal of a shop drawing will constitute their representation that they have determined and verified all quantities, dimensions, field construction criteria, materials, model numbers, and similar data. In addition, it will demonstrate that they have reviewed or coordinated each shop drawing submittal with

the requirements of the Technical Specifications. Review of shop drawings by the Engineer will be to determine general compliance with the Technical Specifications. Submitted data will be reviewed and stamped by the Engineer as follows:

1. "Reviewed" if no objections are observed or comments made;

2. "Reviewed and Noted" if minor objections, comments, or additions are made but resubmittal is not considered necessary provided the Contractor addresses the noted items;

3. "Resubmit" if the objections, comments, or additions are extensive. In this case, the Contractor would resubmit the items after revision; and

4. "Rejected" if the submittal under consideration is not, even with reasonable revision, acceptable or when the data submitted are not sufficiently complete to establish compliance with the Technical Specifications.

The shop drawing submittal and review process will afford an opportunity to monitor and control the quality of construction before construction is actually initiated.

M. Operations Plan

The project site is a former Manufactured Gas Plant that is being investigated and remediated under a Consent Order between NMPC and the NYSDEC. The work of the Contract requires the excavation and disposal of soils and sediments that potentially contain volatile organic compounds (VOCs), Phenols, complexed Cyanides and other metals, Polynuclear Aromatic Compounds (PNAs) and Polychlorinated Biphenyls (PCBs). The work of the contract also requires the Contractor to manage soil, sediment, surface water, and ground water that is potentially impacted with the constituents listed above.

In order to ensure that the work of the contract is completed in an environmentally safe manner, the Contractor will be required to prepare and submit an Operations Plan to NMPC and the Engineer for review and approval prior to the start of work. The Operations Plan shall address the following items:

1. Health and Safety Plan

For work required by the Contract involving the potential for personnel contact or exposure to the constituents listed above, the Contractor must comply with 29 CFR Part 1910, 40 CFR 260-267, and related regulations which call for the development and implementation of a safety and health program

for employees involved in hazardous waste operations. The Contractor will be required to comply with all requirements under these regulations for this project.

Prior to commencement of field activities, the Contractor shall certify that personnel employed at the Site, who are directly involved with remedial activities, including direct employees as well as subcontractors, have completed a 40-hour health and safety training course (and annual refresher training) in accordance with 29 CFR 1910. The Contractor shall also certify that any individuals who later became employed by the Contractor for the purpose of remedial activities also attend such training prior to performing remedial work at the Site. Employees and subcontractors of the Contractor who are unable to demonstrate compliance with such training requirements shall be limited to support roles at the Site.

The Contractor shall certify that all personnel who will be employed by the Contractor to perform remedial work at the Site, including direct employees as well as subcontractors, have received the initial and annual (if applicable) medical examinations as required by 29 CFR 1910.

The Contractor shall also comply with the Department of Labor Safety and Health Regulations for construction promulgated under the Occupational Safety and Health Act of 1970 (PL 91-596) and under Section 107 of the Contract Work Hours and Safety Standards Act (PL 91-54).

The Contractor shall be responsible for the safety of his employees, subcontractors, suppliers, and other parties at the work area as a result of the Contractor's direction.

The Contractor shall prepare, submit, and implement a Health and Safety Plan. The plan shall address, but not be limited to, the following components:

- Identification of Key Personnel - Identify, by name and by title, the on-site and off-site health and safety personnel responsible for the implementation of health and safety procedures.

- Training - Describe and provide certification of all supervisory and on-site personnel having received appropriate health and safety training.

- Medical Surveillance - Certify that all supervisory and on-site personnel have received appropriate medical examinations and are able to conduct the tasks required for this project.

- Site Hazards - Identify and provide a means of mitigating all foreseeable chemical and physical hazards associated with the work, including, but not limited to, hazards associated with exposure to constituents of concern.

- Work Zones - A site plan which depicts the designation of zones including: (1) Exclusion Zones (2) Decontamination Zones, and (3) Support Zones. The level of personal protection for each zone shall be included.

- Personal Safety Equipment and Protective Clothing - Identify personal safety equipment and protective clothing to be used and available on-site.

- Personal and Area Air Monitoring - Identify protocols and criteria associated with personal and area air monitoring of on-site personnel. The air monitoring shall address both airborne volatile constituents and fugitive particulate emissions.

- Equipment Cleaning - Describe methods and procedures for decontamination of personnel, vehicles, and equipment.

