
SITE MANAGEMENT PLAN

**FORMER DAYS INN SITE
NYSDEC SITE NUMBER: 851054
23 RIVERSIDE DRIVE
CORNING, NEW YORK**

July 2026

4504.0001B000

Prepared for:

Fitzpatrick Holdings Inc.
37 Pyrex Street
Corning, New York

Revised SMP Prepared by:

Roux Environmental Engineering & Geology, DPC
2556 Hamburg Turnpike, Suite 300
Buffalo, New York 14218

Revisions to Final Approved Site Management Plan:

Revision #	Submitted Date	Summary of Revision	DEC Approval Date
0	April 2017	Initial SMP	April 2017
1	February 2024	Update contacts and development work.	March 12, 2024
2	July 2026	Update PRR Reporting frequency & Contact Information	August 5, 2026

SITE MANAGEMENT PLAN

Former Days Inn Site

Site No. 851054

Certification

I Thomas H. Forbes certify that I am currently a NYS registered professional engineer as defined in 6 NYCRR Part 375 and that this Site Management Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

Thomas H. Forbes P.E.

8-5-20 Date



SITE MANAGEMENT PLAN

Former Days Inn Site

Site No. 851054

Table of Contents

LIST OF ACRONYMS

ES	EXECUTIVE SUMMARY.....	ES-1
1.0	INTRODUCTION	1
1.1	General.....	1
1.2	Revisions	2
1.3	Notifications.....	2
2.0	SUMMARY OF PREVIOUS INVESTIGATION & REMEDIAL ACTIONS.....	5
2.1	Site Location and Description	5
2.2	Physical Setting	5
2.2.1	Land Use.....	5
2.2.2	Geology	6
2.2.3	Hydrogeology.....	7
2.3	Investigation and Remedial History.....	8
2.4	Remedial Action Objectives.....	13
2.4.1	On-Soil:.....	13
2.4.3	City Parking Lot Soil RAOs.....	13
2.5	Remaining Contamination.....	14
2.5.1	Soil.....	14
2.5.2	Groundwater.....	16
3.0	INSTITUTIONAL & ENGINEERING CONTROL PLAN	17
3.1	General.....	17
3.2	Institutional Controls	17
3.3	Engineering Controls	18
3.3.1	Cover (or Cap)	18
3.3.2	Criteria for Completion of Remediation/Termination of Remedial Systems.....	19
3.3.2.1	Cover (or Cap)	19
4.0	MONITORING AND SAMPLING PLAN	20
4.1	General.....	20
4.2	Site-Wide Inspection	20
5.0	OPERATION & MAINTENANCE PLAN	22
5.1	General.....	22

SITE MANAGEMENT PLAN

Former Days Inn Site

Site No. 851054

Table of Contents

6.0	PERIODIC ASSESSMENTS/EVALUATIONS	23
6.1	Climate Change Vulnerability Assessment.....	23
6.2	Green Remediation Evaluation	23
6.2.1	Timing of Green Remediation Evaluations.....	24
6.3	Remedial System Optimization	24
7.0	REPORTING REQUIREMENTS.....	25
7.1	Site Management Reports.....	25
7.2	Periodic Review Report	27
7.2.1	Certification of Institutional and Engineering Controls	28
7.3	Corrective Measures Work Plan	29
7.4	Remedial Site Optimization Report	30
8.0	REFERENCES	31

LIST OF TABLES

Table 1	Notifications
Table 2	Groundwater Elevation Measurements
Table 3	NYSDEC Soil/Fill Sample USCO Exceedances
Table 4	Site Soil/Fill Sample USCO Exceedances
Table 5	City Owned Parking Lot Soil/Fill Sample USCO Exceedances
Table 6	Inspection, Monitoring and Sampling Schedule

LIST OF FIGURES

Figure 1	Site Vicinity Plan
Figure 2	Site & City Owned Parking Lot Plan (Aerial)
Figure 3	Tax Map
Figure 4	Location of Impacted Soil/Fill
Figure 5	Geologic Cross Section
Figure 6	Groundwater Contour Maps
Figure 7	Extent of Characteristic Hazardous Waste
Figure 8	Remaining Soil/Fill Sample Exceedances
Figure 9	Engineering Controls – Cover System Institutional Control Boundaries

SITE MANAGEMENT PLAN

Former Days Inn Site

Site No. 851054

Table of Contents

APPENDICES

Appendix A	Environmental Easement, Survey, and Metes & Bounds
Appendix B	List of Site Contacts
Appendix C	Soil Boring & Monitoring Well Logs
Appendix D	Excavation Work Plan
Appendix E	Health and Safety Plan
Appendix F	Site Management Forms
Appendix G	Responsibilities of Owner and Remedial Party
Appendix H	Field Operating Procedures
Appendix I	Quality Assurance Project Plan

SITE MANAGEMENT PLAN

Former Days Inn Site

Site No. 851054

List of Acronyms

AS	Air Sparging
ASP	Analytical Services Protocol
BCA	Brownfield Cleanup Agreement
BCP	Brownfield Cleanup Program
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CAMP	Community Air Monitoring Plan
C/D	Construction and Demolition
CFR	Code of Federal Regulation
CLP	Contract Laboratory Program
COC	Certificate of Completion
CO2	Carbon Dioxide
CP	Commissioner Policy
DER	Division of Environmental Remediation
EC	Engineering Control
ECL	Environmental Conservation Law
ELAP	Environmental Laboratory Approval Program
ERP	Environmental Restoration Program
EWP	Excavation Work Plan
GHG	Green House Gas
GWE&T	Groundwater Extraction and Treatment
HASP	Health and Safety Plan
IC	Institutional Control
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
NYCRR	New York Codes, Rules, and Regulations
O&M	Operation and Maintenance
OM&M	Operation, Maintenance and Monitoring
OSHA	Occupational Safety and Health Administration
OU	Operable Unit
PID	Photoionization Detector
PRP	Potentially Responsible Party
PRR	Periodic Review Report
QA/QC	Quality Assurance/Quality Control
QAPP	Quality Assurance Project Plan
RAO	Remedial Action Objective
RAWP	Remedial Action Work Plan
RCRA	Resource Conservation and Recovery Act
RI/FS	Remedial Investigation/Feasibility Study

SITE MANAGEMENT PLAN

Former Days Inn Site

Site No. 851054

List of Acronyms

ROD	Record of Decision
RP	Remedial Party
RSO	Remedial System Optimization
SAC	State Assistance Contract
SCG	Standards, Criteria, and Guidelines
SCO	Soil Cleanup Objective
SMP	Site Management Plan
SOP	Standard Operating Procedures
SOW	Statement of Work
SPDES	State Pollutant Discharge Elimination System
SSD	Sub-slab Depressurization
SVE	Soil Vapor Extraction
SVI	Soil Vapor Intrusion
TAL	Target Analyte List
TCL	Target Compound List
TCLP	Toxicity Characteristic Leachate Procedure
USEPA	United States Environmental Protection Agency
UST	Underground Storage Tank
VCA	Voluntary Cleanup Agreement
VCP	Voluntary Cleanup Program

EXECUTIVE SUMMARY

The following provides a brief summary of the controls implemented for the Site and Site-Owned Parking Lot, as well as the inspections, monitoring, maintenance and reporting activities required by this Site Management Plan:

Site Identification: No. 851054, Former Days Inn, 23 Riverside Drive, Corning, NY

Institutional Controls:	1. The property may be used for commercial and/or industrial use;
	2. The EC (cover system) must be operated and maintained as specified in this SMP;
	3. The EC (cover system) must be inspected at a frequency and in a manner defined in the SMP;
	4. The use of groundwater underlying the property is prohibited without necessary water quality treatments as determined by the NYSDOH or the Steuben County Department of Health to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department;
	5. Data and information pertinent to the site management must be reported at the frequency and in a manner as defined in this SMP;
	6. All future activities that will disturb remaining contamination material must be conducted in accordance with this SMP;
	7. Maintenance, inspection, and reporting of any physical components of the remedy shall be performed as defined in this SMP;
	8. Access to the site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the Environmental Easement;
	9. Vegetable gardens and farming on the site are prohibited.
Engineering Controls:	1. Cover system
Inspections:	
1. Cover inspection	Frequency Annually
Maintenance:	
1. Cover System	As needed
Reporting:	
1. Periodic Review Report	Triennially

Further descriptions of the above requirements are provided in detail in the latter sections of this Site Management Plan.

1.0 INTRODUCTION

1.1 General

This Site Management Plan (SMP) is a required element of the remedial program for the Former Days Inn Site (Site) and the City of Corning-owned parking lot (City Parking Lot) both located in Corning, New York. See Figure 1. The Site is currently in the New York State (NYS) Inactive Hazardous Waste Disposal Site Remedial Program Site No. 851054 which is administered by New York State Department of Environmental Conservation (NYSDEC).

Fitzpatrick Holdings, Inc. (Fitzpatrick), the Site owner; High Construction Company (HCC), the Site construction contractor for the hotel project; and Doug Gross Construction, Inc. (DGC), HCC's subcontractor for excavation activities associated with the hotel project entered into a Order on Consent on September 10, 2015 with the NYSDEC to remediate the Site. A figure showing the location and boundaries of the Site and City Parking Lot is provided in Figure 2. The Site subject to the Environmental Easement is more fully described in the metes and bounds description that is part of the Environmental Easement provided in Appendix A. We note that the City Parking Lot is not subject to the Environmental Easement in Appendix A, but subsurface activities conducted on the City Parking Lot parcel are required to adhere to this SMP.

Contamination remains at the Site and City Parking Lot, which is hereafter referred to as "remaining contamination." Institutional and Engineering Controls (ICs and ECs) have been incorporated into the Site and City Parking Lot remedy to control exposure to remaining contamination to ensure protection of public health and the environment. An Environmental Easement granted to the NYSDEC, and recorded with the Steuben County Clerk, requires compliance with this SMP and all ECs and ICs placed on the Site.

This SMP was prepared to manage remaining contamination at the Site until the Environmental Easement is extinguished in accordance with ECL Article 71, Title 36 and at the City Parking Lot while improvements are made and future subsurface activities are completed related to the hotel redevelopment project. This plan has been approved by the NYSDEC, and compliance with this plan is required by the grantor of the Environmental Easement and the grantor's successors and assigns. This SMP may only be revised with the approval of the NYSDEC.

It is important to note that:

- This SMP details the site-specific implementation procedures that are required by the Environmental Easement. Failure to properly implement the SMP is a violation of the Environmental Easement.
- Failure to comply with this SMP is also a violation of Environmental Conservation Law, 6NYCRR Part 375 (Ref. 1) and the Order on Consent (Site #851054) for the site, and thereby subject to applicable penalties.

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

This updated SMP was prepared by Roux Environmental Engineering and Geology, D.P.C. (formerly TurnKey Environmental Restoration, LLC and Benchmark Environmental Engineering & Science, PLLC who merged with Roux in July 2023), on behalf of Fitzpatrick, HCC and DGC, in accordance with the requirements of the NYSDEC's DER-10 ("Technical Guidance for Site Investigation and Remediation"), dated May, 2010, and the guidelines provided by the NYSDEC. This SMP addresses the means for implementing the ICs and/or ECs that are required by the Environmental Easement for the Site and improvement/subsurface activities associated with the City Parking Lot.

1.2 Revisions

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

1.3 Notifications

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

- 60-day advance notice of any proposed changes in site use that are required under the terms of the Order on Consent, 6NYCRR Part 375 and/or Environmental Conservation Law.
- 7-day advance notice of any field activity associated with the remedial program.
- 15-day advance notice of any proposed ground-intrusive activity pursuant to the Excavation Work Plan.
- Notice within 48-hours of any damage or defect to the foundation, structures, or EC that reduces or has the potential to reduce the effectiveness of an EC, and likewise, any action to be taken to mitigate the damage or defect.
- Verbal notice by noon of the following day of any emergency, such as a fire; flood; or earthquake that reduces or has the potential to reduce the effectiveness of ECs in place at the site, with written confirmation within 7 days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public.
- Follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action submitted to the NYSDEC within 45 days describing and documenting actions taken to restore the effectiveness of the ECs.

Any change in the ownership of the site or the responsibility for implementing this SMP will include the following notifications:

- At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser/Remedial Party has been provided with a copy of the Order on Consent, and all approved work plans and reports, including this SMP.
- Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing to the NYSDEC.

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

Table 1: Notifications*

Name	Contact Information
Mr. James Mazzeo NYSDEC Project Manager	585-438-5282 james.mazzeo@dec.ny.gov
NYSDEC Regional HW Engineer	R8HWR@dec.ny.gov
Kelly Lewandowski, P.E. NYSDEC Site Control	518-402-9543 kelly.lewandowski@dec.ny.gov

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

2.0 SUMMARY OF PREVIOUS INVESTIGATION & REMEDIAL ACTIONS

2.1 Site Location and Description

The Site and City Parking Lot are located in Corning, Steuben County, New York. The Site consists of one (1) parcel identified as Block 1, Lot 24 on the Steuben County Tax Map #317-08 (see Figure 3). The Site is an approximately 1.35-acre area and is bounded by a commercial property to the north, Riverside Drive to the south, commercial properties to the east, and Ferris Street to the west (see Figure 2). The boundaries of the Site are more fully described in Appendix A –Environmental Easement.

The City Parking Lot consists of one parcel identified as Block 1 and Lot 38 on the Steuben County Tax Map #317-08 (see Figure 3). The Site is an approximately 1.11-acre area and is bounded by Riverside Drive to the north, City of Corning property containing flood control berms to the south, a private commercial parking lot to the east, and City of Corning pump station to the west (see Figure 2).

The owner(s) of the Site parcel(s) at the time of issuance of this SMP is/are:

Fitzpatrick Holdings Inc.

The owner(s) of the City Parking Lot at the time of the issuance of this SMP is/are:

City of Corning

2.2 Physical Setting

2.2.1 Land Use

The Site was redeveloped as a Hilton Garden Inn hotel with hotel frontage along Riverside Drive that occupies the southern portion of the Site. The northern portion of the Site is a parking lot area for the hotel. The Site is zoned commercial/light industrial and its occupants will include hotel staff and guests.

The City Parking Lot is leased by FHI for use as additional hotel parking and was improved (e.g., catch basin replacement, light pole installation, etc.), prior to the hotel opening and being utilized for hotel parking. The City Parking Lot is zoned commercial and used as parking lot by the commercial businesses in the area.

The redevelopment activities that occurred and have become the final remedy for the Site were outline and discussed in the IRMWP.

The properties adjoining the Site and the City Parking Lot and in the neighborhood surrounding area primarily include commercial properties. The properties immediately south of the Site and City Parking Lot include City of Coring Pump station, a flood control berm and the Chemung River; the properties immediately north of the Site include commercial properties; the properties immediately east of the Site include commercial and industrial properties; and the properties to the west of the Site include commercial properties.

2.2.2 Geology

The overburden geology at the Site and City Parking Lot are very similar due to their close proximity. Fill material, which generally consists of sand with gravel, gravel with sand or fill material containing ash, glass cullet and slag with other and varying quantities of soil/fill types is present overlying native soils, which generally consist of lean clay, silts, sands with gravel and/or gravels with sands. The U.S. Department of Agriculture Soil Conservation Service soil survey map of Steuben County describes the general soil type for this area as Tioga Silt Loam. The Tioga series consist of deep well drained soils that formed in recent deposits of alluvium. They are nearly level on flood plains throughout Steuben County and subject to occasional overflow.

The focus of the previous investigation and rationale for this SMP is the soil/fill material containing ash, glass cullet and slag present at the Site and City Parking Lot. This material was observed in the southern portion of Site at depths ranging from 0.25 to 5 fbgs with thicknesses ranging from 1 to 4 feet (see Figure 4). At the City Parking Lot parcel, this material was observed throughout the majority of the parcel at depth ranging from 0.25 to 8 fbgs with thicknesses ranging from 1 to 7 feet (see Figure 4). The bottom depth of the material and its thickness appeared to be increase across the City Parking Lot from north to south, as does the thickness if the unit.

Bedrock in the area of the Site and City Parking Lot is of the upper Devonian, West Falls Group, Gardeau Formation which consists of shale and siltstone. Bedrock was not encountered during the SC.

A geologic cross section is shown in Figure 5. Site specific boring logs are provided in Appendix C.

2.2.3 Hydrogeology

Three (3) groundwater monitoring wells were installed and gauged as part of the Site Characterization (SC) activities. A top of riser monitoring point was established for each of the three (3) well relative to each other. Groundwater elevation data was collected during the SC, which included water levels measurements on September 30, 2015 and October 6, 2015. Depth to groundwater ranged from approximately 17 fbs (MW-3) to 19 fbs (MW-1 and -2). A figure showing the locations and groundwater contour map is provided as Figure 6. Groundwater elevation data that was collected is provided in the table below.

Table 2: Groundwater Elevation Measurements

	Top of Riser Elevation	Depth to Water 9/30/15	Groundwater Elevation 9/30/2015	Depth to Water 10/6/2015	Groundwater Elevation 10/6/2015
MW-1	932.17 ft	22.39	909.78	20.24	911.93
MW-2	932.13 ft	22.61	909.52	20.48	911.65
MW-3	930.20 ft	20.47	909.73	18.54	911.66

In general, the overburden groundwater flow direction was estimated to be easterly and has a low hydraulic gradient. Based on the proximity of the Site to the Chemung River, the easterly groundwater flow direction is consistent with the easterly flow direction of the river.

The gradients were determined from the highest elevation at MW-1 to the east towards MW-2. The horizontal gradient for overburden groundwater was calculated to range from 0.001 ft/ft (10/6/2015) to 0.002 ft/ft (9/30/15).

Groundwater monitoring well construction logs are provided in Appendix C, however, the three (3) monitoring wells were decommissioned in April 2017 with NYSDEC approval.

2.3 Investigation and Remedial History

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

A Phase I Environmental Site Assessment (Ref. 3) was completed at the Site. The Site was vacant in the late 1800's and portions of the Site were developed with residential homes and a church between 1900s and 1968. A 1921 Sanborn map indicates that a Corning Glass Works storage building was located to the east of the area. Historic Sanborn maps also identify the Brick Terra Cotta and Tile Co. and a Corning Gas & Elec. Power Station located east of the Site from 1903 through at least 1921 (subsequently Duke, Van Dusen & Duke, Inc. Lumber and Bldg Supplies and NYSEG as of 1931).

Between 1968 and 1978 the residential homes and church were removed and a restaurant constructed. Significant damage to the buildings in the area of the Site occurred in 1972 due to a hurricane and flood control failures. A hotel was constructed in the northern portion of the Site in 1986 and a Days Inn hotel and bakery in the area of the former restaurant in 1989. The Days Inn hotel was closed and the hotel building was demolished in June 2014.

During redevelopment activities to construct a new hotel (Hilton Gardens Inn), contaminated fill consisting of refractory brick, black ash, and glass cullet was removed from the Site during construction activities along with other soil/fill materials. As many as 220 truckloads of mixed volume have been removed from the Site and taken to eight (8) other locations in Steuben County for use as fill material. The NYSDEC expressed concern regarding the fill material present at the Site, and the material that taken to the other eight (8) locations. Construction activities at the Site were stopped in May 2015.

Samples were collected by NYSDEC of the remaining fill at the Site on May 12, 2015 along the excavation for the southern building foundation. Results identified concentrations of toxicity characteristic leaching procedure (TCLP) lead (up to 423 parts per million (ppm)) and TCLP cadmium (up to 2.4 ppm) that exceed the regulatory limits for characteristic hazardous waste in two (2) of the ten (10) samples that were collected (see Table 2). Five (5) of the samples had concentrations that exceed 6 NYCRR Part 375 Restricted Commercial Use Soil Cleanup Objectives (CSCOs) for arsenic (up to 437 ppm), cadmium (up to 238 ppm), lead (up to 25,600 ppm), and/or dibenzo(a,h)anthracene (up to 1.7 ppm). Previous analytical

testing conducted by NYSDEC of similar fill materials at nearby sites has, in some cases, identified concentrations of lead and cadmium above characteristic hazardous waste thresholds. Arsenic, other metals, and semi-volatile organic compounds (SVOCs) have also been identified at concentrations above their respective Part 375 CSCOs.

Fitzpatrick, HCC and DGC entered into an Order on Consent with NYSDEC on September 15, 2015. Also in September 2015, TurnKey completed a SC at the Site and City Parking Lot on behalf of Fitzpatrick, in accordance with the NYSDEC approved SC Work Plan (Ref. 4). The purpose of the SC was to:

- supplement the previous environmental data collected by NYSDEC from the Site;
- collect additional soil/fill samples to further characterize fill and native soil present; and
- delineate the extent of contaminated soil/fill containing ash, slag and glass cullet.
- determine if the contaminated fill material containing the ash, glass cullet and slag is present on the City Parking Lot;
- collect soil/fill samples to characterize fill and native soil present; and,
- determine if limited improvement activities will encountered potentially contaminated soil/fill containing ash, slag and glass cullet.

As part of the SC activities at the Site, 24 soil probes and three (3) groundwater monitoring wells were installed. At the City Parking Lot, three (3) surface soil sample were collected from existing greenspace and eleven (11) soil probes were completed. A SC Report (Ref. 5) was prepared and submitted to NYSDEC in January 2016. The following is a summary and conclusions of SC Report.

Site

- Based on field observations, no evidence of VOCs was present based on visual/olfactory observations or elevated PID readings.
- Based on field observations, evidence of ash, glass cullet and/or slag was observed in the area shown on Figure 4. The fill material containing the ash, glass cullet and slag was present at various depths from 0.25 to 5 fbgs and at thicknesses from 1 to

4 feet in the south and south eastern portion of the Site. The soil/fill material containing ash, glass cullet and/or slag containing contaminants above their respective CSCOs has a volume of approximately 690 cubic yards (CY). The total volume of soil/fill material containing ash, glass cullet and/or slag is 1,100 CY.

- Based on the near-surface soil data (0-1 fbgs) from 3 samples collected, all SVOCs and metals were detected below their respective Unrestricted Use SCOs.
- Based on the sub-surface soil data from 44 samples collected, the vast majority of samples collected did have contaminants detected above Unrestricted SCOs. Only one SVOC at one location was detected above its Commercial Use SCOs. Arsenic, cadmium and lead were detected above their respective Commercial Use SCOs within the area shown on Figure 4. Three of 14 samples collected within that area exhibited TCLP exceedances for lead and/or cadmium. Based on the sampling completed, it appears that the location of the hazardous soil/fill at the Site is outside the HGI building footprint, has an approximate footprint of 1,600 square feet and a volume of 240 CY.
- Based on the groundwater data, No VOCs, SVOCs or metals were detected above GWQS/GVs. An additional groundwater sampling event will be completed in Spring 2016.

City Parking Lot

- Based on field observations, no evidence of significant VOCs was present based on visual/olfactory observations or elevated PID readings.
- Based on field observations, fill material with evidence of ash, glass cullet and/or slag was observed in the area shown on Figure 4. This fill material was present at various depths from 0.25 to 8 fbgs, at thicknesses ranging from 1 to 7 feet, and appears to increase in thickness and depth from north to south, particularly in the southwestern portion of the parking lot. The soil/fill material containing ash, glass cullet and/or slag containing contaminants above their respective CSCOs has a volume of approximately 1,660 CY. The total volume of soil/fill material containing ash, glass cullet and/or slag on the City Parking Lot is 4,150 CY.
- Based on the near-surface soil data from 2 samples collected, all SVOCs and metals were detected below their respective Unrestricted Use SCOs, with the exception of SS-1 where lead was detected slightly above its Unrestricted Use SCO but well below its Commercial SCO.

- Based on the sub-surface soil data from 18 samples collected, the majority of samples collected did have contaminants detected above Unrestricted SCO. Only one location (SB-26, 4-8 fbgs) had SVOCs detected above Commercial Use SCO. Arsenic and lead were detected above their respective Commercial Use SCO at three sample locations with the area shown on Figure 4. One of seven samples collected within that area exhibited a TCLP exceedance for lead.

Given the nature and extent of contamination present in soil/fill and the lack of exposure under the proposed future use, the proposed IRM for the Site and City Parking Lot is the *Implementation of IC/ECs* because it: meets the RAOs; is fully protective of human health and the environment; provides long-term permanence and effectiveness; is technically feasible and has less technical limitations to implement compared to other alternatives; is cost effective; and, is consistent with future land use.

No exposure conditions have been identified whereby a pedestrian, hotel guest, and/or individual using the City Parking Lot would be exposed to the characteristically hazardous soil/fill and/or contaminants exceeding the CSCOs. However, it is reasonable to assume that unforeseen activities could be conducted in the future that could create a potential for exposure. The risk associated with the potential exposure can be mitigated by implementation of procedures and protocols in the SMP. The establishment of an environmental easement would require the implementation of the SMP and the limit the property use (commercial use) in perpetuity and follow with the property deed.

In a letter dated January 8, 2016, NYSDEC approved the SC Report and proposed remedy to be completed as an IRM. TurnKey subsequently prepared an IRM work plan (Ref. 2) and IRM Addendum (Ref. 7) to implement the proposed remedy outlined in the SC Report. The IRMWP and IRMWP Addendum were approved by NYSDEC in a letters dated September 19, 2016 and September 22, 2016, respectively.

IRM actions were completed in early 2017 and included implementation of institutional and engineering controls to mitigate threats to human health and the environment. The controls implemented at the Site included cover system sampling and temporary cover placement over the impacted area of the Site. The cover system sampling found that the existing cover system, prior to hotel construction, meet the requirements for a suitable 1-foot commercial use cover system in accordance with DER-10, with the exception of an approximate 4,900 square feet (sq ft) area in the southeastern portion of the Site. Therefore, a

temporary 1-foot thick (minimum) cover system was installed over the impacted area over a demarcation layer.

The cover system consisted of DER-10 compliant material approved by NYSDEC. The DER-10 compliant cover system installed in the 4,900 sq ft area of the Site (see Figure 4) was from an existing on-site soil stockpile. It was reported that the stockpile was generated from building foundation excavations in the northwestern portion of the building footprint. This soil stockpile was estimated to contain approximately 150 cubic yards of material and was sampled according to NYSDEC DER-10 Table 5.4(e)10 requirements. The analytical results were below their respective Part 375 USCOs and deemed acceptable for on-site reuse in an email correspondence from NYSDEC dated January 5, 2017. The IRM activities were documented in a Construction Completion Report (CCR, Ref. 8) and approved by NYSDEC in a letter dated April 6, 2017.

The Order on Consent (Index No. A8-0860-15-09) was subsequently terminated by NYSDEC in a letter dated April 21, 2017.

Redevelopment activities that constitute the final cover system occurred between September 2017 and July 2018 and were completed in accordance with the SMP. During the redevelopment activities, environmental oversight was provided, and the Community Air Monitoring Plan (CAMP) was implemented. Oversight and CAMP were also provided during intrusive work conducted in Riverside Drive and at the City-Owned Parking Lot.

The contaminated soil/fill encountered during subsurface activities containing ash, slag, brick, and glass cullet that was generated from the Site (southeastern portion of the Site formerly under the 1-foot cover), in the City-owned parking lot, and under Riverside Drive were sent to the Stueben County Bath Landfill for disposal. Approximately 1,865 tons of material were taken to the landfill for disposal as part of the redevelopment activities.

Excess soil and previously placed stone generated from the Site outside of the impacted areas identified during the SC (approximately 700 cubic yards) and soil used to construct the 1 ft soil cover in the southeastern portion of the Site (approximately 200 cubic yards) that could not be reused on-site were taken to Gridley Excavation LLC located at 41 River Road, Corning NY or Country Side Energy Services LLC, located at 8498 Route 415 in Cambell, New York, for use as fill under a NYSDEC Beneficial Use Determination (BUD) approval. These materials were observed during excavation to verify they did not contain ash, slag, brick, and glass cullet before being transported off-site under the BUD approval.

Materials imported to the Site as part of the redevelopment activities included: Round #3 Stone, Crushed #3 Stone, Crusher Run Stone, Crushed #1& 2 Stone, #1A Stone, Sand and Topsoil, which were approved by NYSDEC.

The concrete building slab, walkways, and asphalt parking now constitute the new cover system at the Site. We note that the underlying soil, with the exemption of the 4,900 sq ft area in the southeastern portion of the Site were analyzed and deemed acceptable as cover under a commercial use scenario.

In June 2018, improvements to the City-Owned Parking Lot including stormwater and lighting infrastructure and resurfacing the parking lot were completed. The asphalt cover, walkways, greenspace and landscaped beds constitute the cover system for the City-Owned Parking Lot. The hotel was opened for operation in July 2018.

2.4 Remedial Action Objectives

The Remedial Action Objectives (RAOs) for the Site as listed in the SC Report dated January 2016 and approved by NYSDEC are as follows:

2.4.1 On-Soil:

- Mitigate exposure to, treat or remove metals-impacted soil/fill containing ash, glass cullet and slag that exhibits hazardous waste characteristics.
- Mitigate exposure to prevent ingestion/direct contact with soil/fill where contaminant levels exceed CSCOs through the use of a cover system.
- Implement and maintain engineering and institutional controls to assure that the Site is not used in a manner inconsistent with the reasonably anticipated future use.

2.4.2 Groundwater RAOs

- None required.

2.4.3 City Parking Lot Soil RAOs

- Mitigate exposure to, treat or remove metals-impacted soil/fill containing ash, glass cullet and slag that exhibits hazardous waste characteristics.

- Properly dispose of impacted soil/fill containing ash, glass cullet and slag when encountered during the City Parking Lot improvements (e.g., catch basin replacement).
- Mitigate exposure to prevent ingestion/direct contact with soil/fill where contaminant levels exceed CSCOs through the use of a cover system.
- Implement and maintain engineering and institutional controls to assure that the City Parking Lot is not used in a manner inconsistent with the reasonably anticipated future use.

2.4.4 City Parking Lot Groundwater RAOs

- None required.

2.5 Remaining Contamination

2.5.1 Soil

The location and estimated extent of the impacted areas for the Site and City Parking Lot are described below.

Site Soil

Based on field observations, evidence of ash, glass cullet and/or slag was observed in the area of the Site shown on Figure 4. The fill material containing the ash, glass cullet and slag was present at various depths from 0.25 to 5 fbs and at thicknesses from 1 to 4 feet in the south and southeastern portion of the Site. The area where the ash, glass cullet and slag was observed or is believed to be present (shown in magenta) is an approximate 10,000 square foot (SF) area with a volume of soil/fill material containing ash, glass cullet and/or slag of approximately 1,100 cubic yards (CY).

The area of soil/fill material containing ash, glass cullet and/or slag with contaminants exceeding their respective Commercial Soil Cleanup Objectives (CSCOs) is also shown on Figure 4 (in orange), has an approximate 6,200 SF area and has an estimated volume of 690 CY.

Characteristically hazardous levels of cadmium and lead were also detected in three (3) of the 20 soil/fill samples analyzed from the Site. The location of the characteristic hazardous soil/fill at the Site is outside the HGI building footprint, has an approximate footprint of 1,600 SF, as shown on Figure 7, and a volume of 240 CY, assuming a thickness of 4 feet.

City Parking Lot Soil

Based on field observations at the City Parking Lot, fill material with evidence of ash, glass cullet and/or slag was observed in the area shown on Figure 4. This fill material was present at various depths from 0.25 to 8 fbs, at thicknesses ranging from 1 to 7 feet, and appears to increase in thickness and depth from north to south, particularly in the southwestern portion of the parking lot. The area where the ash, glass cullet and slag was observed or is believed to be present (shown in magenta) is an approximate 32,000 SF area with a volume of approximately 4,150 CY.

The area of soil/fill material containing ash, glass cullet and/or slag with contaminants exceeding their respective CSCOs is also shown on Figure 4 (in orange), has an approximate 12,400 SF area and has an estimated volume of 1,660 CY.

Characteristic hazardous levels of lead were also detected at one (1) of the seven (7) soil/fill samples analyzed from the City Parking Lot. The location of the characteristic hazardous soil/fill at the City Owned Parking Lot is located in the northeastern corner of the property, has an approximate footprint of 3,800 square feet, as shown on Figure 7, and a volume of 563 CY, assuming a thickness of 4 feet.

Tables 3, 4 and 5 summarize the results of all soil samples collected that exceed the Unrestricted Use SCOs and the Commercial Use SCOs at the Site and City Parking Lot. Figure 8 depicts their approximate locations of USCOS and CSCOs after completion of remedial action.

Although, approximately 1,865 tons of material was removed from the Site, Riverside Drive, and City-Owned Parking Lot as part of the redevelopment, only material necessary to facilitate redevelopment (installation of foundations, footers, utilities, cover system, etc.) were removed. Therefore, areas soil/fill material containing ash, glass cullet, and/or slag with contaminants exceeding their respective CSCOs, were not substantially changed.

2.5.2 Groundwater

Based on the groundwater sampling completed at the Site during the SC, no VOCs, SVOCs or metals were detected in the groundwater above their respective NYSDEC groundwater criteria (Ref. 6). Groundwater impacts are not a concern at the Site. Groundwater monitoring wells were decommissioned in April 2017.

3.0 INSTITUTIONAL & ENGINEERING CONTROL PLAN

3.1 General

Since remaining contamination exists at the Site and City Parking Lot, Institutional Controls (ICs) and Engineering Controls (ECs) are required to protect human health and the environment. This IC/EC Plan describes the procedures for the implementation and management of all IC/ECs at the site. The IC/EC Plan is one component of the SMP and is subject to revision by the NYSDEC.

This plan provides:

- A description of all IC/ECs on the Site;
- The basic implementation and intended role of each IC/EC;
- A description of the key components of the ICs set forth in the Environmental Easement;
- A description of the controls to be evaluated during each required inspection and periodic review;
- A description of plans and procedures to be followed for implementation of IC/ECs, such as the implementation of the Excavation Work Plan (EWP) (as provided in Appendix D) for the proper handling of remaining contamination that may be disturbed during maintenance or redevelopment work on the site; and
- Any other provisions necessary to identify or establish methods for implementing the IC/ECs required by the site remedy, as determined by the NYSDEC.

3.2 Institutional Controls

A series of ICs is required by the IRMWP to: (1) implement, maintain and monitor Engineering Control systems; (2) prevent future exposure to remaining contamination; and, (3) limit the use and development of the site to commercial and industrial uses only. Adherence to these ICs on the Site is required by the Environmental Easement and will be implemented under this SMP. ICs identified in the Environmental Easement may not be discontinued without an amendment to or extinguishment of the Environmental Easement. The IC boundaries are shown on Figure 3. These ICs are:

- The property may be used for commercial and/or industrial use;

- All ECs must be operated and maintained as specified in this SMP;
- All ECs must be inspected at a frequency and in a manner defined in the SMP.
- The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or the Steuben Department of Health to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department.
- Data and information pertinent to site management must be reported at the frequency and in a manner as defined in this SMP;
- All future activities that will disturb remaining contaminated material must be conducted in accordance with this SMP;
- Maintenance, inspection, and reporting of any physical component of the remedy shall be performed as defined in this SMP;
- Access to the site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the Environmental Easement.
- Vegetable gardens and farming on the site are prohibited;

3.3 Engineering Controls

3.3.1 Cover (or Cap)

Exposure to remaining contamination at the Site and City Parking Lot are prevented by a cover system placed over the Site as part of the redevelopment activities completed in 2017/2018 and those that were already present at the City Parking Lot. This cover system is comprised of a minimum of 12 inches of clean soil or hardscape consisting of asphalt pavement, concrete-covered sidewalks concrete pavers and/or concrete building slabs. Figure 9 presents the current cover system post-redevelopment. The Excavation Work Plan (EWP) provided in Appendix D outlines the procedures required to be implemented in the event the cover system is breached, penetrated, or temporarily removed, and any underlying remaining contamination is disturbed. Procedures for the inspection of this cover are provided in the Monitoring and Sampling Plan included in Section 4.0 of this SMP. Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a

Health and Safety Plan (HASP) and associated Community Air Monitoring Plan (CAMP) prepared for the site and provided in Appendix E.

3.3.2 Criteria for Completion of Remediation/Termination of Remedial Systems

Generally, remedial processes are considered completed when monitoring indicates that the remedy has achieved the remedial action objectives identified by the decision document. The framework for determining when remedial processes are complete is provided in Section 6.4 of NYSDEC DER-10.

3.3.2.1 Cover (or Cap)

The composite cover system is a permanent control and the quality and integrity of this system will be inspected at defined, regular intervals in accordance with this SMP in perpetuity.

4.0 MONITORING AND SAMPLING PLAN

4.1 General

No long-term monitoring or sampling is required at the Site or City Parking Lot, based on the IRM and redevelopment activities completed. However, the cover system will require periodic inspection, as discussed below.

We note that Appendix H contains Field Operating Procedures for activities that may be required based on potential future activities at the Site that could require penetration of the cover system and Appendix I is the Quality Assurance Plan, if sampling is necessary.

4.2 Site-Wide Inspection

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

- Compliance with all ICs, including site usage;
- An evaluation of the condition and continued effectiveness of ECs;
- General site conditions at the time of the inspection;
- The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection; and
- Confirm that site records are up to date.

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

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

- Compliance with requirements of this SMP and the Environmental Easement;
- Achievement of remedial performance criteria; and
- If site records are complete and up to date; and

Reporting requirements are outlined in Section 7.0 of this plan.

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

5.0 OPERATION & MAINTENANCE PLAN

5.1 General

The site remedy does not rely on any mechanical systems, such as groundwater treatment systems, sub-slab depressurization systems, or air sparge/soil vapor extraction systems to protect public health and the environment. Therefore, a formal operation and maintenance plan is not included in this SMP.

However, the cover system is an engineering control which needs to be maintained in order to be protective of human health and the environment. The cover system is comprised of a minimum of 12 inches of clean soil or hardscape consisting of asphalt pavement, concrete-covered sidewalks concrete pavers and/or concrete building slabs. If the cover system becomes compromised (i.e., loss of vegetation, soil erosion, significant cracking or spalling of concrete/asphalt), the cover system must be repaired to be in compliance with NYSDEC DER-10 requirements.

The Excavation Work Plan (EWP) provided in Appendix D outlines the procedures required to be implemented in the event the cover system is breached, penetrated, or temporarily removed, and any underlying remaining contamination is disturbed. Upon completion of work, the cover system must be restored in a timely manner.

6.0 PERIODIC ASSESSMENTS/EVALUATIONS

6.1 Climate Change Vulnerability Assessment

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

The Site and City Parking Lot are considered to have low vulnerability related to climatic conditions. It is protected from the 100-year flood by levee; will not employ any remedial systems reliant upon electrical power; is serviced by a municipal storm drainage system; and will not incorporate any petroleum or chemical bulk storage in the redevelopment. It has been substantially covered by hardscape (building, pavement, asphalt, etc.) as part of the redevelopment activities in 2017/2018. Consequently, acute cap erosion resultant in potential exposure to remaining impacted soil/fill is unlikely.

6.2 Green Remediation Evaluation

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

The only engineering control established for the Site and City Parking Lot is the cover system. No other remedial components are expected or anticipated. The maintenance of cover system is not anticipated to generate additional waste, use energy, produce emissions, require substantial water to promote vegetative cover growth, and/or affect any ecosystem (Site is located in a highly developed area in the City of Corning).

6.2.1 Timing of Green Remediation Evaluations

For major remedial system components, green remediation evaluations and corresponding modifications will be undertaken as part of a formal Remedial System Optimization (RSO), or at any time that the Project Manager feels appropriate, e.g. during significant maintenance events or in conjunction with storm recovery activities. As the only engineering control implemented at the Site is the cover system, it is not anticipated that additional green remediation evaluations will be needed.

6.3 Remedial System Optimization

A Remedial Site Optimization (RSO) study will not be required as there are no active remedial systems. The only engineering control at the Site is the cover system.

7.0 REPORTING REQUIREMENTS

7.1 Site Management Reports

All site management inspection, maintenance, and monitoring events will be recorded on the appropriate site management forms provided in Appendix F. These forms are subject to NYSDEC revision.

All applicable inspection forms and other records, including media sampling data and system maintenance reports, generated for the site during the reporting period will be provided in electronic format to the NYSDEC in accordance with the requirements of Table 6 and summarized in the Periodic Review Report.

Table 6: Schedule of Interim Monitoring/Inspection Reports

Task/Report	Reporting Frequency*
Excavation Activities Below the Cover System	Monthly
Cover System Inspection	Annually
Periodic Review Report	Triennial, or as otherwise determined by the Department

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

All interim monitoring/inspections reports will include, at a minimum:

- Date of event or reporting period;
- Name, company, and position of person(s) conducting monitoring/inspection activities;
- Description of the activities performed;
- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents noted (included either on the checklist/form or on an attached sheet);
- Type of samples collected (e.g., sub-slab vapor, indoor air, outdoor air, etc.);

- Copies of all field forms completed (e.g., well sampling logs, chain-of-custody documentation, etc.);
- Sampling results in comparison to appropriate standards/criteria;
- A figure illustrating sample type and sampling locations;
- Copies of all laboratory data sheets and the required laboratory data deliverables required for all points sampled (to be submitted electronically in the NYSDEC-identified format);
- Any observations, conclusions, or recommendations; and
- A determination as to whether contaminant conditions have changed since the last reporting event.

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

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

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

- Date of event;
- Name, company, and position of person(s) conducting non-routine maintenance/repair activities;
- Description of non-routine activities performed;
- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents (included either on the form or on an attached sheet); and

- Other documentation such as copies of invoices for repair work, receipts for replacement equipment, etc. (attached to the checklist/form).

Data will be reported in digital format as determined by the NYSDEC. Currently, data is to be supplied electronically and submitted to the NYSDEC EQuIS™ database in accordance with the requirements found at this link <http://www.dec.ny.gov/chemical/62440.html>.

7.2 Periodic Review Report

A Periodic Review Report (PRR) will be submitted to the Department beginning sixteen (16) months after the IRM activities are complete and are deemed acceptable to NYSDEC. After submittal of the initial Periodic Review Report, the next PRR shall be submitted triennially to the Department or at another frequency as may be required by the Department. In the event that the Site or City Parking Lot are subdivided into separate parcels with different ownership, a single Periodic Review Report will be prepared that addresses the site described in Appendix A - Environmental Easement. The report will be prepared in accordance with NYSDEC's DER-10 and submitted within 30 days of the end of each certification period. Media sampling results will also be incorporated into the Periodic Review Report. The report will include:

- Identification, assessment, and certification of all ECs/ICs required by the remedy for the site.
- Results of the required annual site inspections and severe condition inspections, if applicable.
- All applicable site management forms and other records generated for the site during the reporting period in the NYSDEC-approved electronic format, if not previously submitted.
- A summary of any discharge monitoring data and/or information generated during the reporting period, with comments and conclusions.
- Data summary tables and graphical representations of contaminants of concern by media (groundwater, soil vapor, etc.), which include a listing of all compounds analyzed, along with the applicable standards, with all exceedances highlighted. These will include a presentation of past data as part of an evaluation of contaminant concentration trends.

- Results of all analyses, copies of all laboratory data sheets, and the required laboratory data deliverables for all samples collected during the reporting period will be submitted in digital format as determined by the NYSDEC. Currently, data is supplied electronically and submitted to the NYSDEC EQuIS™ database in accordance with the requirements found at this link: <http://www.dec.ny.gov/chemical/62440.html>.
- A site evaluation, which includes the following:
 - The compliance of the remedy with the requirements of the site-specific RAWP, ROD or Decision Document;
 - The operation and the effectiveness of all treatment units, etc., including identification of any needed repairs or modifications;
 - Any new conclusions or observations regarding site contamination based on inspections or data generated by the Monitoring and Sampling Plan for the media being monitored;
 - Recommendations regarding any necessary changes to the remedy and/or Monitoring and Sampling Plan; and
 - Trends in contaminant levels in the affected media will be evaluated to determine if the remedy continues to be effective in achieving remedial goals as specified by the Decision Document.
 - The overall performance and effectiveness of the remedy.

7.2.1 Certification of Institutional and Engineering Controls

Following the last inspection of the reporting period, a professional engineer licensed in the State of New York will prepare, and include in the Periodic Review Report, the following certification as per the requirements of NYSDEC DER-10:

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

- *The inspection of the site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under my direction;*
- *The institutional control and/or engineering control employed at this site is unchanged from the date the control was put in place, or last approved by the Department;*
- *Nothing has occurred that would impair the ability of the control to protect the public health and environment;*

- *Nothing has occurred that would constitute a violation or failure to comply with any site management plan for this control;*
- *Access to the site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of this control;*
- *If a financial assurance mechanism is required under the oversight document for the site, the mechanism remains valid and sufficient for the intended purpose under the document;*
- *Use of the site is compliant with the environmental easement;*
- *The engineering control systems are performing as designed and are effective;*
- *To the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program; and*
- *The information presented in this report is accurate and complete.*

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

The signed certification will be included in the Periodic Review Report.

The Periodic Review Report will be submitted, in electronic format, to the NYSDEC Central Office, Regional Office in which the Site is located, and the NYSDOH Bureau of Environmental Exposure Investigation. The Periodic Review Report may need to be submitted in hard-copy format, as requested by the NYSDEC project manager.

