

Mr. Payson Long
New York State Department of Environmental Conservation (NYSDEC)
Division of Environmental Remediation
Bureau of Project Management
625 Broadway, 12th Floor
Albany, New York 12233

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Date: April 30, 2021
Our Ref: 30055695
Subject: Gladding Cordage Health and Safety (H&S) Diagnostic Audit
NYSDEC Site No. 709009
Contract No. D009804-11

Dear Mr. Long,

At the request of the New York State Department of Environmental Conservation (NYSDEC), Arcadis of New York, Inc. (Arcadis) recently completed an Occupational Safety and Health Administration (OSHA)-compliant Workplace Safety Diagnostic Audit conducted on April 6, 2021, at the Gladding Cordage Site located at 110 County Road 13A, South Otselic, NY 13155.

SITE SETTING AND ACTIVITY SUMMARY

The South Otselic, NY site review consists of one pump house built in the 1990's constructed of steel frame/siding and roofing approximately 16 feet wide and 24 feet long. The onsite treatment building is not occupied full time by staff and is currently visited once per month or as needed by Arcadis personnel.

The site is defined as a Hazardous Waste Operations and Emergency Response (HAZWOPER) site per OSHA standard 29 CFR Part 1910.120 and therefore additional compliance requirements for onsite staff are required. This workplace safety audit included a review of current written safety policies, procedures, and training documentation. A physical walk-through of the grounds and a detailed review of company safety policies and procedures was also conducted. At the time of the site walk no other field team members were present for the workplace assessment.

WORKPLACE SAFETY AUDIT

The audit observations identified within this report are based on Arcadis' professional knowledge and understanding of current relevant legislation and guidance. Changes in legislation or regulatory guidance may cause the opinion or advice contained in this report to become inappropriate or incorrect.

Audit observations were categorized as one of the following: Serious, Moderate and Minor.

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Risk Rating	
Serious	Serious includes reportable spills, lack of permits, and zero compliance with and/or indifference to applicable rules.
Moderate	Moderate includes non-compliance with permits and/or regulations, missing recordkeeping, and missed compliance deadlines.
Minor	Minor includes minor recordkeeping and reporting errors or omissions including those corrected during the audit.

The results of the H&S audit are presented below. A photographic log of the observations is presented in Attachment A.

No.	Observation/Finding	Risk Rating	Recommendations	Regulatory References
1	Chemical labeling was missing from a secondary container.	Minor	Ensure all chemicals in the workplace are properly labelled.	OSHA 29 CFR 1910.1200
2	The monthly fire extinguisher inspection was not performed.	Minor	Perform and document monthly fire extinguisher inspections for all portable fire extinguishers.	OSHA 29 CFR 1910.157(e)(1)
3	Documentation to validate periodic inspection of first aid kit was missing.	Minor	Periodically inspect powered hand tools; document the inspections.	ANSI Z308.1-2015
5	Flammable chemicals and aerosols were being improperly stored with non-compliant materials.	Minor	Provide proper storage cabinets for storing flammable liquids, aerosols, and chemicals; with separate storage for tools and solvents.	OSHA 29 CFR 1910.106(d)
6	Electrical panel labeling was missing.	Minor	Ensure all electrical panels are properly labelled.	NFPA 70E
7	Corrosive chemicals were being improperly stored outside of protective cabinet.	Minor	Provide proper storage cabinets for storing corrosive liquids and chemicals; with separate storage for tools.	OSHA 29 CFR 1910.106(d)

Please let us know if you have any questions or need additional information.

Sincerely,
 Arcadis of New York, Inc.

Daniel Zuck, P.G.
 Senior Environmental Scientist

CC. Andy Vitols, P.G., Jeremy Wyckoff, P.G., Jasmine Mullins, E.I.T.

Enc. Attachment A – Photographic Log

Photograph Log

Gladding Cordage – H&S Audit
NYSDEC Site No. 709009



Photograph: 1

Description: Interior view of Treatment System building.

Photograph taken by:
D. Zuck

Date: 4/6/2021



Photograph: 2

Description: Exit Sign located above entry door.

Photograph taken by:
D. Zuck

Date: 4/6/2021

Photograph Log

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Photograph: 3

Description: Fire Extinguisher with inspection record.

Photograph taken by:
D. Zuck

Date: 4/6/2021



Photograph: 4

Description: Ground-fault circuit interrupter (GFCI) outlet.

Photograph taken by:
D. Zuck

Date: 4/6/2021

Photograph Log

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Photograph: 5

Description:
Flammable Storage
Cabinet.

Photograph taken by:
D. Zuck

Date: 4/6/2021



Photograph: 6

Description: Eyewash
Station.

Photograph taken by:
D. Zuck

Date: 4/6/2021