- Material Safety Data Sheets - Provide Material Safety Data Sheets (MSDSs) for all materials to be brought on site, as well as constituents which are expected to be encountered in the course of remediation.

Determination of the appropriate level of worker safety equipment and procedures shall be made by the Contractor as a result of site visit(s) and review of available information as he deems necessary.

Should any unforeseen or site-specific safety-related factor, hazard, or condition become evident during the performance of work at the Site, it shall be the Contractor's responsibility to bring such to the attention of the Engineer both verbally and in writing as quickly as possible for resolution. In the interim, the Contractor shall take prudent action to establish and maintain safe working conditions and to safeguard employees, the public, and the environment.

Should the Contractor seek relief from, or substitution for, any portion or provision of the Health and Safety Plan, such relief or substitution shall be requested of the Owner in writing, and if approved, be authorized in writing.

Any disregard for the provisions of these Health and Safety requirements shall be deemed just and sufficient cause for termination of the Contract without compromise or prejudice to the rights of the Owner.

The Health and Safety Plan shall be signed by a Certified Industrial Hygienist.

2. Contingency Plan

The Contractor shall prepare, submit, and implement a Contingency Plan which includes, at a minimum, the following items:

- A spill prevention control and counter measures plan for all materials brought on the site;
- Emergency vehicular access/egress;
- Evacuation procedures of personnel from the Site;
- A listing of all contact personnel with phone numbers to include: the Contractor; the Engineer; fire officials; ambulance service; local, county, and State Police; and local hospitals, including routes to local hospitals and procedures for notifying each; and
- Method to contain gasoline/diesel fuel spills if these fuels are to be brought into the limits of the work area. No additional compensation will be provided to the Contractor for work related to cleaning up spills or leaks caused by the Contractor's personnel or equipment.

3. Emergency Calls

The Contractor shall maintain telephone service twenty-four (24) hours a day, seven (7) days a week to responsible personnel who shall be in a position to dispatch personnel and equipment to any point on the Site in the event of an emergency. The telephone number(s) shall be supplied to the Owner in the Operations Plan.

4. Materials Handling and Staging

The preferred method for handling excavated soils subject to off-site disposal is direct loading from the point of excavation into the containers to be used during transportation. Stockpiling of the

excavated materials prior to loading may be utilized, if deemed necessary by the Contractor or if directed by the Engineer, provided that the Contractor meets the following minimum requirements:

- As excavated, all soil shall be placed onto an impermeable membrane of sufficient strength and thickness to prevent failure during use.

- The volume of material to be placed in the stockpile area is less than 20 cubic yards.

- The placement of soil into the stockpile area shall not involve any equipment or procedures that may jeopardize the integrity of the underlying impermeable membrane, or the adjacent sanitary sewer line.

- Except while soils are actively being placed, the stockpile area shall be continuously covered with a properly anchored impermeable membrane. This membrane shall be maintained for the duration of soil stockpiling.

- The Contractor shall provide a means of surface water diversion to prevent run-on from contacting stockpiled soils.

- The Contractor shall place and maintain a construction fence around the soil stockpile(s) for the duration of the stockpiling.

- The stockpile area shall be regularly inspected by the Contractor and any noted deficiencies shall be promptly addressed.

5. Water Management

The Contractor shall provide all labor, equipment, and materials for the management and disposal of water streams and surface water runoff. The Contractor shall prepare and submit a Water Management Plan (WMP) to NMPC and the Engineer for approval which shall address the collection, temporary storage, and off-site disposal of the following wastewater streams:

- Surface runoff;
- Ground water; and
- Effluent from decontamination operations.

No construction activities shall commence prior to approval of the WMP.

6. Erosion and Sedimentation Control Plan

The Contractor shall prepare, submit, and implement an Erosion and Sedimentation Control Plan which, at a minimum, addresses the following work elements:

- Installation of the basin access road;
- Installation of the settling basin; and
- Discharge of water to Cayadutta Creek.

The Erosion and Sedimentation Control Plan shall be prepared in accordance with the latest version of the "New York Guidelines for Urban Erosion and Sediment Control".

7. Covering the Work

Once excavation activities for a given area are initiated, and until such time that the excavation and backfill is complete, all excavated areas shall be covered with an impermeable barrier and surrounded by surface water diversion measures to prevent precipitation and runoff from entering the excavation. Construction fencing shall also be placed around the excavation.