7.3 Corrective Measures Work Plan

If any component of the remedy is found to have failed, or if the periodic certification cannot be provided due to the failure of an institutional or engineering control, a Corrective Measures Work Plan will be submitted to the NYSDEC for approval. This plan will explain the failure and provide the details and schedule for performing work necessary to correct the

failure. Unless an emergency condition exists, no work will be performed pursuant to the Corrective Measures Work Plan until it has been approved by the NYSDEC.

7.4 Remedial Site Optimization Report

In the event that an RSO is to be performed the RSO report will document the research/ investigation and data gathering that was conducted, evaluate the results and facts obtained, present a revised conceptual site model and present recommendations. RSO recommendations are to be implemented upon approval from the NYSDEC. Additional work plans, design documents, HASPs etc., may still be required to implement the recommendations, based upon the actions that need to be taken. A construction completion report and update to the SMP may also be required.

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

8.0 REFERENCES

1. 6NYCRR Part 375, Environmental Remediation Programs. December 14, 2006.
2. “Interim Remedial Measures Work Plan, Former Days Inn Site, Site No. 851054, 23 Riverside Drive Site & City-Owned Parking Lot, Corning, New York”. Prepared for Fitzpatrick Holdings, Inc. by TurnKey Environmental Restoration, LLC. February 2016.
3. “Phase I Environmental Site Assessment for the Corning Hotel Development, 23 Riverside Drive, Corning, NY 14830”. Prepared for High Construction Company, LLC by Hunt Engineer’s, Architects & Land Surveyors, PC. June 2013, Revised October 2014.
4. “Site Characterization Work Plan, 23 Riverside Drive, Former Days Inn Site, Site No. 851054, Corning, New York”. Prepared for Fitzpatrick Holdings, Inc. by TurnKey Environmental Restoration, LLC. July 2015, Revised September 2015.
5. “Site Characterization Report, 23 Riverside Drive, Former Days Inn Site, Site No. 851054, Corning, New York”. Prepared for Fitzpatrick Holdings, Inc. by TurnKey Environmental Restoration, LLC. January 2016.
6. NYSDEC, 1998. Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1. June 1998 (April 2000 addendum).
7. “Interim Remedial Measures Work Plan Addendum, former Days Inn Site, Site no. 851054, 23 Riverside Drive, Corning, New York. Prepared for NYSDEC by TurnKey Environmental Restoration. September 15, 2016.
8. “Construction Completion Report, Former Days Inn Site, NYSDEC Site Number: 851054, 23 Riverside Drive, Corning, New York”. Prepared for Fitzpatrick Holdings, Inc. by TurnKey Environmental Restoration. April 2017

TABLES

TABLE 3

SUMMARY OF NYSDEC ON-SITE SOIL-FILL ANALYTICAL RESULTS EXCEEDING UNRESTRICTED SCOs
SITE MANAGEMENT PLAN
FORMER DAYS INN SITE No. 851054
23 RIVERSIDE DRIVE
CORNING, NEW YORK

PARAMETER ¹	Unrestricted Use SCOs ²	Residential Use SCO's ³	Commercial Use SCOs ⁴									
				70009-1 (DEC-1)	70009-2 (DEC-2)	70009-3 (DEC-3)	70009-4 (DEC-4)	70009-5 (DEC-5)	70009-6 (DEC-6)	70009-7 (DEC-7)	70009-8 (DEC-8)	70009-9 (DEC-9)
Semi-Volatile Organic Compounds (SVOCs) - mg/Kg ⁵												
Acenaphthylene	100	100	500	--	--	--	--	--	0.17	0.17	--	--
Anthracene	100	100	500	--	--	--	0.23	--	--	0.27	--	--
Benzo(a)anthracene	1	1	5.6	0.16	0.16	0.1	0.46	--	0.9	0.64	4.1	0.3
Benzo(a)pyrene	1	1	1	0.16	0.11	0.093	0.31	--	0.89	0.55	0.73	0.31
Benzo(b)fluoranthene	1	1	5.6	0.17	0.2	0.14	0.31	--	1.2	0.9	3.9	0.45
Benzo(ghi)perylene	100	100	500	--	0.13	0.11	0.23	--	0.77	0.52	4.2	0.3
Benzo(k)fluoranthene	0.8	1	56	0.23	0.1	0.097	0.21	--	0.32	0.42	--	0.28
Carbazole	--	--	--	--	--	--	0.11	--	--	0.11	--	--
Chrysene	1	1	56	--	0.11	0.072	0.41	--	0.81	0.66	0.53	0.33
Dibenzo(a,h)anthracene	0.33	0.33	0.56	--	0.4	--	--	--	--	--	1.7	--
Dibenzofuran	7	14	350	--	--	--	--	--	--	0.14	--	--
Fluoranthene	100	100	500	--	0.15	0.084	0.94	--	1.5	0.88	0.45	0.37
Fluorene	30	100	500	--	--	--	--	--	--	0.23	--	--
Indeno(1,2,3-cd)pyrene	0.5	0.5	5.6	0.12	0.13	0.096	0.19	--	0.69	0.48	2.2	0.31
Phenanthrene	100	100	500	0.15	0.09	0.045	0.87	--	0.65	1	0.47	0.21
Pyrene	100	100	500	0.19	0.14	0.088	0.86	--	1.4	0.72	0.34	0.42
Total Metals - mg/Kg												
Aluminum	--	--	--	2380	2340	2950	5130	7190	5580	7680	6900	2830
Antimony	--	--	--	--	--	--	--	34.5	19	1.5	2.5	--
Arsenic	13	16	16	3.5	5.3	9.4	16.7	437	52.7	130	13	15.8
Barium	350	350	400	43.3	199	33.2	65.6	293	197	81.6	50.6	49.6
Beryllium	7.2	14	590	0.33	0.35	0.37	0.52	0.15	0.54	0.37	0.53	0.36
Cadmium	2.5	2.5	9.3	0.31	--	0.44	2.2	238	97.8	3.9	0.55	0.33
Calcium	--	--	--	2020	890	3350	7330	6040	8560	23500	3480	1640
Chromium	30	36	1500	4	4.9	4.7	7.5	6.6	7.8	14.9	10.1	8.5
Cobalt	--	--	--	2.9	3.6	4.9	6.9	4	5.9	6.1	9	3.1
Copper	50	270	270	10	12.6	18.8	37	46.7	30.7	62.8	44.9	26.3
Iron	--	--	--	8050	17300	3860	38900	2460	8290	20000	11400	10900
Lead	63	400	1000	72.2	73.4	134	789	25600	2430	1010	767	277
Magnesium	--	--	--	426	184	228	1530	580	1260	3170	1540	391
Manganese	1600	2000	10000	58.7	24	21.8	192	95.5	137	255	241	73.4
Mercury	0.18	0.81	2.8	0.023	--	0.045	0.1	1.2	0.24	1.2	0.39	0.12
Nickel	30	140	310	7	8.2	12.5	14.4	4.4	15.6	32.1	18.6	10.2
Potassium	--	--	--	328	211	337	793	815	817	1130	1140	355
Selenium	3.9	36	1500	--	--	0.55	--	257	2.4	9.4	0.83	1.4
Silver	2	36	1500	--	--	--	--	0.47	--	--	--	0.4
Sodium	--	--	--	188	307	179	446	572	321	646	732	394
Thallium	--	--	--	--	--	--	--	1.8	0.4	--	--	--
Vanadium	--	--	--	8.5	11.1	8.8	15	7.8	16.2	20.5	17.7	11.1
Zinc	109	2200	10000	27.6	11.8	35	847	2550	467	338	144	34.1
TCLP RCRA 8 Metals (mg/L)												
Arsenic 5	NA	NA	NA	--	--	0.011	0.0098	0.19	0.19	0.13	0.0089	0.013
Barium 100	NA	NA	NA	0.39	0.17	--	0.45	1.2	0.8	0.64	0.28	0.15
Cadmium 1	NA	NA	NA	0.0039	--	--	0.02	2.4	2.3	0.069	0.0043	0.0011
Lead 5	NA	NA	NA	0.085	0.0064	0.012	1.8	423	27.2	3.5	0.43	0.12
Selenium 1	NA	NA	NA	--	--	--	--	--	--	0.01	--	--

Notes:

1. Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.

2. Values per NYSDEC Part 375 Unrestricted Soil Cleanup Objectives (SCOs).

3. Values per NYSDEC Part 375 Residential Soil Cleanup Objectives (SCOs).

4. Values per NYSDEC Part 375 Commercial Soil Cleanup Objectives (SCOs).

5. Sample results were reported by the laboratory in ug/kg and converted to mg/kg for comparisons to SCOs.

Definitions:	
ND = Parameter not detected above laboratory detection limit.	
"--" = No value available for the parameter; Parameter not analysed for.	
J = Estimated value; result is less than the sample quantitation limit but greater than zero.	
B= Compound was found in the blank and sample.	
Bold	= Result exceeds Unrestricted Use SCOs.
Bold	= Result exceeds Restricted Residential Use SCOs.
Bold	= Result exceeds Commercial Use SCOs.
Bold	= Result exceeds regulatory limit for hazardous waste.

TABLE 4
SUMMARY OF SITE SOIL/FILL SAMPLE ANALYTICAL RESULTS EXCEEDING UNRESTRICTED SCOs
SITE MANAGEMENT PLAN
FORMER DAYS INN - SITE NO. 851054
23 RIVERSIDE DRIVE
CORNING, NEW YORK

PARAMETER ¹	Unrestricted Use SCOs ²	Restricted Residential Use ³	Commercial Use SCOs ⁴	Hazardous Waste Threshold	SB-1 (0-1')	SB-1 (1-4')	SB-2 (1-5')	SB-2 (1-5') Blind Duplicate -1	SB-3 (0.25-4')	SB-4 (1-2')	SB-9 (2-5')	SB-10 (2-4')	SB-15 (0-16')
Semi-Volatile Organic Compounds (SVOCs) - mg/Kg⁶													
Acenaphthene	20	100	500	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND
Acenaphthylene	100	100	500	NA	0.11 J	0.047 J	0.043 J	0.041 J	0.29	ND	ND	ND	ND
Anthracene	100	100	500	NA	0.095 J	0.12	0.039 J	0.055 J	0.43	0.045 J	0.033 J	0.73 J	ND
Benzo(a)anthracene	1	1	5.6	NA	0.23	0.58	0.22	0.26	1.1	0.28	0.07 J	0.29	0.11
Benzo(a)pyrene	1	1	1	NA	0.25	0.69	0.24	0.28	0.93	0.37	ND	0.22	0.1 J
Benzo(b)fluoranthene	1	1	5.6	NA	0.39	1	0.37	0.41	1.5	0.58	0.073 J	0.4	0.15
Benzo(ghi)perylene	100	100	500	NA	0.21	0.6	0.19	0.24	0.75	0.39	ND	0.18	0.72 J
Benzo(k)fluoranthene	0.8	3.9	56	NA	0.13	0.4	0.12	0.15	0.66	0.22	ND	0.16	0.056 J
Chrysene	1	3.9	56	NA	0.27	0.54	0.28	0.27	1.1	0.28	0.071 J	0.33	0.13
Dibenzo(a,h)anthracene	0.33	0.33	0.56	NA	0.048 J	0.1	0.045 J	0.055 J	0.18	0.062 J	ND	0.044 J	ND
Fluoranthene	100	100	500	NA	0.4	1.3	0.43	0.5	2.2 J	0.59	0.13	0.55	0.23
Fluorene	30	100	500	NA	ND	ND	ND	ND	0.13 J	ND	ND	ND	ND
Indeno(1,2,3-cd)pyrene	0.5	0.5	5.6	NA	0.23	0.77	0.23	0.3	0.91	0.5	ND	0.19	0.08 J
Naphthalene	12	100	500	NA	ND	0.22	0.11 J	0.076 J	0.45	0.13 J	ND	ND	ND
Phenanthrene	100	100	500	NA	0.14	0.4	0.16	0.21	1.1	0.17	0.15	0.26	0.11
Pyrene	100	100	500	NA	0.35	1	0.4	0.42	1.7	0.48	0.084 J	0.42	0.21
2-Methylnaphthalene	--	--	--	NA	NT	NT	0.13 J	NT	NT	NT	ND	NT	NT
Total Metals - mg/Kg													
Aluminum	--	--	--	NA	NT	NT	6500	NT	NT	NT	18000	NT	NT
Antimony	--	--	--	NA	NT	NT	3.3 J	NT	NT	NT	ND	NT	NT
Arsenic	13	16	16	NA	8.6	11	23	14	420	14	22	14	12
Barium	350	400	400	NA	63	74	82	62	78	100	270	120	85
Beryllium	7.2	72	590	NA	0.23	0.32 J	0.32 J	0.2 J	0.39	0.2 J	0.92	0.4	0.36
Cadmium	2.5	4.3	9.3	NA	0.58	1.1	5.2 J	2.2 J	5.2 J	ND	ND	0.03 J	ND
Calcium	--	--	--	NA	NT	NT	7600	NT	NT	NT	2800	NT	NT
Chromium	30	110	1500	NA	12	8.5	8.9	6.9	9	8.5	24	11	10
Cobalt	--	--	--	NA	NT	NT	7.1	NT	NT	NT	16	NT	NT
Copper	50	270	270	NA	24	18	21	30	34	14	30	20	18
Iron	--	--	--	NA	NT	NT	16000	NT	NT	NT	34000	NT	NT
Lead	63	400	1000	NA	300	210	1100 J	600 J	440	27	13	96	75
Magnesium	--	--	--	NA	NT	NT	2300	NT	NT	NT	4500	NT	NT
Manganese	1600	2000	10000	NA	320	190	390	360	360	160	1200	540	410
Mercury	0.18	0.81	2.8	NA	0.04 J	0.05 J	0.43	0.27	0.14 J	0.06 J	0.06 J	0.06 J	0.06 J
Nickel	30	310	310	NA	14	13	37	35	15	11	30	14	13
Potassium	--	--	--	NA	NT	NT	450	NT	NT	NT	1500	NT	NT
Selenium	3.9	180	1500	NA	ND	ND	4.2 J	ND	3	ND	ND	ND	ND
Silver	2	180	1500	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND
Sodium	--	--	--	NA	NT	NT	600	NT	NT	NT	120 J	NT	NT
Thallium	--	--	--	NA	NT	NT	ND	NT	NT	NT	ND	NT	NT
Vanadium	--	--	--	NA	NT	NT	12	NT	NT	NT	28	NT	NT
Zinc	109	10000	10000	NA	150	190	140	97	95	32	110	68	81
Cyanide	27	27	27	NA	ND	ND	NT	ND	ND	ND	NT	ND	ND
TCLP RCRA 8 Metals - mg/L													
Arsenic	NA	NA	NA	5	NT	ND	ND	NT	ND	ND	ND	ND	NT
Barium	NA	NA	NA	100	NT	0.66	0.77	NT	0.54	0.35 J	0.48 J	0.76	NT
Cadmium	NA	NA	NA	1	NT	0.01 J	0.05 J	NT	0.03 J	ND	ND	0.01 J	NT
Chromium	NA	NA	NA	5	NT	0.03 J	ND	NT	ND	ND	ND	ND	NT
Lead	NA	NA	NA	5	NT	0.19 J	7.2	NT	0.15 J	ND	ND	0.06 J	NT
Mercury	NA	NA	NA	0.2	NT	ND	ND	NT	ND	ND	ND	ND	NT
Selenium	NA	NA	NA	1	NT	ND	ND	NT	ND	ND	ND	ND	NT
Silver	NA	NA	NA	5	NT	ND	ND	NT	ND	ND	ND	ND	NT

Notes:

1. Only those parameters detected at a minimum of one sample location are presented in this table; other compounds which were analyzed for were reported as non-detect.

2. Values per NYSDEC Part 375 Unrestricted Soil Cleanup Objectives (SCOs).

3. Values per NYSDEC Part 375 Restricted Residential Soil Cleanup Objectives (SCOs).

4. Values per NYSDEC Part 375 Commercial Soil Cleanup Objectives (SCOs).

5. Values per NYSDEC Part 375 Industrial Soil Cleanup Objectives (SCOs).

6. Sample results were reported by the laboratory in ug/kg and converted to mg/kg for comparisons to SCOs

Definitions:

ND = Parameter not detected above laboratory detection limit.

“-” = No value available for the parameter.

NT = Parameter not analysed for.

J = Estimated value; result is less than the sample quantitation limit but greater than zero.

J- = Estimated value; result is biased low.

Bold	= Result exceeds Unrestricted Use SCOs.
Bold	= Result exceeds Restricted Residential Use SCOs.
Bold	= Result exceeds Commercial Use SCOs.
Bold	= Result exceeds Industrial Use SCOs.

TABLE 5

SUMMARY OF CITY-OWNED PARKING LOT SOIL/FILL SAMPLE ANALYTICAL RESULTS EXCEEDING UNRESTRICTED SCOs
SITE CHARACTERIZATION REPORT
FORMER DAYS INN - SITE NO. 851054
23 RIVERSIDE DRIVE
CORNING, NEW YORK

PARAMETER ¹	Unrestricted Use SCOs ²	Restricted Residential Use ³	Commercial Use SCOs ⁴	Hazardous Waste Threshold	SB-25 (3-4')	SB-26 (4-8')	DUP-3 SB-26 (4-8)	SB-28 (1-4')	SB-30 (1-5')	SB-31 (2-5')	SS-1 (0-0.5')
Semi-Volatile Organic Compounds (SVOCs) - mg/Kg ⁶											
Acenaphthene	20	100	500	NA	ND	0.15 J	ND	ND	ND	0.26 J	ND
Acenaphthylene	100	100	500	NA	ND	0.93	0.065 J	0.12 J	ND	2	0.04 J
Anthracene	100	100	500	NA	0.13	1 J	0.14 J	0.24	ND	2	0.039 J
Benzo(a)anthracene	1	1	5.6	NA	0.39	4.1	0.5 J	0.93	ND	6.8	0.21
Benzo(a)pyrene	1	1	1	NA	0.36	3.5 J	0.48 J	0.88	ND	7	0.27
Benzo(b)fluoranthene	1	1	5.6	NA	0.47	7.3 J	0.85 J	1.5	ND	10	0.36
Benzo(ghi)perylene	100	100	500	NA	0.21	2.5 J	0.38 J	0.7	ND	6.1	0.19
Benzo(k)fluoranthene	0.8	3.9	56	NA	0.22	2.3 J	0.3 J	0.52	ND	3.4	0.14
Chrysene	1	3.9	56	NA	0.36	4.3 J	0.46 J	0.91	ND	7.4	0.26
Dibenzo(a,h)anthracene	0.33	0.33	0.56	NA	0.055 J	0.85 J	0.11 J	0.18	ND	1.6	0.044 J
Fluoranthene	100	100	500	NA	0.86	5.2 J	0.81 J	1.5	ND	15	0.42
Fluorene	30	100	500	NA	ND	0.31 J	ND	0.071 J	ND	0.74	ND
Indeno(1,2,3-cd)pyrene	0.5	0.5	5.6	NA	0.27	3 J	0.46 J	0.79	ND	5.5	0.23
Naphthalene	12	100	500	NA	ND	0.44 J	0.069 J	0.084 J	ND	0.86	ND
Phenanthrene	100	100	500	NA	0.45	2.4 J	0.41 J	0.63	ND	9.6	0.15
Pyrene	100	100	500	NA	0.64	4.3	0.64 J	1.2	ND	12	0.36
2-Methylnaphthalene	--	--	--	NA	NT	NT	NT	NT	NT	NT	NT
Total Metals - mg/Kg											
Aluminum	--	--	--	NA	NT	NT	NT	NT	NT	NT	NT
Antimony	--	--	--	NA	NT	NT	NT	NT	NT	NT	NT
Arsenic	13	16	16	NA	28	42 J	20 J	10	9.2	32	7.3
Barium	350	400	400	NA	23	81 J	50 J	82	100 J	130	91
Beryllium	7.2	72	590	NA	0.17 J	0.42	0.33 J	0.37	0.4	0.42	0.38
Cadmium	2.5	4.3	9.3	NA	ND	0.11 J	ND	0.06 J	ND	ND	ND
Calcium	--	--	--	NA	NT	NT	NT	NT	NT	NT	NT
Chromium	30	110	1500	NA	4.8	13	12 J	9.3	10 J	16	12
Cobalt	--	--	--	NA	ND	NT	NT	NT	NT	NT	NT
Copper	50	270	270	NA	13	60 J	51 J	24	38 J-	150	20
Iron	--	--	--	NA	NT	NT	NT	NT	NT	NT	NT
Lead	63	400	1000	NA	1600	600	380 J	200	110 J	290	67
Magnesium	--	--	--	NA	NT	NT	NT	NT	NT	NT	NT
Manganese	1600	2000	10000	NA	66	190	230 J	300	330 J-	520	420
Mercury	0.18	0.81	2.8	NA	0.12	1	0.9 J	0.38	0.39 J	0.7	0.18
Nickel	30	310	310	NA	7.4	12	11 J	11	13 J	47	14
Potassium	--	--	--	NA	NT	NT	NT	NT	NT	NT	NT
Selenium	3.9	180	1500	NA	ND	3.6	1.9 J	1	0.65 J	0.42 J	ND
Silver	2	180	1500	NA	3.6	ND	0.2 J	0.2 J	0.1 J	0.30 J	0.13 J
Sodium	--	--	--	NA	NT	NT	NT	NT	NT	NT	NT
Thallium	--	--	--	NA	NT	NT	NT	NT	NT	NT	NT
Vanadium	--	--	--	NA	NT	NT	NT	NT	NT	NT	NT
Zinc	109	10000	10000	NA	40	180 J	100 J	65	88	210	75
Cyanide	27	27	27	NA	ND	0.65 J-	0.34 J	ND	ND	ND	ND
TCLP RCRA 8 Metals - mg/L											
Arsenic 5	NA	NA	NA	5	ND	ND	NT	ND	ND	ND	NT
Barium 100	NA	NA	NA	100	0.59	0.12 J	NT	0.34 J	1.2	0.68	NT
Cadmium 1	NA	NA	NA	1	0.01 J	ND	NT	0.01 J	ND	ND	NT
Chromium 5	NA	NA	NA	5	ND	ND	NT	ND	ND	ND	NT
Lead 5	NA	NA	NA	5	14	0.71	NT	0.1 J	0.11 J	0.04 J	NT
Mercury 0.2	NA	NA	NA	0.2	ND	ND	NT	ND	ND	ND	NT
Selenium 1	NA	NA	NA	1	0.045 J	ND	NT	ND	0.03 J	ND	NT
Silver 5	NA	NA	NA	5	ND	ND	NT	ND	ND	ND	NT

- Notes:
- Only those parameters detected at a minimum of one sample location are presented in this table; other compounds which were analyzed for were reported as non-detect.
 - Values per NYSDEC Part 375 Unrestricted Soil Cleanup Objectives (SCOs).
 - Values per NYSDEC Part 375 Restricted Residential Soil Cleanup Objectives (SCOs).
 - Values per NYSDEC Part 375 Commercial Soil Cleanup Objectives (SCOs).
 - Values per NYSDEC Part 375 Industrial Soil Cleanup Objectives (SCOs).
 - Sample results were reported by the laboratory in ug/kg and converted to mg/kg for comparisons to SCOs

Definitions:

ND = Parameter not detected above laboratory detection limits.

-- = No value available for the parameter.

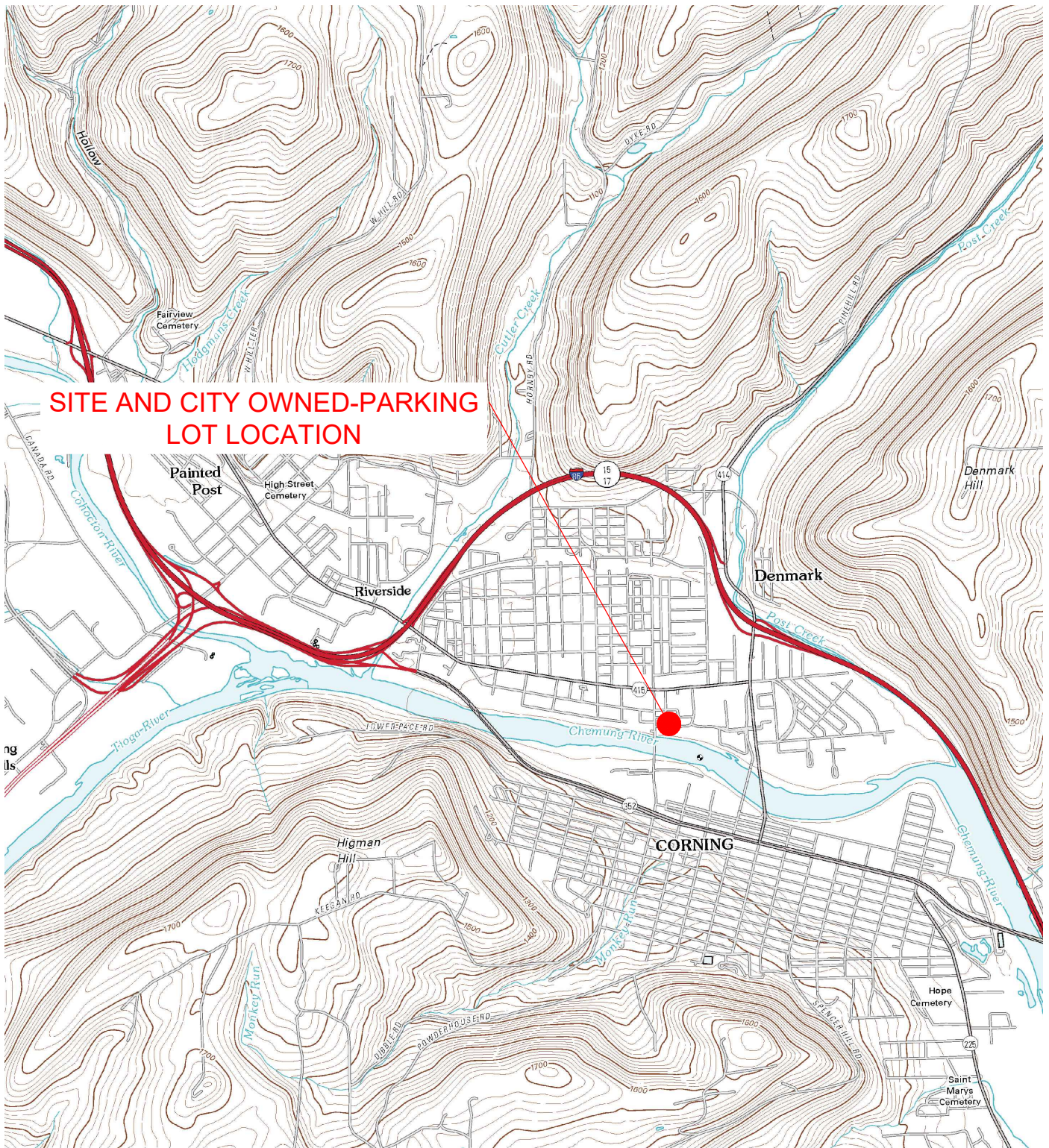
NT = Parameter not analysed for.

J = Estimated value; result is less than the sample quantitation limit but greater than zero.

J- = Estimated value; result is biased low.

Bold	= Result exceeds Unrestricted Use SCOs.
Bold	= Result exceeds Restricted Residential Use SCOs.
Bold	= Result exceeds Commercial Use SCOs.
Bold	= Result exceeds Industrial Use SCOs.

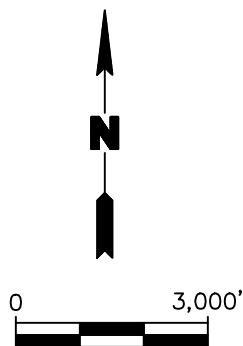
FIGURES



QUADRANGLE LOCATION

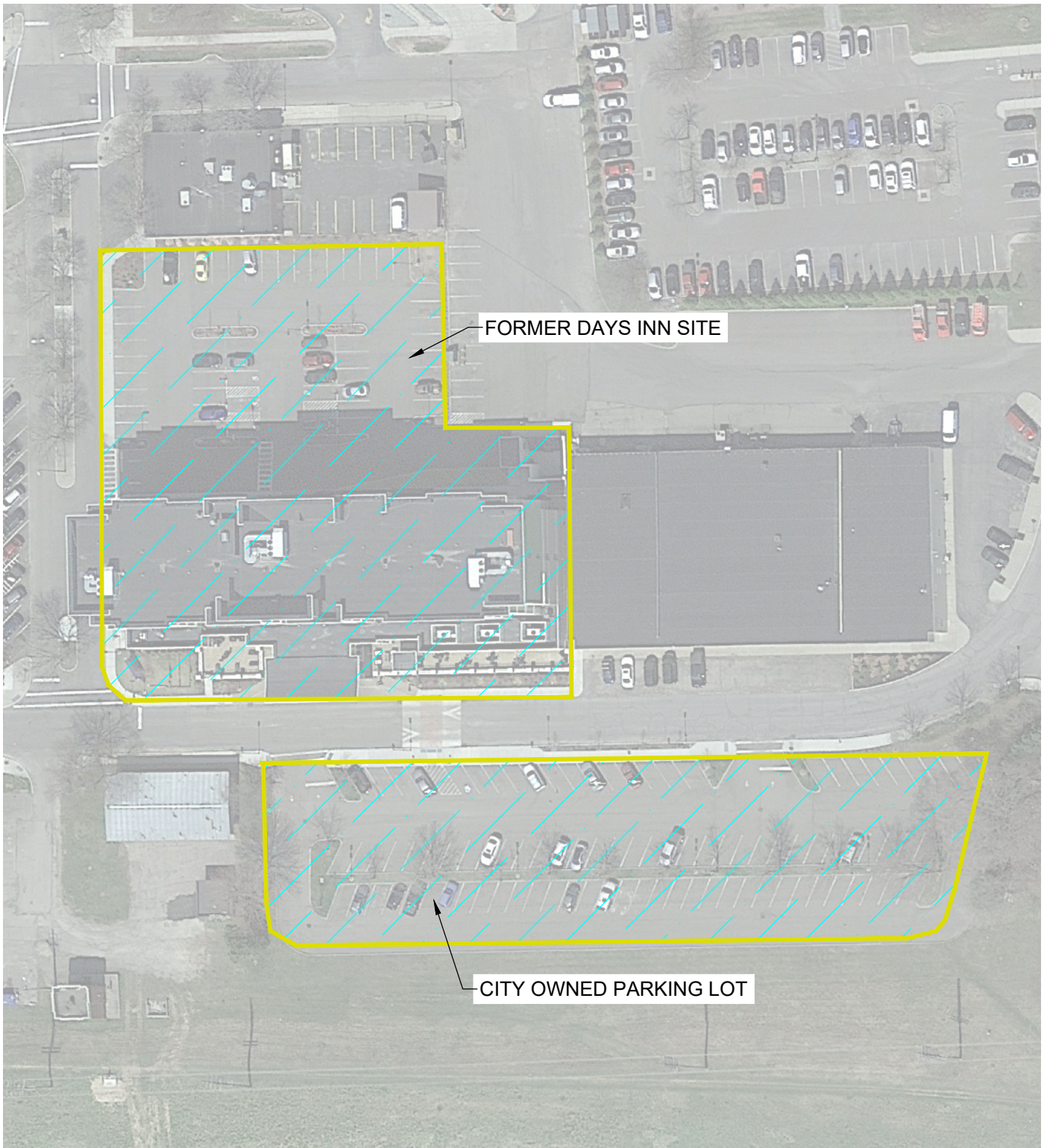


SOURCE:
CORNING, NEW YORK, 2010
USGS 7.5 MINUTE TOPOGRAPHIC MAP



Title:			
SITE VICINITY MAP			
SITE MANAGEMENT PLAN			
23 RIVERSIDE DRIVE (SITE) AND CITY-OWNED PARKING LOT CORNING, NEW YORK			
Prepared for:			
FITZPATRICK HOLDINGS, INC.			
Compiled by: CNK		Date: JANUARY 2024	FIGURE 1
Prepared by: CNK		Scale: AS SHOWN	
Project Mgr: CZB		Project: 4504.0001B000	
File: FIGURE 1: SITE VICINITY PLAN.DWG			





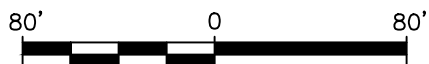
LEGEND:



APPROXIMATE PROJECT
LIMITS

NOTE:

1. IMAGE SOURCE GOOGLE EARTH 2021.



Title: **SITE AND CITY OWNED PARKING LOT
PLAN (AERIAL)
SITE MANAGEMENT PLAN**

23 RIVERSIDE DRIVE (SITE) AND CITY-OWNED PARKING LOT
CORNING, NEW YORK

Prepared for:

FITZPATRICK HOLDINGS, INC.

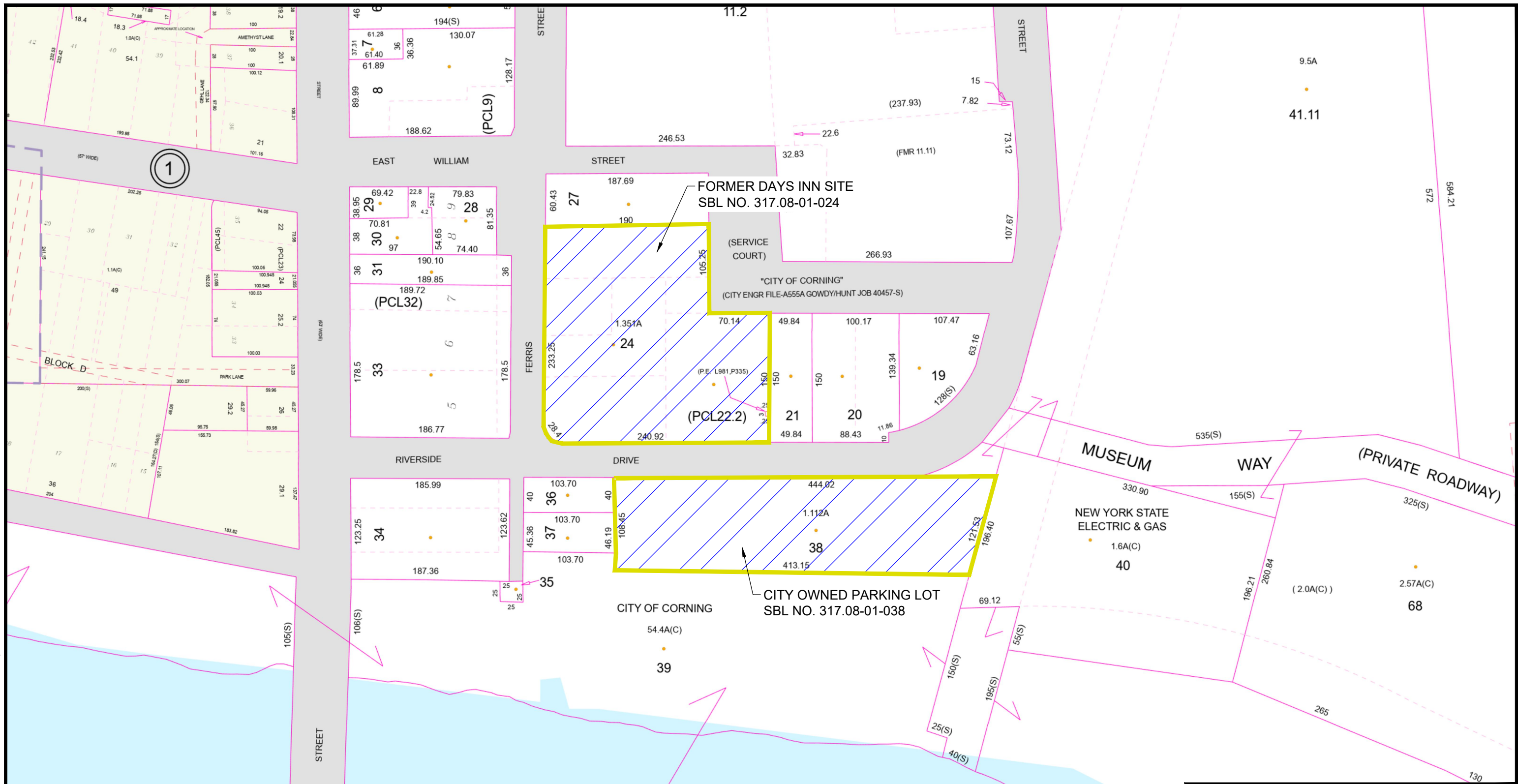


Compiled by: CNK	Date: JANUARY 2024
Prepared by: CNK	Scale: AS SHOWN
Project Mgr: CZB	Project: 4504.0001B000
File: FIGURE 2: SITE AND CITY OWNED PARKING LOT PLAN.DWG	

FIGURE

2

F:\CAD\TURNKEY\FITZPATRICK HOLDINGS\SITE MANAGEMENT PLAN\FIGURE 3: TAX MAP.DWG

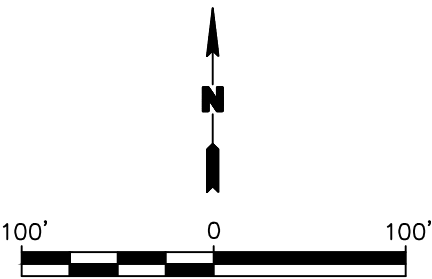


LEGEND:



APPROXIMATE PROJECT
LIMITS

NOTE: IMAGE FROM CITY OF CORNING TAX MAP DATED MARCH 20, 2023.



Title:

TAX MAP

SITE MANAGEMENT PLAN

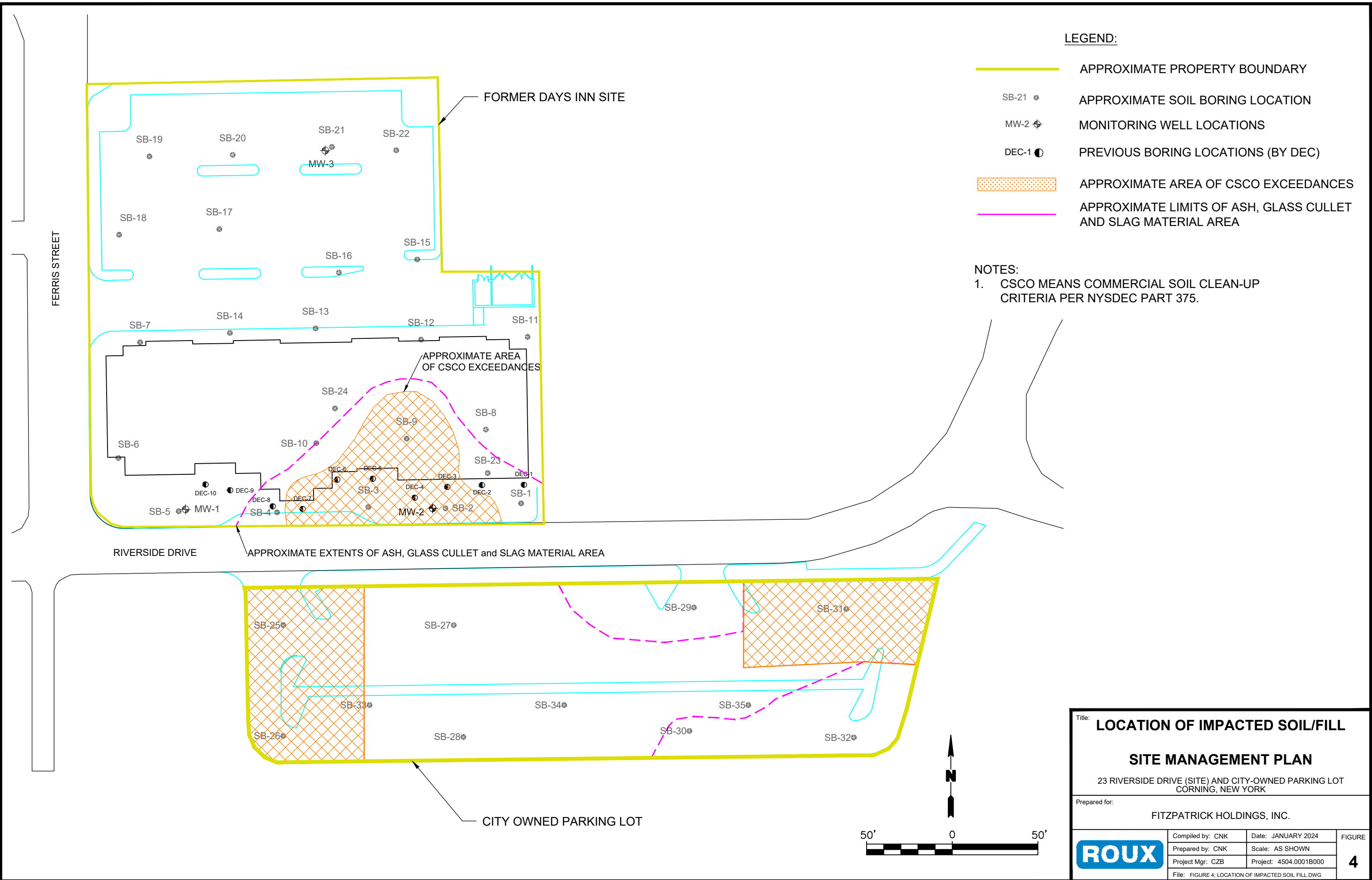
23 RIVERSIDE DRIVE (SITE) AND CITY-OWNED PARKING LOT
CORNING, NEW YORK

Prepared for:

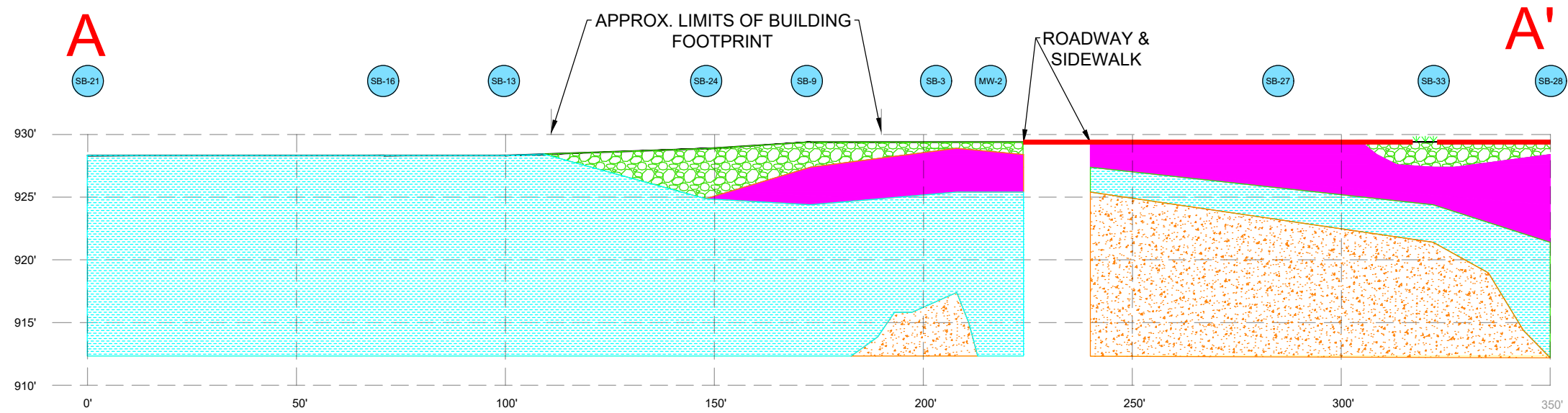
FITZPATRICK HOLDINGS, INC.

	Compiled by: CNK	Date: JANUARY 2024	FIGURE 3
	Prepared by: CNK	Scale: AS SHOWN	
	Project Mgr: CZB	Project: 4504.0001B000	
	File: FIGURE 3: TAX MAP.DWG		

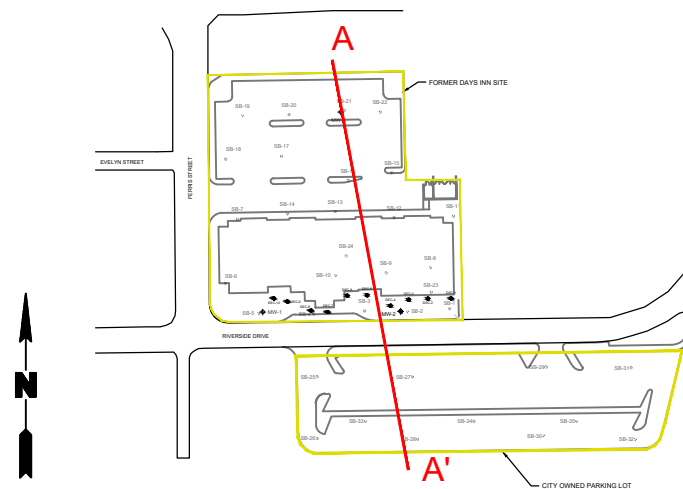
F:\CAD\TURNKEY\FITZPATRICK HOLDINGS\SITE MANAGEMENT PLAN\FIGURE 4: LOCATION OF IMPACTED SOIL FILL.DWG



F:\CAD\TURNKEY\FITZPATRICK HOLDINGS\SITE MANAGEMENT PLAN\FIGURE 5: GEOLOGIC CROSS SECTION AA.DWG



CROSS SECTION A-A'
SCALE 1V:3H



CROSS SECTION A-A' LOCATION
NTS

LEGEND:

- LIMITS OF SURFICIAL ASPHALT AND CONCRETE PAVING
- SOIL BORING/MONITORING WELL LOCATION
- NATIVE SAND AND GRAVEL
- LEAN CLAY
- IMPACTED FILL
- FILL (GRAVEL)

Title:

GEOLOGIC CROSS-SECTION A-A'

SITE MANAGEMENT PLAN

23 RIVERSIDE DRIVE (SITE) AND CITY-OWNED PARKING LOT
CORNING, NEW YORK

Prepared for:

FITZPATRICK HOLDINGS, INC.