The methods employed by the Contractor to prevent the accumulation of water in a given area should be compatible with concurrent construction activities. Unless otherwise directed by the Engineer, the Contractor shall be responsible for all costs associated with the removal, handling, treatment, or disposal of water that accumulates as a result of improper controls.

8. Residual Wastes

Residual wastes, including used personal protective equipment, wash water, gloves, etc., generated by the Contractor, the Owner and the Engineer shall be disposed of by the Contractor at the completion of remedial activities. For the duration that these materials are present on-site, these materials shall be placed in separate DOT-approved 55-gallon drums dedicated for either solid or liquid residual waste. For solids, the Contractor shall double-bag all protective clothing, sampling trash and other debris, secure with duct tape, place in a 55-gallon drum.

The Contractor's personnel responsible for drum labeling shall be properly trained in drum labeling procedures in accordance with DOT regulations at 49 CFR 107 and 171-189. All drums shall be disposed of by the Contractor (as filled) as regulated waste.

9. Equipment Cleaning

All equipment utilized by the Contractor in the performance of this contract shall be cleaned prior to its re-location within the Site, and prior to its departure from the Site. At a minimum, the following procedures shall be executed by the Contractor:

- For equipment that is being transferred within the Site, a visual inspection of the equipment shall be performed by the Contractor. Any visible soils or other debris shall be promptly removed and disposed of in a manner consistent with the soils that were contacted or excavated from that area.

- Unless otherwise directed by the Engineer, any equipment to be taken off site by the Contractor shall be subject to a final visual inspection and cleaning by the Contractor (if necessary). In general, this area will consist of a low-permeability barrier which shall be sloped to a collection sump. Precautions shall be taken to limit contact between the equipment, personnel performing the cleaning activities, and any cleaning liquids that may accumulate in the cleaning area. The Contractor shall be responsible for constructing and maintaining the cleaning area to accommodate all loads, equipment, and migration scenarios. The Contractor shall dismantle and properly dispose of all materials associated with the cleaning area, and shall restore the area to its original conditions to the satisfaction of NMPC and the Engineer.

- The extent and method of cleaning shall be at the discretion of the Contractor; however, each piece of equipment shall be inspected by the Engineer prior to its departure from the Site.

- Wash water, solids, and other materials generated during equipment cleaning shall not contact native soils and existing facilities, and shall be collected by the Contractor and placed into designated containers.

- Disposal and/or treatment of collected wash water, solids, and other materials shall be in accordance with all applicable laws and regulations.

10. Work Sequence

A progress schedule shall be submitted to the Owner and Engineer for review and approval prior to the start of work. The schedule shall include sequence and dates for all components of the work.

Attachment 2

Revised Contract Drawings

Attachment 3

Materials and Performance Specifications
Engineer's Signature and Seal

MATERIALS & PERFORMANCE SPECIFICATIONS

STORM SEWER INTERIM REMEDIAL MEASURE WORK PLAN
FORMER GLOVERSVILLE MGP SITE
GLOVERSVILLE, NEW YORK

NIAGARA MOHAWK POWER CORPORATION
SYRACUSE, NEW YORK

Edward R. Lynch

EDWARD R. LYNCH, P.E.
EXECUTIVE VICE PRESIDENT

SEPTEMBER 1995

BLASLAND, BOUCK & LEE, INC.
6723 TOWPATH ROAD, P.O. BOX 66
SYRACUSE, NEW YORK 13214

Attachment 4

Revised Health and Safety Plan

Appendix C

Storm Sewer Interim Remedial Measure Work Plan Health and Safety Plan

Former Gloversville MGP Site
Gloversville, New York

Niagara Mohawk Power Corporation
Syracuse, New York

July 1995
Revised September 1995

BLASLAND, BOUCK & LEE, INC.
ENGINEERS & SCIENTISTS

6723 Towpath Road
Syracuse, New York 13214
(315) 446-9120

A. LOCATION DESCRIPTION

1. Site Name: Former Gloversville MGP Site

2. Site Location: Gloversville, New York

3. Type of Facility: Operating Niagara Mohawk Power Corporation (NMPC) Service Center

4. Size of Facility/Site: The site is approximately 8 acres in size.

5. Site History:

   Site operations began around 1900 and continued on a full-time basis until approximately 1930. From 1930 to 1952, gas production continued on a winter-season basis only. Foundation from process equipment associated with the MGP operation currently exist at the site. The existing service center building was constructed in two phases over the late 1950s to the early 1970s.

6. Describe Surrounding Population:

   A former Agway petroleum storage facility and a tannery plant are located on the northwest and west sides of the site. An abandoned railroad bed parallels the western boundary and separates the site from the Agway facility. The site is bordered to the east by an abandoned railroad bed, which parallels Southern Boulevard, and a residential area to the northeast. The south side of the site borders a vacant lot where a lumber company was formerly located. Cayadutta Creek borders the southwestern corner of the site and flows along the western border of the Agway facility.

7. Topography:

   Cayadutta Creek is located west of the site and flows in a general north to south direction. The creek meanders close to the southwest corner of the site where a drainage ditch joins the creek. This ditch receives flow from surface water runoff and site storm sewers that contain discharges from building and driveway underdrains, interior building floor drains, and paved surface runoff.

8. Unusual Features:

   According to Niagara Mohawk Power Corporation employees, a spring on the site was tapped by a hand pump for drinking water purposes. When the garage was attached to the rear of the service building in 1970, the spring was covered over. Water from the spring was thought to seep onto the garage floor and into the floor trench for ultimate discharge into the storm sewer system.

9. Site Geology:

   The site is underlain by approximately 50 to 70 feet of unconsolidated, Pleistocene glacial sediments that overlay Middle Ordovician Canajoharie Shale. The glacial sediments are comprised predominantly of fine-grained sands, with occasional silty sand and clayey silt. The stratigraphy of the site is comprised of three units: 1) fill; 2) glacially deposited gravel, sand, silt, and clay; and 3) bedrock.

B. PROJECT ACTIVITIES

1. Blasland, Bouck & Lee, Inc. (BBL) will provide construction observation and oversight.

C. HAZARD RECOGNITION

1. Appendix A provides a Potential Hazard by Work Task matrix for each individual task listed in Section B. Project Activities. Appendix B provides a listing of materials which could be present at the site. Significant exposure to contaminated soil is not anticipated.

2. Physical hazards at the site include overhead power lines, or underground utilities when excavation activities are taking place. NMPC standard procedures for locating buried utility lines will be employed prior to site excavations.

D. PERSONNEL TRAINING REQUIREMENTS

1. General Training

   All BBL personnel and visitors must be trained commensurate with their job responsibilities. Pre-assignment training must be in accordance with 29 CFR 1910.120(e) Training. BBL employees must possess current wallet cards attesting to their training level. Appendix C must be completed prior to engaging in any on-site activities.

2. Site Orientation

   All BBL personnel and visitors must attend an initial site orientation conducted by the HSS prior to engaging in any on-site activity. A review of this HASP will be provided at the orientation meeting. Each attendee must acknowledge attendance at the orientation by signing the sign-off sheet provided as Appendix D.

E. MEDICAL SURVEILLANCE

1. General Medical Program

   Medical surveillance for this project will be in accordance with 29 CFR 1910.120 (f) Medical Surveillance. BBL employees must possess current wallet cards attesting to their medical clearance status. Appendix C must be completed prior to engaging in any on-site activities.

   Medical clearance is not required for visiting employees whose activity(s) will not require the use of respiratory protective equipment.

2. Respirator Certification

   Prior to authorizing the use of any air purifying, negative pressure respirator, BBL employees must provide the HSS with current documentation regarding the individual's physical abilities to wear respiratory protective equipment. A current BBL wallet card will serve as adequate documentation. A current qualitative fit test (not older than 12 months) must also be on file.

3. Exposure/Injury Medical Emergency

As a follow-up to an injury or illness or as a result of possible exposure to either a chemical or physical hazard, all employees are entitled to and encouraged to seek appropriate medical attention. The HSS or designated alternate must be informed that an individual is seeking medical attention.

During and immediately following the emergency medical situation, the HSS or designated alternate have the following responsibilities:

- Ensure that the examining medical facility is fully informed about the site condition and/or hazard which caused the medical emergency;
- Conduct an investigation of the site condition which caused the medical situation prior to reassigning the task;
- Complete the Accident Investigation Form;
- Ensure the injured/ill worker receives written medical clearance prior to return to the site;
- Ensure a copy of the medical clearance and accident investigation form are maintained on-site for the duration of the project;
- Provide a copy of the medical clearance and accident investigation form for the employee's medical records; and,
- Provide a copy of the accident investigation form to the Manager, Health & Safety.