Compiled by: CNK

Date: JANUARY 2024

Prepared by: CNK

Scale: AS SHOWN

Project Mgr: CZB

Project: 4504.0001B000

File: FIGURE 5: GEOLOGIC CROSS SECTION AA.DWG

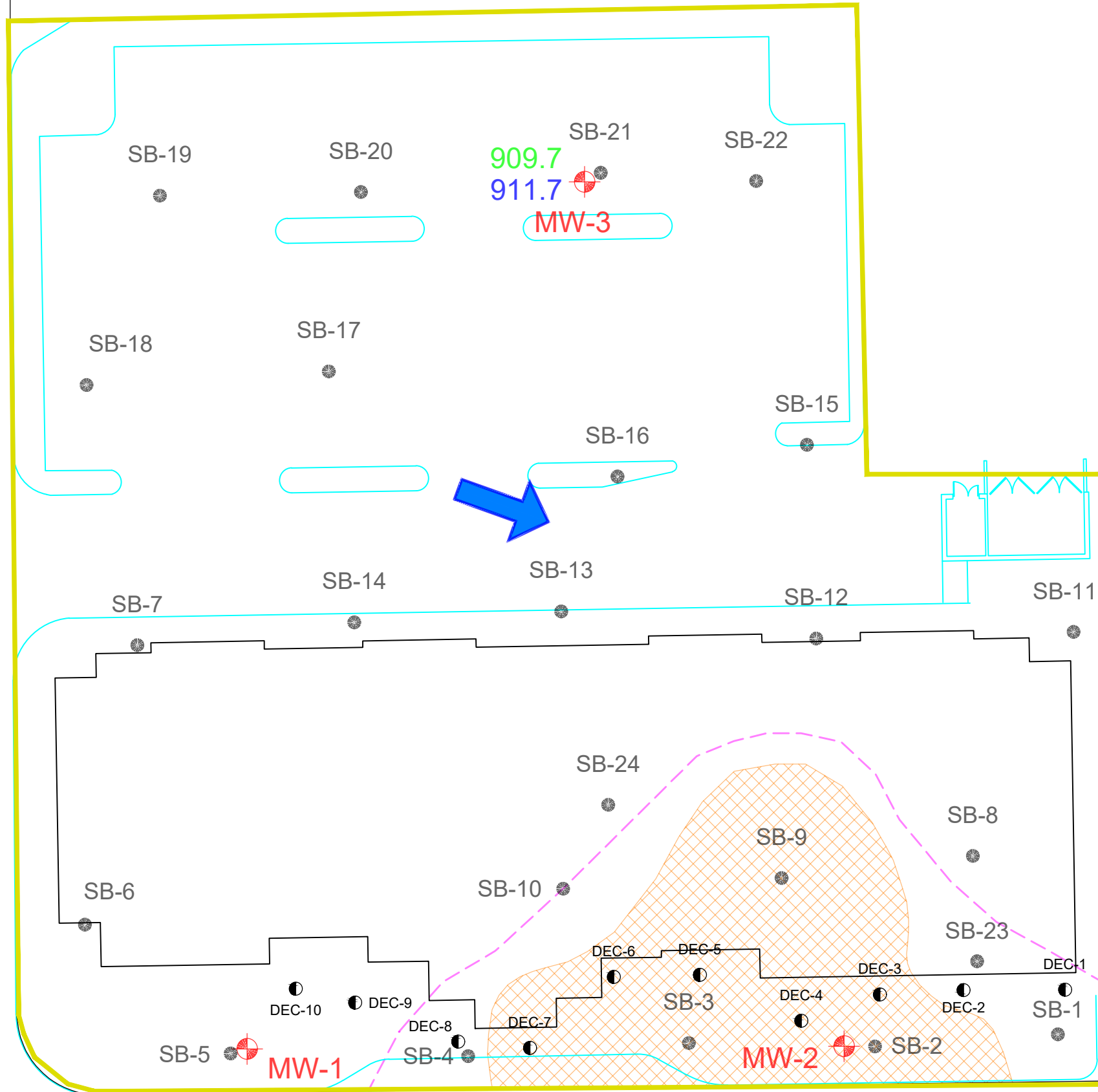
FIGURE

5

F:\CAD\TURNKEY\FITZPATRICK HOLDINGS\SITE MANAGEMENT PLAN\FIGURE 6: GROUNDWATER FLOW DIRECTION.DWG

FERRIS STREET

RIVERSIDE DRIVE

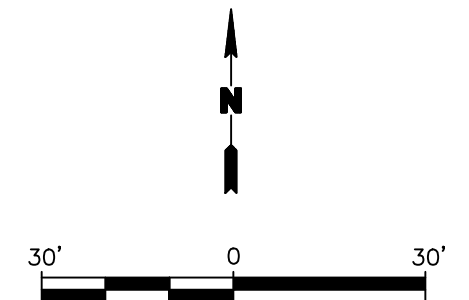


LEGEND:

- APPROXIMATE PROPERTY BOUNDARY
- MONITORING WELL LOCATIONS
- 909.7 ← GROUNDWATER ELEVATION (FT) MEASURED 9/30/15
- 911.7 ← GROUNDWATER ELEVATION (FT) MEASURED 10/6/15
- INFERRED GROUNDWATER FLOW DIRECTION (SEE NOTE 1)
- SB-21 ● APPROXIMATE SOIL BORING LOCATION
- DEC-1 ● PREVIOUS BORING LOCATIONS (BY DEC)
- APPROXIMATE AREA OF CSCO EXCEEDANCES
- APPROXIMATE LIMITS OF ASH, GLASS CULLET AND SLAG MATERIAL AREA (INFERRED)

NOTES:

- GROUNDWATER FLOW DIRECTION INFERRED BASED ON GROUNDWATER LEVEL MEASUREMENTS, TOPOGRAPHY, AND INFORMATION FROM THE USGS DOCUMENT TITLED "GROUND WATER ATLAS OF THE UNITED STATES; CONNECTICUT, MAINE, MASSACHUSETTS, NEW HAMPSHIRE, NEW YORK, RHODE ISLAND, VERMONT (HA 730-M)".
- CSCO MEANS COMMERCIAL SOIL CLEAN-UP CRITERIA PER NYSDEC PART 375.



Title: **GROUNDWATER FLOW DIRECTION**

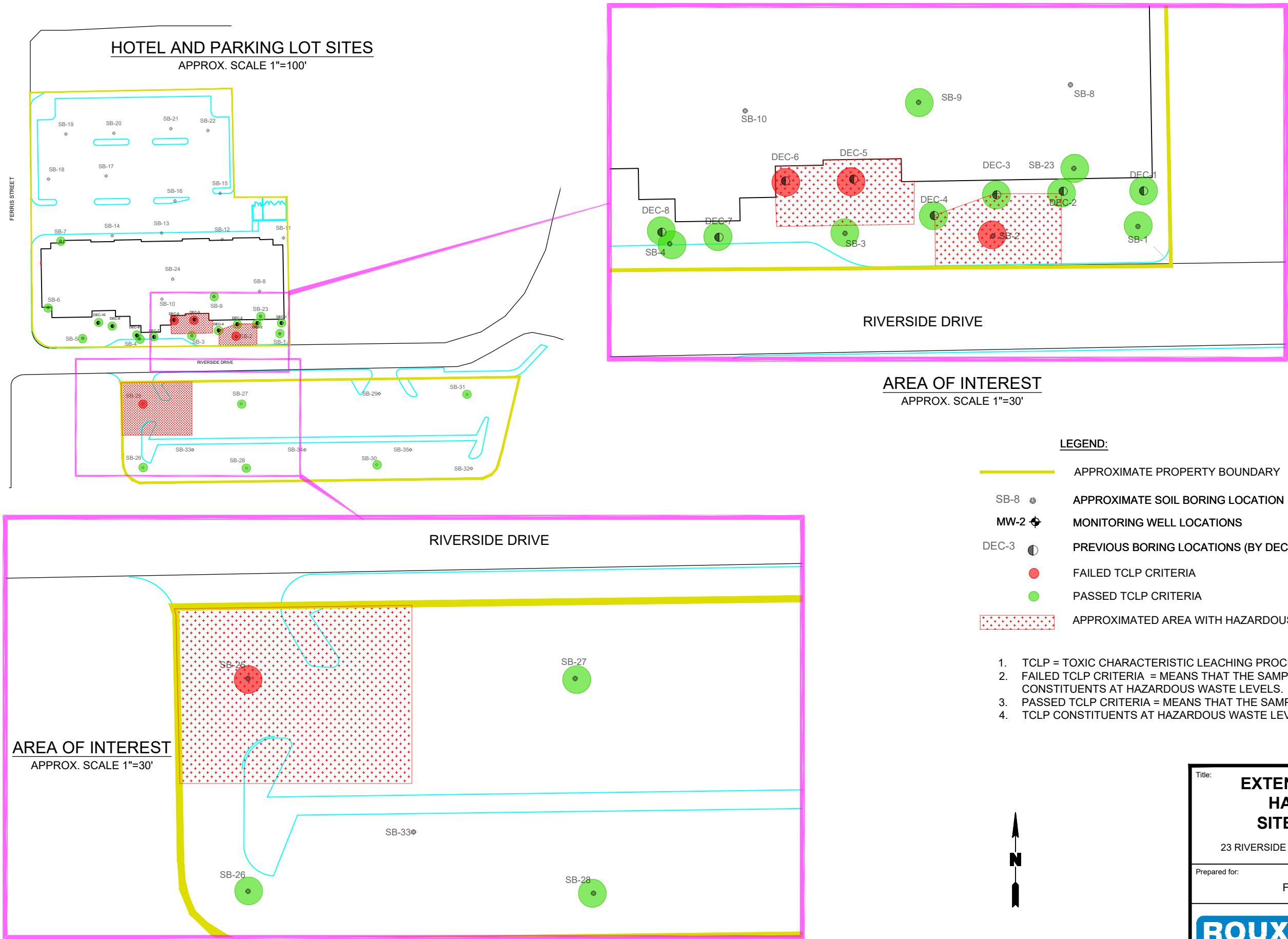
SITE MANAGEMENT PLAN

23 RIVERSIDE DRIVE (SITE) AND CITY-OWNED PARKING LOT
CORNING, NEW YORK

Prepared for:
FITZPATRICK HOLDINGS, INC.

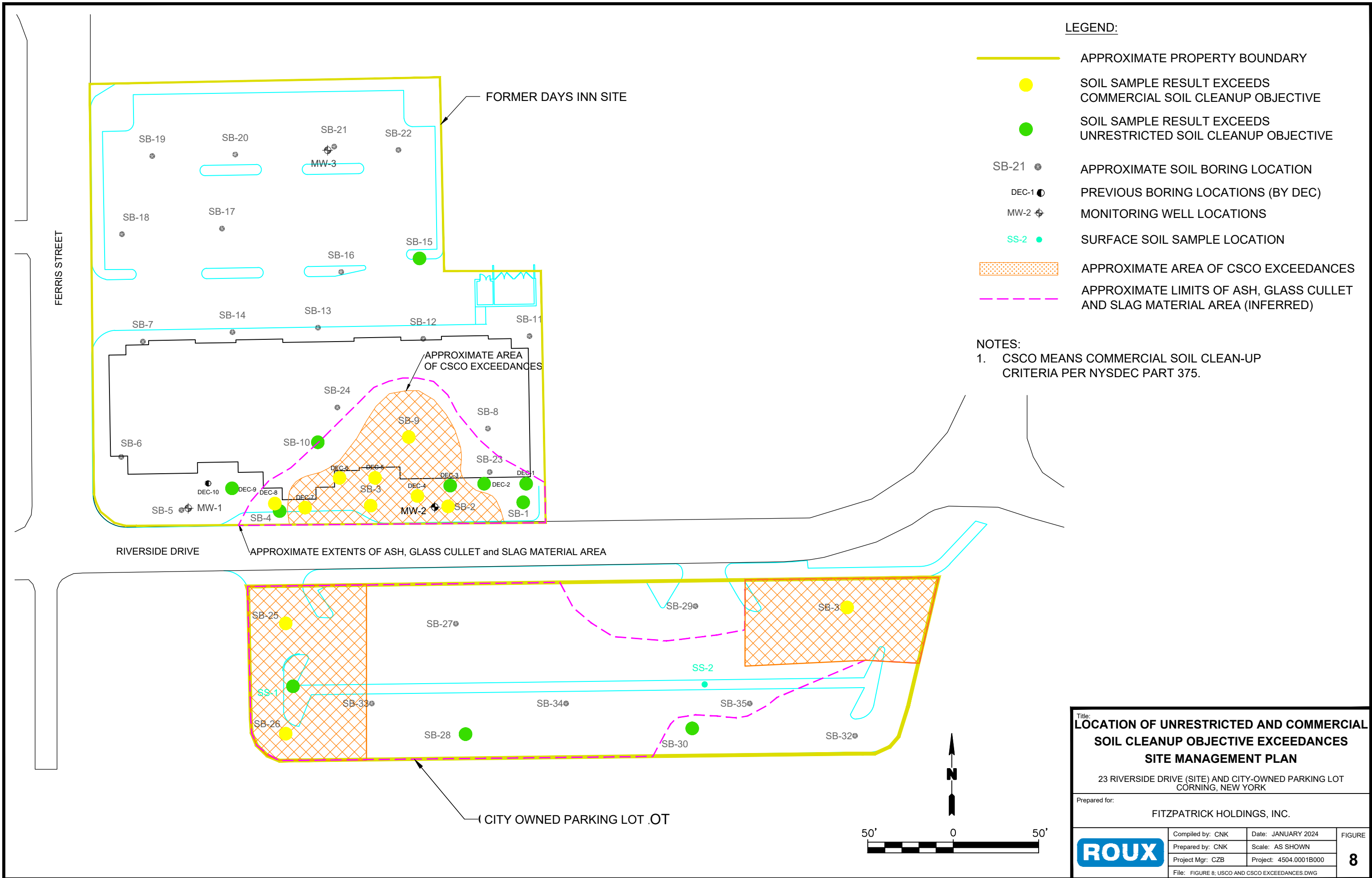
	Compiled by: CNK	Date: JANUARY 2024	FIGURE 6
	Prepared by: CNK	Scale: AS SHOWN	
	Project Mgr: CZB	Project: 4504.0001B000	
	File: FIGURE 6: GROUNDWATER FLOW DIRECTION.DWG		

F:\CAD\TURNKEY\FITZPATRICK HOLDINGS\SITE MANAGEMENT PLAN\FIGURE 7: HAZARDOUS SOIL EVALUATION FORMER HOTEL SITE.DWG



Title:			
EXTENT OF CHARACTERISTIC HAZARDOUS SOIL/FILL SITE MANAGEMENT PLAN			
23 RIVERSIDE DRIVE (SITE) AND CITY-OWNED PARKING LOT CORNING, NEW YORK			
Prepared for:			
FITZPATRICK HOLDINGS, INC.			
ROUX	Compiled by: CNK	Date: JANUARY 2024	FIGURE 7
	Prepared by: CNK	Scale: AS SHOWN	
	Project Mgr: CZB	Project: 4504.0001B000	
	File: FIGURE 7: HAZARDOUS SOIL EVALUATION FORMER HOTEL SITE.DWG		

F:\CAD\TURNKEY\FITZPATRICK HOLDINGS\SITE MANAGEMENT PLAN\FIGURE 8: USCO AND CSCO EXCEEDANCES.DWG



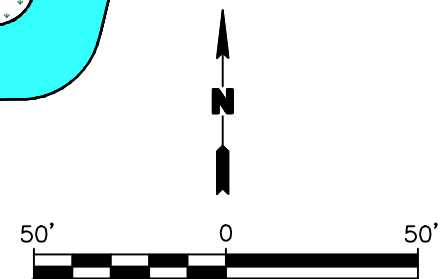
F:\CAD\TURNKEY\FITZPATRICK HOLDINGS\SITE MANAGEMENT PLAN\FIGURE 9: COVER SYSTEM.DWG

FERRIS STREET

RIVERSIDE DRIVE

LEGEND:

- APPROXIMATE PROPERTY LIMIT AND INSTITUTIONAL CONTROL BOUNDARY
- GRANITE CURBING (HARDSCAPE)
- CONCRETE BUILDING COVER (HARDSCAPE)
- CONCRETE SIDEWALK COVER OR STORAGE AREA (HARDSCAPE)
- DECORATIVE PAVER SIDEWALK COVER (HARDSCAPE)
- ASPHALT COVER (HARDSCAPE)
- 1 FOOT OF ACCEPTABLE SOIL WITH MULCH & LANDSCAPING
- 1 FOOT OF ACCEPTABLE SOIL WITH STONE (RIVERSTONE)
- 1 FOOT OF ACCEPTABLE SOIL WITH STONE (RIP RAP)
- GREENSPACE



Title:

ENGINEERING CONTROLS AND
INSTITUTIONAL CONTROL BOUNDARY
SITE MANAGEMENT PLAN

23 RIVERSIDE DRIVE (SITE) AND CITY-OWNED PARKING LOT
CORNING, NEW YORK

Prepared for:

FITZPATRICK HOLDINGS, INC.

	Compiled by: CNK	Date: JULY 2026	FIGURE 9
	Prepared by: CNK	Scale: AS SHOWN	
	Project Mgr: CZB	Project: 4504.0001B000	
	File: FIGURE 9: COVER SYSTEM.DWG		

APPENDIX A

ENVIRONMENTAL EASEMENT

Judith M. Hunter, County Clerk
3 East Pulteney Square
Bath, NY 14810
(607) 664-2564

Steuben County Clerk Recording Cover Sheet

Received From :

STEWART TITLE INSURANCE COMPANY
150 LAKE STREET 3RD FLOOR
ELMIRA, NY 14901

Return To :

BOND SCHOENECK & KING PLLC
350 LINDEN OAKS THIRD FLOOR
ROCHESTER, NY 14625

Method Returned : MAIL

First GRANTOR

FITZPATRICK HOLDINGS INC

First GRANTEE

NYS PEOPLE

Index Type : Deeds

Book : 2635 Page : 60

Type of Instrument : Easements

Type of Transaction : Easement

Recording Fee: \$95.50

Recording Pages : 10

Real Estate Transfer Tax

RETT # : 2126

Deed Amount : \$0.00

RETT Amount : \$0.00

Total Fees : \$95.50

State of New York

County of Steuben

I hereby certify that the within and foregoing was
recorded in the Clerk's office for Steuben County,
New York

On (Recorded Date) : 02/09/2017

At (Recorded Time) : 1:20:37 PM

Judith M. Hunter
Judith M. Hunter, County Clerk



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

THIS INDENTURE made this 6th day of JANUARY, 2017, between Owner(s) Fitzpatrick Holdings, Inc., having an office at 37 Pyrex Street, Corning, New York 14830, County of Steuben, State of New York (the "Grantor"), and The People of the State of New York (the "Grantee."), acting through their Commissioner of the Department of Environmental Conservation (the "Commissioner", or "NYSDEC" or "Department" as the context requires) with its headquarters located at 625 Broadway, Albany, New York 12233,

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

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

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

WHEREAS, Grantor, is the owner of real property located at the address of 23 Riverside Drive in the City of Corning, County of Steuben and State of New York, known and designated on the tax map of the County Clerk of Steuben as tax map parcel numbers: Section 317.08 Block 01 Lot 24, being the same as that property conveyed to Grantor by deed dated March 11, 2014 and recorded in the Steuben County Clerk's Office in Liber and Page 2476/260. The property subject to this Environmental Easement (the "Controlled Property") comprises approximately 1.351 +/- acres, and is hereinafter more fully described in the Land Title Survey dated March 25, 2014 last revised October 17, 2016 prepared by Timothy A. Olmstead, L.L.S., which will be attached to the Site Management Plan. The Controlled Property description is set forth in and attached hereto as Schedule A; and

WHEREAS, the Department accepts this Environmental Easement in order to ensure the protection of public health and the environment and to achieve the requirements for remediation established for the Controlled Property until such time as this Environmental Easement is

extinguished pursuant to ECL Article 71, Title 36; and

NOW THEREFORE, in consideration of the mutual covenants contained herein and the terms and conditions of the Order on Consent dated September 10, 2015 and having Index No. A8-0860-15-09, Grantor conveys to Grantee a permanent Environmental Easement pursuant to ECL Article 71, Title 36 in, on, over, under, and upon the Controlled Property as more fully described herein ("Environmental Easement").

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

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

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

Commercial as described in 6 NYCRR Part 375-1.8(g)(2)(iii) and Industrial as described in 6 NYCRR Part 375-1.8(g)(2)(iv)

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

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

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

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

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

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

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

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

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

B. The Controlled Property shall not be used for Residential or Restricted Residential purposes as defined in 6NYCRR 375-1.8(g)(2)(i) and (ii), and the above-stated engineering controls may not be discontinued without an amendment or extinguishment of this Environmental Easement.

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

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

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

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

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

Law.

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

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

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

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

(i) are in-place;

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

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

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

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

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

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

(7) the information presented is accurate and complete.

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

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

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

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

5. Enforcement

A. This Environmental Easement is enforceable in law or equity in perpetuity by Grantor, Grantee, or any affected local government, as defined in ECL Section 71-3603, against

the owner of the Property, any lessees, and any person using the land. Enforcement shall not be defeated because of any subsequent adverse possession, laches, estoppel, or waiver. It is not a defense in any action to enforce this Environmental Easement that: it is not appurtenant to an interest in real property; it is not of a character that has been recognized traditionally at common law; it imposes a negative burden; it imposes affirmative obligations upon the owner of any interest in the burdened property; the benefit does not touch or concern real property; there is no privity of estate or of contract; or it imposes an unreasonable restraint on alienation.

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

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

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

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

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

Parties shall address correspondence to: Site Number: 851054
Office of General Counsel
NYSDEC
625 Broadway
Albany New York 12233-5500

With a copy to:

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

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

7. Recordation. Grantor shall record this instrument, within thirty (30) days of execution of this instrument by the Commissioner or her/his authorized representative in the office of the

recording officer for the county or counties where the Property is situated in the manner prescribed by Article 9 of the Real Property Law.

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

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

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

Remainder of Page Intentionally Left Blank

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

Fitzpatrick Holdings, Inc.:

By: Kerry J. Fitzpatrick

Print Name: Kerry J. Fitzpatrick

Title: President Date: 12/16/2016

Grantor's Acknowledgment

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

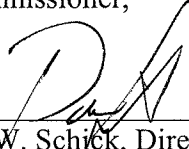
On the 16 day of December, in the year 2016, before me, the undersigned, personally appeared Kerry J. Fitzpatrick, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.

Brenda VanKurin
Notary Public - State of New York

BRENDA VAN KURIN
Notary Public, State of New York
Steuben County No. 01VA6283113
Commission Expires 05/28/2017

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

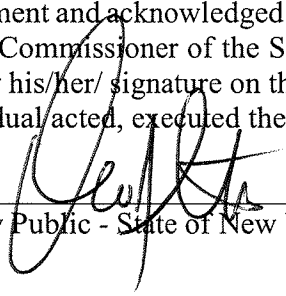
By:


Robert W. Schick, Director
Division of Environmental Remediation

Grantee's Acknowledgment

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

On the 03 day of January, in the year 2017, before me, the undersigned, personally appeared Robert W. Schick, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/ executed the same in his/her/ capacity as Designee of the Commissioner of the State of New York Department of Environmental Conservation, and that by his/her/ signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.


Notary Public - State of New York

David J. Chiusano
Notary Public, State of New York
No. 01CH5032146
Qualified in Schenectady County
Commission Expires August 22, 2018

SCHEDULE "A" PROPERTY DESCRIPTION

Property Description for Environmental Easement

ALL THAT TRACT OR PARCEL OF LAND situate in the City of Corning, County of Steuben and State of New York, bounded and described as follows:

Beginning at an iron pipe set near the concrete curb on the easterly boundary of Ferris Street at its intersection with the dividing line between lands now or formerly owned by Time Warner Entertainment - Advance/Newhouse Partnership (L. 1448, P. 63) on the north and lands now or formerly owned by Pierri's Motel Associates (L. 1548, P. 66) on the south, said point of beginning further described as being 83.50 feet distant southerly as measured along said easterly boundary of Ferris Street from the center line of East William Street;

Thence N88°29'23"E, along the aforesaid dividing line, a distance of 190.00 feet to a point on the westerly boundary of lands now or formerly owned by the City of Corning;

Thence the following three (3) courses and distances along said City of Corning lands:

1. S00°59'30"E, a distance of 62.89 feet to a nail;
2. S00°26'06"W, a distance of 42.36 feet to a point;
3. N89°02'49"E, a distance of 70.14 feet to a nail at the northwest corner of lands now or formerly owned by Allan E. Hall (L. 2212, P. 344);

Thence S00°54'54"E, along the westerly boundary of the aforesaid lands of Allan E. Hall, a distance of 150.00 feet to a point on a concrete curb at the northerly boundary of Riverside Drive;

Thence S89°02'49"W, along the aforesaid curb and northerly boundary of Riverside Drive, a distance of 240.92 feet to a point;

Thence along a curve to the right, having a radius of 20.00 feet, an arc distance of 31.58 feet, a chord bearing of N45°43'24"W and chord distance of 28.40 feet to a point on the first above mentioned easterly boundary of Ferris Street;

Thence N00°29'37"W, along said boundary of Ferris Street, a distance of 233.25 feet to the point of beginning, containing 1.351 acres, more or less.

Address: 23 Riverside Drive, Corning, New York 14830

Tax Map No. 317.08-01-24

APPENDIX B

LIST OF SITE CONTACTS

SITE MANAGEMENT PLAN

Former Days Inn Site

Site No. 851054

Appendix B

List of Site Contacts

Name	Phone/Email Address
Site Owner: Fitzpatrick Holdings, Inc.	Phone: (607) 377-4410 kfitzpatr1@stny.rr.com
City Parking Lot Owner: City of Corning – Steve Dennis	Phone: (607) 962-0340 corningplanning@gmail.com
Remedial Party: Fitzpatrick Holdings, Inc.	Phone: (607) 377-4410 kfitzpatr1@stny.rr.com
Qualified Environmental Professional Christopher Boron, P.G. Roux Environmental Engineering & Geology, DPC	Phone: (716) 856-0599 cboron@rouxinc.com
NYSDEC DER Project Manager James Mazzeo	Phone: (585) 438-5282 james.mazzeo@dec.ny.gov
NYSDEC Regional HW Engineer	R8HWR@dec.ny.gov
NYSDEC Site Control Kelly A. Lewandowski, P.E.	Phone: (518)402-9543 Kelly.lewandowski@dec.ny.gov
Remedial Party Attorney George Van Nest, Esq.	Phone: (716) 8855-1111 gvannest@dukeholzman.com

APPENDIX C

SOIL BORING & MONITORING WELL INSTALLATION LOGS

Project No: 0353-015-001

Borehole Number: SB-1

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	-1.0	Fill Material - Lean Clay with Gravel Brown/gray, moist, mostly no plasticity, soft fine grains, with some fine, angular gravel (non-native)					0.0	SAMPLE ANALYZED	
	1.0	Fill Material Black moist, mostly ash, slag (fill) with some medium plastic, stiff fine grains and trace glass (fill)	S1	NA	3		0.0	SAMPLE ANALYZED	
	-4.0	Lean Clay Brown, moist, mostly soft, medium plasticity, fine grains							
5.0	4.0		S2	NA	2		0.0	SAMPLE ANALYZED	
	-8.0	As above, but with few coarse, angular gravel							
10.0	8.0		S3	NA	2.5		0.0		
	-12.0	Clayey Gravel Brown, moist, mostly coarse, angular gravel with some stiff, low plasticity fine grains							
	12.0		S4	NA	2		0.0		
15.0	-16.0	End of Borehole							
	16.0								
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 8, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 1 of 40

Project No: 0353-015-001

Borehole Number: SB-2

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	-1.0	Fill Material - Poorly Graded Sand with Gravel Gray, moist, mostly medium dense, medium and fine grain sand with few coarse, angular gravel (non-native)					0.0		
	1.0	Fill Material Black moist, mostly ash, slag, brick (fill) with few medium and fine grain sand and trace fine angular gravel (fill)	S1	NA	2		0.0	SAMPLE ANALYZED	
5.0	-5.0	Lean Clay Tan, moist, mostly soft, medium plasticity, fine grains	S2	NA	3		0.0	SAMPLE ANALYZED	
	5.0								
	-8.0	Sandy Lean Clay As above, but with some medium and fine grain sand					0.0		
	8.0								
10.0	-12.0	Sandy Lean Clay with Gravel As above, but with some coarse, subrounded gravel	S3	NA	3		0.0		
	12.0								
	-16.0		S4	NA	2		0.0		
	16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 8, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 2 of 40

Project No: 0353-015-001

Borehole Number: SB-3

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Fill Material - Well Graded Sand with Gravel Gray, moist, mostly, medium dense, medium and fine grain sand with trace fine, subrounded gravel (non-native)	S1	NA	2		0.0	SAMPLE ANALYZED	
		Fill Material Black, moist, medium dense, mostly brick, ash, glass and slag (fill) with few fine grain sand							
	-4.0 4.0	Lean Clay Brown, moist, mostly stiff, medium plasticity, fine grains	S2	NA	3		0.0	SAMPLE ANALYZED	
5.0									
			S3	NA	3		0.0		
10.0									
	-12.0 12.0	Poorly Graded Gravel with Sand Brown, moist, mostly coarse, subrounded and angular gravel with some medium and fine grain sand and trace soft, lost plasticity, fine grains	S4	NA	2		0.0		
15.0									
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 8, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 3 of 40

Project No: 0353-015-001

Borehole Number: SB-4

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	-1.0	Fill Material - Well Graded Sand Gray, moist, mostly medium dense, fine sand with trace soft, no plasticity fine grains (non-native)	S1	NA	2		0.0	SAMPLE ANALYZED	
	-2.0	Fill Material Black, moist, mostly medium dense, fine and medium grain sand with trace ash (fill)					0.0	SAMPLE ANALYZED	
	-4.0	Lean Clay Brown, moist, mostly stiff, low plasticity, fine grains					0.0	SAMPLE ANALYZED	
5.0	4.0	Sandy Lean Clay Tan, moist, mostly stiff, low plasticity fine grains with some medium and fine grain sand and trace coarse, angular gravel	S2	NA	2		0.0		
10.0			S3	NA	2		0.0		
15.0			S4	NA	2		0.0		
	-16.0	End of Borehole							
20.0	16.0								

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 8, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 4 of 40

Project No: 0353-015-001

Borehole Number: SB-5

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Well Graded Sand Gray/brown, moist, mostly medium dense, medium and fine grain sand with trace soft, low plasticity fine grains	S1	NA	2		0.0		
5.0			S2	NA	2		0.0	SAMPLE ANALYZED	
	-8.0 8.0	Poorly Graded Gravelly Sand Brown, moist, mostly medium dense, medium and fine grain sand with some fine angular gravel and trace stiff, low plasticity, fine grains	S3	NA	2		0.0	SAMPLE ANALYZED	
15.0			S4	NA	2		0.0		
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 8, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 5 of 40

Project No: 0353-015-001

Borehole Number: SB-6

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Poorly Graded Sand Gray/brown, moist, mostly medium dense, medium and fine grain sand with trace soft, no plasticity fine grains	S1	NA	2		0.0		
5.0			S2	NA	2		0.0	SAMPLE ANALYZED	
	-9.0	Poorly Graded Gravelly Sand Brown, moist, mostly medium dense, coarse, medium and fine grain sand with some coarse, angular gravel	S3	NA	2		0.0	SAMPLE ANALYZED	
10.0	9.0		S4	NA	2		0.0		
15.0									
	-16.0	End of Borehole							
20.0	16.0								

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 8, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 6 of 40

Project No: 0353-015-001

Borehole Number: SB-7

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Silt with Gravel Brown, moist, mostly hard, no plasticity fine grains with few fine, angular and subrounded gravel	S1	NA	2		0.0		
	-4.0	As above, but with trace medium and fine grain sand	S2	NA	2		0.0	SAMPLE ANALYZED	
5.0	4.0								
			S3	NA	2		0.0		
10.0									
	-12.0	Gravelly Lean Clay Brown, moist, stiff, low plasticity fine grains with some fine, subrounded gravel and trace fine grain sand	S4	NA	2		0.0		
	12.0								
15.0									
	-16.0	End of Borehole							
	16.0								
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 8, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 7 of 40

Project No: 0353-015-001

Borehole Number: SB-8

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0 0.0	Ground Surface							
		Gravelly Lean Clay Gray, moist, mostly stiff, medium plasticity, fine grains with few fine, angular gravel and trace medium sand	S1	NA	2		0.0	SAMPLE ANALYZED	
5.0	-5.0 5.0	Lean Clay Brown, moist, stiff, medium plasticity fine grains	S2	NA	2		0.0		
10.0			S3	NA	2		0.0		
	-12.0 12.0	No recovery	S4	NA	0				
15.0									
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 9, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 8 of 40

Project No: 0353-015-001

Borehole Number: SB-9

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
		Fill Material - Poorly Graded Gravel with Silt Brown, moist, mostly coarse, subrounded gravel with few soft, no plasticity fine grains (non-native)							
	-2.0 2.0	Fill Material Brown/black moist, stiff, medium plasticity fine grains with trace ash (fill)	S1	NA	2		0.0		
								SAMPLE ANALYZED	
5.0	-5.0 5.0	Lean Clay Brown, moist, stiff, medium plasticity fine grains	S2	NA	2		0.0		
								SAMPLE ANALYZED	
	-8.0 8.0	As above, but with trace fine, subrounded gravel							
10.0			S3	NA	2		0.0		
	-12.0 12.0	No recovery							
			S4	NA	0				
15.0									
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 9, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 9 of 40

Project No: 0353-015-001

Borehole Number: SB-10

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
		Fill Material - Lean Clay with Gravel Brown, moist, mostly stiff, low plasticity fine grains with some coarse, angular gravel (non-native)					0.0		
	-2.0 2.0	Fill Material As above, but with trace ash (fill)	S1	NA	4		0.0	SAMPLE ANALYZED	
	-4.0 4.0	Gravelly Lean Clay Brown, moist, mostly stiff, low plasticity fine grains with some coarse, angular gravel	S2	NA	2		0.0		
5.0									
			S3	NA	2		0.0	SAMPLE ANALYZED	
10.0									
	-12.0 12.0	Gravelly Lean Clay with Sand As above, but with trace medium sand	S4	NA	2.5		0.0		
15.0									
	-16.2 16.2	End of Borehole							Refusal at 16.2 fbgs
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 9, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 10 of 40

Project No: 0353-015-001

Borehole Number: SB-11

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
		Gravelly Lean Clay Brown, moist, stiff, low plasticity fine grain with some fine and coarse, angular gravel							
	-2.0 2.0	Lean Clay with Gravel Brown, moist, stiff, low plasticity fine grains with few coarse, angular gravel	S1	NA	2		0.0		
5.0									
			S2	NA	2		0.0		
	-8.0 8.0	As above but with some coarse, angular gravel and few medium grain sand							
10.0			S3	NA	2		0.0		
			S4	NA	2		0.0		
15.0									
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 9, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 11 of 40

Project No: 0353-015-001

Borehole Number: SB-12

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Gravelly Lean Clay Brown, moist, stiff, low plasticity fine grains with few fine angular gravel	S1	NA	2		0.0	SAMPLE ANALYZED	
	-4.0	Poorly Graded Sand with Clay and Gravel Brown moist, mostly dense, medium and fine grain sand with some coarse, angular gravel and few stiff, no plasticity fine grains	S2	NA	2		0.0		
5.0	4.0								
10.0			S3	NA	2		0.0		
15.0			S4	NA	2		0.0		
	-16.0	End of Borehole							
	16.0								
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 9, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 12 of 40

Project No: 0353-015-001

Borehole Number: SB-13

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Gravelly Lean Clay with Sand Brown, moist, mostly stiff, low plasticity fine grains with few fine, angular gravel and trace medium and fine grain sand	S1	NA	2		0.0		
5.0			S2	NA	2		0.0		
	-8.0 8.0	Gravelly Lean Clay Brown, moist, mostly stiff, medium plasticity fine grains, with some fine and coarse, angular gravel	S3	NA	2		0.0		
15.0			S4	NA	2		0.0		
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 9, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 13 of 40

Project No: 0353-015-001

Borehole Number: SB-14

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0 0.0	Ground Surface							
		Sandy Lean Clay Brown, moist, mostly stiff, low plasticity fine grains with some fine and medium sand and few fine, angular gravel	S1	NA	2		0.0		
5.0			S2	NA	2		0.0		
10.0			S3	NA	2		0.0		
			S4	NA	2		0.0		
	-14.0 14.0	End of Borehole							refusal at 14 fbgs
15.0									
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 9, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 14 of 40

Project No: 0353-015-001

Borehole Number: SB-15

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Gravelly Lean Clay Brown/gray moist, mostly stiff, low plasticity fine grains, with some coarse, angular gravel and trace medium and fine grain sand	S1	NA	2		0.0		
	-4.0								
	4.0	As above, but brown	S2	NA	2		0.0		
5.0									
			S3	NA	2		0.0		
10.0									
			S4	NA	2		0.0		
15.0									
	-16.0								
	16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 9, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 15 of 40

Project No: 0353-015-001

Borehole Number: SB-16

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0 0.0	Ground Surface							
		Sandy Lean Clay Brown, moist, mostly, stiff, low plasticity fine grains with some fine and medium grain sand and few fine, angular gravel	S1	NA	2		0.0		
5.0			S2	NA	2		0.0		
10.0			S3	NA	2		0.0		
15.0			S4	NA	2		0.0		
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 9, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 16 of 40

Project No: 0353-015-001

Borehole Number: SB-17

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Fill Material - Sandy Lean Clay Brown, moist, mostly stiff, low plasticity fine grains with few fine, subrounded gravel, trace medium and fine grain sand and trace brick (fill)	S1	NA	2		0.0	SAMPLE ANALYZED	
	-4.0								
	4.0	Sandy Lean Clay As above, minus brick (fill)	S2	NA	2		0.0		
5.0									
			S3	NA	2		0.0	SAMPLE ANALYZED	
10.0									
			S4	NA	2		0.0		
15.0									
	-16.0								
	16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 9, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 17 of 40

Project No: 0353-015-001

Borehole Number: SB-18

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0 0.0	Ground Surface							
		Poorly Graded Sand with Gravel Brown, moist, medium dense, medium and fine grain sand with some fine, angular and subrounded gravel with trace no plasticity fine grains	S1	NA	2		0.0		
5.0			S2	NA	2		0.0		
10.0			S3	NA	4		0.0 0.0		
15.0			S4	NA	2		0.0		
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 10, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 18 of 40

Project No: 0353-015-001

Borehole Number: SB-19

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0 0.0	Ground Surface							
		Sandy Lean Clay Brown, moist, stiff, low plasticity fine grains, with some medium and fine sand, and few fine, angular gravel	S1	NA	2		0.0		
5.0			S2	NA	2		0.0		
10.0			S3	NA	0.5		0.0		
15.0			S4	NA	4		0.0 0.0		
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 10, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 19 of 27

Project No: 0353-015-001

Borehole Number: SB-20

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
		Fill Material Brown, moist, mostly stiff, low plasticity, fine grains with few coarse, angular gravel and trace medium and fine grain sand and trace brick (fill)	S1	NA	2		0.0		
			S2	NA	2		0.0	SAMPLE ANALYZED	
	-4.0 4.0	Gravelly Lean Clay Brown, moist, mostly stiff, low plasticity, fine grains with few coarse, angular gravel and trace medium and fine grain sand	S3	NA	2		0.0		
5.0									
	-8.0 8.0	As above, but few medium and fine sand	S4	NA	2		0.0	SAMPLE ANALYZED	
10.0									
			S5	NA	2		0.0		
15.0									
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 10, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 20 of 40

Project No: 0353-015-001

Borehole Number: SB-21

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0 0.0	Ground Surface							
		Sandy Lean Clay Brown, moist, mostly stiff, low fine grain with some medium and fine grain sand and trace fine, angular and subrounded gravel	S1	NA	4		0.0	SAMPLE ANALYZED	
							0.0		
5.0			S2	NA	2		0.0		
10.0			S3	NA	2		0.0	SAMPLE ANALYZED	
15.0			S4	NA	2		0.0		
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 10, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 21 of 40

Project No: 0353-015-001

Borehole Number: SB-22

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Gravelly Lean Clay Brown, moist, mostly stiff, low plasticity fine grains with some fine, angular gravel and trace fine and medium sand	S1	NA	2		0.0		
5.0			S2	NA	2		0.0		
10.0			S3	NA	2		0.0		
15.0			S4	NA	2		0.0		
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 10, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 22 of 40

Project No: 0353-015-001

Borehole Number: SB-23

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
		Fill Material - Poorly Graded Gravel with Sand Brown, moist, mostly fine, angular and subrounded gravel with some stiff no plasticity fine grains and trace medium, fine and coarse sand (non-native)					0.0		
	-2.0 2.0	Fill Material As above, but with trace ash, brick and slag (fill)	S1	NA	2.5		0.0		
								SAMPLE ANALYZED	
5.0	-5.0 5.0	Lean Clay Brown, moist, stiff, medium plasticity fine grains, with trace fine, subrounded gravel	S2	NA	2.5		0.0		
								SAMPLE ANALYZED	
	-8.0 8.0	As above, minus gravel					0.0		
10.0			S3	NA	3		0.0		
	-12.0 12.0	Sandy Lean Clay Brown, moist, stiff, medium plasticity fine grains with some medium and fine grain sand and trace coarse, angular gravel	S4	NA	2		0.0		
15.0									
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 10, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 23 of 40

Project No: 0353-015-001

Borehole Number: SB-24

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Poorly Graded Gravel with Sand Gray/brown, moist mostly fine, angular gravel with some medium and fine grain sand and few stiff, no plasticity fine grains	S1	NA	2		0.0	SAMPLE ANALYZED	
	-4.0	Gravelly Lean Clay with Sand Brown, moist, mostly stiff, low plasticity fine grains with some fine, angular gravel with few coarse, medium and fine grain sand	S2	NA	2		0.0		
5.0	4.0								
10.0			S3	NA	2		0.0		
15.0			S4	NA	2		0.0		
	-16.0	End of Borehole							
	16.0								
20.0									

Drilled By: Nature's Way

Drill Rig Type: Geoprobe 540B

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): September 10, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 24 of 40

Project No: 0353-015-001

Borehole Number: MW-1

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
-2.0									
	0.0	Ground Surface							
	0.0	Augered down to 16 fbgs due to proximity of SB-5							
3.0									
8.0									
13.0									
	-16.0								
	16.0	Well Graded Sand Brown, moist, mostly coarse, medium sand with trace coarse, angular gravel	S1	50-3	<0.5		0.0 0.0		

Drilled By: Nature's Way
Drill Rig Type: Acker AD2
Drill Method: Hollow Stem Auger with 2' split spoon sampler
Comments: NA
Drill Date(s): September 14, 2015

Hole Size: 8"
Stick-up: 2.52'
Datum: Mean Sea Level
Sheet: 25 of 40

Project No: 0353-015-001

Borehole Number: MW-1

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
-18.0	18.0	Well Graded Gravel Gray, moist, coarse, angular and subrounded gravel	S2	50-3	<0.5		0.0		
-20.0	20.0	No recovery	S3	50-1	0		0.0		
-20.5	20.5	Poorly Graded Gravel with Sand Brown, wet, medium dense, coarse, angular gravel with few medium and fine grain sand	S4	94	1		0.0		
22.0			S5	50-5	0.5		0.0		
-25.0	25.0	Lean Clay Gray, moist, stiff, medium plasticity fine grains	S6	31	0.5		0.0		
-26.0	26.0	End of Borehole							
27.0									
32.0									
37.0									

Drilled By: Nature's Way
Drill Rig Type: Acker AD2
Drill Method: Hollow Stem Auger with 2' split spoon sampler
Comments: NA
Drill Date(s): September 14, 2015

Hole Size: 8"
Stick-up: 2.52'
Datum: Mean Sea Level
Sheet: 25 of 40

Project No: 0353-015-001

Borehole Number: MW-2

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
-3.0									
	0.0	Ground Surface							
	0.0	Augered down to 16 fbgs due to proximity of SB-2							
2.0									
7.0									
12.0									
	-16.0								
	16.0								
17.0			S1	72	1		0.0		

Drilled By: Nature's Way
Drill Rig Type: Acker AD2
Drill Method: Hollow Stem Auger with 2' split spoon sampler
Comments: NA
Drill Date(s): September 15, 2015