Injuries/illnesses and/or possible excessive exposure to either a chemical or physical hazard requiring emergency medical treatment and hospitalization must be reported within 24-hours to Manager, Health & Safety. Fatalities must be reported immediately.

F. MONITORING:

BBL will not conduct air monitoring. The IRM contractor will conduct air monitoring and advise BBL personnel of the results and the need to upgrade the level of protection.

G. PERSONAL PROTECTIVE EQUIPMENT (PPE)

1. Anticipated Level of Protection for Task Initiation is Modified Level D.

Task	Level of Protection	Action Level
1	Modified Level D with upgrade to Level C	As advised by IRM contractor

2. Selected PPE Ensembles (Specify requirements):

Respiratory	Clothing
(X) Full Face Respirator (if necessary)	(X) Tyvek Coverall or equivalent
Specify Cartridge to be Utilized: 6MC-H	( ) Saranex Coverall
	( ) Cotton Coverall
	( ) Apron, Specify _____
Head & Eye	**Hand Protection**
(X) Hard Hat	(X) Undergloves Nitrile surgical Type
( ) Goggles	(X) Gloves Nitrile Type
( ) Face Shield	( ) Overgloves _____ Type
(X) Safety Eyeglasses	( ) None
( ) None	

Hearing

(X) Ear Plugs (as needed)

Foot Protection

(X) Safety Boots (steel toe minimum)

(X) Disposable Overboots

( ) Other _____

( ) Other PPE Requirements: _____

H. SITE CONTROL MEASURES

1. Site Control

If Level C (air purifying respirators) is required, the work zone will be properly delineated by barricades or barrier tape which will be placed a minimum of 30 feet from the edge of the active operation. Personnel and equipment decontamination stations (Contamination Reduction Zone)

will be established as per Section I - DECONTAMINATION between the work zone and support zone.

I. DECONTAMINATION

1. Personnel Decontamination

(X) Required ( ) Not Required

If required, describe decontamination protocol:

Remove tyvek coverall, overboots, and nitrile gloves and place in a container for off-site disposal.

2. Equipment Decontamination

( ) Required (X) Not Required

If required, describe decontamination protocol: _____

J. EMERGENCY PLAN

Contingency Contacts and Phone Numbers (This page must also be posted by on-site telephone).

1. Agency Phone Listing

Agency	Phone Number
Fire Department	911 or (518) 725-3122
Police Department	(518) 773-7511
State Police	(518) 725-3034
Health Department	(800) 525-2521
Poison Control Center (Albany)	(800) 336-6997
State Environmental Agency	(518) 863-4545
Pollution Toxic Chemical, Oil Spills	(800) 424-8802
UFPO	(800) 253-5395
Utility Emergencies (Electric) Utility Emergencies (Gas)	(800) 637-2770 (800) 627-6466

2. Project Phone Listing

Company and Title	Contact	Phone Number
NMPC On-Site Contact	Ken Shaver	(518) 773-8674
NMPC Environmental Affairs Project Manager	Steven Stucker (Syracuse)	(315) 428-5652
NMPC Corporate Health and Safety Officer	Kathy Smith (Syracuse)	(315) 460-1278
NMPC Corporate Health and Safety Officer	Bill Todeschini (Syracuse)	(315) 460-1303
BBL, Inc. Health and Safety Supervisor	Donald F. Sauda (Syracuse)	(315) 446-9120
BBL, Inc. Health and Safety Coordinator	Herrick Teeter (Syracuse)	(315) 446-9120
BBL, Inc. Health and Safety Manager	Jay D. Keough, CIH (Cranbury)	(609) 860-8072

3. Spill/Accidental Release Response Plan (Describe):

   Contact - On-site NMPC contact.

4. Fire/Explosion Response Plan (Describe):

   Contact - On-site NMPC contact.

5. Medical/First Aid Plan (Describe):

   Contact - On-site NMPC contact.

6. Exit Routes/Communication Systems (Describe):

   None required.

K. MEDICAL EMERGENCY FACILITY(S)

1. Primary Medical Facility

   Name of Hospital - Nathan Littauer Hospital

   Address - 99 East State Street, Gloversville, New YorkPhone No. (518) 725-8621

   Route to Hospital: Turn right out of the parking lot onto Hill Street. Travel 0.25 miles to Kingsboro Avenue and turn left. Travel approximately 2.25 miles north to Route 349 (State Street) and turn right. Travel one block east to East State Street and turn left. Travel 0.25 miles north. The hospital entrance is on the right. Travel time is approximately 10 minutes.

2. Ambulance Service

   Fulton County: (518) 725-1122

APPENDIX A

POTENTIAL HAZARD BY WORK TASK

Check hazards which apply to each specific task listed in Section B. Project Activities.

Task	Potential Hazard																Level of Protection	Possible Upgrade[1]	Monitoring Requirements[2]
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P			
1	X			X	X					X							D		
2																			
3																			
4																			
5																			
6																			
7																			
8																			
9																			
10																			

Hazard Key:

A Physical Injury (Slip, Trip, Fall)
B Inhalation Hazard
C Ingestion Hazard
D Skin Contact Hazard
E Heat/Cold Stress Hazard
F Fire/Explosion Hazards
G Water Hazard
H Noise Hazard
I Biological Hazard
J Overhead/Underground Utility Hazard
K Oxygen Deficiency
L Traffic Hazard
M Electrical Hazard
N
O
P

Notes:

[1]Limited to Level C.
[2]Refer to Section F. Monitoring.

APPENDIX B

CONTAMINANTS OF CONCERN[1]

CONTAMINANT	OSHA PEL	ACGIH TLV	IDLH	EXPOSURE SYMPTOMS
1. Benzene	1 ppm	10 ppm	3,000 ppm	Dizziness, mental dullness, nausea, headache, fatigue
2. Toluene	200 ppm	100 ppm	2,000 ppm	Dry skin, mild fatigue, weakness, confusion
3. Ethylbenzene	100 ppm	100 ppm	2,000 ppm	Skin irritation, dizziness, headache
4. Napthalene	10 ppm	10 ppm	500 ppm	Confusion, headache, nausea
5. Cyanide	5 mg/M^3	5 mg/M^3	50 mg/M^3	Bright-pink coloration of skin, weak, rapid irregular heartbeat, dilated pupils
6. Styrene	100 ppm	50 ppm	5,000 ppm	Irritable eyes, nose, drowsiness, and weakness
7. O-,M-,P-Xylenes	100 ppm	100 ppm	1,000 ppm	Dizziness, excitement, irritable eyes, nose, throat, abdominal pain
8. N-Hexane	500 ppm	50 ppm	5,000 ppm	Light-headed, nausea, headache, numbness in extremities, eye irritation
9. Octane	500 ppm	300 ppm	5,000 ppm	Eye irritation, drowsiness
10. Hydrogen Cyanide	10 ppm	10 ppm	50 ppm	Headache, nausea, confusion
11. Phenol	5 ppm	5 ppm	250 ppm	Eye, nose, throat irritation, weakness, muscle ache
12. Polynuclear Aromatic Hydrocarbons	0.2 mg/M^3		700 mg/M^3	
13. Aroclor 1254	0.05 mg/M^3	0.5 mg/M^3	5.0 mg/M^3	Eye, ear, nose, throat irritation
14. Aroclor 1260	0.5 $mg/^3$		5.0 mg/M^3	Eye, ear, nose, throat irritation

Notes:

OSHA, PEL = Occupational Safety and Health Administration, Permissible Exposure Limit (PEL).
ACGIH, TLV = American Conference of Governmental Industrial Hygienist, Threshold Limit Value (TLV).
mg/m^3 = milligrams contaminant per cubic meter of air, by volume.
ppm = parts contaminant per million parts of air, by volume.
IDLH = Immediately Dangerous to Life and Health.
[1] = **Material Safety Data Sheets are attached for each contaminant of concern.**

APPENDIX C

PERSONNEL TRAINING/MEDICAL SURVEILLANCE REQUIREMENTS[1]

NAME	TRAINING CURRENT	MEDICAL CLEARANCE	RESPIRATORY CLEARANCE
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			

Health & Safety Supervisor _____

Date _____

[1] Wallet cards must be checked to ensure that they are current as well as to note any listed medical restrictions. Employees with expired training and/or medical clearance are not permitted site access.

APPENDIX D

HEALTH AND SAFETY PLAN
SIGN-OFF SHEET

I have read, and understood, and agreed with the information set forth in this Health & Safety Plan (and attachments) and discussed in the personnel Health & Safety orientation.

Name	Signature	Date
Jay D. Keough, CIH	[signature], CIH	9/6/95

Personnel Health & Safety Briefing Conducted by:

Health & Safety Supervisor	Signature	Date