Hole Size: 8"
Stick-up: 2.51'
Datum: Mean Sea Level
Sheet: 26 of 40

Borehole Number: MW-2

A.K.A.: NA

Logged By: JSM

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
20.0 <									

Hole Size: 8"
Stick-up: 2.51'
Datum: Mean Sea Level

Sheet: 26 of 40

Project No: 0353-015-001

Borehole Number: MW-3

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

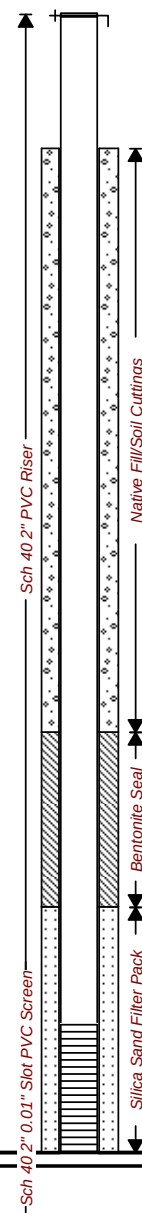
Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
-3.0									
	0.0	Ground Surface							
	0.0	Sandy Lean Clay Brown, moist, mostly stiff, low plasticity fine grains with some fine grain sand and trace fine, angular gravel	S1	32	1		0.0		
2.0	-2.0 2.0	Gravelly Lean Clay Brown, moist, mostly stiff, low plasticity fine grains, with some fine, angular gravel and little fine and medium sand	S2	44	1		0.0		
	-4.0 4.0	Poorly Graded Sand with Gravel Brown, moist, medium dense, medium grain sand with some fine and coarse, angular gravel with little soft, low plasticity fine grains	S3	22	1		0.0		
			S4	32	1		0.0		
			S5	30	1		0.0		
			S6	49	0.5		0.0		
12.0	-12.0 12.0	Poorly Graded Sand Brown, moist, medium dense, medium and fine grain sand with little coarse, angular gravel	S7	78	0.5		0.0		
	-14.0 14.0	As above, but with few fine and coarse, angular gravel	S8	69	<0.5		0.0		
			S9	50-3	0.5		0.0		
17.0									



Drilled By: Nature's Way

Drill Rig Type: Acker AD2

Drill Method: Hollow Stem Auger with 2' split spoon sampler

Comments: NA

Drill Date(s): September 14, 2015

Hole Size: 8"

Stick-up: 2.30'

Datum: Mean Sea Level

Sheet: 27 of 40

Project No: 0353-015-001

Borehole Number: MW-3

Project: Former Days Inn Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: 23 Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
-18.0 18.0		Poorly Graded Gravel with Sand Brown, wet, mostly loose, fine rounded and subrounded gravel with little medium and coarse sand and trace silt	S9	30.5			0.0		
			S10	29	1		0.0		
			S11	58	<0.5		0.0		
22.0 -22.0 22.0		As above, but with fine, angular gravel	S12	51	0.5		0.0		
			S13	23	<0.5		0.0		
-25.0 25.0		End of Borehole							
27.0									
32.0									
37.0									

Drilled By: Nature's Way
Drill Rig Type: Acker AD2
Drill Method: Hollow Stem Auger with 2' split spoon sampler
Comments: NA
Drill Date(s): September 14, 2015

Hole Size: 8"
Stick-up: 2.30'
Datum: Mean Sea Level
Sheet: 27 of 40

Borehole Number: SB-25

A.K.A.: NA

Logged By: JSM

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

[illegible]

Hole Size: 2"
Stick-up: NA
Datum: Mean Sea Level

Sheet: 28 of 40

Project No: 0353-015-001

Borehole Number: SB-26

Project: City Owned Parking Lot Site

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Asphalt and subbase							
	-0.5								
	0.5	Brown, moist, mostly dense, fine and medium grain sand with some angular, coarse gravel and trace low plasticity clay, poorly graded (non-native)	S1	NA	.5		0.6		
	-2.0	Fill Material							
	2.0	Blac, moist, mostly dense, fine grain sand with ash, and trace slag, glass and brick					0.5	SAMPLE ANALYZED	
5.0			S2	NA	2		0.4		
	-8.0	Poorly Graded Sand with Gravel							
	8.0	Brown, moist, dense, medium and fine grain sand with some fine, rounded and subrounded gravel and trace low plasticity clay (poorly graded)	S3	NA	1		0.5	SAMPLE ANALYZED	
10.0									
	-12.0	As above, but wet							
	12.0		S4	NA	1		0.6		
15.0									
	-16.0	End of Borehole							
	16.0								
20.0									

12 fbgs during drilling

Drilled By: Nature's Way

Drill Rig Type: Simco Earthprobe 200

Drill Method: Hydraulically Driven Percussion with 4' Macrocore

Comments: NA

Drill Date(s): October 6, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 29 of 40

Project No: 0353-015-001

Borehole Number: SB-27

Project: City Owned Parking Lot

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Asphalt and subbase							
	-1.0	Fill Material							
	1.0	Black, moist, poorly graded dense, medium and fine grain sand with few fine grain, angular and subrounded gravel and little glass (fill)						SAMPLE ANALYZED	
	-2.0	As above, but gray							
	2.0	Lean Clay	S1	NA	1				SAMPLE ANALYZED
	-4.0	Brown, moist, stiff, medium plasticity fine grains with trace fine sand							
	4.0	Clayey Sand							
	5.0	Brown, moist, well graded dense, fine grain sand with some soft, low plasticity fine grains	S2	NA	2				
	-8.0								
	8.0	Poorly Graded Sand with Gravel							
	10.0	Brown, moist, poorly graded, dense, medium and fine grain sand with coarse, subrounded gravel	S3	NA	1				
	-12.0								
	12.0	As above, but with coarse, angular and subrounded gravel							
	15.0								
	-16.0		S4	NA	1				
	16.0								
		End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Simco Earthprobe 200

Drill Method: Hydraulically Driven Percussion System with 4' macrocore

Comments: NA

Drill Date(s): October 6, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 30 of 40

Project No: 0353-015-001

Borehole Number: SB-28

Project: City Owned Parking Lot

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Asphalt and subbase							
	-0.5								
	0.5	Poorly Graded Sand with Gravel							
	-1.0	brown, moist, poorly graded, medium and coarse grain, dense sand with some angular and fine grain gravel and trace low plasticity, soft clay	S1	NA	.75		0.5	SAMPLE ANALYZED	
	1.0	Fill Material							
		black, moist, mostly poorly graded fine and medium grain, dense sand with few medium plasticity, soft fine grains, few ash, slag, glass (fill) and trace angular, coarse gravel					0.6	SAMPLE ANALYZED	
5.0			S2	NA	1		0.6		
	-8.0	Sandy Lean Clay with Gravel							
	8.0	brown, moist, medium plasticity, soft fine grains with few medium grain sand and few subrounded, fine gravel	S3	NA	1		1.2	SAMPLE ANALYZED	
10.0									
	-12.0	Well Graded Sand with Gravel							
	12.0	brown, wet, well graded, medium dense, medium and fine grain sand with some fine, rounded gravel	S4	NA	1		1.2		
15.0									
	-16.0	End of Borehole							
	16.0								
20.0									

12 fbgs during drilling

Drilled By: Nature's Way

Drill Rig Type: Simco Earthprobe 200

Drill Method: Hydraulically driven percussion with 4' macrocore

Comments: NA

Drill Date(s): October 6, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 31 of 40

Project No: 0353-015-001

Borehole Number: SB-29

Project: City Owned Parking Lot

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Asphalt and subbase							
		Fill Material - Poorly Graded Sand with Gravel Brown, moist, poorly graded, dense, fine and medium grain sand with some fine, angular gravel and trace low plasticity fine grains (non-native)	S1	NA	1		1.6		
	-2.0 2.0	Sandy Lean Clay Brown, moist, soft, low plasticity, fine grains with some medium and fine grain sand					1.7		
	-4.0 4.0	Lean Clay Brown, moist, stiff, medium plasticity fine grains	S2	NA	3		1.6		
							1.9		
			S3	NA	2		1.2		
	-11.0 11.0	Poorly Graded Sand with Gravel Brown, moist, poorly graded, dense, fine grain sand with some coarse, angular gravel and trace low plasticity fine grains	S4	NA	1		1.3		
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Simco Earthprobe 200

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): October 6, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 32 of 40

Project No: 0353-015-001

Borehole Number: SB-30

Project: City Owned Parking Lot

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Asphalt and subbase					0.4		
	-1.0	Fill Material - Poorly Graded Sand with Gravel Brown, moist, poorly graded, mostly medium and fine grain, medium dense, sand with some angular, fine gravel (non-native)	S1	NA	1		0.8		
	1.0	Fill Material Gray, moist, mostly soft, low plasticity fine grains with few fine sand and little brick (fill)							
5.0	-5.0	Well Graded Sand Tan, moist, medium dense, medium and fine grain sand with trace fine grains	S2	NA	1		0.2		
	5.0								
10.0			S3	NA	1		1.2		
	-12.0	Well Graded Sand with Gravel Brown, moist, mostly medium dense, medium and fine grain sand with some fine and coarse grain, angular gravel	S4	NA	1		0.8		
	12.0								
15.0									
	-16.0	End of Borehole							
	16.0								
20.0									

Drilled By: Nature's Way

Drill Rig Type: Simco Earthprobe 200

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): October 6, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 33 of 40

Project No: 0353-015-001

Borehole Number: SB-31

Project: City Owned Parking Lot

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Asphalt and subbase							
		Fill Material - Clayey Sand with Gravel Brown, moist, poorly graded, mostly medium dense, medium and fine grain sand with some low plasticity fine grains and few coarse, angular gravel (non-native)	S1	NA	2		1.1	SAMPLE ANALYZED	
	-2.0 2.0	Fill Material Black, moist, mostly soft, low plasticity fine grains with some medium and fine grain sand, few brick, glass and ash (fill), and little fine, angular gravel					1.2	SAMPLE ANALYZED	
	-4.0 4.0	As above, but with more brick (fill)					1.2		
5.0	-5.0 5.0	Lean Clay Brown, moist, stiff, medium plasticity fine grains	S2	NA	4		1.0	SAMPLE ANALYZED	
							1.3		
10.0			S3	NA	3		1.2		
	-11.5 11.5	Well Graded Sand Brown, moist, dense, medium and fine grain sand with trace low plasticity fine grains							
	-12.0 12.0	Well Graded Sand with Gravel Brown, moist, dense, medium and fine grain sand, some coarse, angular gravel and trace low plasticity fine grains	S4	NA	0.5		0.5		
15.0									
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Simco Earthprobe 200

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): October 6, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 34 of 40

Project No: 0353-015-001

Borehole Number: SB-32

Project: City Owned Parking Lot

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 0 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Asphalt and subbase							
		Lean Clay with Gravel Gray, moist, stiff, low plasticity, fine grains with few coarse, angular gravel and little medium grain sand (non-native)	S1	NA	1		0.7	SAMPLE ANALYZED	
	-4.0 4.0	Lean Clay Brown, moist, low plasticity, stiff fine grains	S2	NA	2		0.8		
			S3	NA	3		0.8		
	-11.0 11.0	Poorly Graded Sand with Gravel Brown, moist, poorly graded, dense, medium and fine grain sand with little coarse, angular gravel and trace fine grains	S4	NA	1		0.8		
	-16.0 16.0	End of Borehole							
20.0									

Drilled By: Nature's Way

Drill Rig Type: Simco Earthprobe 200

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): October 6, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 35 of 40

Project No: 0353-015-001

Borehole Number: SB-33

Project: City Owned Parking Lot

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
 2558 Hamburg Turnpike, Suite 300
 Buffalo, NY 14218
 (716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Asphalt and subbase							
		Fill Material - Poorly Graded Sand with Gravel Brown, moist, poorly graded, mostly loose, medium and fine grain sand with some fine, angular gravel (non-native)	S1	NA	2		1.4		
	-2.0 2.0	Fill Material - Clayey Sand Black, moist, poorly graded mostly dense, medium and fine grain sand with some soft, low plasticity fine grains and few ash (fill)					1.0		
5.0	-5.0 5.0	Lean Clay Brown, moist, stiff, low plasticity, fine grains	S2	NA	3		1.0		
	-8.0 8.0	End of Borehole							
10.0									
15.0									
20.0									

Drilled By: Nature's Way

Drill Rig Type: Simco Earthprobe 200

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): October 6, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 36 of 40

Borehole Number: SB-34

A.K.A.: NA

Logged By: JSM

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs		Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol				
							0	ppm 12.5	25	
0.0	0.0	Ground Surface								
	0.0	Asphalt and subbase								
		Fill Material - Poorly Graded Sand with Gravel Brown, moist, poorly graded, loose, medium and fine grainsand with few coarse, angular gravel (non-native)	S1	NA	1		1.0			
	-2.0	Fill Material - Well Graded Sand Black, moist, dense, well graded, medium and fine grain sand with ash (fill)					0.5			
	2.0									
	-4.0	Lean Clay Brown, moist, stiff, low plasticity fine grains					0.7			
	4.0									
5.0										
	-8.0	End of Borehole	S2	NA	4					
	8.0									
10.0										

Hole Size: 2"
Stick-up: NA
Datum: Mean Sea Level

Sheet: 37 of 40

Project No: 0353-015-001

Borehole Number: SB-35

Project: City Owned Parking Lot

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0	Asphalt and subbase							
		Fill Material - Lean Clay Brown, moist, stiff, low plasticity fine grains, wth trace slag and ash (fill)					1.1		
	-2.0 2.0	Lean Clay Brown, moist, stiff, medium plasticity, fine grains with trace fine grain sand	S1	NA	2		0.8		
	-4.0 4.0	As above, but without sand							
5.0			S2	NA	4		0.6		
	-8.0 8.0	End of Borehole							
10.0									
15.0									
20.0									

Drilled By: Nature's Way

Drill Rig Type: Simco Earthprobe 200

Drill Method: Hydraulically Driven Percussion with 4' macrocore

Comments: NA

Drill Date(s): October 6, 2015

Hole Size: 2"

Stick-up: NA

Datum: Mean Sea Level

Sheet: 38 of 40

Borehole Number: SS-1

A.K.A.: NA

Logged By: JSM

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

[illegible]

Hole Size: 4"
Stick-up: NA
Datum: Mean Sea Level

Sheet: 39 of 40

Project No: 0353-015-001

Borehole Number: SS-2

Project: City Owned Parking Lot

A.K.A.: NA

Client: Fitzpatrick Holdings, Inc.

Logged By: JSM

Site Location: Riverside Drive, Corning, New York

Checked By:



TurnKey Environmental Restoration, LLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0635

SUBSURFACE PROFILE			SAMPLE				PID VOCs ppm 12.5 25	Lab Sample	Well Completion Details or Remarks
Depth (fbgs)	Elev. /Depth	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol			
0.0	0.0	Ground Surface							
	0.0								
	-0.5	Lean Clay	S1	NA	0.5	▲	0.4	SAMPLE ANALYZED	
	0.5	Brown, moist, soft, low plasticity fine grains with trace fine sand							
		End of Borehole							
5.0									
10.0									
15.0									
20.0									

Drilled By: Nature's Way
Drill Rig Type: Hand Auger
Drill Method: Manual Method
Comments: NA
Drill Date(s): October 6, 2015

Hole Size: 4"
Stick-up: NA
Datum: Mean Sea Level
Sheet: 40 of 40

APPENDIX D

EXCAVATION WORK PLAN

D-1 NOTIFICATION

At least 15 days prior to the start of any activity that is anticipated to encounter remaining contamination, the site owner or their representative will notify the NYSDEC. Table D-1 includes contact information for the above notification. The information on this table will be updated as necessary to provide accurate contact information. A full listing of site-related contact information is provided in Appendix B.

Table D-1: Notifications*

NYSDEC Project Manager James Mazzeo	585-438-5282 james.mazzeo@dec.ny.gov
NYSDEC Regional HW Engineer	R8HWR@dec.ny.gov

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

This notification will include:

- A detailed description of the work to be performed, including the location and areal extent of excavation, plans/drawings for site re-grading, intrusive elements or utilities to be installed below the soil cover, estimated volumes of contaminated soil to be excavated and any work that may impact an engineering control;
- A summary of environmental conditions anticipated to be encountered in the work areas, including the nature and concentration levels of contaminants of concern, potential presence of grossly contaminated media, and plans for any pre-construction sampling;
- A schedule for the work, detailing the start and completion of all intrusive work;
- A summary of the applicable components of this EWP;
- A statement that the work will be performed in compliance with this EWP and 29 CFR 1910.120;
- A copy of the contractor's health and safety plan (HASP), in electronic format, if it differs from the HASP provided in Appendix E of this SMP;
- Identification of disposal facilities for potential waste streams; and

- Identification of sources of any anticipated backfill, along with all required chemical testing results.

D-2 SOIL SCREENING METHODS

Visual, olfactory and instrument-based (e.g. photoionization detector) soil screening will be performed by a qualified environmental professional during all excavations into known or potentially contaminated material (remaining contamination). Soil screening will be performed when invasive work is done and will include all excavation and invasive work performed during development, such as excavations for foundations and utility work.

Soils will be segregated based on previous environmental data and screening results into material that requires off-site disposal and material that requires testing to determine if the material can be reused on-site as soil beneath a cover or if the material can be used as cover soil. Further discussion of off-site disposal of materials and on-site reuse is provided in Section D-5 of this Appendix.

D-3 SOIL STAGING METHODS

Soil stockpiles will be continuously encircled with a berm and/or silt fence. Hay bales will be used as needed near catch basins, surface waters and other discharge points.

Stockpiles will be kept covered at all times with appropriately anchored tarps. Stockpiles will be routinely inspected and damaged tarp covers will be promptly replaced.

Stockpiles will be inspected at a minimum once each week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by the NYSDEC.

D-4 MATERIALS EXCAVATION AND LOAD-OUT

A qualified environmental professional or person under their supervision will oversee all invasive work and the excavation and load-out of all excavated material.

The owner of the property and remedial party (if applicable) and its contractors are responsible for safe execution of all invasive and other work performed under this Plan.

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

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

A truck wash will be operated on-site, as appropriate. The qualified environmental professional will be responsible for ensuring that all outbound trucks will be washed at the truck wash before leaving the site until the activities performed under this section are complete. Truck wash waters will be collected and disposed of off-site in an appropriate manner.

Locations where vehicles enter or exit the site shall be inspected daily for evidence of off-site soil tracking.

The qualified environmental professional will be responsible for ensuring that all egress points for truck and equipment transport from the site are clean of dirt and other materials derived from the site during intrusive excavation activities. Cleaning of the adjacent streets will be performed as needed to maintain a clean condition with respect to site-derived materials.

D-5 MATERIALS TRANSPORT OFF-SITE

All transport of 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 exiting the site will be secured with tight-fitting covers. Loose-fitting canvas-type truck covers will be prohibited. If loads contain wet material capable of producing free liquid, truck liners will be used.

Truck transport routes shall be selected to involve the shortest commute through residential neighborhoods, if necessary, and shortest commute to an expressway or thruway pending the final destination of the vehicle.

All trucks loaded with site materials will exit the vicinity of the site using only these approved truck routes. This is the most appropriate route and takes into account: (a) limiting transport through residential areas and past sensitive sites; (b) use of city mapped truck routes; (c) prohibiting off-site queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; and (f) overall safety in transport.

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

Egress points for truck and equipment transport from the site will be kept clean of dirt and other materials during site remediation and development.

Queuing of trucks will be performed on-site in order to minimize off-site disturbance. Off-site queuing will be prohibited.

D-6 MATERIALS DISPOSAL OFF-SITE

All material excavated and removed from the site will be treated as contaminated and regulated material and will be transported and disposed in accordance with all local, State (including 6NYCRR Part 360) and Federal regulations. If disposal of material from this site is proposed for unregulated off-site disposal (i.e. clean soil removed for development purposes), a formal request with an associated plan will be made to the NYSDEC. Unregulated off-site management of materials from this site will not occur without formal NYSDEC approval.

Off-site disposal locations for excavated soils will be identified in the pre-excavation notification. This will include estimated quantities and a breakdown by class of disposal facility if appropriate, i.e. hazardous waste disposal facility, solid waste landfill, petroleum treatment facility, C/D recycling facility, etc. Actual disposal quantities and associated documentation will be reported to the NYSDEC in the Periodic Review Report. This documentation will include: waste profiles, test results, facility acceptance letters, manifests, bills of lading and facility receipts.

Non-hazardous historic fill and contaminated soils taken off-site will be handled, at minimum, as a Municipal Solid Waste per 6NYCRR Part 360-1.2. Material that does not meet Unrestricted SCOs is prohibited from being taken to a New York State recycling facility (6NYCRR Part 360-16 Registration Facility).

D-7 MATERIALS REUSE ON-SITE

The qualified environmental professional will ensure that procedures defined for materials reuse in this SMP are followed and that unacceptable material does not remain on-site. Contaminated on-site material, including historic fill and contaminated soil, that is acceptable for reuse on-site will be placed below the demarcation layer or impervious surface, and will not be reused within a cover soil layer, within landscaping berms, or as backfill for subsurface utility lines.

Any demolition material proposed for reuse on-site will be sampled for asbestos and the results will be reported to the NYSDEC for acceptance. Concrete crushing or processing on-site will not be performed without prior NYSDEC approval. Organic matter (wood, roots, stumps, etc.) or other solid waste derived from clearing and grubbing of the site will not be reused on-site.

D-8 FLUIDS MANAGEMENT

All liquids to be removed from the site, including but not limited to, excavation dewatering, decontamination waters and groundwater monitoring well purge and development waters, will be handled, transported and disposed in accordance with applicable local, State, and Federal regulations. Dewatering, purge, and development fluids will not be recharged back to the land surface or subsurface of the site, and will be managed off-site, unless prior approval is obtained from NYSDEC.

Discharge of water generated during large-scale construction activities to surface waters (i.e. a local pond, stream, or river) will be performed under a SPDES permit.

D-9 COVER SYSTEM RESTORATION

After the completion of soil removal and any other invasive activities the cover system will be restored in a manner that complies with the IRMWP. The cover system will be comprised of a minimum of 12 inches of clean soil or a hardscape cover system including asphalt pavement, concrete covered sidewalks, concrete pavers, and concrete building. The demarcation layer, consisting of [orange mesh material or equivalent material will be replaced to provide a visual reference to the top of the remaining contamination zone, the zone that requires adherence to special conditions for disturbance of remaining contaminated soils defined in this SMP. If the type of cover system changes from that which exists prior to the excavation (i.e., a soil cover is replaced by asphalt), this will constitute a modification of the cover element of the remedy and the upper surface of the remaining contamination. A figure showing the modified surface will be included in the subsequent Periodic Review Report and in an updated SMP.

D-10 BACKFILL FROM OFF-SITE SOURCES

All materials proposed for import onto the site will be approved by the qualified environmental professional and will be in compliance with provisions in this SMP prior to receipt at the site. A Request to Import/Reuse Fill or Soil form, which can be found at <http://www.dec.ny.gov/regulations/67386.html>, will be prepared and submitted to the NYSDEC project manager allowing a minimum of 5 business days for review.

Material from industrial sites, spill sites, or other environmental remediation sites or potentially contaminated sites will not be imported to the site.

All imported soils will meet the backfill and cover soil quality standards established in 6NYCRR 375-6.7(d). Based on an evaluation of the land use, protection of groundwater and protection of ecological resources criteria, the resulting soil quality standards are listed in Table 9. Soils that meet 'exempt' fill requirements under 6 NYCRR Part 360, but do not meet backfill or cover soil objectives for this site, will not be imported onto the site without prior approval by NYSDEC. Solid waste will not be imported onto the site.

The specific criteria under which off-site material may be used as cover or backfill are presented below.

- **Off-Site Soil:** Off-Site soil may be used as backfill provided that it originates from: 1) an NYSDEC-approved borrow site; or 2) a known source having no evidence of disposal or releases of hazardous substances, hazardous, toxic, radioactive wastes, or petroleum. In both instances the imported soil must be tested as discussed herein and demonstrated to meet restricted-residential SCOs or lesser as published in 6NYCRR Part 375-6.8(b). In addition, no off-site materials meeting the definition of a solid waste as defined in 6NYCRR, Part 360-1.2 (a) shall be used as backfill.
- **Other Off-Site Material:** Certain material may be imported as backfill or cover, without chemical testing, provided it contains less than 10% (by weight) material that would pass through a size 80 sieve: 1) Rock or stone, consisting of virgin material from a permitted mine or quarry; or 2) other material approved by NYSDEC.

D-10.1 Quality Assurance Requirements

The contractor will be required to collect the specified number of samples and submit the samples to an independent, NYSDOH ELAP-certified laboratory for analysis. The NYSDEC will be notified of the sampling and provided an opportunity to observe the sample collection work.

All analyses will be in accordance with USEPA SW-846 methodology. The laboratory data package will be a Category A deliverable; however, the NYSDEC may request, at any time, to upgrade the deliverable to Category B. Each import soil source shall be analyzed for the following parameters as more specifically listed in 6NYCRR Part 375-6:

- VOCs – Method 8260
- SVOCs – Method 8270
- Organochlorine Pesticides and PCBs – Method 8081/8082
- Metals, excluding mercury – Method 6010
- Mercury – Method 7471
- Cyanide – Method 9013

Each import soil source shall be subject to testing in accordance with the following schedule per NYSDEC DER-10 Table 5.4(e)10:

Contaminant:	VOCs	SVOCs, Inorganics & PCBs/Pesticides	
Soil Quantity (cubic yards)	Discrete Samples	Composite	Discrete Samples/Composite
0-50	1	1	3-5 discrete samples from different locations in the fill being provided will comprise a composite sample for analysis
50-100	2	1	
100-200	3	1	
200-300	4	1	
300-400	4	2	
400-500	5	2	
500-800	6	2	
800-1,000	7	2	
1,000 or greater	Add an additional 2 VOC and 1 composite for each additional 1,000 cubic yards or consult with DER		

Grab samples will be required for VOC analysis. For all other required analyses, a minimum of four grab samples will be collected to form a single composite sample. Approximately equal aliquots of the grab samples will be composited in the field using a stainless steel trowel and bowl. The trowel and bowl shall be decontaminated with a non-phosphate detergent (e.g., Alconox®) and potable water wash solution followed by a distilled water rinse between sampling locations).

Import criteria are restricted-residential SCOs or lesser as published in 6NYCRR Part 375-6.8(b).

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

D-11 STORMWATER POLLUTION PREVENTION

Small excavations disturbing less than 1-acre shall follow the minimum erosion controls presented below. For construction projects exceeding 1 acre, coverage must be obtained under the NYSDEC SPDES General Permit for Construction Activity, and shall include preparation and approval of a Storm Water Pollution Prevention Plan (SWPPP) that conforms to the requirements of the NYSDEC Division of Water guidelines and NYS regulations.

Minimum Storm Water Controls for Small Excavations:

Barriers and hay bale checks will be installed and inspected once a week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by the NYSDEC. All necessary repairs shall be made immediately.

Accumulated sediments will be removed as required to keep the barrier and hay bale check functional.

All undercutting or erosion of the silt fence toe anchor shall be repaired immediately with appropriate backfill materials.

Manufacturer's recommendations will be followed for replacing silt fencing damaged due to weathering.

Erosion and sediment control measures identified in the SMP shall be observed to ensure that they are operating correctly. Where discharge locations or points are accessible, they shall be inspected to ascertain whether erosion control measures are effective in preventing significant impacts to receiving waters.

Silt fencing or hay bales will be installed around the entire perimeter of the construction area.

D-12 EXCAVATION CONTINGENCY PLAN

If underground tanks or other previously unidentified contaminant sources are found during post-remedial subsurface excavations or development related construction, excavation activities will be suspended until sufficient equipment is mobilized to address the condition.

Sampling will be performed on product, sediment and surrounding soils, etc. as necessary to determine the nature of the material and proper disposal method. Chemical analysis will be performed for a full list of analytes (TAL metals; TCL volatiles and semi-volatiles, TCL pesticides and PCBs), unless the site history and previous sampling results provide a sufficient justification to limit the list of analytes. In this case, a reduced list of analytes will be proposed to the NYSDEC for approval prior to sampling.

Identification of unknown or unexpected contaminated media identified by screening during invasive site work will be promptly communicated by phone to NYSDEC's Project Manager. Reportable quantities of petroleum product will also be reported to the NYSDEC spills hotline. These findings will be also included in the Periodic Review Report.

D-13 COMMUNITY AIR MONITORING PLAN

A figure showing the location of air sampling stations based on generally prevailing wind conditions is shown in Figure 4. These locations will be adjusted on a daily or more frequent basis based on actual wind directions to provide an upwind and at least two downwind monitoring stations.

Exceedances of action levels listed in the CAMP will be reported to NYSDEC and NYSDOH Project Managers. Particulate exceedances will be handled in accordance with Section D-15 of this EWP.

D-14 ODOR CONTROL PLAN

This odor control plan is capable of controlling emissions of nuisance odors off-site associated with soil contamination. Contaminants of concern for the Site and City Parking Lot consist of SVOCs and metals and are not known for producing odors. Volatile organic compounds are not a concern at the site or City Parking Lot.

If nuisance odors are identified at the site boundary, or if odor complaints are received, work will be halted and the source of odors will be identified and corrected. Work will not resume until all nuisance odors have been abated. NYSDEC and NYSDOH will be notified of all odor events and of any other complaints about the project. Implementation of all odor controls, including the halt of work, is the responsibility of the remedial party's Remediation Engineer, and any measures that are implemented will be discussed in the Periodic Review Report.

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

If nuisance odors develop during intrusive work that cannot be corrected, or where the control of nuisance odors cannot otherwise be achieved due to on-site conditions or close proximity to sensitive receptors, odor control will be achieved by sheltering the excavation and handling areas in a temporary containment structure equipped with appropriate air venting/filtering systems.

D-15 DUST CONTROL PLAN

A dust suppression plan that addresses dust management during invasive on-site work will include, at a minimum, the items listed below:

- Dust suppression will be achieved through the use of a dedicated on-site water truck for road wetting. The truck will be equipped with a water cannon capable of spraying water directly onto off-road areas including excavations and stockpiles.
- Clearing and grubbing of larger sites will be done in stages to limit the area of exposed, unvegetated soils vulnerable to dust production.
- Gravel will be used on roadways to provide a clean and dust-free road surface.
- On-site roads will be limited in total area to minimize the area required for water truck sprinkling.

D-16 OTHER NUISANCES

A plan for rodent control, if necessary, will be developed and utilized by the contractor prior to and during site clearing and site grubbing, and during all remedial work.

A plan will be developed and utilized by the contractor for all remedial work to ensure compliance with local noise control ordinances, if necessary.

APPENDIX E

HEALTH & SAFETY PLAN

**SITE HEALTH AND SAFETY PLAN
for
INTERIM REMEDIAL MEASURE
ACTIVITIES**

**FORMER DAYS INN SITE (23 RIVERSIDE DRIVE) and
CITY OF CORNING OWNED PARKING LOT
SITE NO. 851054
CORNING, NEW YORK**

January 2016

0353-015-001

Prepared for:

FITZPATRICK HOLDINGS, INC.

**23 RIVERSIDE DRIVE SITE
HEALTH AND SAFETY PLAN FOR IRM AND FUTURE SITE ACTIVITIES**

ACKNOWLEDGEMENT

Plan Reviewed by (initial):

Corporate Health and Safety Director: _____ Thomas H. Forbes, P.E.

Project Manager: _____ Christopher Boron

Designated Site Safety and Health Officer: _____ To Be Determined(Primary Field Team Member)

Acknowledgement:

I acknowledge that I have reviewed the information contained in this site-specific Health and Safety Plan, and understand the hazards associated with performance of the field activities described herein. I agree to comply with the requirements of this plan.

NAME (PRINT)	SIGNATURE	DATE
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

**23 RIVERSIDE DRIVE SITE
HEALTH AND SAFETY PLAN FOR IRM AND FUTURE SITE ACTIVITIES**

TABLE OF CONTENTS

1.0	INTRODUCTION.....	1
1.1	General.....	1
1.2	Background.....	2
1.3	Known and Suspected Environmental Conditions.....	2
1.4	Parameters of Interest.....	4
1.5	Overview of RI/IRM Activities	4
2.0	ORGANIZATIONAL STRUCTURE.....	6
2.1	Roles and Responsibilities	6
2.1.1	Corporate Health and Safety Director.....	6
2.1.2	Project Manager	6
2.1.3	Site Safety and Health Officer.....	7
2.1.4	Site Workers.....	8
2.1.5	Other Site Personnel.....	8
3.0	HAZARD EVALUATION	9
3.1	Chemical Hazards.....	9
3.2	Physical Hazards	11
4.0	TRAINING.....	12
4.1	Site Workers	12
4.1.1	Initial and Refresher Training	12
4.1.2	Site Training.....	13
4.2	Supervisor Training.....	14
4.3	Emergency Response Training.....	15
4.4	Site Visitors.....	15
5.0	MEDICAL MONITORING	16
6.0	SAFE WORK PRACTICES.....	18
7.0	PERSONAL PROTECTIVE EQUIPMENT	20
7.1	Equipment Selection	20
7.2	Protection Ensembles	21
7.2.1	Level A/B Protection Ensemble	21
7.2.2	Level C Protection Ensemble	22
7.2.3	Level D Protection Ensemble.....	22
7.2.4	Recommended Level of Protection for Site Tasks	23

**23 RIVERSIDE DRIVE SITE
HEALTH AND SAFETY PLAN FOR IRM AND FUTURE SITE ACTIVITIES**

TABLE OF CONTENTS

8.0	EXPOSURE MONITORING	24
8.1	General.....	24
8.1.1	On-Site Work Zone Monitoring.....	24
8.1.2	Off-Site Community Air Monitoring.....	24
8.2	Monitoring Action Levels	25
8.2.1	On-Site Work Zone Action Levels	25
8.2.2	Community Air Monitoring Action Levels	26
9.0	SPILL RELEASE/RESPONSE	29
9.1	Potential Spills and Available Controls	29
9.2	Initial Spill Notification and Evaluation.....	30
9.3	Spill Response	31
9.4	Post-Spill Evaluation.....	32
10.0	HEAT/COLD STRESS MONITORING	33
10.1	Heat Stress Monitoring.....	33
10.2	Cold Stress Monitoring.....	35
11.0	WORK ZONES AND SITE CONTROL	38
12.0	DECONTAMINATION.....	40
12.1	Decontamination for TurnKey-Benchmark Employees	40
12.2	Decontamination for Medical Emergencies	41
12.3	Decontamination of Field Equipment	41
13.0	CONFINED SPACE ENTRY	42
14.0	FIRE PREVENTION AND PROTECTION	43
14.1	General Approach	43
14.2	Equipment and Requirements	43
14.3	Flammable and Combustible Substances.....	43
14.4	Hot Work.....	43
15.0	EMERGENCY INFORMATION	44
16.0	REFERENCES	45

**23 RIVERSIDE DRIVE SITE
HEALTH AND SAFETY PLAN FOR IRM AND FUTURE SITE ACTIVITIES**

TABLE OF CONTENTS

LIST OF TABLES

Table 1	Toxicity Data for Constituents of Potential Concern
Table 2	Potential Routes of Exposure to Constituents of Potential Concern
Table 3	Required Levels of Protection for SI Tasks

LIST OF FIGURES

Figure 1	Site Vicinity and Location Map
Figure 2	Site Map

ATTACHMENTS

Attachment A	Emergency Response Plan
Attachment B	Hot Work Permit Form
Attachment C	Community Air Monitoring Plan

1.0 INTRODUCTION

1.1 General

In accordance with OSHA requirements contained in 29 CFR 1910.120, this Health and Safety Plan (HASP) describes the specific health and safety practices and procedures to be employed by TurnKey Environmental Restoration, LLC and Benchmark Environmental Engineering & Science, PLLC employees (referred to jointly hereafter as “TurnKey-Benchmark”) during Interim Remedial Measure (IRM) and future site activities at the Former Days Inn Site, located at 23 Riverside Drive (Site) and the City of Corning-Owned Parking Lot (located south of the Site across Riverside Drive; City Parking Lot), in Corning, Steuben County, New York (see Figure 1 and 2). This HASP presents procedures for TurnKey-Benchmark employees who will be involved with IRM field activities; it does not cover the activities of other contractors, subcontractors or other individuals on the Site. These firms will be required to develop and enforce their own HASPs as discussed in Section 2.0. TurnKey-Benchmark accepts no responsibility for the health and safety of contractor, subcontractor or other personnel.

This HASP presents information on known Site health and safety hazards using available historical information, and identifies the equipment, materials and procedures that will be used to eliminate or control these hazards. Environmental monitoring will be performed during the course of field activities to provide real-time data for on-going assessment of potential hazards.

1.2 Background

TurnKey reviewed the Site history as provided in the Phase I Environmental Site Assessment completed at the Site. The Site was vacant in the late 1800's and portions of the Site were developed with residential homes and a church between 1900s and 1968. A 1921 Sanborn map indicates that a Corning Glass Works storage building was to the east of the area. Historic Sanborn maps also identify the Brick Terra Cotta and Tile Co. and a Corning Gas & Elec. Power Station located east of the hotel site from 1903 through at least 1921 (subsequently Duke, Van Dusen & Duke, Inc. Lumber and Bldg Supplies and NYSEG as of 1931).

Between 1968 and 1978 the residential homes and church were removed and a restaurant constructed. Significant damage to the buildings in the area of the Site occurred in 1972 due to a hurricane and flood control failures. A hotel was constructed in the northern portion of the Site in 1986 and a Days Inn hotel and bakery in the area of the former restaurant in 1989. The Days Inn hotel was closed and the hotel building was demolished in June 2014. The Site is currently under redevelopment for the construction of a new Hilton Garden Inn hotel.

During redevelopment activities, potentially-contaminated fill consisting of refractory brick, black ash, and glass cullet was removed from the Site during construction activities along with other soil/fill materials. As many as 220 truckloads of mixed volume have been removed from the Site and taken to seven (7) other locations near Corning in Steuben County for use as fill material. The New York State Department of Environmental Conservation (NYSDEC) has expressed concern regarding the fill material present at the Site, and that which has been removed. Construction activities at the Site have been stopped until this matter is resolved.

Samples collected by NYSDEC of the remaining fill at the Site along the excavation for the southern building foundation have identified concentrations of toxicity characteristic leaching procedure (TCLP) lead (up to 423 parts per million (ppm)) and TCLP cadmium (up to 2.4 ppm) that exceed the regulatory limits for hazardous waste in two (2) of the ten (10) samples that were collected. Five of the samples had concentrations that exceed Part 375 SCO's for Restricted Commercial Use for arsenic (up to 437 ppm), cadmium (up to 238 ppm), lead (up to 25,600 ppm), and/or dibenzo(a,h)anthracene (up to 1.7 ppm). Previous analytical testing conducted by NYSDEC of similar fill materials at nearby sites has, in some cases, identified concentrations of lead and cadmium above hazardous waste thresholds.

Arsenic, other metals, and semi-volatile organic compounds (SVOCs) have also been identified at concentrations above the 6 NYCRR Part 375 Soil Cleanup Objectives (SCOs).

The Site and City Parking Lot were characterized by TurnKey Environmental Restoration LLC, (TurnKey) as documented in the Site Characterization Report¹ dated January 2016 in accordance with the Order on Consent. The location and estimated extent of the impacted areas for the Site and City Parking Lot are described below.

Site

Based on field observations, evidence of ash, glass cullet and/or slag was observed in the area of the Site shown on Figure 3. The fill material containing the ash, glass cullet and slag was present at various depths from 0.25 to 5 fbs and at thicknesses from 1 to 4 feet in the south and south eastern portion of the Site. The area where the ash, glass cullet and slag was observed or is believed to be present (shown in magenta) is an approximate 10,000 square foot (SF) area with a volume of soil/fill material containing ash, glass cullet and/or slag of approximately 1,100 cubic yards (CY).

The area of soil/fill material containing ash, glass cullet and/or slag with contaminants exceeding their respective Commercial Soil Cleanup Objectives (CSCOs) is also shown on Figure 3 (in orange), has an approximate 6,200 SF area and has an estimated volume of 690 CY.

Characteristically hazardous levels of cadmium and lead were also detected in three (3) of the 20 soil/fill samples analyzed from the Site. The location of the characteristic hazardous soil/fill at the Site is outside the HGI building footprint (shown in blue), has an approximate footprint of 1,600 SF, as shown on Figure 3, and a volume of 240 CY, assuming a thickness of 4 feet.

City Parking Lot

Based on field observations at the City Parking Lot, fill material with evidence of ash, glass cullet and/or slag was observed in the area shown on Figure 3. This fill material was present at various depths from 0.25 to 8 fbs, at thicknesses ranging from 1 to 7 feet, and appears to increase in thickness and depth from north to south, particularly in the southwestern portion of the parking lot. The area where the ash, glass cullet and slag was

¹“Site Characterization Report, 23 Riverside Drive, Former Days Inn Site, Site No. 851054, Corning, New York”. Prepared for Fitzpatrick Holdings, Inc. by TurnKey Environmental Restoration, LLC. January 2016.

observed or is believed to be present (shown in magenta) is an approximate 32,000 SF area with a volume of approximately 4,150 CY.

The area of soil/fill material containing ash, glass cullet and/or slag with contaminants exceeding their respective CSCOs is also shown on Figure 3 (in orange), has an approximate 12,400 SF area and has an estimated volume of 1,660 CY.

Characteristic hazardous levels of lead were also detected at one (1) of the seven (7) soil/fill samples analyzed from the City Parking Lot. The location of the characteristic hazardous soil/fill at the City Owned Parking Lot is located in the northeastern corner of the property (shown in blue), has an approximate footprint of 3,800 square feet, as shown on Figure 3, and a volume of 563 CY, assuming a thickness of 4 feet.

The selected and NYSDEC-approved remedial approach for Site and City Parking Lot consist of *Implementation of Institutional Controls (ICs) and Engineering Controls (ECs)*. The ICs will consist establishing an environmental easement for the properties to restrict the use of the property (i.e., commercial and/or industrial uses) and require the implementation of a Site Management Plan (SMP). The ECs will consist of the use of a cover system to mitigate the potential for exposure to the impacted soil/fill material remaining on-site. The use of these ICs/ECs will achieve the remedial action objectives for the properties while facilitating redevelopment of the Site for commercial reuse.

1.3 Parameters of Interest

Based on our SC of the Site the Constituents of Concern (COCs) are:

- **Soil/Fill:** Polycyclic aromatic hydrocarbons (PAHs) and select metals (arsenic, cadmium, copper, lead mercury, nickel, selenium, and zinc).

1.4 Overview of IRM Activities

TurnKey-Benchmark personnel will be on-Site to observe IRM activities that will be completed in the area where soil/fill material containing ash, glass cullet and/or slag have been identified and/or if the material is encountered outside of the areas shown on Figure 3. The field activities to be completed as part of the SI are described below.

Interim Remedial Measures Activities

- 1. Excavation for underground utilities, footers, catch basins and light poles:** TurnKey-Benchmark will observe excavations to install underground utilities, footers, catch basins and light poles that will occur in areas where soil/fill material containing ash, glass cullet and/or slag or with contaminants exceeding their respective Part 375 Commercial Soil Cleanup Objectives (CSCOs) at the Site and City Parking Lot have been encountered. TurnKey-Benchmark will observe soil/fill conditions during the excavations and conduct community air monitoring as outlined in Attachment C. Soil/fill encountered during the excavation activities that cannot be returned to the excavation will be managed in accordance with the Site Management Plan (SMP).
- 2. Soil/fill grading and cover system installation:** TurnKey-Benchmark will observe site grading and cover system installation, as needed, in areas where soil/fill materials containing ash, glass cullet and/or slag or with contaminants exceeding their respective CSCOs at the Site and City Parking Lot have been encountered. TurnKey-Benchmark will observe soil/fill conditions during the grading activities and conduct community air monitoring as outlined in Attachment C. Soil/fill encountered during the grading activities that cannot be reused under the cover system will be managed in accordance with the SMP.
- 3. Future Site Activities and cover system penetrations:** Future Site activities could include utility line repair(s) or other types of cover system penetrations for Site and City Parking Lot development or repair activities. These activities will be subject to the requirements of SMP under the Environmental Easement.

2.0 ORGANIZATIONAL STRUCTURE

This section of the HASP describes the lines of authority, responsibility and communication as they pertain to health and safety functions at the Site and City Parking Lot. The purpose of this chapter is to identify the personnel who impact the development and implementation of the HASP and to describe their roles and responsibilities. This chapter also identifies other contractors and subcontractors involved in work operations and establish the lines of communications among them for health and safety matters. The organizational structure described in this chapter is consistent with the requirements of 29 CFR 1910.120(b)(2). This section will be reviewed by the Project Manager and updated as necessary to reflect the current organizational structure at this Site.

2.1 Roles and Responsibilities

Turnkey-Benchmark personnel on the Site must comply with the minimum requirements of this HASP. The specific responsibilities and authority of management, safety and health, and other personnel on this Site are detailed in the following paragraphs.

2.1.1 Corporate Health and Safety Director

The TurnKey-Benchmark Corporate Health and Safety Director is ***Mr. Thomas H. Forbes, P.E.*** The Corporate Health and Safety Director responsible for developing and implementing the Health and Safety program and policies for Benchmark Environmental Engineering & Science, PLLC and TurnKey Environmental Restoration, LLC, and consulting with corporate management to ensure adequate resources are available to properly implement these programs and policies. The Corporate Health and Safety Director coordinates TurnKey-Benchmark's Health and Safety training and medical monitoring programs and assists project management and field staff in developing site-specific health and safety plans.

2.1.2 Project Manager

The Project Manager for this Site is ***Mr. Christopher Boron.*** The Project Manager has the responsibility and authority to direct all TurnKey-Benchmark work operations at the Site. The Project Manager coordinates safety and health functions with the Site Safety and Health Officer, and bears ultimate responsibility for proper implementation of this HASP.

He may delegate authority to expedite and facilitate any application of the program, including modifications to the overall project approach as necessary to circumvent unsafe work conditions. Specific duties of the Project Manager include:

- Preparing and coordinating the Site work plan.
- Providing TurnKey-Benchmark workers with work assignments and overseeing their performance.
- Coordinating health and safety efforts with the Site Safety and Health Officer (SSHO).
- Reviewing the emergency response coordination plan to assure its effectiveness.
- Serving as the primary liaison with Site contractors and the property owner.

2.1.3 Site Safety and Health Officer

The Site Safety and Health Officer (SSHO) for this Site will be **Mr. Christopher Boron** (Field Team Leader), or a primary member of the field team assigned to the project. The qualified alternate SSHO is **Mr. Nathan Munley**. The SSHO reports to the Project Manager. The SSHO is on-site or readily accessible to the Site during work operations and has the authority to halt Site work if unsafe conditions are detected. The specific responsibilities of the SSHO are:

- Managing the safety and health functions for TurnKey-Benchmark personnel on the Site.
- Serving as the point of contact for safety and health matters.
- Ensuring that TurnKey-Benchmark field personnel working on the Site have received proper training (per 29 CFR Part 1910.120(e)), that they have obtained medical clearance to wear respiratory protection (per 29 CFR Part 1910.134), and that they are properly trained in the selection, use and maintenance of personal protective equipment, including qualitative respirator fit testing.
- Performing or overseeing Site monitoring as required by the HASP.
- Assisting in the preparation and review of the HASP.

- Maintaining site-specific safety and health records as described in this HASP.
- Coordinating with the Project Manager, Site Workers, and Contractor's SSHO as necessary for safety and health efforts.

2.1.4 Site Workers

Site workers are responsible for: complying with this HASP or a more stringent HASP, if appropriate (i.e., Contractor and Subcontractor's HASP); using proper PPE; reporting unsafe acts and conditions to the SSHO; and following the safety and health instructions of the Project Manager and SSHO.

2.1.5 Other Site Personnel

Other Site personnel who will have health and safety responsibilities will include the soil probes drilling contractor, who will be responsible for developing, implementing and enforcing a Health and Safety Plan equally stringent or more stringent than TurnKey-Benchmark's HASP. TurnKey-Benchmark assumes no responsibility for the health and safety of anyone outside its direct employ. Each Contractor's HASP shall cover all non-TurnKey/Benchmark Site personnel. Each Contractor shall assign a SSHO who will coordinate with TurnKey-Benchmark's SSHO as necessary to ensure effective lines of communication and consistency between contingency plans.

In addition to TurnKey-Benchmark and Contractor personnel, other individuals who may have responsibilities in the work zone include subcontractors and governmental agencies performing Site inspection work (i.e., the New York State Department of Environmental Conservation). The Contractor shall be responsible for ensuring that these individuals have received OSHA-required training (29 CFR 1910.120(e)), including initial, refresher and site-specific training, and shall be responsible for the safety and health of these individuals while they are on-site.

3.0 HAZARD EVALUATION

Due to the presence of certain contaminants at the Site and City Parking Lot, the possibility exists that workers will be exposed to hazardous substances during field activities. The principal points of exposure would be through direct contact with and incidental ingestion of soil, and through the inhalation of contaminated particles or vapors. In addition, the use of construction equipment (e.g., excavator, compactors, etc.) will also present conditions for potential physical injury to workers. Further, since work will be performed outdoors, the potential exists for heat/cold stress to impact workers, especially those wearing protective equipment and clothing. Adherence to the medical evaluations, worker training relative to chemical hazards, safe work practices, proper personal protection, environmental monitoring, establishment work zones and Site control, appropriate decontamination procedures and contingency planning outlined herein will reduce the potential for chemical exposures and physical injuries.

3.1 Chemical Hazards

As discussed in Section 1.3, the SC have identified PAHs and select metals (arsenic, cadmium, copper, lead mercury, nickel, selenium, and zinc) in soil/fill at the Site and City Parking Lot. The PAHs and metals impact are general associated with the fill materials containing ash, glass cullet and/or slag. Visual and olfactory observations, as well as elevated PID readings, indicate a potential VOC impact to Site soil will be used during subsurface activities. Table 1 lists exposure limits for airborne concentrations of the COCs identified in Section 1.3 of this HASP. Brief descriptions of the toxicology of the prevalent COCs and related health and safety guidance and criteria are provided below.

1. **Arsenic** is listed as a Group A human carcinogen by the Environmental Protection Agency. Primary exposure routes are ingestion and inhalation. Exposure to arsenic can cause nausea, vomiting, diarrhea, decreased production of red blood cells, fatigue, abnormal heart rhythm, blood-vessel damage, as well as cancer of the liver, bladder, lungs, and skin.
2. **Barium** is a silver white metal, produced by the reduction of barium oxide. Local effects and symptoms of exposure to barium compounds, such as the hydroxide or carbonate, may include irritation of the eyes, throat, nose and skin. Systemic effects from ingestion include increased muscle contractility, reduction of heart rate/potential arrest, intestinal peristalsis, vascular constriction, and bladder

contraction.

3. **Cadmium** is a natural element and is usually combined with one or more elements, such as oxygen, chloride or sulfur. Breathing high levels of cadmium severely damages the lungs and can cause death. Ingestion of high levels of cadmium severely irritates the stomach, leading to vomiting and diarrhea. Long term exposure to lower levels of cadmium leads to a buildup of this substance in the kidneys and possible kidney disease. Other potential long term effects are lung damage and fragile bones. Cadmium is suspected to be a human carcinogen.
4. **Lead** can affect almost every organ and system in our bodies. The most sensitive is the central nervous system, particularly in children. Lead also damages kidneys and the immune system. The effects are the same whether it is breathed or swallowed. Lead may decrease reaction time, cause weakness in fingers, wrists or ankles and possibly affect memory. Lead may cause anemia.
5. **Mercury** is used in industrial applications for the production of caustic and chlorine, and in electrical control equipment and apparatus. Overexposure to mercury may cause coughing, chest pains, bronchitis, pneumonia, indecision, headaches, fatigue and salivation. Mercury is a skin and eye irritant.
6. **Polycyclic Aromatic Hydrocarbons (PAHs)** are formed as a result of the pyrolysis and incomplete combustion of organic matter such as fossil fuel. PAH aerosols formed during the combustion process disperse throughout the atmosphere, resulting in the deposition of PAH condensate in soil, water and on vegetation. In addition, several products formed from petroleum processing operations (e.g., roofing materials and asphalt) also contain elevated levels of PAHs. Hence, these compounds are widely dispersed in the environment. PAHs are characterized by a molecular structure containing three or more fused, unsaturated carbon rings. Seven of the PAHs are classified by USEPA as probable human carcinogens (USEPA Class B2). These are: benzo(a)pyrene; benzo(a)anthracene; benzo(b)fluoranthene; benzo(k)fluoranthene; chrysene; dibenzo(a,h)anthracene; and indeno(1,2,3-cd)pyrene. The primary route of exposure to PAHs is through incidental ingestion and inhalation of contaminated particulates. PAHs are characterized by an organic odor, and exist as oily liquids in pure form. Acute exposure symptoms may include acne-type blemishes in areas of the skin exposed to sunlight.

With respect to the anticipated IRM activities discussed in Section 1.4, possible routes of exposure to the above-mentioned contaminants are presented in Table 2. The use of proper respiratory equipment, as outlined in Section 7.0 of this HASP, will minimize the

potential for exposure to airborne contamination. Exposure to contaminants through dermal and other routes will also be minimized through the use of protective clothing (Section 7.0), safe work practices (Section 6.0), and proper decontamination procedures (Section 12.0).

3.2 Physical Hazards

IRM activities at the 23 Riverside Drive Site and City Parking Lot may present the following physical hazards:

- The potential for physical injury during heavy construction equipment use, such as backhoes, excavators and compactor equipment.
- The potential for heat/cold stress to employees during the summer/winter months (see Section 10.0).
- The potential for slip and fall injuries due to rough, uneven terrain and/or open excavations.

These hazards represent only some of the possible means of injury that may be present during IRM operations and sampling activities at the Site. Since it is impossible to list all potential sources of injury, it shall be the responsibility of each individual to exercise proper care and caution during all phases of the work.

4.0 TRAINING

4.1 Site Workers

Personnel performing IRM activities at the Site or City Parking Lot (such as, but not limited to equipment operators and general laborers) that will be working in areas where the ash, glass cullet, and slag have been identified and may be exposed to hazardous substances, health hazards, or safety hazards, including their supervisors/managers responsible for the Site shall receive training in accordance with 29 CFR 1910.120(e) before they are permitted to engage in operations in the exclusion zone or contaminant reduction zone. This training includes an initial 40-hour Hazardous Waste Site Worker Protection Course, an 8-hour Annual Refresher Course subsequent to the initial 40-hour training, and 3 days of actual field experience under the direct supervision of a trained, experienced supervisor. Additional site-specific training shall also be provided by the SSHO prior to the start of field activities. A description of topics to be covered by this training is provided below.

4.1.1 Initial and Refresher Training

Initial and refresher training is conducted by a qualified instructor as specified under OSHA 29 CFR 1910.120(e)(5), and is specifically designed to meet the requirements of OSHA 29 CFR 1910.120(e)(3) and 1910.120(e)(8). The training covers, as a minimum, the following topics:

- OSHA HAZWOPER regulations.
- Site safety and hazard recognition, including chemical and physical hazards.
- Medical monitoring requirements.
- Air monitoring, permissible exposure limits, and respiratory protection level classifications.
- Appropriate use of personal protective equipment (PPE), including chemical compatibility and respiratory equipment selection and use.
- Work practices to minimize risk.

- Work zones and Site control.
- Safe use of engineering controls and equipment.
- Decontamination procedures.
- Emergency response and escape.
- Confined space entry procedures.
- Heat and cold stress monitoring.
- Elements of a Health and Safety Plan.
- Spill containment.

Initial training also incorporates workshops for PPE and respiratory equipment use (Levels A, B and C), and respirator fit testing. Records and certification received from the course instructor documenting each employee's successful completion of the training identified above are maintained on file at TurnKey-Benchmark's Buffalo, NY office. Contractors and Subcontractors are required to provide similar documentation of training for all their personnel who will be involved in on-site work activities.

Any employee who has not been certified as having received health and safety training in conformance with 29 CFR 1910.120(e) is prohibited from working in the exclusion and contamination reduction zones, or to engage in any on-site work activities that may involve exposure to hazardous substances or wastes.

4.1.2 Site Training

Site workers are given a copy of the HASP and provided a site-specific briefing prior to the commencement of work to ensure that employees are familiar with the HASP and the information and requirements it contains. The Site briefing shall be provided by the SSHO prior to initiating field activities and shall include:

- Names of personnel and alternates responsible for Site safety and health.
- Safety, health and other hazards present on the Site.

- The site lay-out including work zones and places of refuge.
- The emergency communications system and emergency evacuation procedures.
- Use of PPE.
- Work practices by which the employee can minimize risks from hazards.
- Safe use of engineering controls and equipment on the site.
- Medical surveillance, including recognition of symptoms and signs of over-exposure as described in Chapter 5 of this HASP.
- Decontamination procedures as detailed in Chapter 12 of this HASP.
- The emergency response plan as detailed in Chapter 15 of this HASP.
- Confined space entry procedures, if required, as detailed in Chapter 13 of this HASP.
- The spill containment program as detailed in Chapter 9 of this HASP.
- Site control as detailed in Chapter 11 of this HASP.

Supplemental health and safety briefings will also be conducted by the SSHO on an as-needed basis during the course of the work. Supplemental briefings are provided as necessary to notify employees of any changes to this HASP as a result of information gathered during ongoing Site characterization and analysis. Conditions for which the SSHO may schedule additional briefings include, but are not limited to: a change in Site conditions (e.g., based on monitoring results); changes in the work schedule/plan; newly discovered hazards; and safety incidents occurring during Site work.

4.2 Supervisor Training

On-site safety and health personnel who are directly responsible for or who supervise the safety and health of workers engaged in hazardous waste operations (i.e., SSHO) shall receive, in addition to the appropriate level of worker training described in Section 4.1,

above, 8 additional hours of specialized supervisory training, in compliance with 29 CFR 1910.120(e)(4).

4.3 Emergency Response Training

Emergency response training is addressed in Appendix A of this HASP, Emergency Response Plan.

4.4 Site Visitors

Each Contractor's SSHO will provide a site-specific briefing to Site visitors and other non-TurnKey-Benchmark personnel who enter the Site beyond the Site entry point. The site-specific briefing will provide information about Site hazards, the Site layout including work zones and places of refuge, the emergency communications system and emergency evacuation procedures, and other pertinent safety and health requirements as appropriate.

Site visitors will not be permitted to enter the exclusion zone or contaminant reduction zones unless they have received the level of training required for Site workers as described in Section 4.1.

5.0 MEDICAL MONITORING

Medical monitoring examinations are provided to TurnKey-Benchmark employees as stipulated under 29 CFR Part 1910.120(f). These exams include initial employment, annual and employment termination physicals for TurnKey-Benchmark employees involved in hazardous waste site field operations. Post-exposure examinations are also provided for employees who may have been injured, received a health impairment, or developed signs or symptoms of over-exposure to hazardous substances or were accidentally exposed to substances at concentrations above the permissible exposure limits without necessary personal protective equipment. Such exams are performed as soon as possible following development of symptoms or the known exposure event.

Medical evaluations are performed by Health Works, an occupational health care provider under contract with TurnKey-Benchmark. Health Works is located in Seneca Square Plaza, 1900 Ridge Road, West Seneca, New York 14224. The facility can be reached at (716) 823-5050 to schedule routine appointments or post-exposure examinations.

Medical evaluations are conducted according to the TurnKey-Benchmark Medical Monitoring Program and include an evaluation of the workers' ability to use respiratory protective equipment. The examinations include:

- Occupational/medical history review.
- Physical exam, including vital sign measurement.
- Spirometry testing.
- Eyesight testing.
- Audio testing (minimum baseline and exit, annual for employees routinely exposed to greater than 85db).
- EKG (for employees >40 yrs age or as medical conditions dictate).
- Chest X-ray (baseline and exit, and every 5 years).
- Blood biochemistry (including blood count, white cell differential count, serum multiplastic screening).

- Medical certification of physical requirements (i.e., sight, musculoskeletal, cardiovascular) for safe job performance and to wear respiratory protection equipment.

The purpose of the medical evaluation is to determine an employee's fitness for duty on hazardous waste sites; and to establish baseline medical data.

In conformance with OSHA regulations, TurnKey-Benchmark will maintain and preserve medical records for a period of 30 years following termination of employment. Employees are provided a copy of the physician's post-exam report, and have access to their medical records and analyses.

6.0 SAFE WORK PRACTICES

TurnKey-Benchmark employees shall conform to the following safe work practices during on-site work activities conducted within the exclusion and contamination reduction zones:

- Eating, drinking, chewing gum or tobacco, smoking, or any practice that increases the probability of hand-to-mouth contact is strictly prohibited.
- The hands and face must be thoroughly washed upon leaving the work area and prior to engaging in any activity indicated above.
- Respiratory protective equipment and clothing must be worn by all personnel entering the Site as required by the HASP or as modified by the Site safety officer. Excessive facial hair (i.e., beards, long mustaches or sideburns) that interferes with the satisfactory respirator-to-face seal is prohibited.
- Contact with surfaces/materials either suspected or known to be contaminated will be avoided to minimize the potential for transfer to personnel, cross contamination and need for decontamination.
- Medicine and alcohol can synergize the effects of exposure to toxic chemicals. Due to possible contraindications, use of prescribed drugs should be reviewed with the TurnKey-Benchmark occupational physician. Alcoholic beverage and illegal drug intake are strictly forbidden during the workday.
- Personnel shall be familiar with standard operating safety procedures and additional instructions contained in this Health and Safety Plan.
- On-site personnel shall use the “buddy” system. No one may work alone (i.e., out of earshot or visual contact with other workers) in the exclusion zone.
- Personnel and equipment in the contaminated area shall be minimized, consistent with effective Site operations.
- Employees have the obligation to immediately report and if possible, correct unsafe work conditions.
- Use of contact lenses on-site will not be permitted. Spectacle kits for insertion into full-face respirators will be provided for TurnKey-Benchmark employees, as requested and required.

The recommended specific safety practices for working around the contractor's equipment (e.g., backhoes, bulldozers, excavators, etc.) are as follows:

- Although the Contractor and subcontractors are responsible for their equipment and safe operation of the Site, TurnKey-Benchmark personnel are also responsible for their own safety.
- Subsurface work will not be initiated without first clearing underground utility services.
- Heavy equipment should not be operated within 20 feet of overhead wires. This distance may be increased if windy conditions are anticipated or if lines carry high voltage. The Site should also be sufficiently clear to ensure the project staff can move around the heavy machinery safely.
- Care should be taken to avoid overhead wires when moving heavy-equipment from location to location.
- Hard hats, safety boots and safety glasses should be worn in the vicinity of heavy equipment. Hearing protection is also recommended.
- The work Site should be kept neat. This will prevent personnel from tripping and will allow for fast emergency exit from the Site.
- Proper lighting must be provided when working at night.
- Construction activities should be discontinued during an electrical storm or severe weather conditions.
- Personnel shall stand upwind of any construction operation when not immediately involved in sampling/logging/observing activities.
- Personnel will not approach the edge of an unsecured trench/excavation closer than 2 feet.

7.0 PERSONAL PROTECTIVE EQUIPMENT

7.1 Equipment Selection

Personal protective equipment (PPE) will be donned when work activities may result in exposure to physical or chemical hazards beyond acceptable limits, and when such exposure can be mitigated through appropriate PPE. The selection of PPE will be based on an evaluation of the performance characteristics of the PPE relative to the requirements and limitations of the Site, the task-specific conditions and duration, and the hazards and potential hazards identified at the Site.

Equipment designed to protect the body against contact with known or suspect chemical hazards are grouped into four categories according to the degree of protection afforded. These categories designated A through D consistent with United States Environmental Protection Agency (USEPA) Level of Protection designation, are:

- **Level A:** Should be selected when the highest level of respiratory, skin and eye protection is needed.
- **Level B:** Should be selected when the highest level of respiratory protection is needed, but a lesser level of skin protection is required. Level B protection is the minimum level recommended on initial Site entries until the hazards have been further defined by on-site studies. Level B (or Level A) is also necessary for oxygen-deficient atmospheres.
- **Level C:** Should be selected when the types of airborne substances are known, the concentrations have been measured and the criteria for using air-purifying respirators are met. In atmospheres where no airborne contaminants are present, Level C provides dermal protection only.
- **Level D:** Should not be worn on any Site with elevated respiratory or skin hazards. This is generally a work uniform providing minimal protection.

OSHA requires the use of certain PPE under conditions where an immediate danger to life and health (IDLH) may be present. Specifically, OSHA 29 CFR 1910.120(g)(3)(iii) requires use of a positive pressure self-contained breathing apparatus, or positive pressure air-line respirator equipped with an escape air supply when chemical exposure levels present a substantial possibility of immediate serious injury, illness or death, or impair the ability to

escape. Similarly, OSHA 29 CFR 1910.120(g)(3)(iv) requires donning totally-encapsulating chemical protective suits (with a protection level equivalent to Level A protection) in conditions where skin absorption of a hazardous substance may result in a substantial possibility of immediate serious illness, injury or death, or impair the ability to escape.

In situations where the types of chemicals, concentrations, and possibilities of contact are unknown, the appropriate level of protection must be selected based on professional experience and judgment until the hazards can be further characterized. The individual components of clothing and equipment must be assembled into a full protective ensemble to protect the worker from site-specific hazards, while at the same time minimizing hazards and drawbacks of the personal protective gear itself. Ensemble components are detailed below for levels A/B, C, and D protection.

7.2 Protection Ensembles

7.2.1 Level A/B Protection Ensemble

Level A/B ensembles include similar respiratory protection, however Level A provides a higher degree of dermal protection than Level B. Use of Level A over Level B is determined by: comparing the concentrations of identified substances in the air with skin toxicity data, and assessing the effect of the substance (by its measured air concentrations or splash potential) on the small area of the head and neck unprotected by Level B clothing.

The recommended PPE for level A/B is:

- Pressure-demand, full-face piece self-contained breathing apparatus (MSHA/-NIOSH approved) or pressure-demand supplied-air respirator with escape self-contained breathing apparatus (SCBA).
- Chemical-resistant clothing. For Level A, clothing consists of totally-encapsulating chemical resistant suit. Level B incorporates hooded one-or two-piece chemical splash suit.
- Inner and outer chemical resistant gloves.
- Chemical-resistant safety boots/shoes.
- Hardhat.

7.2.2 Level C Protection Ensemble

Level C protection is distinguished from Level B by the equipment used to protect the respiratory system, assuming the same type of chemical-resistant clothing is used. The main selection criterion for Level C is that conditions permit wearing an air-purifying device. The device (when required) must be an air-purifying respirator (MSHA/NIOSH approved) equipped with filter cartridges. Cartridges must be able to remove the substances encountered. Respiratory protection will be used only with proper fitting, training and the approval of a qualified individual. In addition, an air-purifying respirator can be used only if: oxygen content of the atmosphere is at least 19.5% in volume; substances are identified and concentrations measured; substances have adequate warning properties; the individual passes a qualitative fit-test for the mask; and an appropriate cartridge/canister is used, and its service limit concentration is not exceeded.

Recommended PPE for Level C conditions includes:

- Full-face piece, air-purifying respirator equipped with MSHA and NIOSH approved organic vapor/acid gas/dust/mist combination cartridges or as designated by the SSHO.
- Chemical-resistant clothing (hooded, one or two-piece chemical splash suit or disposable chemical-resistant one-piece suit).
- Inner and outer chemical-resistant gloves.
- Chemical-resistant safety boots/shoes.
- Hardhat.

An air-monitoring program is part of all response operations when atmospheric contamination is known or suspected. It is particularly important that the air be monitored thoroughly when personnel are wearing air-purifying respirators. Continual surveillance using direct-reading instruments is needed to detect any changes in air quality necessitating a higher level of respiratory protection.

7.2.3 Level D Protection Ensemble

As indicated above, Level D protection is primarily a work uniform. It can be worn in areas where only boots can be contaminated, where there are no inhalable toxic substances

and where the atmospheric contains at least 19.5% oxygen.

Recommended PPE for Level D includes:

- Coveralls.
- Safety boots/shoes.
- Safety glasses or chemical splash goggles.
- Hardhat.
- Optional gloves; escape mask; face shield.

7.2.4 Recommended Level of Protection for Site Tasks

Based upon current information regarding both the contaminants suspected to be present at the Site and the various tasks that are included in the IRM activities, the minimum required levels of protection for these tasks shall be as identified in Table 3.

8.0 EXPOSURE MONITORING

8.1 General

Based on the results of SC and the nature of the IRM work activities at the Site and City Parking Lot, the possibility exist that particulates may be released to the air during intrusive construction activities. Ambient breathing zone concentrations may at times, exceed the permissible exposure limits (PELs) established by OSHA for the individual compounds (see Table 1), in which case respiratory protection will be required. Respiratory and dermal protection may be modified (upgraded or downgraded) by the SSHO based upon real-time field monitoring data.

8.1.1 On-Site Work Zone Monitoring

TurnKey-Benchmark personnel will conduct routine, real-time air monitoring during intrusive construction phases such as excavation, backfilling, grading, etc. in areas where the ash, glass cullet and/or slag have been identified. The work area will be monitored at regular intervals using a photoionization detector (PID). Observed values will be recorded and maintained as part of the permanent field record.

Additional air monitoring measurements may be made by TurnKey-Benchmark personnel to verify field conditions during subcontractor oversight activities. Monitoring instruments will be protected from subsurface contamination during use. Additional monitoring instruments may be added if the situations or conditions change. Monitoring instruments will be calibrated in accordance with manufacturer's instructions before use.

8.1.2 Off-Site Community Air Monitoring

In addition to on-Site monitoring within the work zone(s), monitoring at the down-wind portion of the Site and City Parking Lot perimeters will be conducted. This will provide a real-time method for determination of vapor releases to the surrounding community as a result of ground intrusive investigation work.

Ground intrusive activities are defined in the Generic Community Air Monitoring Plan and attached as Appendix C. Ground intrusive activities include soil/fill excavations, trenching, and/or grading. Continuous monitoring is required for ground intrusive activities in areas where the ash, glass cullet and/or slag have been identified

8.2 Monitoring Action Levels

8.2.1 On-Site Work Zone Action Levels

The PID, or other appropriate instrument(s), will be used by TurnKey-Benchmark personnel to monitor organic vapor concentrations as specified in this HASP. In addition, fugitive dust/particulate concentrations will be monitored during soil/fill excavations, trenching and grading in areas where the ash, glass cullet and/or slag have been identified using a real-time particulate monitor as specified in this plan. In the absence of such monitoring, appropriate respiratory protection for particulates shall be donned. Sustained readings obtained in the breathing zone may be interpreted (with regard to other Site conditions) as follows for TurnKey-Benchmark personnel:

- Total atmospheric concentrations of unidentified vapors or gases ranging from 0 to 1 ppm above background on the PID) - Continue operations under Level D (see Appendix A).
- Total atmospheric concentrations of unidentified vapors or gases yielding sustained readings from >1 ppm to 5 ppm above background on the PID (vapors not suspected of containing high levels of chemicals toxic to the skin) - Continue operations under Level C (see Appendix A).
- Total atmospheric concentrations of unidentified vapors or gases yielding sustained readings of >5 ppm to 50 ppm above background on the PID - Continue operations under Level B (see Attachment 1), re-evaluate and alter (if possible) construction methods to achieve lower vapor concentrations.
- Total atmospheric concentrations of unidentified vapors or gases above 50 ppm on the PID - Discontinue operations and exit the work zone immediately.

The particulate monitor will be used to monitor respirable dust concentrations during major intrusive activities such as soil excavation. Action levels based on the instrument readings shall be as follows:

- Less than 50 mg/m³ - Continue field operations.
- 50-150 mg/m³ - Don dust/particulate mask or equivalent

- Greater than 150 mg/m³ - Don dust/particulate mask or equivalent. Initiate engineering controls to reduce respirable dust concentration (viz., wetting of excavated soils or tools at discretion of Site Health and Safety Officer).

Readings from the field equipment will be recorded and documented on the appropriate Project Field Forms. Instruments will be calibrated before use on a daily basis and the procedure will be documented on the appropriate Project Field Forms.

8.2.2 Community Air Monitoring Action Levels

In addition to the action levels prescribed in Section 8.2.1 for TurnKey-Benchmark personnel on-site, the following criteria shall also be adhered to for the protection of downwind receptors consistent with NYSDOH requirements (Appendix C):

o **ORGANIC VAPOR PERIMETER MONITORING:**

- If the sustained ambient air concentration of organic vapors at the downwind perimeter of the exclusion zone exceeds 5 ppm above background for the 15-minute average, work activities will be temporarily halted and monitoring continued. If the sustained organic vapor decreases below 5 ppm over background, work activities can resume with continued monitoring.
- If the sustained ambient air concentration of organic vapors at the downwind perimeter of the exclusion zone are greater than 5 ppm over background but less than 25 ppm for the 15-minute average, activities can resume provided that: the organic vapor level 200 feet downwind of the working site or half the distance to the nearest off-site residential or commercial structure, whichever is less, but in no case less than 20 feet, is below 5 ppm over background; and more frequent intervals of monitoring, as directed by the Site Health and Safety Officer, are conducted.
- If the sustained organic vapor level is above 25 ppm at the perimeter of the exclusion zone for the 15-minute average, the Site Health and Safety Officer must be notified and work activities shut down. The Site Health and Safety Officer will determine when re-entry of the exclusion zone is possible and will implement downwind air monitoring to ensure vapor emissions do not impact the nearest off-site residential or commercial structure at levels exceeding those specified in the ***Organic Vapor Contingency Monitoring Plan*** below. All readings will be recorded and will be available for New York State

Department of Environmental Conservation (DEC) and Department of Health (DOH) personnel to review.

o **ORGANIC VAPOR CONTINGENCY MONITORING PLAN:**

- If the sustained organic vapor level is greater than 5 ppm over background 200 feet downwind from the work area or half the distance to the nearest off-site residential or commercial property, whichever is less, all work activities must be halted.
- If, following the cessation of the work activities or as the result of an emergency, sustained organic levels persist above 5 ppm above background 200 feet downwind or half the distance to the nearest off-site residential or commercial property from the work area, then the air quality must be monitored within 20 feet of the perimeter of the nearest off-site residential or commercial structure (20-foot zone).
- If efforts to abate the emission source are unsuccessful and if sustained organic vapor levels approach or exceed 5 ppm above background within the 20-foot zone for more than 30 minutes, or are sustained at levels greater than 10 ppm above background for longer than one minute, then the ***Major Vapor Emission Response Plan*** (see below) will automatically be placed into effect.

o **MAJOR VAPOR EMISSION RESPONSE PLAN:**

Upon activation, the following activities will be undertaken:

1. All Emergency Response Contacts as listed in this Health and Safety Plan and the Emergency Response Plan (Appendix A) will be advised.
2. The local police authorities will immediately be contacted by the Site Health and Safety Officer and advised of the situation.
3. Frequent air monitoring will be conducted at 30-minute intervals within the 20-foot zone. If two (2) sustained successive readings below action levels are measured, air monitoring may be halted or modified by the Site Health and Safety Officer.

The following personnel are to be notified in the listed sequence in the event that a Major Vapor Emission Plan is activated:

Responsible Person	Contact	Phone Number
SSHO	Police	911
SSHO	State Emergency Response Hotline	(800) 457-7362

Additional emergency numbers are listed in the Emergency Response Plan included as Appendix A.

o **AIRBORNE PARTICULATE COMMUNITY AIR MONITORING DURING MAJOR SOIL/FILL INTRUSION ONLY**

Respirable (PM-10) particulate monitoring will be performed on a continuous basis at the upwind and downwind perimeter of the exclusion zone. The monitoring will be performed using real-time monitoring equipment capable of measuring PM-10 and integrating over a period of 15-minutes for comparison to the airborne particulate action levels. The equipment will be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration will be visually assessed during all work activities. All readings will be recorded and will be available for NYSDEC and NYSDOH review. Readings will be interpreted as follows:

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter (ug/m^3) greater than the background (upwind perimeter) reading for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression provided that the downwind PM-10 particulate levels do not exceed 150 ug/m^3 above the upwind level and that visible dust is not migrating from the work area.
- If, after implementation of dust suppression techniques downwind PM-10 levels are greater than 150 ug/m^3 above the upwind level, work activities must be stopped and dust suppression controls re-evaluated. Work can resume provided that supplemental dust suppression measures and/or other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 ug/m^3 of the upwind level and in preventing visible dust migration.

Pertinent emergency response information including the telephone number of the Fire Department is included in the Emergency Response Plan (Appendix A).

9.0 SPILL RELEASE/RESPONSE

This chapter of the HASP describes the potential for and procedures related to spills or releases of known or suspected petroleum and/or hazardous substances on the Site. The purpose of this Section of the HASP is to plan appropriate response, control, counter-measures and reporting, consistent with OSHA requirements in 29 CFR 1910.120(b)(4)(ii)(J) and (j)(1)(viii). The spill containment program addresses the following elements:

- Potential hazardous material spills and available controls.
- Initial notification and evaluation.
- Spill response.
- Post-spill evaluation.

9.1 Potential Spills and Available Controls

An evaluation was conducted to determine the potential for hazardous material and oil/petroleum spills at the Site and the City Parking Lot. For the purpose of this evaluation, hazardous materials posing a significant spill potential are considered to be:

- CERCLA Hazardous Substances as identified in 40 CFR Part 302, where such materials pose the potential for release in excess of their corresponding Reportable Quantity (RQ).
- Extremely Hazardous Substances as identified in 40 CFR Part 355, Appendix A, where such materials pose the potential for release in excess of their corresponding Reportable Quantity (RQ).
- Hazardous Chemicals as defined under Section 311(e) of the Emergency Planning and Community Right-To-Know Act of 1986, where such chemicals are present or will be stored in excess of 10,000 lbs.
- Toxic Chemicals as defined in 40 CFR Part 372, where such chemicals are present or will be stored in excess of 10,000 lbs.
- Chemicals regulated under 6NYCRR Part 597, where such materials pose the potential for release in excess of their corresponding Reportable Quantity (RQ).

Oil/petroleum products are considered to pose a significant spill potential whenever the following situations occur:

- The potential for a “harmful quantity” of oil (including petroleum and non-petroleum-based fuels and lubricants) to reach navigable waters of the U.S. exists (40 CFR Part 112.4). Harmful quantities are considered by USEPA to be volumes that could form a visible sheen on the water or violate applicable water quality standards.
- The potential for any amount of petroleum to reach any waters of NY State, including groundwater, exists. Petroleum, as defined by NY State in 6NYCRR Part 612, is a petroleum-based heat source, energy source, or engine lubricant/maintenance fluid.
- The potential for any release, to soil or water, of petroleum from a bulk storage facility regulated under 6NYCRR Part 612. A regulated petroleum storage facility is defined by NY State as a site having stationary tank(s) and intra-facility piping, fixtures and related equipment with an aggregate storage volume of 1,100 gallons or greater.

9.2 Initial Spill Notification and Evaluation

Any worker who discovers a hazardous substance or oil/petroleum spill will immediately notify the Project Manager and SSHO. The worker will, to the best of his/her ability, report the material involved, the location of the spill, the estimated quantity of material spilled, the direction/flow of the spill material, related fire/explosion incidents, if any, and any associated injuries. The Emergency Response Plan presented in Attachment H2 of this HASP will immediately be implemented if an emergency release has occurred.

Following initial report of a spill, the Project Manager will make an evaluation as to whether the release exceeds RQ levels. If an RQ level is exceeded, the Project Manager will notify the Site owner and NYSDEC at 1-800-457-7362 within 2 hours of spill discovery. The Project Manager will also determine what additional agencies (e.g., USEPA) are to be contacted regarding the release, and will follow-up with written reports as required by the applicable regulations.

9.3 Spill Response

For spill situations, the following general response guidelines will apply:

- Only those personnel involved in overseeing or performing containment operations will be allowed within the spill area. If necessary, the area will be roped, ribboned, or otherwise blocked off to prevent unauthorized access.
- Appropriate PPE, as specified by the SSHO, will be donned before entering the spill area.
- Ignition points will be extinguished/removed if fire or explosion hazards exist.
- Surrounding reactive materials will be removed.
- Drains or drainage in the spill area will be blocked to prevent inflow of spilled materials or applied materials.

For minor spills, the Contractor will maintain a Spill Control and Containment Kit in the Field Office or other readily accessible storage location. The kit will consist of, at a minimum, a 50 lb. bag of “speedy dry” granular absorbent material, absorbent pads, shovels, empty 5-gallon pails and an empty open-top 55-gallon drum. Spilled materials will be absorbed, and shoveled into a 55-gallon drum for proper disposal (NYSDEC approval will be secured for on-site treatment of the impacted soils/absorbent materials, if applicable). Impacted soils will be hand-excavated to the point that no visible signs of contamination remains, and will be drummed with the absorbent.

In the event of a major release or a release that threatens surface water, a spill response contractor will be called to the Site. The response contractor may use heavy equipment (e.g., excavator, backhoe, etc.) to berm the soils surrounding the spill Site or create diversion trenching to mitigate overland migration or release to navigable waters. Where feasible, pumps will be used to transfer free liquid to storage containers. Spill control/cleanup contractors in the Central New York area that may be contacted for assistance include:

- Op-Tech: (607) 565-8891
- TREC Environmental, Inc.: (585) 594-5545
- Environmental Products and Services, Inc.: (716) 447-4700

9.4 Post-Spill Evaluation

If a reportable quantity of hazardous material or oil/petroleum is spilled as determined by the Project Manager, a written report will be prepared as indicated in Section 9.2. The report will identify the root cause of the spill, type and amount of material released, date/time of release, response actions, agencies notified and/or involved in cleanup, and procedures to be implemented to avoid repeat incidents. In addition, all re-useable spill cleanup and containment materials will be decontaminated, and spill kit supplies/disposable items will be replenished.

10.0 HEAT/COLD STRESS MONITORING

Since some of the work activities at the Site and City Parking Lot will be scheduled for spring through fall months, measures will be taken to minimize heat/cold stress to TurnKey-Benchmark employees. The Site Safety and Health Officer and/or his or her designee will be responsible for monitoring TurnKey-Benchmark field personnel for symptoms of heat/cold stress.

10.1 Heat Stress Monitoring

Personal protective equipment may place an employee at risk of developing heat stress, a common and potentially serious illness often encountered at construction, landfill, waste disposal, industrial or other unsheltered sites. The potential for heat stress is dependent on a number of factors, including environmental conditions, clothing, workload, physical conditioning and age. Personal protective equipment may severely reduce the body's normal ability to maintain temperature equilibrium (via evaporation and convection), and require increased energy expenditure due to its bulk and weight.

Proper training and preventive measures will mitigate the potential for serious illness. Heat stress prevention is particularly important because once a person suffers from heat stroke or heat exhaustion, that person may be predisposed to additional heat related illness. To avoid heat stress, the following steps should be taken:

- Adjust work schedules.
- Modify work/rest schedules according to monitoring requirements.
- Mandate work slowdowns as needed.
- Perform work during cooler hours of the day if possible or at night if adequate lighting can be provided.
- Provide shelter (air-conditioned, if possible) or shaded areas to protect personnel during rest periods.
- Maintain worker's body fluids at normal levels. This is necessary to ensure that the cardiovascular system functions adequately. Daily fluid intake must approximately equal the amount of water lost in sweat (i.e., eight fluid ounces must be ingested for approximately every 1 lb of weight lost). The normal thirst

mechanism is not sensitive enough to ensure that enough water will be consumed to replace lost perspiration. When heavy sweating occurs, workers should be encouraged to drink more.

- Train workers to recognize the symptoms of heat related illness.

Heat-Related Illness - Symptoms:

- Heat rash may result from continuous exposure to heat or humid air.
- Heat cramps are caused by heavy sweating with inadequate electrolyte replacement. Signs and symptoms include: muscle spasms; pain in the hands, feet and abdomen.
- Heat exhaustion occurs from increased stress on various body organs including inadequate blood circulation due to cardiovascular insufficiency or dehydration. Signs and symptoms include: pale, cool, moist skin; heavy sweating; dizziness; nausea; fainting.
- Heat stroke is the most serious form of heat stress. Temperature regulation fails and the body temperature rises to critical levels. Immediate action must be taken to cool the body before serious injury and death occur. Competent medical help must be obtained. Signs and symptoms are: red, hot, usually dry skin; lack of or reduced perspiration; nausea; dizziness and confusion; strong, rapid pulse; coma.

The monitoring of personnel wearing protective clothing should commence when the ambient temperature is 70 degrees Fahrenheit or above. For monitoring the body's recuperative ability to excess heat, one or more of the following techniques should be used as a screening mechanism.

- Heart rate may be measured by the radial pulse for 30 seconds as early as possible in the resting period. The rate at the beginning of the rest period should not exceed 100 beats per minute. If the rate is higher, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest periods stay the same. If the pulse rate is 100 beats per minute at the beginning of the next rest period, the following work cycle should be further shortened by 33%.
- Body temperature may be measured orally with a clinical thermometer as early as possible in the resting period. Oral temperature at the beginning of the rest period

should not exceed 99.6 degrees Fahrenheit. If it does, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest period remains the same. However, if the oral temperature exceeds 99.6 degrees Fahrenheit at the beginning of the next period, the work cycle may be further shortened by 33%. Oral temperature should be measured at the end of the rest period to make sure that it has dropped below 99.6 degrees Fahrenheit. No TurnKey-Benchmark employee will be permitted to continue wearing semi-permeable or impermeable garments when his/her oral temperature exceeds 100.6 degrees Fahrenheit.

10.2 Cold Stress Monitoring

Exposure to cold conditions may result in frostbite or hypothermia, each of which progresses in stages as shown below.

- **Frostbite** occurs when body tissue (usually on the extremities) begins to freeze. The three states of frostbite are:
 - 1) **Frost nip** - This is the first stage of the freezing process. It is characterized by a whitened area of skin, along with a slight burning or painful sensation. Treatment consists of removing the victim from the cold conditions, removal of boots and gloves, soaking the injured part in warm water (102 to 108 degrees Fahrenheit) and drinking a warm beverage. Do not rub skin to generate friction/ heat.
 - 2) **Superficial Frostbite** - This is the second stage of the freezing process. It is characterized by a whitish gray area of tissue, which will be firm to the touch but will yield little pain. The treatment is identical for Frost nip.
 - 3) **Deep Frostbite** - In this final stage of the freezing process the affected tissue will be cold, numb and hard and will yield little to no pain. Treatment is identical to that for Frost nip.
- **Hypothermia** is a serious cold stress condition occurring when the body loses heat at a rate faster than it is produced. If untreated, hypothermia may be fatal. The stages of hypothermia may not be clearly defined or visible at first, but generally include:
 - 1) Shivering
 - 2) Apathy (i.e., a change to an indifferent or uncaring mood)

- 3) Unconsciousness
- 4) Bodily freezing

Employees exhibiting signs of hypothermia should be treated by medical professionals. Steps that can be taken while awaiting help include:

- 1) Remove the victim from the cold environment and remove wet or frozen clothing. (Do this carefully as frostbite may have started.)
- 2) Perform active re-warming with hot liquids for drinking (Note: do not give the victim any liquid containing alcohol or caffeine) and a warm water bath (102 to 108 degrees Fahrenheit).
- 3) Perform passive re-warming with a blanket or jacket wrapped around the victim.

In any potential cold stress situation, it is the responsibility of the Site Health and Safety Officer to encourage the following:

- Education of workers to recognize the symptoms of frostbite and hypothermia.
- Workers should dress warmly, with more layers of thin clothing as opposed to one thick layer.
- Personnel should remain active and keep moving.
- Personnel should be allowed to take shelter in a heated areas, as necessary.
- Personnel should drink warm liquids (no caffeine or alcohol if hypothermia has set in).
- For monitoring the body's recuperation from excess cold, oral temperature recordings should occur:
 - At the Site Safety Technicians discretion when suspicion is based on changes in a worker's performance or mental status.
 - At a workers request.
 - As a screening measure, two times per shift, under unusually hazardous conditions (e.g., wind chill less than 20 degrees Fahrenheit or wind chill

less than 30 degrees Fahrenheit with precipitation).

- As a screening measure, whenever anyone worker on-site develops hypothermia.

Any person developing moderate hypothermia (a core body temperature of 92 degrees Fahrenheit) will not be allowed to return to work for 48 hours without the recommendation of a qualified medical doctor.

11.0 WORK ZONES AND SITE CONTROL

Work zones around the areas designated for construction activities will be established on a daily basis and communicated to employees and other Site users by the SSHO. It shall be each Contractor's Site Safety and Health Officer's responsibility to ensure that Site workers are aware of the work zone boundaries and to enforce proper procedures in each area. The zones will include:

- Exclusion Zone ("Hot Zone") - The area where contaminated materials may be exposed, excavated or handled and all areas where contaminated equipment or personnel may travel. Flagging tape will delineate the zone. Personnel entering the Exclusion Zone must wear the prescribed level of personal protective equipment identified in Section 7.
- Contamination Reduction Zone - The zone where decontamination of personnel and equipment takes place. Any potentially contaminated clothing, equipment and samples must remain in the Contamination Reduction Zone until decontaminated.
- Support Zone - The part of the site that is considered non-contaminated or "clean." Support equipment will be located in this zone, and personnel may wear normal work clothes within this zone.

In the absence of other task-specific work zone boundaries established by the SSHO, the following boundaries will apply to investigation and construction activities involving disruption or handling of Site soils or groundwater:

- Exclusion Zone: 50 foot radius from the outer limit of the sampling/construction activity.
- Contaminant Reduction Zone: 100 foot radius from the outer limit of the sampling/construction activity.
- Support Zone: Areas outside the Contaminant Reduction Zone.

Access of non-essential personnel to the Exclusion and Contamination Reduction Zones will be strictly controlled by the SSHO. Only personnel who are essential to the

completion of the task will be allowed access to these areas and only if they are wearing the prescribed level of protection. Entrance of personnel must be approved by the SSHO.

The SSHO will maintain a Health and Safety Logbook containing the names of TurnKey-Benchmark workers and their level of protection. The zone boundaries may be changed by the SSHO as environmental conditions warrant, and to respond to the necessary changes in work locations on-site.

12.0 DECONTAMINATION

12.1 Decontamination for TurnKey-Benchmark Employees

The degree of decontamination required is a function of a particular task and the environment within which it occurs. The following decontamination procedure will remain flexible, thereby allowing the decontamination crew to respond appropriately to the changing environmental conditions that may arise at the Site. TurnKey-Benchmark personnel on-site shall follow the procedure below, or the Contractor's procedure (if applicable), whichever is more stringent.

Station 1 - Equipment Drop: Deposit visibly contaminated (if any) re-useable equipment used in the contamination reduction and exclusion zones (tools, containers, monitoring instruments, radios, clipboards, etc.) on plastic sheeting.

Station 2 - Boots and Gloves Wash and Rinse: Scrub outer boots and outer gloves. Deposit tape and gloves in waste disposal container.

Station 3 - Tape, Outer Boot and Glove Removal: Remove tape, outer boots and gloves. Deposit tape and gloves in waste disposal container.

Station 4 - Canister or Mask Change: If worker leaves exclusive zone to change canister (or mask), this is the last step in the decontamination procedure. Worker's canister is exchanged, new outer gloves and boot cover donned, and worker returns to duty.

Station 5 - Outer Garment/Face Piece Removal: Protective suit removed and deposited in separate container provided by Contractor. Face piece or goggles are removed if used. Avoid touching face with fingers. Face piece and/or goggles deposited on plastic sheet. Hard hat removed and placed on plastic sheet.

Station 6 - Inner Glove Removal: Inner gloves are the last personal protective equipment to be removed. Avoid touching the outside of the gloves with bare fingers. Dispose of these gloves in waste disposal container.

Following PPE removal, personnel shall wash hands, face and forearms with absorbent wipes. If field activities proceed for duration of 6 consecutive months or longer, shower facilities will be provided for worker use in accordance with OSHA 29 CFR 1910.120(n).

12.2 Decontamination for Medical Emergencies

In the event of a minor, non-life threatening injury, personnel should follow the decontamination procedures as defined, and then administer first-aid.

In the event of a major injury or other serious medical concern (e.g., heat stroke), immediate first-aid is to be administered and the victim transported to the hospital in lieu of further decontamination efforts unless exposure to a Site contaminant would be considered “Immediately Dangerous to Life or Health.”

12.3 Decontamination of Field Equipment

The Contractor in accordance with his approved Health and Safety Plan in the Contamination Reduction Zone will conduct decontamination of heavy equipment. As a minimum, this will include manually removing heavy soil contamination, followed by steam cleaning on an impermeable pad.

TurnKey-Benchmark personnel will conduct decontamination of tools used for sample collection purposes. It is expected that tools will be constructed of nonporous, nonabsorbent materials (i.e., metal), which will aid in the decontamination effort. Any tool or part of a tool made of porous, absorbent material (i.e., wood) will be placed into suitable containers and prepared for disposal.

Decontamination of bailers, split-spoons, spatula knives, and other tools used for environmental sampling and examination shall be as follows:

- Disassemble the equipment
- Water wash to remove visible foreign matter.
- Wash with detergent.
- Rinse parts with distilled-deionized water.
- Allow to air dry.
- Wrap parts in aluminum foil or polyethylene.

13.0 CONFINED SPACE ENTRY

OSHA 29 CFR 1910.146 identifies a confined space as a space that is large enough and so configured that an employee can physically enter and do assigned work, has limited or restricted means for entry and exit, and is not intended for continuous employee occupancy. Confined spaces include, but are not limited to, trenches, storage tanks, process vessels, pits, sewers, tunnels, underground utility vaults, pipelines, sumps, wells, and excavations.

Confined space entry by TurnKey-Benchmark employees is not anticipated to be necessary to complete the IRM activities identified in Section 2.0. In the event that the scope of work changes or confined space entry appears necessary, the Project Manager will be consulted to determine if feasible engineering alternatives to confined space entry can be implemented. If confined space entry by TurnKey-Benchmark employees cannot be avoided through reasonable engineering measures, task-specific confined space entry procedures will be developed and a confined-space entry permit will be issued through TurnKey-Benchmark's corporate Health and Safety Director. TurnKey-Benchmark employees shall not enter a confined space without these procedures and permits in place.

14.0 FIRE PREVENTION AND PROTECTION

14.1 General Approach

Recommended practices and standards of the National Fire Protection Association (NFPA) and other applicable regulations will be followed in the development and application of Project Fire Protection Programs. When required by regulatory authorities, the project management will prepare and submit a Fire Protection Plan for the approval of the contracting officers, authorized representative or other designated official. Essential considerations for the Fire Protection Plan will include:

- Proper Site preparation and safe storage of combustible and flammable materials.
- Availability of coordination with private and public fire authorities.
- Adequate job-site fire protection and inspections for fire prevention.
- Adequate indoctrination and training of employees.

14.2 Equipment and Requirements

Fire extinguishers will be provided by each Contractor and are required on heavy equipment and in each field trailer. Fire extinguishers will be inspected, serviced, and maintained in accordance with the manufacturer's instructions. As a minimum, extinguishers shall be checked monthly and weighed semi-annually, and recharged if necessary. Recharge or replacement shall be mandatory immediately after each use.

14.3 Flammable and Combustible Substances

Storage, handling or use of flammable and combustible substances will be under the supervision of qualified persons. Tanks, containers and pumping equipment, whether portable or stationary, used for the storage and handling of flammable and combustible liquids, will meet the recommendations of the National Fire Protection Association.

14.4 Hot Work

If the scope of work necessitates welding or blowtorch operation, the hot work permit presented in Appendix B will be completed by the SSHO and reviewed/issued by the Project Manager.

15.0 EMERGENCY INFORMATION

In accordance with OSHA 29 CFR Part 1910, an Emergency Response Plan is attached to this HASP as Appendix A. The hospital route map is presented within Appendix A as Figure 1.

16.0 REFERENCES

1. New York State Department of Environmental Conservation. *DER-10; Technical Guidance for Site Investigation and Remediation*. May 2010.

TABLES



TABLE 1

TOXICITY DATA FOR CONSTITUENTS OF POTENTIAL CONCERN

23 Riverside Drive
Corning, New York

Parameter	Synonyms	CAS No.	Code	Concentration Limits ¹		
				PEL	TLV	IDLH
Semi-volatile Organic Compounds (SVOCs) ² : ppm						
Acenaphthene	none	83-32-9	none	--	--	--
Acenaphthylene	none	208-96-8	none	--	--	--
Anthracene	none	120-12-7	none	--	--	--
Benzo(a)anthracene	none	56-55-3	none	--	--	--
Benzo(a)pyrene	none	50-32-8	none	--	--	--
Benzo(b)fluoranthene	none	205-99-2	none	--	--	--
Benzo(ghi)perylene	none	191-24-2	none	--	--	--
Benzo(k)fluoranthene	none	207-08-9	none	--	--	--
Chrysene	none	218-01-9	none	--	--	--
Dibenzo(a,h)anthracene	none	53-70-3	none	--	--	--
Fluoranthene	none	206-44-0	none	--	--	--
Fluorene	none	86-73-7	none	--	--	--
Indeno(1,2,3-cd)pyrene	none	193-39-5	none	--	--	--
Naphthalene	Naphthalin, Tar camphor, White tar	91-20-3	none	10	10	250
Phenanthrene	none	85-01-8	none	--	--	--
Pyrene	none	129-00-0	none	--	--	--
Inorganic Compounds: mg/m ²						
Arsenic	none	7440-38-2	Ca	0.01	0.01	5
Barium	none	7440-39-3	none	--	0.5	--
Cadmium	none	7440-43-9	Ca	0.005	0.01	9
Lead	none	7439-92-1	none	0.05	0.15	100
Mercury	none	7439-97-6	C-0.1	0.1	0.05	10

Notes:

1. Concentration limits as reported by NIOSH Pocket Guide to Chemical Hazards, February 2004 (NIOSH Publication No. 97-140, fourth printing with changes and updates).
2. " -- " = concentration limit not available; exposure should be minimized to the extent feasible through appropriate engineering controls & PPE.

Explanation:

IDLH = Immediately Dangerous to Life or Health.

TLV = Threshold Limit Value, established by American Conference of Industrial Hygienists (ACGIH), equals the maximum exposure concentration allowable for 8 hours/day @ 40 hours/week.

PEL = Permissible Exposure Limit, established by OSHA, equals the maximum exposure concentration allowable for 8 hours per day @ 40 hours per week



TABLE 2

**POTENTIAL ROUTES OF EXPOSURE TO THE
CONSTITUENTS OF POTENTIAL CONCERN**

**23 Riverside Drive
Corning, New York**

Activity ¹	Direct Contact with Soil/Fill	Inhalation of Vapors or Dust
Site Investigation Tasks		
1. Subsurface Excavations in Areas of Impacted Soil/Fill	X	X
2. Grading Activities and Cover System Installation in Areas of Impacted Soil/Fill	X	X
3. Future Site activities could include utility line repair or cover system penetrations for other development activities.	X	X

Notes:

1. Activity as described in Section 1.4 of the Health and Safety Plan.



TABLE 3

**REQUIRED LEVELS OF PROTECTION
FOR SI TASKS**

**23 Riverside Drive
Corning, New York**

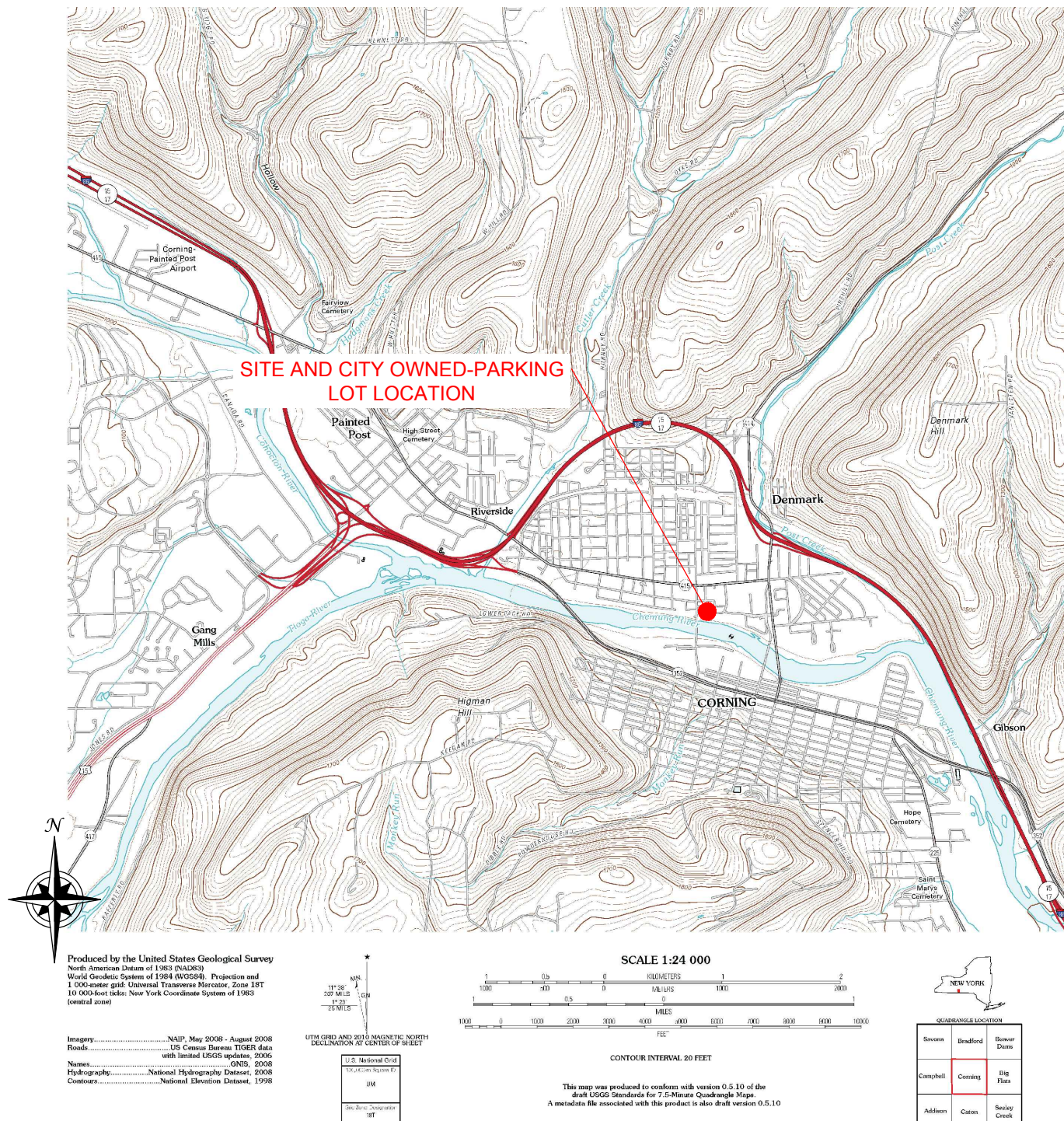
Activity	Respiratory Protection ¹	Clothing	Gloves ²	Boots ^{2,3}	Other Required PPE/Modifications ^{2,4}
Site Investigation Tasks					
1. Surface/Subsurface Soil Sampling	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	HH SGSS
2. Grading Activities and Cover System Installation in Areas of Impacted Soil/Fill	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	HH SGSS
3. Future Site activities could include utility line repair or cover system penetrations for other development activities.	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	SGSS

Notes:

1. Respiratory equipment shall conform to guidelines presented in Section 7.0 of this HASP. The Level C requirement is an air-purifying respirator equipped with organic compound/acid gas/dust cartridge.
2. HH = hardhat; L= Latex; L/N = latex inner glove, nitrile outer glove; N = Nitrile; S = Saranex; SG = safety glasses; SGSS = safety glasses with sideshields; STSS = steel toe safety shoes.
3. Latex outer boot (or approved overboot) required whenever contact with contaminated materials may occur. SSHO may downgrade to STSS (steel-toed safety shoes) if contact will be limited to cover/replacement soils.
4. Dust masks shall be donned as directed by the SSHO (site safety and health officer) or site safety technician whenever potentially contaminated airborne particulates (i.e., dust) are present in significant amounts in the breathing zone. Goggles may be substituted with safety glasses w/side-shields whenever contact with contaminated liquids is not anticipated.

FIGURES

FIGURE 1



2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

SITE VICINITY PLAN

HEALTH AND SAFETY PLAN

23 RIVERSIDE DRIVE (SITE) AND CITY-OWNED PARKING LOT
CORNING, NEW YORK

PREPARED FOR

FITZPATRICK HOLDINGS, INC.

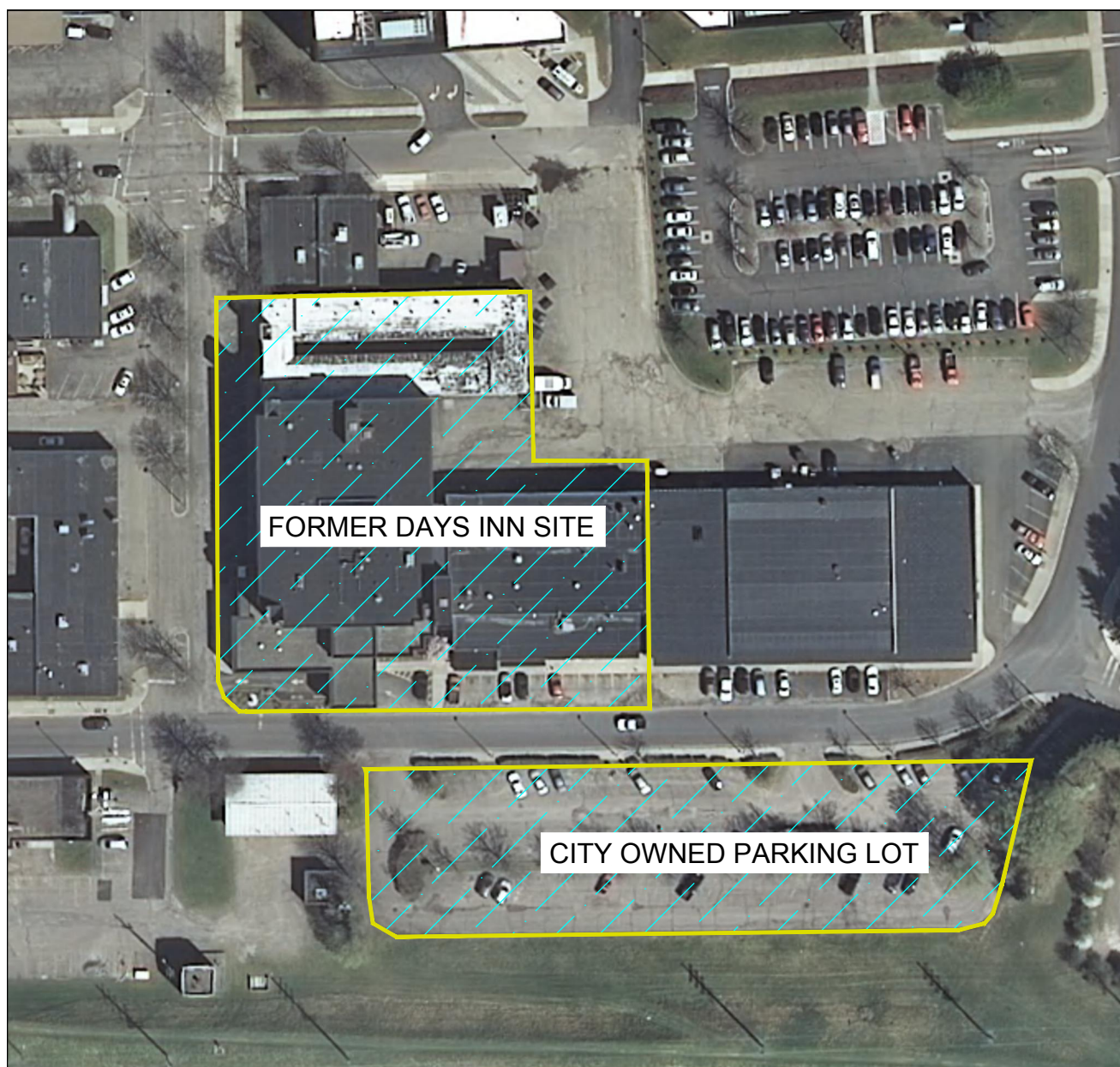
PROJECT NO.: 0353-015-001

DATE: JANUARY 2016

DRAFTED BY: RFL

DISCLAIMER:
PROPERTY OF TURNKEY ENVIRONMENTAL RESTORATION, LLC. IMPORTANT: THIS DRAWING PRINT IS LOANED FOR MUTUAL ASSISTANCE AND AS SUCH IS SUBJECT TO RECALL AT ANY TIME. INFORMATION CONTAINED HEREON IS NOT TO BE DISCLOSED OR REPRODUCED IN ANY FORM FOR THE BENEFIT OF PARTIES OTHER THAN NECESSARY SUBCONTRACTORS & SUPPLIERS WITHOUT THE WRITTEN CONSENT OF TURNKEY ENVIRONMENTAL RESTORATION, LLC.

FIGURE 2



SCALE: 1 INCH = 100 FEET
SCALE IN FEET
(approximate)



LEGEND:

 APPROXIMATE PROJECT LIMITS



2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

PROJECT NO.: 0353-015-001

DATE: JANUARY 2016

DRAFTED BY: RFL / KRR

SITE AND CITY OWNED PARKING LOT PLAN (AERIAL)

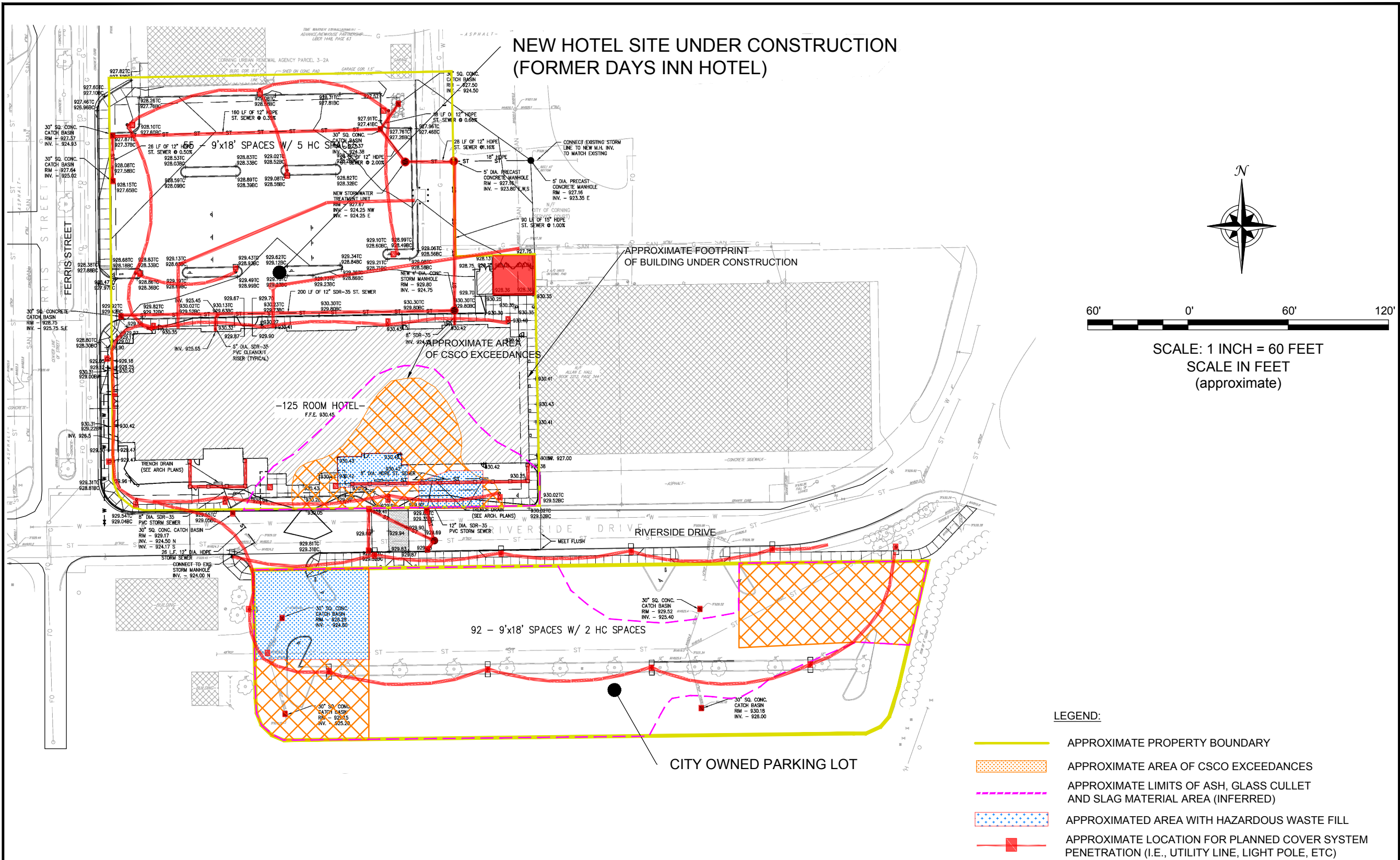
HEALTH AND SAFETY PLAN

23 RIVERSIDE DRIVE (SITE) AND CITY-OWNED PARKING LOT
CORNING, NEW YORK

PREPARED FOR
FITZPATRICK HOLDINGS, INC.

DISCLAIMER:

PROPERTY OF TURNKEY ENVIRONMENTAL RESTORATION, LLC. IMPORTANT: THIS DRAWING PRINT IS LOANED FOR MUTUAL ASSISTANCE AND AS SUCH IS SUBJECT TO RECALL AT ANY TIME. INFORMATION CONTAINED HEREON IS NOT TO BE DISCLOSED OR REPRODUCED IN ANY FORM FOR THE BENEFIT OF PARTIES OTHER THAN NECESSARY SUBCONTRACTORS & SUPPLIERS WITHOUT THE WRITTEN CONSENT OF TURNKEY ENVIRONMENTAL RESTORATION, LLC.



NOTES:
1. DRAWING ADAPTED FROM DRAWING C4.1 PREPARED BY HUNT ENGINEERS JULY 2014



SCALE: 1 INCH = 60 FEET
SCALE IN FEET
(approximate)

EXTENT OF IMPACTED SOIL/FILL AND SUBSURFACE WORK AREAS

HEALTH AND SAFETY PLAN

23 RIVERSIDE DRIVE (SITE) AND CITY-OWNED PARKING LOT
CORNING, NEW YORK

2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635



JOB NO.: 0353-015-001

PREPARED FOR
FITZPATRICK HOLDINGS, INC.

FIGURE 3

ATTACHMENT A

EMERGENCY RESPONSE PLAN

EMERGENCY RESPONSE PLAN
for
INTERIM REMEDIAL MEASURE
ACTIVITIES

FORMER DAYS INN SITE (23 RIVERSIDE DRIVE) and
CITY OF CORNING OWNED PARKING LOT
SITE NO. 851054
CORNING, NEW YORK

January 2016

0353-015-001

Prepared for:

FITZPATRICK HOLDINGS, INC.

23 RIVERSIDE DRIVE
HEALTH AND SAFETY PLAN FOR IRM ACTIVITIES
APPENDIX A: EMERGENCY RESPONSE PLAN

TABLE OF CONTENTS

1.0	GENERAL	1
2.0	PRE-EMERGENCY PLANNING	2
3.0	ON-SITE EMERGENCY RESPONSE EQUIPMENT	3
4.0	EMERGENCY PLANNING MAPS	4
5.0	EMERGENCY CONTACTS	5
6.0	EMERGENCY ALERTING & EVACUATION	6
7.0	EXTREME WEATHER CONDITIONS.....	8
8.0	EMERGENCY MEDICAL TREATMENT & FIRST AID	9
9.0	EMERGENCY RESPONSE CRITIQUE & RECORD KEEPING.....	10
10.0	EMERGENCY RESPONSE TRAINING	11

LIST OF FIGURES

Figure 1	Hospital Route Map

1.0 GENERAL

This report presents the site-specific Emergency Response Plan (ERP) referenced in the Site Health and Safety Plan (HASP) prepared for Interim Remedial Measure (IRM) activities at the Form Days Inn, 23 Riverside Drive, and the City of Corning Owned Parking Lot (across Riverside Drive from the Site) in Corning, New York. This appendix of the HASP describes potential emergencies that may occur at the Site; procedures for responding to those emergencies; roles and responsibilities during emergency response; and training all workers must receive in order to follow emergency procedures. This ERP also describes the provisions this Site has made to coordinate its emergency response planning with other contractors on-site and with off-site emergency response organizations.

This ERP is consistent with the requirements of 29 CFR 1910.120(l) and provides the following site-specific information:

- Pre-emergency planning.
- Personnel roles, lines of authority, and communication.
- Emergency recognition and prevention.
- Safe distances and places of refuge.
- Evacuation routes and procedures.
- Decontamination procedures.
- Emergency medical treatment and first aid.
- Emergency alerting and response procedures.
- Critique of response and follow-up.
- Emergency personal protective equipment (PPE) and equipment.

2.0 PRE-EMERGENCY PLANNING

This Site and City Parking Lot has been evaluated for potential emergency occurrences, based on site hazards, the required work tasks, the site topography, and prevailing weather conditions. The results of that evaluation indicate the potential for the following site emergencies to occur at the locations indicated.

Type of Emergency:

1. Medical, due to physical injury

Source of Emergency:

1. Slip/trip/fall

Location of Source:

1. Non-specific

3.0 ON-SITE EMERGENCY RESPONSE EQUIPMENT

Emergency procedures may require specialized equipment to facilitate worker rescue, contamination control and reduction, or post-emergency clean up. Emergency response equipment available on the Site is listed below. The equipment inventory and storage locations are based on the potential emergencies described above. This equipment inventory is designed to meet on-site emergency response needs and any specialized equipment needs that off-site responders might require because of the hazards at this Site but not ordinarily stocked.

Any additional personal protective equipment (PPE) required and stocked for emergency response is also listed in below. During an emergency, the Emergency Response Coordinator (ERC) is responsible for specifying the level of PPE required for emergency response. At a minimum, PPE used by emergency responders will comply with Section 7.0, Personal Protective Equipment, of this HASP. Emergency response equipment is inspected at regular intervals and maintained in good working order. The equipment inventory is replenished as necessary to maintain response capabilities.

Emergency Equipment	Quantity	Location
First Aid Kit	1	Site Vehicle
Chemical Fire Extinguisher	2 (minimum)	Heavy equipment and Site Vehicle

Emergency PPE	Quantity	Location
Full-face respirator	1 for each worker	Site Vehicle
Chemical-resistant suits	4 (minimum)	Site Vehicle

4.0 EMERGENCY PLANNING MAPS

An area-specific map of the Site and City Parking Lot will be developed on a daily basis during performance of field activities. The map will be marked to identify critical on-site emergency planning information, including: emergency evacuation routes, a place of refuge, an assembly point, and the locations of key site emergency equipment. Site zone boundaries will be shown to alert responders to known areas of contamination. There are no major topographical features, however the direction of prevailing winds/weather conditions that could affect emergency response planning are also marked on the map. The map will be posted at site-designated place of refuge and inside the TurnKey personnel field vehicle.

5.0 EMERGENCY CONTACTS

The following identifies the emergency contacts for this ERP.

Emergency Telephone Numbers:

Project Manager: *Christopher Boron*

Work: (716) 856-0599

Mobile: (716) 864-2726

Corporate Health and Safety Director: *Thomas H. Forbes*

Work: (716) 856-0599

Mobile: (716) 864-1730

Site Safety and Health Officer (SSHO): *Field Staff To Be Determined*

Work: (716) 856-0635

Mobile: (716)

Alternate SSHO: *Christopher Boron*

Work: (716) 856-0635

Mobile: (716) 864-2726

GUTHRIE CORNING HOSPITAL:	(607) 937-47200
FIRE:	911
AMBULANCE:	911
CITY OF CORNING POLICE:	911
STATE EMERGENCY RESPONSE HOTLINE:	(800) 457-7362
NATIONAL RESPONSE HOTLINE:	(800) 424-8802
NYSDEC:	(585) 226-5356
NYSDEC 24-HOUR SPILL HOTLINE:	(800) 457-7252

The Site location is:

23 Riverside Drive

Corning, New York 14830

Site Phone Number: (Insert Cell Phone or Field Trailer):

6.0 EMERGENCY ALERTING & EVACUATION

Internal emergency communication systems are used to alert workers to danger, convey safety information, and maintain site control. Any effective system can be employed. Two-way radio headsets or field telephones are often used when work teams are far from the command post. Hand signals and air-horn blasts are also commonly used. Every system must have a backup. It shall be the responsibility of each contractor's Site Health and Safety Officer to ensure personnel entering the site understand an adequate method of internal communication. Unless personnel are otherwise informed, the following signals shall be used.

- 1) Emergency signals by portable air horn, siren, or whistle: two short blasts, personal injury; continuous blast, emergency requiring site excavation.
- 2) Visual signals: hand gripping throat, out of air/cannot breathe; hands on top of head, need assistance; thumbs up, affirmative/ everything is OK; thumbs down, no/negative; grip partner's wrist or waist, leave area immediately.

If evacuation notice is given, site workers leave the worksite with their respective buddies, if possible, by way of the nearest exit. Emergency decontamination procedures detailed in Section 12.0 of the HASP are followed to the extent practical without compromising the safety and health of site personnel. The evacuation routes and assembly area will be determined by conditions at the time of the evacuation based on wind direction, the location of the hazard source, and other factors as determined by rehearsals and inputs from emergency response organizations. Wind direction indicators are located so that workers can determine a safe up wind or cross wind evacuation route and assembly area if not informed by the emergency response coordinator at the time the evacuation alarm sounds. Since work conditions and work zones within the site may be changing on daily basis, it shall be the responsibility of the construction Site Health and Safety Officer to review evacuation routes and procedures as necessary and to inform all TurnKey-Benchmark workers of any changes.

Personnel exiting the site will gather at a designated assembly point. To determine that everyone has successfully exited the site, personnel will be accounted for at the assembly

HEALTH & SAFETY PLAN
APPENDIX A: EMERGENCY RESPONSE PLAN

site. If any worker cannot be accounted for, notification is given to the SSHO and/or Project Manager (Christopher Boron) so that appropriate action can be initiated. Contractors and subcontractors on this site have coordinated their emergency response plans to ensure that these plans are compatible and that source(s) of potential emergencies are recognized, alarm systems are clearly understood, and evacuation routes are accessible to all personnel relying upon them.

7.0 EXTREME WEATHER CONDITIONS

In the event of adverse weather conditions, the Site Safety and Health Officer in conjunction with the Contractor's SSHO will determine if engineering operations can continue without sacrificing the health and safety of site personnel. Items to be considered prior to determining if work should continue include but are not limited to:

- Potential for heat/cold stress.
- Weather-related construction hazards (e.g., flooding or wet conditions producing undermining of structures or sheeting, high wind threats, etc).
- Limited visibility.
- Potential for electrical storms.
- Limited site access/egress (e.g., due to heavy snow)

8.0 EMERGENCY MEDICAL TREATMENT & FIRST AID

Personnel Exposure:

The following general guidelines will be employed in instances where health impacts threaten to occur acute exposure is realized:

- Skin Contact: Use copious amounts of soap and water. Wash/rinse affected area for at least 15 minutes. Decontaminate and provide medical attention. Eyewash stations will be provided on site. If necessary, transport to Buffalo General Hospital.
- Inhalation: Move to fresh air and, if necessary, transport to Hospital.
- Ingestion: Decontaminate and transport to Hospital.

Personal Injury:

Minor first-aid will be applied on-site as deemed necessary. In the event of a life threatening injury, the individual should be transported to Hospital via ambulance. The Site Health and Safety Officer will supply available chemical specific information to appropriate medical personnel as requested.

First aid kits will conform to Red Cross and other applicable good health standards, and shall consist of a weatherproof container with individually sealed packages for each type of item. First aid kits will be fully equipped before being sent out on each job and will be checked weekly by the SSHO to ensure that the expended items are replaced.

Directions to Guthrie Corning Hospital (see Figure 1):

The following directions describe the best route from the Site to Guthrie Corning Hospital located 6.6 miles away (10 minutes):

- Exit the Site to the West and head north on Warren Street,
- Turn right onto East Pulteney Street (RT-415),
- Turn left onto RT-414,
- Turn right and take ramp onto i-86 East (Southern Tier Expressway) towards RT-17E
- Take exit 48 towards Rt-352/East Corning,
- Turn left onto RT-352,
- Turn right onto East Corning Road,
- Continue onto Guthrie Drive
- Guthrie Corning Hospital is on the left, 1 Guthrie Drive.

9.0 EMERGENCY RESPONSE CRITIQUE & RECORD KEEPING

Following an emergency, the SSHO and Project Manager shall review the effectiveness of this Emergency Response Plan (ERP) in addressing notification, control and evacuation requirements. Updates and modifications to this ERP shall be made accordingly. It shall be the responsibility of each contractor to establish and assure adequate records of the following:

- Occupational injuries and illnesses.
- Accident investigations.
- Reports to insurance carrier or State compensation agencies.
- Reports required by the client.
- Records and reports required by local, state, federal and/or international agencies.
- Property or equipment damage.
- Third party injury or damage claims.
- Environmental testing logs.
- Explosive and hazardous substances inventories and records.
- Records of inspections and citations.
- Safety training.

10.0 EMERGENCY RESPONSE TRAINING

Persons who enter the worksite, including visitors, shall receive a site-specific briefing about anticipated emergency situations and the emergency procedures by the SSHO. Where this site relies on off-site organizations for emergency response, the training of personnel in those off-site organizations has been evaluated and is deemed adequate for response to this site.

FIGURES

Map & Directions

Map Only

Directions Only

Print

 **Corning Ny** [Corning.TripAdvisor.com](https://www.tripadvisor.com) Research Corning Hotels and Corning Attractions!

Ad



A 23 Riverside Dr, Corning, NY 14830-2264

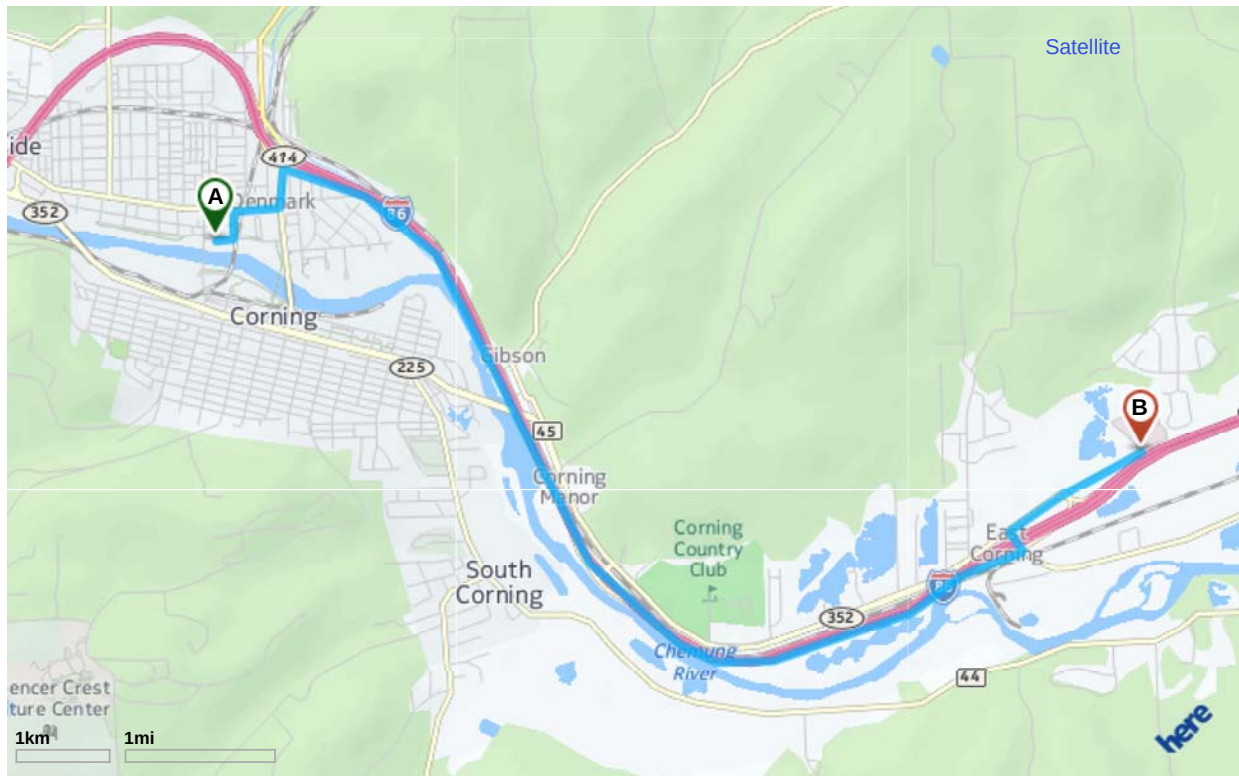
B 1 Guthrie Dr, Corning, NY 14830-3696

Enter notes here

255

Total Distance: 6.65 mi— Total Time: 10 mins

Map Layout ☒ ☐ ☐



A 23 Riverside Dr, Corning, NY 14830-2264

[Expand All](#)

Head toward Museum Way on Riverside Dr

Go for 465 ft

[Hide](#)



Continue on Warren St

Go for 0.1 mi

[Hide](#)



Turn right onto E Pulteney St (RT-415)

Go for 0.2 mi

[Hide](#)



Turn left onto RT-414

Go for 0.2 mi

[Hide](#)

	Turn right and take ramp onto I-86 E (Southern Tier Expy) toward RT-17 E	Go for 4.8 mi	Hide
	Take exit 48 toward RT-352/East Corning	Go for 0.3 mi	Hide
	Turn left onto RT-352	Go for 0.1 mi	Hide
	Turn right onto E Corning Rd	Go for 0.3 mi	Hide
	Continue on Guthrie Dr	Go for 0.4 mi	Hide
Arrive at Guthrie Dr. Your destination is on the left.			Hide
	1 Guthrie Dr, Corning, NY 14830-3696	Expand All	

When using any driving directions or map, it is a good idea to double check and make sure the road still exists, watch out for construction, and follow all traffic safety precautions. This is only to be used as an aid in planning

ATTACHMENT B

HOT WORK PERMIT FORM



HOT WORK PERMIT

PART 1 - INFORMATION

Issue Date:

Date Work to be Performed: Start:

Finish (permit terminated):

Performed By:

Work Area:

Object to be Worked On:

PART 2 - APPROVAL

(for 1, 2 or 3: mark Yes, No or NA)*

Will working be on or in:

Finish (permit terminated):

1. Metal partition, wall, ceiling covered by combustible material?	yes	no
2. Pipes, in contact with combustible material?	yes	no
3. Explosive area?	yes	no

* = If any of these conditions exist (marked "yes"), a permit will not be issued without being reviewed and approved by Thomas H. Forbes (Corporate Health and Safety Director). Required Signature below.

PART 3 - REQUIRED CONDITIONS**

(Check all conditions that must be met)

PROTECTIVE ACTION		PROTECTIVE EQUIPMENT	
☐	Specific Risk Assessment Required	☐	Goggles/visor/welding screen
☐	Fire or spark barrier	☐	Apron/fireproof clothing
☐	Cover hot surfaces	☐	Welding gloves/gauntlets/other:
☐	Move movable fire hazards, specifically	☐	Wellintons/Knee pads
☐	Erect screen on barrier	☐	Ear protection: Ear muffs/Ear plugs
☐	Restrict Access	☐	B.A.: SCBA/Long Breather
☐	Wet the ground	☐	Respirator: Type:
☐	Ensure adequate ventilation	☐	Cartridge:
☐	Provide adequate supports	☐	Local Exhaust Ventilation
☐	Cover exposed drain/floor or wall cracks	☐	Extinguisher/Fire blanket
☐	Fire watch (must remain on duty during duration of permit)	☐	Personal flammable gas monitor
☐	Issue additional permit(s):	☐	

Other precautions:

** Permit will not be issued until these conditions are met.

SIGNATURES

Originating Employee:

Date:

Project Manager:

Date:

Part 2 Approval:

Date:

ATTACHMENT C

NYSDOH GENERIC COMMUNITY AIR MONITORING PLAN

Appendix C1
New York State Department of Health
Generic Community Air Monitoring Plan

Overview

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical- specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for VOCs and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate DEC/NYSDOH staff.

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. "Periodic" monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or

overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

VOC Monitoring, Response Levels, and Actions

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

1. If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.
2. If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.
3. If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.
4. All 15-minute readings must be recorded and be available for State (DEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

Particulate Monitoring, Response Levels, and Actions

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

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed $150 \text{ mcg}/\text{m}^3$ above the upwind level and provided that no visible dust is migrating from the work area.

2. If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than $150 \text{ mcg}/\text{m}^3$ above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within $150 \text{ mcg}/\text{m}^3$ of the upwind level and in preventing visible dust migration.

3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

December 2009

Appendix C2

Fugitive Dust and Particulate Monitoring

A program for suppressing fugitive dust and particulate matter monitoring at hazardous waste sites is a responsibility on the remedial party performing the work. These procedures must be incorporated into appropriate intrusive work plans. The following fugitive dust suppression and particulate monitoring program should be employed at sites during construction and other intrusive activities which warrant its use:

1. Reasonable fugitive dust suppression techniques must be employed during all site activities which may generate fugitive dust.
2. Particulate monitoring must be employed during the handling of waste or contaminated soil or when activities on site may generate fugitive dust from exposed waste or contaminated soil. Remedial activities may also include the excavation, grading, or placement of clean fill. These control measures should not be considered necessary for these activities.
3. Particulate monitoring must be performed using real-time particulate monitors and shall monitor particulate matter less than ten microns (PM₁₀) with the following minimum performance standards:
 - (a) Objects to be measured: Dust, mists or aerosols;
 - (b) Measurement Ranges: 0.001 to 400 mg/m³ (1 to 400,000 :ug/m³);
 - (c) Precision (2-sigma) at constant temperature: +/- 10 :g/m³ for one second averaging; and +/- 1.5 g/m³ for sixty second averaging;
 - (d) Accuracy: +/- 5% of reading +/- precision (Referred to gravimetric calibration with SAE fine test dust (mmd= 2 to 3 :m, g= 2.5, as aerosolized);
 - (e) Resolution: 0.1% of reading or 1g/m³, whichever is larger;
 - (f) Particle Size Range of Maximum Response: 0.1-10;
 - (g) Total Number of Data Points in Memory: 10,000;
 - (h) Logged Data: Each data point with average concentration, time/date and data point number
 - (i) Run Summary: overall average, maximum concentrations, time/date of maximum, total number of logged points, start time/date, total elapsed time (run duration), STEL concentration and time/date occurrence, averaging (logging) period, calibration factor, and tag number;
 - (j) Alarm Averaging Time (user selectable): real-time (1-60 seconds) or STEL (15 minutes), alarms required;
 - (k) Operating Time: 48 hours (fully charged NiCd battery); continuously with charger;
 - (l) Operating Temperature: -10 to 50° C (14 to 122° F);
 - (m) Particulate levels will be monitored upwind and immediately downwind at the working site and integrated over a period not to exceed 15 minutes.
4. In order to ensure the validity of the fugitive dust measurements performed, there must be appropriate Quality Assurance/Quality Control (QA/QC). It is the responsibility of the remedial party to adequately supplement QA/QC Plans to include the following critical features: periodic instrument calibration, operator training, daily instrument performance (span) checks, and a record keeping plan.
5. The action level will be established at 150 ug/m³ (15 minutes average). While conservative,

this short-term interval will provide a real-time assessment of on-site air quality to assure both health and safety. If particulate levels are detected in excess of 150 ug/m³, the upwind background level must be confirmed immediately. If the working site particulate measurement is greater than 100 ug/m³ above the background level, additional dust suppression techniques must be implemented to reduce the generation of fugitive dust and corrective action taken to protect site personnel and reduce the potential for contaminant migration. Corrective measures may include increasing the level of personal protection for on-site personnel and implementing additional dust suppression techniques (see paragraph 7). Should the action level of 150 ug/m³ continue to be exceeded work must stop and DER must be notified as provided in the site design or remedial work plan. The notification shall include a description of the control measures implemented to prevent further exceedances.

6. It must be recognized that the generation of dust from waste or contaminated soil that migrates off-site, has the potential for transporting contaminants off-site. There may be situations when dust is being generated and leaving the site and the monitoring equipment does not measure PM₁₀ at or above the action level. Since this situation has the potential to allow for the migration of contaminants off-site, it is unacceptable. While it is not practical to quantify total suspended particulates on a real-time basis, it is appropriate to rely on visual observation. If dust is observed leaving the working site, additional dust suppression techniques must be employed. Activities that have a high dusting potential--such as solidification and treatment involving materials like kiln dust and lime--will require the need for special measures to be considered.

7. The following techniques have been shown to be effective for the controlling of the generation and migration of dust during construction activities:

- (a) Applying water on haul roads;
- (b) Wetting equipment and excavation faces;
- (c) Spraying water on buckets during excavation and dumping;
- (d) Hauling materials in properly tarped or watertight containers;
- (e) Restricting vehicle speeds to 10 mph;
- (f) Covering excavated areas and material after excavation activity ceases; and
- (g) Reducing the excavation size and/or number of excavations.

Experience has shown that the chance of exceeding the 150ug/m³ action level is remote when the above-mentioned techniques are used. When techniques involving water application are used, care must be taken not to use excess water, which can result in unacceptably wet conditions. Using atomizing sprays will prevent overly wet conditions, conserve water, and provide an effective means of suppressing the fugitive dust.

8. The evaluation of weather conditions is necessary for proper fugitive dust control. When extreme wind conditions make dust control ineffective, as a last resort remedial actions may need to be suspended. There may be situations that require fugitive dust suppression and particulate monitoring requirements with action levels more stringent than those provided above. Under some circumstances, the contaminant concentration and/or toxicity may require additional monitoring to protect site personnel and the public. Additional integrated sampling and chemical analysis of the dust may also be in order. This must be evaluated when a health and safety plan is developed and when appropriate suppression and monitoring requirements are established for protection of health and the environment.

APPENDIX F

SITE MANAGEMENT FORMS

Enclosure 1

Certification Instructions

I. Verification of Site Details (Box 1 and Box 2):

Answer the three questions in the Verification of Site Details Section. The Owner and/or Qualified Environmental Professional (QEP) may include handwritten changes and/or other supporting documentation, as necessary.

II. Certification of Institutional Controls/ Engineering Controls (IC/ECs)(Boxes 3, 4, and 5)

1.1.1. Review the listed IC/ECs, confirming that all existing controls are listed, and that all existing controls are still applicable. If there is a control that is no longer applicable the Owner / Remedial Party should petition the Department separately to request approval to remove the control.

2. In Box 5, complete certifications for all Plan components, as applicable, by checking the corresponding checkbox.

3. If you cannot certify "YES" for each Control listed in Box 3 & Box 4, sign and date the form in Box 5. Attach supporting documentation that explains why the **Certification** cannot be rendered, as well as a plan of proposed corrective measures, and an associated schedule for completing the corrective measures. Note that this **Certification** form must be submitted even if an IC or EC cannot be certified; however, the certification process will not be considered complete until corrective action is completed.

If the Department concurs with the explanation, the proposed corrective measures, and the proposed schedule, a letter authorizing the implementation of those corrective measures will be issued by the Department's Project Manager. Once the corrective measures are complete, a new Periodic Review Report (with IC/EC Certification) must be submitted within 45 days to the Department. If the Department has any questions or concerns regarding the PRR and/or completion of the IC/EC Certification, the Project Manager will contact you.

III. IC/EC Certification by Signature (Box 6 and Box 7):

If you certified "YES" for each Control, please complete and sign the IC/EC Certifications page as follows:

- For the Institutional Controls on the use of the property, the certification statement in Box 6 shall be completed and may be made by the property owner or designated representative.
- For the Engineering Controls, the certification statement in Box 7 must be completed by a Professional Engineer or Qualified Environmental Professional, as noted on the form.



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



Site Details

Box 1

Site No. **851054**

Site Name **Former Days Inn**

Site Address: 23 Riverside Drive Zip Code: 14830

City/Town: Corning

County: Steuben

Site Acreage: 1.350

Reporting Period:

YES NO

1. Is the information above correct?

☐ ☐

If NO, include handwritten above or on a separate sheet.

2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?

☐ ☐

3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?

☐ ☐

4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?

☐ ☐

If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.

5. Is the site currently undergoing development?

☐ ☐

Box 2

YES NO

6. Is the current site use consistent with the use(s) listed below?
Commercial and Industrial

☐ ☐

7. Are all ICs in place and functioning as designed?

☐ ☐

**IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

SITE NO. 851054

Box 3

Description of Institutional Controls

Parcel

Owner

Institutional Control

317.08-01-024.000

Fitzpatrick Holdings, Inc.

Ground Water Use Restriction
Landuse Restriction
Site Management Plan

EE filed 2017

SMP

Box 4

Description of Engineering Controls

Parcel

Engineering Control

317.08-01-024.000

Cover System

Cover system

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the Engineering Control certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

☐☐

2. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

(a) The Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

☐☐

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. 851054

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1,2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I _____ at _____,
print name print business address

am certifying as _____(Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

Date

EC CERTIFICATIONS

Box 7

Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

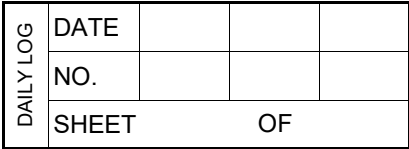
I _____ at _____,
print name print business address

am certifying as a Qualified Environmental Professional for the _____
(Owner or Remedial Party)

Signature of Qualified Environmental Professional, for
the Owner or Remedial Party, Rendering Certification

Stamp
(Required for PE)

Date

[illegible]

APPENDIX G

RESPONSIBILITIES OF OWNER & REMEDIAL PARTY

RESPONSIBILITIES

The responsibilities for implementing the Site Management Plan (“SMP”) for the Former Days Inn Site (the “Site”), number 851054, are that of the Site Owner, as defined below. The owner(s) is/are currently listed as:

Fitzpatrick Holdings, Inc., 37 Pyrex Street, Corning New York (the “owner”).

Solely for the purposes of this document and based upon the facts related to a particular site and the remedial program being carried out, the term Remedial Party (“RP”) refers to any of the following: certificate of completion holder, volunteer, applicant, responsible party, and, in the event the New York State Department of Environmental Conservation (“NYSDEC”) is carrying out remediation or site management, the NYSDEC and/or an agent acting on its behalf. The RP is:

- Fitzpatrick Holdings, Inc., 37 Pyrex Street, Corning New York

Nothing on this page shall supersede the provisions of an Environmental Easement, Consent Order, Consent Decree, agreement, or other legally binding document that affects rights and obligations relating to the site.

SITE OWNER’S RESPONSIBILITIES:

- 1) The owner shall follow the provisions of the SMP as they relate to future construction and excavation at the site.
- 2) In accordance with a periodic time frame determined by the NYSDEC, the owner shall periodically certify, in writing, that all Institutional Controls set forth in a(n) Environmental Easement remain in place and continue to be complied with. The owner shall provide a written certification to the RP, upon the RP’s request, in order to allow the RP to include the certification in the site’s Periodic Review Report (PRR) certification to the NYSDEC.

- 3) In the event the site is delisted, the owner remains bound by the Environmental Easement and shall submit, upon request by the NYSDEC, a written certification that the Environmental Easement is still in place and has been complied with.
- 4) The owner shall grant access to the site to the RP and the NYSDEC and its agents for the purposes of performing activities required under the SMP and assuring compliance with the SMP.
- 5) The owner is responsible for assuring the security of the remedial components located on its property to the best of its ability. In the event that damage to the remedial components or vandalism is evident, the owner shall notify the site's RP and the NYSDEC in accordance with the timeframes indicated in Section 1.3 -Notifications.
- 6) In the event some action or inaction by the owner adversely impacts the site, the owner must notify the site's RP and the NYSDEC in accordance with the time frame indicated in Section 1.3- Notifications and (ii) coordinate the performance of necessary corrective actions with the RP.
- 7) The owner must notify the RP and the NYSDEC of any change in ownership of the site property (identifying the tax map numbers in any correspondence) and provide contact information for the new owner of the site property/ies. 6 NYCRR Part contains notification requirements applicable to any construction or activity changes and changes in ownership. Among the notification requirements is the following: Sixty days prior written notification must be made to the NYSDEC. Notification is to be submitted to the NYSDEC Division of Environmental Remediation's Site Control Section. Notification requirements for a change in use are detailed in Section 2.4 of the SMP. A 60-Day Advance Notification Form and Instructions are found at <http://www.dec.ny.gov/chemical/76250.html>.

If an owner has a written agreement to perform work for the RP, a description of the activities may be inserted here. (The corresponding agreement should also be included in the SMP.) The owner will [insert activities here: maintain fences, conduct mowing, etc.] on behalf of the RP. The RP remains ultimately responsible for maintaining the engineering controls.

REMEDIAL PARTY RESPONSIBILITIES

- 1) The RP must follow the SMP provisions regarding any construction and/or excavation it undertakes at the site.
- 2) The RP shall report to the NYSDEC all activities required for remediation, operation, maintenance, monitoring, and reporting. Such reporting includes, but is not limited to, periodic review reports and certifications, electronic data deliverables, corrective action work plans and reports, and updated SMPs.

- 3) Before accessing the site property to undertake a specific activity, the RP shall provide the owner advance notification that shall include an explanation of the work expected to be completed. The RP shall provide to (i) the owner, upon the owner's request, (ii) the NYSDEC, and (iii) other entities, if required by the SMP, a copy of any data generated during the site visit and/or any final report produced.
- 4) If the NYSDEC determines that an update of the SMP is necessary, the RP shall update the SMP and obtain final approval from the NYSDEC. Within 5 business days after NYSDEC approval, the RP shall submit a copy of the approved SMP to the owner(s).
- 5) The RP shall notify the NYSDEC and the owner of any changes in RP ownership and/or control and of any changes in the party/entity responsible for the operation, maintenance, and monitoring of and reporting with respect to any remedial system (Engineering Controls). The RP shall provide contact information for the new party/entity. Such activity constitutes a Change of Use pursuant to 375-1.11(d) and requires 60-days prior notice to the NYSDEC. A 60-Day Advance Notification Form and Instructions are found at <http://www.dec.ny.gov/chemical/76250.html>.
- 6) The RP shall notify the NYSDEC of any damage to or modification of the systems as required under Section 1.3- Notifications of the SMP.
- 7) Prior to a change in use that impacts the remedial system or requirements and/or responsibilities for implementing the SMP, the RP shall submit to the NYSDEC for approval an amended SMP.
- 8) Any change in use, change in ownership, change in site classification (*e.g.*, delisting), reduction or expansion of remediation, and other significant changes related to the site may result in a change in responsibilities and, therefore, necessitate an update to the SMP and/or updated legal documents. The RP shall contact the Department to discuss the need to update such documents.

Change in RP ownership and/or control and/or site ownership does not affect the RP's obligations with respect to the site unless a legally binding document executed by the NYSDEC releases the RP of its obligations.

Future site owners and RPs and their successors and assigns are required to carry out the activities set forth above.

APPENDIX H

FIELD OPERATING PROCEDURES

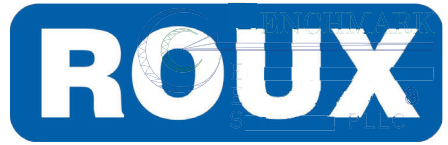
FIELD OPERATING PROCEDURES

ROUX ENVIRONMENTAL ENGINEERING & GEOLOGY, D.P.C.

FOP Number	Description
002.0	Abandonment of Monitoring Wells Procedure
011.1	Calibration and Maintenance of Portable Photoionization Detector
013.1	Composite Sample Collection Procedure for Non-Volatile Organic Analysis
025.0	Hand Augering Procedure
046.1	Sample Labeling, Storage and Shipment Procedures
048.0	Screening of Soil Samples for Organic Vapors During UST Removal Activities
054.2	Soil Description Procedures Using The Visual-Manual Method
057.0	Soil Sample Collection for VOC Analysis - EnCore Sampling
065.1	Test Pit Excavation and Logging Procedures
073.2	Real-Time Air Monitoring During Intrusive Activities
079.0	Stockpile Sampling Procedures for Chemical Analysis
082.0	Waste Sampling Procedures
084.0	Calibration and Maintenance of Portable Particulate Meter
085.0	Field Quality Control Procedures

Notes:

1. FOPs are identified by the sequential FOP number and revision number. For example, FOP number 097.3 indicates FOP 97, revision 3.



FIELD OPERATING PROCEDURES

Abandonment of Monitoring Wells Procedure

ABANDONMENT OF MONITORING WELLS PROCEDURE

PURPOSE

This guideline presents a method for the abandonment and decommissioning of wells that are no longer reliable as competent monitors of formation groundwater. Well abandonment and decommissioning is required in order to remove a potential pathway for the vertical migration of impacted groundwater and/or surface water.

PROCEDURE

1. Examine the existing well to be abandoned/decommissioned and review well construction detail information (if applicable) to determine well depth,, screened interval, diameter, material of composition and other construction details. Establish appropriate equipment requirements for removal of the well.
2. Determine the most suitable seal materials as discussed in the next section.
3. Attempt to remove the well using a drilling rig, by using the following procedures:
 - Attaching the winch line to the well to see if it can be removed by pulling;
 - Using the rig's hydraulics to advance casing incrementally;
 - If a cable tool rig is available, bump back the casing using the cathead and drive block.
3. Upon removal of the well, ream the borehole by advancing the augers approximately one foot beyond the total depth of the well. Rotate the augers at a speed sufficient to remove the construction materials (i.e., filter pack, bentonite seal, etc.) from the borehole annulus (if possible). Backfill the resulting borehole with cement/bentonite grout, by tremie method, to approximately one foot below ground surface. Fill the remaining borehole to match the existing grade elevation and material of construction (i.e., clean native soil, concrete or asphalt, as necessary). Go to Step 10.

ABANDONMENT OF MONITORING WELLS PROCEDURE

4. If the well cannot be removed from the borehole over-drill the borehole and well to approximately two (2) feet below the well depth. Upon reaching the desired depth, remove the well from within the augers and go back to Step 3.
5. If the borehole cannot be reamed out using conventional drilling techniques (i.e., over-drilled), remove or puncture the base plate of the well screen using the drill rig and associated equipment by pounding with the drill rods. Upon filling the well with grout by tremie method, slowly pull the well from the ground surface to allow the grout to evacuate through the bottom of the well to fill the void space created by removal of the well casing. Continue adding grout mix to the well casing, as necessary, to fill the void space to approximately one foot below ground surface. Fill the remaining borehole to match the existing grade elevation and material of construction (i.e., clean native soil, concrete or asphalt, as necessary). Go to Step 10.

If the driller is unsuccessful at removing or puncturing the base plate of the well due, in part, to well construction materials (i.e., stainless steel or black iron), go to Step 6.

6. Insert a tremie pipe down the well to the bottom and pump a cement/bentonite grout mixture to a depth one to two feet above the top of the screen.
7. Perform a hydraulic pressure test on the portion of the well casing above the grouted screen section. Allow the grout to set up for a period not less than 72 hours before pressure testing of the grouted interval. Place a pneumatic packer a maximum of 4.5 feet above the top of the slotted screen section of the well. The infiltration pressure applied to the packer shall not exceed the pressure rating of the well casing material. If the interval between the top of the grout and the bottom of the packer is not saturated, potable water will be used to fill the interval. A gauge pressure of 5 psig at the well head shall be applied to the interval for a period of 5 minutes to allow for temperature stabilization. After 5 minutes, the pressure will be maintained at 5 psig for 30 minutes. The grout seal shall be considered acceptable if the total loss of water to the seal does not exceed 0.5 gallons over a 30-minute period.

ABANDONMENT OF MONITORING WELLS PROCEDURE

8. If the grout seal is determined to be unacceptable, tremie grout an additional 5 feet of well riser above the failing interval and retest as specified above (see Step 7).
9. If the grout seal is determined to be acceptable, tremie grout the remainder of the well until grout displaces all formation water and a grout return is visible in the well at the surface. Cut off well casing at a depth of five feet or greater below ground surface and backfill the remaining borehole to match the existing grade elevation and material of construction (i.e., clean native soil, concrete or asphalt, as necessary).
10. Record all well construction details and abandonment procedures on the **Well Abandonment/Decommissioning Log** (sample attached).

CEMENT/BENTONITE GROUT MIXTURE

The cement/bentonite grout mixture identified below is generally considered the most suitable seal material for monitoring well advancement and abandonment. Grout specifications generally have mixture ratios as follows:

Grout Slurry Composition (% Weight)

1.5 to 3.0%	-	Bentonite (Quick Gel)
40 to 60%	-	Cement (Portland Type I)
40 to 60%	-	Potable Water

MISCELLANEOUS

All removed well materials (PVC, stainless steel, steel pipe) should be decontaminated (if necessary) as per the project specific **Drilling and Excavation Equipment Decontamination FOP** and removed from the site. The project manager will determine the destination of final disposal for all well materials. All drill cuttings (depending on site protocol) should be placed in DOT-approved 55-gallon drums, labeled and sampled in

FOP 002.0

ABANDONMENT OF MONITORING WELLS PROCEDURE

accordance with Roux's field operating procedure **Management of Investigation-Derived Waste** in order to determine proper removal and disposal procedures. The drilling subcontractor will provide any potable water utilized during this field activity from a known and reliable source (see Notes section).

ATTACHMENTS

Well Abandonment/Decommissioning Log (sample)

REFERENCES

New York State Department of Environmental Conservation, July 1988, *Drilling and Monitoring Well Installation Guidance Manual*.

Driscoll, F.G., 1987, *Groundwater and Wells*, Johnson Division, St. Paul, Minnesota, p. 1089.

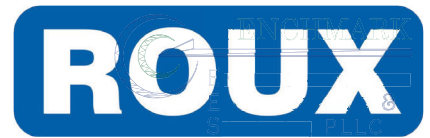
Roux FOPs:

- 018 *Drilling/Excavation Equipment Decontamination Protocols*
- 032 *Management of Investigation-Derived Waste*

NOTES

Tap water may be used from any municipal water treatment system. The use of an untreated potable water supply is not an acceptable substitute.





FIELD OPERATING PROCEDURES

Calibration and Maintenance of Portable Photoionization Detector (PID)

FOP 011.1

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

PURPOSE

This procedure describes a general method for the calibration and maintenance of a portable photoionization detector (PID). The PID detects and initially quantifies a reading of the volatile organic compound (VOC) concentration in air. The PID is used as a field-screening tool for initial evaluation of soil samples and for ambient air monitoring of compounds with ionization potentials (IP) less than the PID lamp electron voltage (eV) rating. The IP is the amount of energy required to move an electron to an infinite distance from the nucleus thus creating a positive ion plus an electron. It should be noted that all of the major components of air (i.e., carbon dioxide, methane, nitrogen, oxygen etc.) have IP's above 12 eV. As a result, they will not be ionized by the 9.8, 10.6, or 11.7 eV lamps typically utilized in field PIDs. The response of the PID will then be the sum of the organic and inorganic compounds in air that are ionized by the appropriate lamp (i.e., 9.8, 10.6 or 11.7 eV). Attached to this FOP is a table summarizing common organic compounds and their respective IPs.

Calibration is performed to verify instrument accuracy and function. All field instruments will be calibrated, verified and recalibrated at frequencies required by their respective operating manuals or manufacturer's specifications, but not less than once each day that the instrument is in use. Compound-specific calibration methods should be selected on a project-by-project basis to increase the accuracy of the instrument. The best way to calibrate a PID to different compounds is to use a standard of the gas of interest. However, correction factors have been determined that enable the user to quantify a large number of chemicals using only a single calibration gas, typically isobutylene. Field personnel should have access to all operating manuals for the instruments used for the field measurements. This procedure also documents critical maintenance activities for this meter.

FOP 011.1

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

Note: The information included below is equipment manufacturer- and model-specific, however, accuracy, calibration, and maintenance procedures for this type of portable equipment are typically similar. The information below pertains to the MiniRAE 2000 Portable VOC Monitor equipped with a 10.6 eV lamp. The actual equipment to be used in the field will be equivalent or similar. The following information is provided for general reference; the equipment-specific manufacturer's manual should be followed with precedence over this FOP.

Note: The PID indicates total VOC concentration readings that are normalized to a calibration standard, so actual quantification of individual compounds is not provided. In addition, the PID response to compounds is highly variable, dependent on ionization potential of the compound, and the presence or absence of other compounds.

ACCURACY

The MiniRAE 2000 is accurate to ± 2 ppm or 10% of the reading for concentrations ranging from 0-2,000 ppm and $\pm 20\%$ of the reading at concentrations greater than 2,000 ppm. Response time is less than two seconds to 90 percent of full-scale. The operating temperature range is 0 to 45° C and the operating humidity range is 0 to 95 % relative humidity (non-condensing).

CALIBRATION PROCEDURE

The calibration method and correction factor, if applicable, will be selected on a project-by-project basis and confirmed with the Project Manager prior to the start of field work.

1. Calibrate all field test equipment at the beginning of each sampling day. Check and recalibrate the PID according to the manufacture's specifications.

FOP 011.1

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

2. Calibrate the PID using a compressed gas cylinder or equivalent containing the calibration standard, a flow regulator, and a tubing assembly. In addition, a compressed gas cylinder containing zero air (“clean” air) may be required if ambient air conditions do not permit calibration to “clean air”.
3. Fill two Tedlar® bags equipped with a one-way valve with zero-air (if applicable) and the calibration standard gas.
4. Assemble the calibration equipment and actuate the PID in its calibration mode.
5. Select the appropriate calibration method. Calibration may be completed with two methods: 1) where the calibration standard gas is the same as the measurement gas (no correction factor is applied) or 2) where the calibration standard gas is not the same as the measurement gas and a correction factor will be applied. An isobutylene standard gas must be used as the calibration standard gas for the use of correction factors with the MiniRAE 2000. See below for additional instructions for calibration specific to use with or without correction factors.

Calibrating Without a Correction Factor

Navigate within the menu to select the “cal memory” for the specific calibration standard gas prior to calibration. The default gas selections for the MiniRAE 2000 are as follows:

Cal Memory #0	Isobutylene
Cal Memory #1	Hexane
Cal Memory #2	Xylene
Cal Memory #3	Benzene
Cal Memory #4	Styrene
Cal Memory #5	Toluene
Cal Memory #6	Vinyl Chloride
Cal Memory #7	Custom

FOP 011.1

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

The calibration standard gas for Cal Memory #1-7 may be toggled for selection of any of the approximately 100 preprogrammed calibration standard gases for use without an applied correction factor (i.e., the calibration gas must be the same as the measurement gas).

Calibrating With a Correction Factor

Navigate within the menu to select the “Cal Memory”.

Select “Cal Memory #0” and toggle for selection of any of the approximately 100 preprogrammed chemicals. During calibration, the unit requests isobutylene gas and displays the isobutylene concentration immediately following calibration, but when the unit is returned to the normal reading mode, it displays the selected chemical and applies the correction factor.

If the pre-programmed list does not include the desired chemical or a user-defined measurement gas and correction factor is desired, toggle Cal Memory #0 to “user defined custom gas”. A list of approximately 300 correction factors is attached in Technical Note 106 generated by MiniRAE.

6. Once the PID settings have been verified, connect the PID probe to the zero air calibration bag (or calibrate to ambient air if conditions permit) and wait for a stable indication.
7. Connect the PID probe to the calibration standard bag. Measure an initial reading of the standard and wait for a stable indication.
8. Keep the PID probe connected to the calibration standard bag, calibrate to applicable concentration (typically 100 ppm with isobutylene) with the standard and wait for a stable indication.
9. Document the calibration results and related information in the Project Field Book and on an **Equipment Calibration Log** (see attached sample), indicating the meter readings before and after the instrument has been adjusted. This is important, not only for data validation, but also to establish

FOP 011.1

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

maintenance schedules and component replacement. Information will include, at a minimum:

- Time, date and initials of the field team member performing the calibration
- The unique identifier for the meter, including manufacturer, model, and serial number
- The calibration standard and concentration
- Correction factors used, if any
- The brand and expiration date of the calibration standard gas
- The instrument readings: before and after calibration
- The instrument settings (if applicable)
- Pass or fail designation in accordance with the accuracy specifications presented above
- Corrective action taken (see Maintenance below) in the event of failure to adequately calibrate.

MAINTENANCE

- The probe and dust filter of the PID should be checked before and after every use for cleanliness. Should instrument response become unstable, recalibration should be performed. If this does not resolve the problem, access the photoionization bulb and clean with the manufacturer-supplied abrasive compound, then recalibrate.
- The PID battery must be recharged after each use. Store the PID in its carrying case when not in use. Additional maintenance details related to individual components of the PID are provided in the equipment manufacturer's instruction manual. If calibration or instrument performance is not in accordance with specifications, send the instrument to the equipment manufacturer for repair.
- Maintain a log for each monitoring instrument. Record all maintenance performed on the instrument on this log with date and name of the organization performing the maintenance.

FOP 011.1

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

ATTACHMENTS

Table 1; Summary of Ionization Potentials
Equipment Calibration Log (sample)
Technical Note TN-106

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
A		
2-Amino pyridine	8	
Acetaldehyde	10.21	
Acetamide	9.77	
Acetic acid	10.69	X
Acetic anhydride	10	
Acetone	9.69	
Acetonitrile	12.2	X
Acetophenone	9.27	
Acetyl bromide	10.55	
Acetyl chloride	11.02	X
Acetylene	11.41	X
Acrolein	10.1	
Acrylamide	9.5	
Acrylonitrile	10.91	X
Allyl alcohol	9.67	
Allyl chloride	9.9	
Ammonia	10.2	
Aniline	7.7	
Anisidine	7.44	
Anisole	8.22	
Arsine	9.89	
B		
1,3-Butadiene (butadiene)	9.07	
1-Bromo-2-chloroethane	10.63	X
1-Bromo-2-methylpropane	10.09	
1-Bromo-4-fluorobenzene	8.99	
1-Bromobutane	10.13	
1-Bromopentane	10.1	
1-Bromopropane	10.18	
1-Bromopropene	9.3	
1-Butanethiol	9.14	
1-Butene	9.58	
1-Butyne	10.18	
2,3-Butadione	9.23	
2-Bromo-2-methylpropane	9.89	
2-Bromobutane	9.98	
2-Bromopropane	10.08	

FOP 011.1

CALIBRATION AND MAINTENANCE OF PORTABLE
PHOTOIONIZATION DETECTOR

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
2-Bromothiophene	8.63	
2-Butanone (MEK)	9.54	
3-Bromopropene	9.7	
3-Butene nitrile	10.39	
Benzaldehyde	9.53	
Benzene	9.25	
Benzenethiol	8.33	
Benzonitrile	9.71	
Benzotrifluoride	9.68	
Biphenyl	8.27	
Boron oxide	13.5	X
Boron trifluoride	15.56	X
Bromine	10.54	
Bromobenzene	8.98	
Bromochloromethane	10.77	X
Bromoform	10.48	
Butane	10.63	X
Butyl mercaptan	9.15	
cis-2-Butene	9.13	
m-Bromotoluene	8.81	
n-Butyl acetate	10.01	
n-Butyl alcohol	10.04	
n-Butyl amine	8.71	
n-Butyl benzene	8.69	
n-Butyl formate	10.5	
n-Butyraldehyde	9.86	
n-Butyric acid	10.16	
n-Butyronitrile	11.67	X
o-Bromotoluene	8.79	
p-Bromotoluene	8.67	
p-tert-Butyltoluene	8.28	
s-Butyl amine	8.7	
s-Butyl benzene	8.68	
sec-Butyl acetate	9.91	
t-Butyl amine	8.64	
t-Butyl benzene	8.68	
trans-2-Butene	9.13	
C		

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
1-Chloro-2-methylpropane	10.66	X
1-Chloro-3-fluorobenzene	9.21	
1-Chlorobutane	10.67	X
1-Chloropropane	10.82	X
2-Chloro-2-methylpropane	10.61	X
2-Chlorobutane	10.65	X
2-Chloropropane	10.78	X
2-Chlorothiophene	8.68	
3-Chloropropene	10.04	
Camphor	8.76	
Carbon dioxide	13.79	X
Carbon disulfide	10.07	
Carbon monoxide	14.01	X
Carbon tetrachloride	11.47	X
Chlorine	11.48	X
Chlorine dioxide	10.36	
Chlorine trifluoride	12.65	X
Chloroacetaldehyde	10.61	X
α -Chloroacetophenone	9.44	
Chlorobenzene	9.07	
Chlorobromomethane	10.77	X
Chlorofluoromethane (Freon 22)	12.45	X
Chloroform	11.37	X
Chlorotrifluoromethane (Freon 13)	12.91	X
Chrysene	7.59	
Cresol	8.14	
Crotonaldehyde	9.73	
Cumene (isopropyl benzene)	8.75	
Cyanogen	13.8	X
Cyclohexane	9.8	
Cyclohexanol	9.75	
Cyclohexanone	9.14	
Cyclohexene	8.95	
Cyclo-octatetraene	7.99	
Cyclopentadiene	8.56	
Cyclopentane	10.53	
Cyclopentanone	9.26	
Cyclopentene	9.01	

FOP 011.1

CALIBRATION AND MAINTENANCE OF PORTABLE
PHOTOIONIZATION DETECTOR

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
Cyclopropane	10.06	
m-Chlorotoluene	8.83	
o-Chlorotoluene	8.83	
p-Chlorotoluene	8.7	
D		
1,1-Dibromoethane	10.19	
1,1-Dichloroethane	11.12	X
1,1-Dimethoxyethane	9.65	
1,1-Dimethylhydrazine	7.28	
1,2-Dibromoethane	9.45	
1,2-Dichloro-1,1,2,2-tetrafluoroethane (Freon 114)	12.2	X
1,2-Dichloroethane	11.12	X
1,2-Dichloropropane	10.87	X
1,3-Dibromopropane	10.07	
1,3-Dichloropropane	10.85	X
2,2-Dimethyl butane	10.06	
2,2-Dimethyl propane	10.35	
2,3-Dichloropropene	9.82	
2,3-Dimethyl butane	10.02	
3,3-Dimethyl butanone	9.17	
cis-Dichloroethene	9.65	
Decaborane	9.88	
Diazomethane	9	
Diborane	12	X
Dibromochloromethane	10.59	
Dibromodifluoromethane	11.07	X
Dibromomethane	10.49	
Dibutylamine	7.69	
Dichlorodifluoromethane (Freon 12)	12.31	X
Dichlorofluoromethane	12.39	X
Dichloromethane	11.35	X
Diethoxymethane	9.7	
Diethyl amine	8.01	
Diethyl ether	9.53	
Diethyl ketone	9.32	
Diethyl sulfide	8.43	
Diethyl sulfite	9.68	
Difluorodibromomethane	11.07	X

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
Dihydropyran	8.34	
Diiodomethane	9.34	
Diisopropylamine	7.73	
Dimethoxymethane (methylal)	10	
Dimethyl amine	8.24	
Dimethyl ether	10	
Dimethyl sulfide	8.69	
Dimethylaniline	7.13	
Dimethylformamide	9.18	
Dimethylphthalate	9.64	
Dinitrobenzene	10.71	X
Dioxane	9.19	
Diphenyl	7.95	
Dipropyl amine	7.84	
Dipropyl sulfide	8.3	
Durene	8.03	
m-Dichlorobenzene	9.12	
N,N-Diethyl acetamide	8.6	
N,N-Diethyl formamide	8.89	
N,N-Dimethyl acetamide	8.81	
N,N-Dimethyl formamide	9.12	
o-Dichlorobenzene	9.06	
p-Dichlorobenzene	8.95	
p-Dioxane	9.13	
trans-Dichloroethene	9.66	
E		
Epichlorohydrin	10.2	
Ethane	11.65	X
Ethanethiol (ethyl mercaptan)	9.29	
Ethanolamine	8.96	
Ethene	10.52	
Ethyl acetate	10.11	
Ethyl alcohol	10.48	
Ethyl amine	8.86	
Ethyl benzene	8.76	
Ethyl bromide	10.29	
Ethyl chloride (chloroethane)	10.98	X
Ethyl disulfide	8.27	

FOP 011.1

CALIBRATION AND MAINTENANCE OF PORTABLE
PHOTOIONIZATION DETECTOR

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
Ethyl ether	9.51	
Ethyl formate	10.61	X
Ethyl iodide	9.33	
Ethyl isothiocyanate	9.14	
Ethyl mercaptan	9.29	
Ethyl methyl sulfide	8.55	
Ethyl nitrate	11.22	X
Ethyl propionate	10	
Ethyl thiocyanate	9.89	
Ethylene chlorohydrin	10.52	
Ethylene diamine	8.6	
Ethylene dibromide	10.37	
Ethylene dichloride	11.05	X
Ethylene oxide	10.57	
Ethylenimine	9.2	
Ethynylbenzene	8.82	
F		
2-Furaldehyde	9.21	
Fluorine	15.7	X
Fluorobenzene	9.2	
Formaldehyde	10.87	X
Formamide	10.25	
Formic acid	11.05	X
Freon 11 (trichlorofluoromethane)	11.77	X
Freon 112 (1,1,2,2-tetrachloro-1,2-difluoroethane)	11.3	X
Freon 113 (1,1,2-trichloro-1,2,2-trifluoroethane)	11.78	X
Freon 114 (1,2-dichloro-1,1,2,2-tetrafluoroethane)	12.2	X
Freon 12 (dichlorodifluoromethane)	12.31	X
Freon 13 (chlorotrifluoromethane)	12.91	X
Freon 22 (chlorofluoromethane)	12.45	X
Furan	8.89	
Furfural	9.21	
m-Fluorotoluene	8.92	
o-Fluorophenol	8.66	
o-Fluorotoluene	8.92	
p-Fluorotoluene	8.79	
H		
1-Hexene	9.46	

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
2-Heptanone	9.33	
2-Hexanone	9.35	
Heptane	10.08	
Hexachloroethane	11.1	X
Hexane	10.18	
Hydrazine	8.1	
Hydrogen	15.43	X
Hydrogen bromide	11.62	X
Hydrogen chloride	12.74	X
Hydrogen cyanide	13.91	X
Hydrogen fluoride	15.77	X
Hydrogen iodide	10.38	
Hydrogen selenide	9.88	
Hydrogen sulfide	10.46	
Hydrogen telluride	9.14	
Hydroquinone	7.95	
I		
1-Iodo-2-methylpropane	9.18	
1-Iodobutane	9.21	
1-Iodopentane	9.19	
1-Iodopropane	9.26	
2-Iodobutane	9.09	
2-Iodopropane	9.17	
Iodine	9.28	
Iodobenzene	8.73	
Isobutane	10.57	
Isobutyl acetate	9.97	
Isobutyl alcohol	10.12	
Isobutyl amine	8.7	
Isobutyl formate	10.46	
Isobutyraldehyde	9.74	
Isobutyric acid	10.02	
Isopentane	10.32	
Isophorone	9.07	
Isoprene	8.85	
Isopropyl acetate	9.99	
Isopropyl alcohol	10.16	
Isopropyl amine	8.72	

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
Isopropyl benzene	8.69	
Isopropyl ether	9.2	
Isovaleraldehyde	9.71	
m-Iodotoluene	8.61	
o-Iodotoluene	8.62	
p-Iodotoluene	8.5	
K		
Ketene	9.61	
L		
2,3-Lutidine	8.85	
2,4-Lutidine	8.85	
2,6-Lutidine	8.85	
M		
2-Methyl furan	8.39	
2-Methyl naphthalene	7.96	
1-Methyl naphthalene	7.96	
2-Methyl propene	9.23	
2-Methyl-1-butene	9.12	
2-Methylpentane	10.12	
3-Methyl-1-butene	9.51	
3-Methyl-2-butene	8.67	
3-Methylpentane	10.08	
4-Methylcyclohexene	8.91	
Maleic anhydride	10.8	X
Mesityl oxide	9.08	
Mesitylene	8.4	
Methane	12.98	X
Methanethiol (methyl mercaptan)	9.44	
Methyl acetate	10.27	
Methyl acetylene	10.37	
Methyl acrylate	9.9	
Methyl alcohol	10.85	X
Methyl amine	8.97	
Methyl bromide	10.54	
Methyl butyl ketone	9.34	
Methyl butyrate	10.07	
Methyl cellosolve	9.6	
Methyl chloride	11.28	X

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
Methyl chloroform (1,1,1-trichloroethane)	11	X
Methyl disulfide	8.46	
Methyl ethyl ketone	9.53	
Methyl formate	10.82	X
Methyl iodide	9.54	
Methyl isobutyl ketone	9.3	
Methyl isobutyrate	9.98	
Methyl isocyanate	10.67	X
Methyl isopropyl ketone	9.32	
Methyl isothiocyanate	9.25	
Methyl mercaptan	9.44	
Methyl methacrylate	9.7	
Methyl propionate	10.15	
Methyl propyl ketone	9.39	
α -Methyl styrene	8.35	
Methyl thiocyanate	10.07	
Methylal (dimethoxymethane)	10	
Methylcyclohexane	9.85	
Methylene chloride	11.32	X
Methyl-n-amyl ketone	9.3	
Monomethyl aniline	7.32	
Monomethyl hydrazine	7.67	
Morpholine	8.2	
n-Methyl acetamide	8.9	
N		
1-Nitropropane	10.88	X
2-Nitropropane	10.71	X
Naphthalene	8.12	
Nickel carbonyl	8.27	
Nitric oxide, (NO)	9.25	
Nitrobenzene	9.92	
Nitroethane	10.88	X
Nitrogen	15.58	X
Nitrogen dioxide	9.78	
Nitrogen trifluoride	12.97	X
Nitromethane	11.08	X
Nitrotoluene	9.45	
p-Nitrochloro benzene	9.96	

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
O		
Octane	9.82	
Oxygen	12.08	X
Ozone	12.08	X
P		
1-Pentene	9.5	
1-Propanethiol	9.2	
2,4-Pentanedione	8.87	
2-Pentanone	9.38	
2-Picoline	9.02	
3-Picoline	9.02	
4-Picoline	9.04	
n-Propyl nitrate	11.07	X
Pentaborane	10.4	
Pentane	10.35	
Perchloroethylene	9.32	
Pheneloic	8.18	
Phenol	8.5	
Phenyl ether (diphenyl oxide)	8.82	
Phenyl hydrazine	7.64	
Phenyl isocyanate	8.77	
Phenyl isothiocyanate	8.52	
Phenylene diamine	6.89	
Phosgene	11.77	X
Phosphine	9.87	
Phosphorus trichloride	9.91	
Phthalic anhydride	10	
Propane	11.07	X
Propargyl alcohol	10.51	
Propiolactone	9.7	
Propionaldehyde	9.98	
Propionic acid	10.24	
Propionitrile	11.84	X
Propyl acetate	10.04	
Propyl alcohol	10.2	
Propyl amine	8.78	
Propyl benzene	8.72	
Propyl ether	9.27	

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
Propyl formate	10.54	
Propylene	9.73	
Propylene dichloride	10.87	X
Propylene imine	9	
Propylene oxide	10.22	
Propyne	10.36	
Pyridine	9.32	
Pyrrole	8.2	
Q		
Quinone	10.04	
S		
Stibine	9.51	
Styrene	8.47	
Sulfur dioxide	12.3	X
Sulfur hexafluoride	15.33	X
Sulfur monochloride	9.66	
Sulfuryl fluoride	13	X
T		
o-Terphenyls	7.78	
1,1,2,2-Tetrachloro-1,2-difluoroethane (Freon 112)	11.3	X
1,1,1-Trichloroethane	11	X
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	11.78	X
2,2,4-Trimethyl pentane	9.86	
o-Toluidine	7.44	
Tetrachloroethane	11.62	X
Tetrachloroethene	9.32	
Tetrachloromethane	11.47	X
Tetrahydrofuran	9.54	
Tetrahydropyran	9.25	
Thiolacetic acid	10	
Thiophene	8.86	
Toluene	8.82	
Tribromoethene	9.27	
Tribromofluoromethane	10.67	X
Tribromomethane	10.51	
Trichloroethene	9.45	
Trichloroethylene	9.47	
Trichlorofluoromethane (Freon 11)	11.77	X

**CALIBRATION AND MAINTENANCE OF PORTABLE
PHOTOIONIZATION DETECTOR**

TABLE 1**SUMMARY OF IONIZATION POTENTIALS**

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
Trichloromethane	11.42	X
Triethylamine	7.5	
Trifluoromonobromo-methane	11.4	X
Trimethyl amine	7.82	
Tripopyl amine	7.23	
V		
o-Vinyl toluene	8.2	
Valeraldehyde	9.82	
Valeric acid	10.12	
Vinyl acetate	9.19	
Vinyl bromide	9.8	
Vinyl chloride	10	
Vinyl methyl ether	8.93	
W		
Water	12.59	X
X		
2,4-Xylidine	7.65	
m-Xylene	8.56	
o-Xylene	8.56	
p-Xylene	8.45	

FOP 011.0

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR



EQUIPMENT CALIBRATION LOG

PROJECT INFORMATION:

Project Name: _____
Project No.: _____
Client: _____

Date: _____

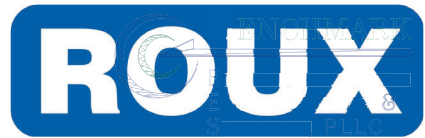
Instrument Source: ☐ Roux ☐ Rental

METER TYPE	UNITS	TIME	MAKE/MODEL	SERIAL NUMBER	CAL. BY	STANDARD	POST CAL. READING	SETTINGS
☐ pH meter	units		Myron L Company Ultra Meter 6P	606987		4.00 7.00 10.01		
☐ Turbidity meter	NTU		Hach 2100P Turbidimeter	97060001450		0.4 100 800		
☐ Sp. Cond. meter	uS mS		Myron L Company Ultra Meter 6P			_____ mS @ 25 °C		
☐ PID	ppm		MinRAE 20			open air zero _____ ppm Iso. Gas		MIBK response factor = 1.0
☐ Dissolved Oxygen	ppm		YSI Model 5					
☐ Particulate meter	mg/m ³					zero air		
☐ Oxygen	%					open air		
☐ Hydrogen sulfide	ppm					open air		
☐ Carbon monoxide	ppm					open air		
☐ LEL	%					open air		
☐ Radiation Meter	uR/H					background area		
☐								

ADDITIONAL REMARKS:

PREPARED BY: _____ DATE: _____





FIELD OPERATING PROCEDURES

Composite Sample Collection Procedure for Non-VOC Analysis

FOP 013.1

COMPOSITE SAMPLE COLLECTION PROCEDURE FOR NON-VOLATILE ORGANIC ANALYSIS

PURPOSE

This guideline addresses the procedure to be used when soil samples are to be composited in the field.

PROCEDURE

1. Transfer equal weighted aliquots of soil from individual split-spoon samples, excavator bucket, hand auger or surface soil sample location to a large precleaned stainless steel (or Pyrex glass) mixing bowl.
2. Thoroughly mix (homogenize) and break up the soil using a stainless steel scoop or trowel.
3. Spread the composite sample evenly on a stainless steel tray and quarter the sample.
4. Discard alternate (i.e., diagonal) quarters and, using a small stainless steel scoop or spatula, collect equal portions of subsample from the remaining two quarters until the amount required for the composite sample is acquired. Transfer these subsamples to a precleaned stainless steel (or Pyrex glass) mixing bowl and re-mix.
5. Transfer the composite sample to the laboratory provided, precleaned sample jars. Store any excess sample from the stainless steel tray in a separate, precleaned, wide-mouth sample jar and refrigerate for future use, if applicable.
6. Decontaminate all stainless steel (or Pyrex glass) equipment in accordance with Roux's Non-disposable and Non-dedicated Sampling Equipment Decontamination procedures.
7. Prepare samples in accordance with Roux's Sample Labeling, Storage and Shipment FOP.

FOP 013.1

COMPOSITE SAMPLE COLLECTION PROCEDURE FOR NON-VOLATILE ORGANIC ANALYSIS

8. Record all sampling details in the Project Field Book and on the Soil/Sediment Sample Collection Summary Log (sample attached).

ATTACHMENTS

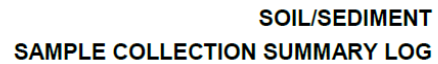
Soil/Sediment Sample Collection Summary Log (sample)

REFERENCES

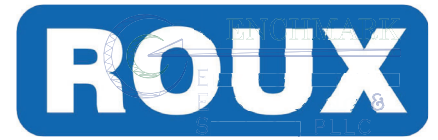
Roux FOPs:

- 040 *Non-disposable and Non-dedicated Sampling Equipment Decontamination*
046 *Sample Labeling, Storage and Shipment*

COMPOSITE SAMPLE COLLECTION PROCEDURE FOR NON-VOLATILE ORGANIC ANALYSIS

[illegible]

Prepared By: _____



FIELD OPERATING PROCEDURES

Hand Augering Procedures

HAND AUGERING PROCEDURES

PURPOSE

This guideline presents a method for hand augering, which enables the recovery of representative surface and shallow subsurface samples for classification and sample collection (ASTM D1452).

PROCEDURE

1. Review project objectives and the Project Health and Safety Plan (HASP).
2. Follow Roux's FOP: Drill Site Selection Procedure prior to implementing any hand augering activity.
3. Establish a central staging area for storage of augering supplies and for equipment decontamination (include plastic-covered work bench/table as necessary). Locate a secure storage area for augered samples.
4. Assemble auger and decontaminate in accordance with Roux's FOP: Non-Disposable and Non-Dedicated Sampling Equipment Decontamination.
5. Cover the area to be sampled with plastic sheeting, as determined by the Project Work Plan.
6. Make the auger boring through the plastic sheeting by rotating and advancing the auger to the desired depth below ground surface.
7. Withdraw the auger from the hole and remove soil for examination, soil classification, on-site testing (if applicable) and laboratory physical/chemical sample collection (if applicable) in accordance with specific Roux FOPs (Soil Description Procedures Using the Unified Soil Classification System; Composite Sample Collection Procedure for Non-Volatile Organic Analysis; and/or Soil Sample Handling for VOC Analysis) and as directed by the Project Work Plan.

FOP 025.0

HAND AUGERING PROCEDURES

8. Document all properties and sample locations in the Project Field Book and Hand Auger Borehole Log (sample attached). Specifically, total depth, borehole diameter, depth of sample collection, personnel, etc. should be recorded.
9. Place sample in appropriate container(s), label and store for future reference or ship to laboratory for analysis in accordance with Roux's Field Operating Procedure for Sample Labeling, Storage and Shipment.
10. Decontaminate auger in accordance with Roux's Field Operating Procedure for Non-Disposable and Non-Dedicated Sampling Equipment Decontamination.
11. Advance auger to next sample interval and repeat steps 7 through 12 as necessary.
12. Backfill auger holes in accordance with approved procedures outlined in the Project Work Plan.

ATTACHMENTS

Hand Auger Borehole Log (sample)

REFERENCES

Roux FOPs:

- 013 *Composite Sample Collection Procedure for Non-Volatile Organic Analysis*
- 017 *Drill Site Selection Procedure*
- 040 *Non-Disposable and Non-Dedicated Sampling Equipment Decontamination*
- 046 *Sample Labeling, Storage and Shipment*
- 054 *Soil Description Procedures Using the Unified Soil Classification System*
- 057 *Soil Sample Handling for Volatile Organic Compound Analysis – Encore Sampling*

FOP 025.0

HAND AUGERING PROCEDURES

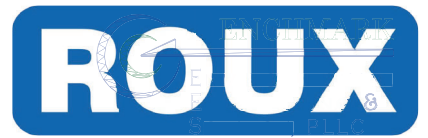


HAND AUGER BOREHOLE LOG

Project:	BOREHOLE I.D.:
Project No.:	Excavation Date:
Client:	Excavation Method:
Location:	Logged / Checked By:

Hand Auger Location: <i>NOT TO SCALE</i>		Hand Auger Cross Section:		
		Grade - 0' 2' 4' 6' 8' 10'		
TIME		BOREHOLE DIMENSIONS		
Start:		Diameter: (approx.)		
End:		Depth: (approx.)		
Depth (fbs)	SAMPLE DESCRIPTION USCS Classification: Color, Moisture Condition, % of Soil Type, Texture, Plasticity, Fabric, Bedding, Weathering, Fracturing, Color, Other	RID Scan (ppm)	Photos Y / N	Samples Collected (fbs)
COMMENTS:				
GROUNDWATER ENCOUNTERED:		yes	no	If yes, depth to GW:
VISUAL IMPACTS:		yes	no	Describe:
OLFACTORY OBSERVATIONS:		yes	no	Describe:
NON-NATIVE FILL ENCOUNTERED:		yes	no	
OTHER OBSERVATIONS:		yes	no	Describe:
SAMPLES COLLECTED:		yes	no	Sample I.D.:
				Sample I.D.:
				Sample I.D.:





FIELD OPERATING PROCEDURES

Sample Labeling, Storage, and Shipment Procedures

SAMPLE LABELING, STORAGE & SHIPMENT PROCEDURES

PURPOSE

The collection and analysis of samples of environmental media, including soils, groundwater, surface water, and sediment, are the central activities of the field investigation. These samples must be properly labeled to preserve its identity, and properly stored and shipped in a manner that preserves its integrity and chain of custody. This procedure presents methods for these activities.

SAMPLE LABELING PROCEDURE

1. Assign each sample retained for analysis a unique 9-digit alphanumeric identification code or as indicated in the Project Work Plan. Typically, this code will be formatted as follows:

Sample I.D. Example: GW051402047	
GW	Sample matrix GW = groundwater; SW = surface water; SUB = subsurface soil; SS = surface soil; SED = sediment; L = leachate; A = air
05	Month of sample collection
14	Day of sample collection
02	Year of sample collection
047	Consecutive sample number

2. Consecutive sample numbers will indicate the individual sample's sequence in the total set of samples collected during the investigation/sampling event. The sample number above, for example, would indicate the 47th sample retained for analysis during the field investigation, collected on May 14, 2002.

SAMPLE LABELING, STORAGE & SHIPMENT PROCEDURES

3. Affix a non-removable (when wet) label to each sample container. The following information will be written on the label with black or blue ink that will not smudge when wet:
 - Project number
 - Sample ID (see Step 1 above)
 - Date of sample collection
 - Time of sample collection (military time only)
 - Specify “grab” or “composite” sample with an “X”
 - Sampler initials
 - Preservative(s) (if applicable)
 - Analytes for analysis (if practicable)
4. Record all sample label information in the Project Field Book and on a Sample Summary Collection Log (see attached samples), keyed to the sample identification number. In addition, add information regarding the matrix, sample location, depth, etc. to provide a complete description of the sample.

SAMPLE STORAGE PROCEDURE

1. Immediately after collection, placement in the proper container, and labeling, place samples to be retained for chemical analysis into resealable plastic bags.
2. Place bagged samples into an ice chest filled approximately half-full of double bagged ice. Blue ice is not an acceptable substitute for ice.
3. Maintain samples in an ice chest or in an alternative location (e.g. sample refrigerator) as approved by the Roux Field Team Leader until time of shipment. Periodically drain melt-water off coolers and replenish ice as necessary.

FOP 046.1

SAMPLE LABELING, STORAGE & SHIPMENT PROCEDURES

4. Ship samples on a daily basis, unless otherwise directed by the Roux Field Team Leader.
5. Maintain appropriate custody procedures on coolers and other sample storage containers at all times. These procedures are discussed in detail in the Project Quality Assurance Project Plan, Monitoring Plan or Work Plan.
6. Samples shall be kept in a secure location locked and controlled (i.e., locked building or fenced area) so that only the Project Field Team Leader has access to the location or under the constant visual surveillance of the same.

SAMPLE SHIPPING PROCEDURE

1. Fill out the chain-of-custody form completely (see attached sample) with all relevant information. The white original goes with the samples and should be placed in a resealable plastic bag and taped inside the sample cooler lid; the sampler should retain the copy.
2. Place a layer of inert cushioning material such as bubble pack in the bottom of cooler.
3. Place each bottle in a bubble wrap sleeve or other protective wrap. To the extent practicable, then place each bottle in a resealable plastic bag.
4. Open a garbage bag (or similar) into a cooler and place sample bottles into the garbage bag (or similar) with volatile organic analysis (VOA) vials near the center of the cooler.
5. Pack bottles with ice in plastic bags. At packing completion, cooler should be at least 50 percent ice, by volume. Coolers should be completely filled, so that samples do not move excessively during shipping.
6. Duct tape (or similar) cooler drain closed and wrap cooler completely in two or more locations to secure lid, specifically covering the hinges of the cooler.

FOP 046.1

SAMPLE LABELING, STORAGE & SHIPMENT PROCEDURES

7. Place laboratory label address identifying cooler number (i.e., 1 of 4, 2 of 4 etc.) and overnight delivery waybill sleeves on cooler lid or handle sleeve (Federal Express).
8. Sign the custody seal tape with an indelible soft-tip marker and place over the duct tape across the front and back seam between the lid and cooler body.
9. Cover the signed custody seal tape with an additional wrap of transparent strapping tape.
10. Place “Fragile” and “This Side Up” labels on all four sides of the cooler. “This Side Up” labels are yellow labels with a black arrow with the arrowhead pointing toward the cooler lid.
11. For coolers shipped by overnight delivery, retain a copy of the shipping waybill, and attach to the chain-of-custody documentation.

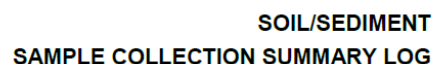
ATTACHMENTS

Soil/Sediment Sample Summary Collection Log (sample)
Groundwater/Surface Water Sample Summary Collection Log (sample)
Wipe Sample Summary Collection Log (sample)
Air Sample Summary Collection Log (sample)
Chain-Of-Custody Form (sample)

REFERENCES

None

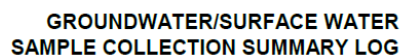
SAMPLE LABELING, STORAGE & SHIPMENT PROCEDURES

[illegible]

Prepared By: _____



SAMPLE LABELING, STORAGE & SHIPMENT PROCEDURES

[illegible]

FOP 046.1

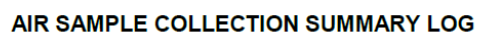
SAMPLE LABELING, STORAGE & SHIPMENT PROCEDURES

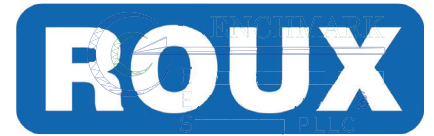


Parameters	Initials	changes
of QC samples. samples. 20 samples when non-dedicated equipment is utilized in accordance with DER-10. glove (and any other sampling equipment coming into contact with sampled surface) with prepared al sample at a rate of field duplicate per 20 samples.		

Prepared By: _____

SAMPLE LABELING, STORAGE & SHIPMENT PROCEDURES

[illegible]



FIELD OPERATING PROCEDURES

Screening of Soil
Samples for Organic
Vapors During
Impacted Soil Removal
Activities

**SCREENING OF SOIL SAMPLES FOR ORGANIC
VAPORS DURING IMPACTED SOIL REMOVAL ACTIVITIES**

PURPOSE

This procedure is used to screen soil samples for the presence of volatile organic constituents (VOCs) using a field organic vapor meter. The field meter should either be a photoionization detector (PID) or flame-ionization detector (FID) type. This type of screening is generally performed during underground storage tank (UST) and/or impacted soil removal activities as a procedure for ensuring the health and safety of the community and personnel at the site as well as to identify potential VOC-impacted soil samples for laboratory analysis (i.e., confirmatory or verification samples). Soil samples are also screened in the field to provide assessment criteria to determine horizontal and vertical extents of VOC-impacts in order to ensure soils that may have been impacted by volatile organic substances are removed.

PROCEDURE

1. Calibrate air-monitoring equipment in accordance with the appropriate Roux's Field Operating Procedures or manufacturers recommendations for calibration of field meters.
2. Perform community air monitoring in accordance with the Project Work Plan and/or Roux's FOP: Real-Time Air Monitoring During Intrusive Activities.
3. Upon proper removal of any identified UST in accordance with NYSDEC Division of Environmental Remediation, Spill Response Unit or Bulk Storage Unit guidelines and/or Roux's FOP: Underground Storage Tank Removal Procedures; examine the four sidewalls and bottom of the excavation for visually impacted (i.e., stained) soils.
4. If visually impacted soils are identified, direct the excavating equipment operator to scrape the impacted area (i.e., sidewall or bottom of the

**SCREENING OF SOIL SAMPLES FOR ORGANIC
VAPORS DURING IMPACTED SOIL REMOVAL ACTIVITIES**

excavation) and present the scraped soil for evaluation. NOTE: Under no circumstances should anyone enter an excavation greater than 4 feet in depth, unless absolutely necessary. Excavation entry may only occur under strict confined space entry procedures following implementation of specific engineering controls (i.e., continuous air monitoring, excavation shoring, trench box installation, benching).

5. Visually inspect and perform an open air PID/FID scan of the scraped soil sample noting stratification, visible staining, or other evidence of impact (i.e., presence of non-aqueous phase liquid, NAPL).
6. Collect a representative sample (approximately 100 milligrams (mg)) of soil using a decontaminated or dedicated stainless steel sampling tool (i.e., spoon, spatula, scoop, or approved equivalent), for field headspace determination of VOC-impact. Place the representative soil sample into a labeled wide-mouth glass jar approximately $\frac{1}{2}$ to $\frac{3}{4}$ full and seal with aluminum foil and a screw top cap. Alternatively, the soil sample may be placed into a clean, re-sealable plastic bag and sealed. Be sure to leave adequate headspace above the soil sample within either sealed container.
7. Place the field screening sample (i.e., jar or bag) in a location where the ambient temperature is at least 70° Fahrenheit for at least 15 minutes, but no more than 60 minutes.
8. Carefully remove the screw top cap from the jar and slowly insert the tip of the organic vapor meter (PID or FID) through the aluminum foil seal making the smallest hole possible. Alternatively, unseal a portion of the plastic bag just big enough to insert the probe of a calibrated PID.
9. Record the depth, sample location (i.e., sidewall, bottom) and maximum reading in parts per million by volume (ppmv) in the Project Field Book and Impacted Soil Excavation Log (sample attached), at the depth interval corresponding to the depth of sample collection.

FOP 048.0

SCREENING OF SOIL SAMPLES FOR ORGANIC VAPORS DURING IMPACTED SOIL REMOVAL ACTIVITIES

10. The representative soil samples collected from the excavation will be used to assess the vertical and horizontal limits of VOC-impact and guide the impacted soil removal activities in accordance with project requirements (i.e., PID scans less than 20 ppm will not require removal unless laboratory analytical results exceed regulatory limits).
11. Collect verification/confirmation samples in accordance with NYSDEC Division of Environmental Remediation, Spill Response Unit or Bulk Storage Unit guidelines and/or Roux's FOP: Surface and Subsurface Soil Sampling Procedures.

ATTACHMENTS

Impacted Soil Excavation Log (sample)

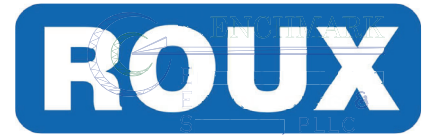
REFERENCES

Roux FOPs:

- 010 *Calibration and Maintenance of Portable Flame Ionization Detector*
- 011 *Calibration and Maintenance of Portable Photoionization Detector*
- 063 *Surface and Subsurface Soil Sampling Procedures*
- 073 *Real-Time Air Monitoring During Intrusive Activities*
- 074 *Underground Storage Tank Removal Procedures*

SCREENING OF SOIL SAMPLES FOR ORGANIC VAPORS DURING IMPACTED SOIL REMOVAL ACTIVITIES





FIELD OPERATING PROCEDURES

Soil Sample Collection for VOC Analysis (EnCore Sampling)

FOP 057.0

SOIL SAMPLE COLLECTION FOR VOC ANALYSIS – ENCORE SAMPLING

BACKGROUND AND PURPOSE

This procedure describes the methods for collecting soil samples for VOC analysis to ensure that the sample adequately represents the VOC concentrations in the soil in accordance with SW-846 Method 5035A (effective July 1, 2002). These compounds tend to volatilize from the soil after disturbance or introduction to the atmosphere. Therefore, care must be exercised to ensure that the sample collected is not altered during the collection and storage procedures. A variety of sampling options are allowed and Appendix A of Method 5035A provides details regarding the many options available for sample collection. The collection and preservation procedures are intended to prevent loss of VOCs during sample transport, handling and analysis.

Method 5035A is a method designed for volatile sample collection and analysis of soils and solid wastes for volatile organic compounds. This method is described in Update III to the Third Edition of SW-846, *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*, and is required for all analytical methods using purge and trap techniques (8021, 8015B, and 8260B). Alternative protocols may be used in some states (including New York), however this method is strongly recommended.

The volatile analysis is performed over two ranges:

	<u>GC/MS (µg/kg)</u>	<u>GC (µg/kg)</u>
Low Level	5 – 300	Not Available
High Level	>250	>20

FOP 057.0

SOIL SAMPLE COLLECTION FOR VOC ANALYSIS – ENCORE SAMPLING

The different levels require different sampling techniques. The low level method can only handle samples within a specific concentration range (these samples CANNOT be diluted), therefore a high level sample MUST be collected to ensure that all the target analytes can be quantified.

Naturally occurring carbonates in some soils may cause effervescence (foaming) on contact with the sodium bisulfate (NaHSO₄) solution used as preservative for the low-level preparation. This interference makes it necessary for the laboratory to use the high-level prep or an alternative technique for low level. Check with the NYSDEC to discuss acceptable options.

Typically, analytical laboratories will support the following options for the two levels:

Option	No. of Containers	Sample Size (g)	Holding Time (days)
A – Low Level EnCore™ Samplers	3*	5	14**
B – High Level EnCore™ Sampler	1*	5	14**
C – High Level Methanol vial w/syringe	1	10	14
* Additional EnCore™ Samplers are required for MS/MSD.			
** The sample MUST be extracted and preserved in sodium bisulfate or methanol within 48 hours of collection.			

NOTE: The EnCore™ Sampler is disposable – it can only be used ONCE. It CANNOT be cleaned and/or reused. The samplers MUST be used in conjunction with an EnCore™ T-handle.

FOP 057.0

SOIL SAMPLE COLLECTION FOR VOC ANALYSIS – ENCORE SAMPLING

PROCEDURE

The preferred method for collecting and storing a soil sample for VOC analysis is using the EnCore™ method. This field procedure is described in this FOP.

1. The sampling team should reference the manufacturers' directions prior to sample collection (attached).
 - a. Ensure that the EnCore™ Sampler is present at the sampling location before collecting the sample from the borehole or surface sample location. The necessary parts of the EnCore™ Sampler will consist of three disposable coring bodies, three disposable caps, and a reusable stainless steel T-handle.
 - b. Retrieve the sampling tool from the borehole or sample location.
 - c. Expose a surface of the soil sample. For Shelby tube samples, this would require the extrusion of the sample. For split spoon samples, this would require the spoon be disassembled and opened. If liners are being used in conjunction with a split spoon or solid barrel sampler, this would require the removal of the liners from the sampler, so that the soil at the liner's end is exposed.
 - d. Following the manufacturer's directions for the use of the EnCore™ Sampler (attached), collect three aliquots of soil from the exposed soil surface, using the three coring bodies. After the collection of each aliquot, cap and label each aliquot. The manufacturer's direction for use of the EnCore™ Sampler are attached
2. If the use of the EnCore™ Sampler is not possible due to soil texture (e.g. gravels) the sample must be field preserved with acid and methanol in accordance with SW-846 Method 5035A.

FOP 057.0

SOIL SAMPLE COLLECTION FOR VOC ANALYSIS – ENCORE SAMPLING

3. If the soil material is too coarse for sampling with the EnCore™ Sampler and contains excessive calcium carbonate material that reacts with the acid preservative, the sample will be retained in the brass or stainless steel liner of the split-spoon sampler or similar device. The ends of these liners will be covered with Teflon™ rounds, capped and sealed with tape.
4. Record all information associated with sample collection in the Project Field Book.
5. The samples will be labeled, stored and shipped in accordance with the Roux Field Operating Procedure for Sample Labeling, Storage and Shipment Procedures.

ATTACHMENTS

EnCore™ Sampling Procedure (manufacturers instructions)

REFERENCES

Roux FOPs:

046 *Sample Labeling, Storage and Shipment Procedures*

SOIL SAMPLE COLLECTION FOR VOC ANALYSIS – ENCORE SAMPLING

ATTACHMENT

EnCore™ Sampling Procedure (manufacturers instructions)

Disposable
EnCore® Sampler



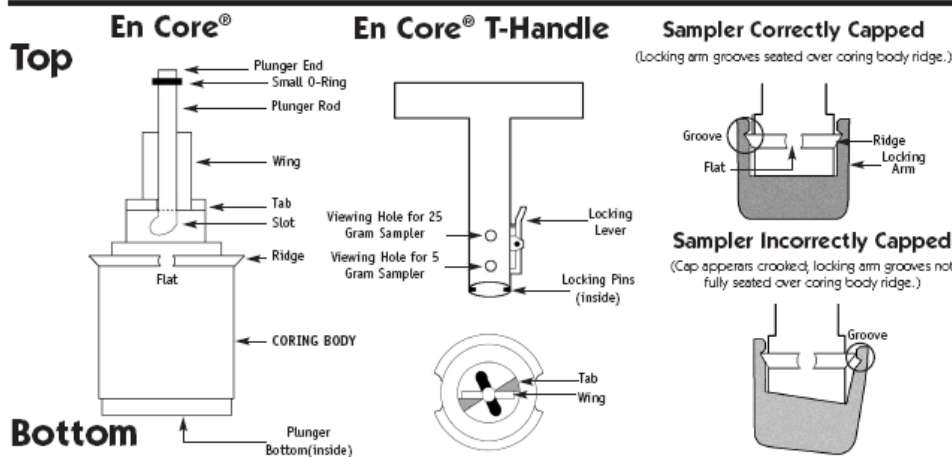
En Novative Technologies, Inc.
1241 Bellevue Street
Green Bay, WI 54302
Phone: 920-465-3960 • Fax: 920-465-3963
Toll Free: 888-411-0757
www.ennovativetech.com

Sampling Procedures

Using The En Core® T-Handle

NOTE:

1. En Core® Sampler is a SINGLE USE device. It cannot be cleaned and/or reused.
2. En Core® Sampler is designed to store soil. Do not use En Core Sampler to store solvent or free product!
3. En Core® Sampler must be used with En Core® T-Handle and/or En Core® Extrusion Tool exclusively. (These items are sold separately.)



BEFORE TAKING SAMPLE:

1. Hold coring body and push plunger rod down until small o-ring rests against tabs. This will assure that plunger moves freely.

2. Depress locking lever on En Core T-Handle. Place coring body, plunger end first, into open end of T-Handle, aligning the (2) slots on the coring body with the (2) locking pins in the T-Handle. Twist coring body clockwise to lock pins in slots. Check to ensure Sampler is locked in place. Sampler is ready for use.

TAKING SAMPLE:

3. Turn T-Handle with T-up and coring body down. This positions plunger bottom flush with bottom of coring body (ensure that plunger bottom is in position). Using T-Handle, push Sampler into soil until coring body is completely full. When full, small o-ring will be centered in T-Handle viewing hole. Remove Sampler from soil. Wipe excess soil from coring body exterior.

4. Cap coring body while it is still on T-handle. *Push* cap over flat area of ridge *and twist* to lock cap in place. **CAP MUST BE SEATED TO SEAL SAMPLER** (see diagram).

PREPARING SAMPLER FOR SHIPMENT:

5. Remove the capped Sampler by depressing locking lever on T-Handle while twisting and pulling Sampler from T-Handle.
6. Lock plunger by rotating extended plunger rod fully counter-clockwise until wings rest firmly against tabs (see plunger diagram).
7. Attach completed tear-off label (from En Core Sampler bag) to cap on coring body.
8. Return full En Core Sampler to zipper bag. Seal bag and put on ice.

SOIL SAMPLE COLLECTION FOR VOC ANALYSIS – ENCORE SAMPLING

Disposable EnCore® Sampler EXTRUSION PROCEDURES

USING THE EnCore® EXTRUSION TOOL

CAUTION! Always use the Extrusion Tool to extrude soil from the En Core Sampler. If the Extrusion Tool is not used, the Sampler may fragment, causing injury.

1. Use a pliers to break locking arms on cap of En Core Sampler. Do not remove cap at this time. (CAUTION: Broken edges will be sharp.)
2. To attach En Core Sampler to En Core Extrusion Tool: Depress locking lever on Extrusion Tool and place Sampler, plunger end first, into open end of Extrusion Tool, aligning slots on coring body with pins in Extrusion Tool. Turn coring body clockwise until it locks into place. Release locking lever.
3. Rotate and gently push Extrusion Tool plunger knob clockwise until plunger slides over wings of coring body. (When properly positioned plunger will not rotate further.)
4. Hold Extrusion Tool with capped Sampler pointed upward so soil does not fall out when cap is removed. To release soil core, remove cap from Sampler and push down on plunger knob of En Core Extrusion Tool. Remove and properly dispose of En Core Sampler.

Warranty and Disclaimers

IMPORTANT: FAILURE TO USE THE EN CORE® SAMPLER IN COMPLIANCE WITH THE WRITTEN INSTRUCTIONS PROVIDED HEREIN VOIDS ALL EXPRESS AND IMPLIED WARRANTIES, INCLUDING WARRANTY OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE.

PRINCIPLE OF USE. The En Core Sampler Cartridge System is a volumetric sampling system designed to collect, store and deliver a soil sample. The En Core Sampler comes in two sizes for sample volumes of approximately 25 or 5 grams. There are four components: the cartridge with a movable plunger; a cap with two locking arms; a T-handle (purchased separately); and an extrusion handle (purchased separately). NOTE: The En Core Sampler is designed to store soil. It is not designed to store solvent or free product.

The soil is stored in a sealed headspace-free state. The seals are achieved by three special Viton® * o-rings, two located on the plunger and one on the cap of the Sampler. At no time and under no condition should these o-rings be removed or disturbed.

QUALITY CONTROL. The cartridge is sealed in an airtight package to prevent contamination prior to use. Due to the stringent quality control requirements associated with the use of this system, the disposable cartridge is designed to be used only once.

WARRANTY. En Novative Technologies, Inc. ("En Novative Technologies") warrants that the En Core Sampler shall perform consistent with the research conducted under En Novative Technologies' approval, within thirty (30) days from the date of delivery, provided that the Customer gives En Novative Technologies prompt notice of any defect or failure to perform and satisfactory proof thereof. THIS WARRANTY DOES NOT APPLY TO THE FOLLOWING, AS SOLELY DETERMINED BY EN NOVATIVE TECHNOLOGIES: (a) Damage caused by accident, abuse, mishandling or dropping; (b) Samplers that have been opened, taken apart or mishandled; (c) Samplers not used in accordance with the directions; and (d) Damages exceeding the cost of the sampler. Seller warrants that all En Core Samplers shall be free from defects in title. THE FOREGOING WARRANTIES ARE IN LIEU OF ALL OTHER WARRANTIES, WHETHER ORAL, WRITTEN, EXPRESSED, IMPLIED OR STATUTORY, INCLUDING ANY INFORMATION PROVIDED BY SALES REPRESENTATIVES OR IN MARKETING LITERATURE. IMPLIED WARRANTIES OF FITNESS AND MERCHANTABILITY SHALL NOT APPLY. En Novative Technologies' warranty obligations and Customer's remedies, except as to title, are solely and exclusively as stated herein.

LIMITATION OF LIABILITY. IN NO EVENT SHALL EN NOVATIVE TECHNOLOGIES

BE LIABLE FOR ANTICIPATED PROFITS, INCIDENTAL, SPECIAL OR CONSEQUENTIAL DAMAGES, INCLUDING, BUT NOT LIMITED TO, DAMAGES FOR LOSS OF REVENUE, DOWNTIME, REMEDIATION ACTIVITIES, REMOBILIZATION OR RESAMPLING, COST OF CAPITAL, SERVICE INTERRUPTION OR FAILURE OF SUPPLY, LIABILITY OF CUSTOMER TO A THIRD PARTY, OR FOR LABOR, OVERHEAD, TRANSPORTATION, SUBSTITUTE SUPPLY SOURCES OR ANY OTHER EXPENSE, DAMAGE OR LOSS, INCLUDING PERSONAL INJURY OR PROPERTY DAMAGE. En Novative Technologies' liability on any claim of any kind shall be replacement of the En Core Sampler or refund of the purchase price. En Novative Technologies shall not be liable for penalties of any description whatsoever. In the event the En Core Sampler will be utilized by Customer on behalf of a third party, such third party shall not occupy the position of a third-party beneficiary of the obligation or warranty provided by En Novative Technologies, and no such third party shall have the right to enforce same. All claims must be brought within one (1) year of shipment, regardless of their nature.

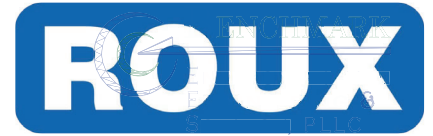


En Novative Technologies, Inc.

1241 Bellevue Street
Green Bay, WI 54302
Phone: 920-465-3960 • Fax: 920-465-3963
Toll Free: 888-411-0757
www.ennovativetech.com

The En Core™ Sampler is covered by One or More of the Following U.S. Patents: 5,343,771; 5,505,098; 5,517,868; 5,522,271. Other U.S. and Foreign Patents Pending.

* Viton® is a registered trademark of DuPont Dow Elastomers.



FIELD OPERATING PROCEDURES

Test Pit Excavation and Logging Procedures

TEST PIT EXCAVATION & LOGGING PROCEDURES

PURPOSE

This procedure describes the methods for completing test pits, trenches, and other excavations that may be performed to expose subsurface soils or materials. In most cases, these pits will be mechanically excavated, using a backhoe, trackhoe, or other equipment. Because pits and other excavations can represent a substantial physical hazard, it requires a particular focus on safety procedures. The Project Health and Safety Plan identifies practices related to excavation permits, entry, and control that must be incorporated into excavation activities.

EXCAVATION PROCEDURE

1. Review project objectives and the Project Health and Safety Plan (HASP).
2. Perform excavation equipment safety checks with the operator. Specific concerns should include, but not limited to, no leaking hydraulic lines, fire extinguisher on board of the excavation equipment, operator experience etc.
3. Conduct tailgate health and safety meeting with project team and excavation operator(s) by completing the Tailgate Safety Meeting Form (sample attached).
4. Calibrate air-monitoring equipment in accordance with the appropriate Roux's Field Operating Procedures or manufacturers recommendations for calibration of field meters.
5. Conduct air monitoring as required by the HASP and/or Project Work Plan. Record all results on the Real Time Air Monitoring Log (sample attached).
6. Mobilize the excavation equipment to the site and position over the required location.
7. Select excavation locations, which provide necessary information for achieving objectives. Check locations with owner/operator to ensure excavation

TEST PIT EXCAVATION & LOGGING PROCEDURES

operations will not interfere with site operations, and select appropriate access routes.

8. Stake locations in the field and measure distance from locations to nearest landmarks. Survey location, if required.
9. Obtain clearances from appropriate utilities and, if buried waste/metallic objects are suspected, screen location with appropriate geophysical methods, as necessary.
10. Decontaminate excavation equipment in accordance with Roux's Drilling and Excavation Equipment Decontamination procedures.
11. Excavate pits. In uncontrolled areas, excavate only as many test pits as can be backfilled during the same day. Generally, allow equal time for excavation and backfilling. To the extent practicable, no pits should be left open overnight in an uncontrolled area. If sudden weather changes or other unforeseen events necessitate this, pits will be covered and/or barricaded and flagged with caution/hazard tape. These pits should be backfilled as soon as possible.
12. The Roux field geologist or experienced professional should determine the depth of excavation. The depth is generally limited by the safe reach of the selected equipment, but may also be limited by the stability of the excavated materials (i.e. wall stability).
13. Excavate the test pits in compliance with applicable safety regulations. In no case should a pit deeper than 4 feet be entered without first stabilizing the sidewalls by using forms, or by terracing or sloping (2:1 slope maximum) the sidewalls.
14. Excavated spoils must be placed no closer than 2 feet from the open excavation.
15. Collect soil samples from pit sidewalls in accordance with Roux's Surface and Subsurface Soil Sampling Procedures. If the test pit is greater than 4 feet in depth, it will not be entered for sampling. In this event, collect samples using

TEST PIT EXCAVATION & LOGGING PROCEDURES

the backhoe bucket, then fill sample containers from the center of the bucket using the stainless steel sampling equipment (i.e., spoon, spade, trowel etc.) or drive a Shelby tube or EnCore™ sampler for VOCs.

16. Record excavation observations in the Project Field Book or Test Pit Excavation Log form (sample attached). Information recorded should include:
 - Physical dimension of the pit;
 - A scaled sketch of one side of the pit showing any lithologic contacts, zones of groundwater seepage, other special features (jointing, boulders, cobbles, zones of contamination, color abnormalities, etc.)
 - General information such as project number, pit designation number, depth, date, name of responsible professional (i.e., geologist), type of excavating equipment utilized, time of excavation and backfilling, method of collecting samples and amount of sample collected (if applicable);
 - Rate of groundwater inflow, depth to groundwater and time of measurement; and
 - Unified Soil Classification System (USCS) designation of each distinctive unit.
17. Photograph each excavation, highlighting unique or important features. Use a ruler or other suitable item for scale. Include a label with the pit designation so the developed picture will be labeled.
18. Backfill pit to match the existing grade compacting in 2 to 3 foot lifts. Since the excavated material should be cover soil, the excess soil will be placed back into the hole. The Roux Field Team Leader will provide direction on whether excavated soils may be used as fill, or these materials are to be containerized as investigation derived waste.

FOP 065.1

TEST PIT EXCAVATION & LOGGING PROCEDURES

ATTACHMENTS

Tailgate Safety Meeting Form (sample)
Real Time Air Monitoring Log (sample)
Test Pit Excavation Log (sample)

REFERENCES

Roux FOPs:

006 *Calibration and Maintenance of Combustible Gas/Oxygen Meter*
010 *Calibration and Maintenance of Portable Flame Ionization Detector*
011 *Calibration and Maintenance of Portable Photoionization Detector*
018 *Drilling and Excavation Equipment Decontamination*
063 *Surface and Subsurface Soil Sampling Procedures*

TEST PIT EXCAVATION & LOGGING PROCEDURES



TAILGATE SAFETY MEETING FORM

Project Name: _____ Date: _____ Time: _____
 Project Number: _____ Client: _____
 Work Activities: _____

HOSPITAL INFORMATION:

Name: _____
 Address: _____ City: _____ State: _____ Zip: _____
 Phone No.: _____ Ambulance Phone No.: _____

SAFETY TOPICS PRESENTED:

Chemical Hazards: _____

 Physical Hazards: Slips, Trips, Falls _____

PERSONAL PROTECTIVE EQUIPMENT:

Activity:	PPE Level:	A	B	C	D
Activity:	PPE Level:	A	B	C	D
Activity:	PPE Level:	A	B	C	D
Activity:	PPE Level:	A	B	C	D
Activity:	PPE Level:	A	B	C	D
Activity:	PPE Level:	A	B	C	D

New Equipment: _____

Other Safety Topic(s): Environmental Hazards (aggressive fauna)
 Eating, drinking, use of tobacco products is prohibited in the Exclusion Zone (EZ)

ATTENDEES

Name Printed	Signatures
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Meeting conducted by: _____

FOP 073.2

REAL-TIME AIR MONITORING DURING INTRUSIVE ACTIVITIES PROCEDURE

PURPOSE

This guideline presents requirements for real-time community air monitoring and required responses during all project required intrusive activities, such as drilling, test pitting, earthwork construction etc. This procedure is consistent with the requirements for community air monitoring for all intrusive projects, including projects conducted at remediation sites, as established by the New York State Department of Health (NYSDOH) and the New York State Department of Environmental Conservation (NYSDEC). Accordingly, it follows procedures and practices outlined under NYSDEC's DER-10 (May 2010) Appendix 1A (NYSDOH's Generic Community Air Monitoring Plan) and Appendix 1B (Fugitive Dust and Particulate Monitoring).

This FOP requires real-time monitoring for constituents of concern (COC) (i.e., volatile organic compounds (VOCs), lower explosive limit (% LEL), particulates (i.e., dust) etc.) at the upwind and downwind perimeter as well as the exclusion zone of a project site during all intrusive activities. This FOP is not intended for use in establishing action levels for worker respiratory protection (see Project Health and Safety Plan (HASP) for worker protection action levels). Rather, its intent is to provide a measure of protection for the surrounding community from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The community, as referenced in this document, includes any off-site residences, public buildings/grounds and commercial or industrial establishments adjacent to the project site. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, this FOP helps to confirm that work activities did not spread contamination off-site through via air transport mechanisms. Community air monitoring shall be integrated with the construction

FOP 073.2

REAL-TIME AIR MONITORING DURING INTRUSIVE ACTIVITIES PROCEDURE

worker personal exposure-monitoring program contained in the project and site-specific HASP.

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for volatile organic compounds (VOCs) and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate NYSDEC/NYSDOH staff.

MONITORING & MITIGATION PROCEDURE

Real-time air monitoring perimeter locations for monitoring stations will be established based on the location of the exclusion zone (i.e., immediate work area) and wind direction. Where wind direction is shifting or winds are calm, the downwind monitoring location will default to the perimeter location nearest the most sensitive receptor (i.e., residential property). All downwind receptors being equal, the downwind monitoring location will default to the perimeter location downwind of the prevailing winds at the site. Although additional site specific COCs may be monitored during real-time air monitoring activities, the most common COCs are discussed in this FOP, including organic vapors (i.e., VOCs), airborne particulates (i.e., fugitive dust) and combustible gases (i.e., methane) and oxygen.

FOP 073.2

REAL-TIME AIR MONITORING DURING INTRUSIVE ACTIVITIES PROCEDURE

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. “Periodic” monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence

ORGANIC VAPORS

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

FOP 073.2

REAL-TIME AIR MONITORING DURING INTRUSIVE ACTIVITIES PROCEDURE

capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

- If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.
- If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.
- If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.
- All 15-minute readings must be recorded and be available for State (DEC and DOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.
- **Special Requirements for Work Within 20 Feet of Potentially Exposed Individuals or Structures**
 - When work areas are within 20 feet of potentially exposed populations or occupied structures, the continuous monitoring locations for VOCs and

FOP 073.2

REAL-TIME AIR MONITORING DURING INTRUSIVE ACTIVITIES PROCEDURE

particulates must reflect the nearest potentially exposed individuals and the location of ventilation system intakes for nearby structures. The use of engineering controls such as vapor/dust barriers, temporary negative-pressure enclosures, or special ventilation devices should be considered to prevent exposures related to the work activities and to control dust and odors. Consideration should be given to implementing the planned activities when potentially exposed populations are at a minimum, such as during weekends or evening hours in non-residential settings.

- If total VOC concentrations opposite the walls of occupied structures or next to intake vents exceed 1 ppm, monitoring should occur within the occupied structure (s). Background readings in the occupied spaces must be taken prior to commencement of the planned work. Any unusual background readings should be discussed with NYSDOH prior to commencement of the work.
- If total particulate concentrations opposite the walls of occupied structures or next to intake vents exceed 150 mcg/m³, work activities should be suspended until controls are implemented and are successful in reducing the total particulate concentration to 150 mcg/m³ or less at the monitoring point.
- Depending upon the nature of contamination and remedial activities, other parameters (e.g., explosivity, oxygen, hydrogen Sulfide, carbon monoxide) may also need to be monitored. Response levels and actions should be pre-determined, as necessary, for each site.

FOP 073.2

REAL-TIME AIR MONITORING DURING INTRUSIVE ACTIVITIES PROCEDURE

Additionally, if following the cessation of work and efforts to abate the emission source are unsuccessful, and if sustained organic vapor levels exceed 25 ppm above background within the 20-foot zone for more than 30 minutes, then the **Major Vapor Emission Response Plan** (see below) will automatically be placed into effect.

Major Vapor Emission Response Plan

Upon activation of Major Vapor Emission Response Plan, the following activities will be undertaken:

1. All Emergency Response Contacts as listed below and in the Site-Specific Health and Safety Plan will be contacted.
2. The local police authorities will immediately be contacted by the Site Safety and Health Officer and advised of the situation.
3. The Site Safety and Health Officer will determine if site workers can safely undertake source abatement measures. Abatement measures may include covering the source area with clean fill or plastic sheeting, or consolidating contaminated materials to minimize surface area. The Site Safety and Health Officer will adjust worker personal protective equipment as necessary to protect workers from over-exposure to organic vapors.

The following personnel are to be notified by the Site Safety and Health Officer in the listed sequence if the Major Vapor Emission Response Plan is activated:

Contact	Phone
Police/Fire Department	911
New York State DOH	(518) 402-7860
New York State DEC Region 8	(585) 226-2466, switchboard

FOP 073.2

REAL-TIME AIR MONITORING DURING INTRUSIVE ACTIVITIES PROCEDURE

New York State DEC Region 9

(716) 851-7220

State Emergency Response Hotline

(800) 457-7362

In addition, the Site Safety and Health Officer will provide these authorities with a description of the apparent source of the contamination and abatement measures being taken by the contractor, if any.

AIRBORNE PARTICULATES

Fugitive dust suppression and airborne particulate monitoring shall be performed during any intrusive activities involving disturbance or handling of site soil/fill materials. Fugitive dust suppression techniques will include the following minimum measures:

- Spraying potable water on all excessively dry work areas and roads.
- All fill materials leaving the site will be hauled in properly covered containers or haul trailers.
- Additional dust suppression efforts may be required as discussed below.

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible alarm to indicate exceedance

FOP 073.2

REAL-TIME AIR MONITORING DURING INTRUSIVE ACTIVITIES PROCEDURE

of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

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

Visual Assessment

In conjunction with the real-time monitoring program, Roux personnel and any subcontractors thereof will be responsible for visually assessing fugitive dust migration from the site. If airborne dust is observed leaving the site, the work will be stopped until supplemental dust suppression techniques are employed in those areas.

Supplemental Dust Suppression

Supplemental dust suppression techniques may include but are not necessarily limited to the

FOP 073.2

REAL-TIME AIR MONITORING DURING INTRUSIVE ACTIVITIES PROCEDURE

following measures:

- Reducing the excavation size, number of excavations or volume of material handled.
- Restricting vehicle speeds.
- Applying water on buckets during excavation and dumping.
- Wetting equipment and excavation faces.
- Wetting haul roads.
- Restricting work during extreme wind conditions.
- Use of a street sweeper on paved haul roads, where feasible.

Work can resume using supplemental dust suppression techniques provided that the measures are successful in reducing the sustained downwind particulate concentration to below 150 ug/m³ of the upwind level, and in preventing visible dust migration off-site.

COMBUSTIBLE GASES & OXYGEN

Ambient combustible gas and oxygen concentrations should be measured prior to commencing intrusive activities each workday and a minimum of every 30-minutes thereafter. Air monitoring activities should be performed using equipment appropriate to measure combustible gases in percent lower explosive limit (LEL) and percent oxygen and calibrated daily. All combustible gas and oxygen readings must be recorded in the Project Field Book and/or Real-Time Air Monitoring Logs (sample attached) and, if applicable, be made available for State (DEC and DOH) personnel to review.

FOP 073.2

REAL-TIME AIR MONITORING DURING INTRUSIVE ACTIVITIES PROCEDURE

Mitigation upon the detection of various action levels of organic vapors are presented below:

Combustible Gas:

- If the sustained ambient air concentration of combustible gas at the downwind perimeter of the site exceeds a reading of 10 to 25% LEL, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 10% LEL, work activities can resume with continued monitoring.
- If sustained combustible gas levels at the downwind perimeter of the site persist at levels in excess of 25% LEL, work activities must be halted, the source of explosion hazards identified, corrective actions taken to abate emissions and monitoring continued. Following combustible gas mitigation, work activities can resume provided that the sustained total organic vapor level 200 feet downwind of the exclusions zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less, (but in no case less than 20 feet) is below a sustained value of 10% LEL.

Oxygen:

- If the sustained ambient oxygen concentration at the downwind perimeter of the site measures a reading between 19.5% - 21% oxygen, work activities can continue with extreme caution, however attempts to determine the potential source of oxygen displacement must be conducted.
- If the sustained oxygen level readily decreases below 19.5% LEL, work activities should be discontinued and all personnel must leave the area immediately.
- If the sustained oxygen level at the downwind perimeter of the site persists at levels between 21-25%, work activities can resume with caution.
- If the sustained oxygen level at the downwind perimeter of the site persists at levels exceeding 25% (fire hazard potential), work activities should be discontinued and all personnel must leave the area immediately.

FOP 073.2

REAL-TIME AIR MONITORING DURING INTRUSIVE ACTIVITIES PROCEDURE

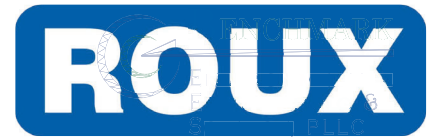
ATTACHMENTS

Real-Time Air Monitoring Log (sample)

REFERENCES

Roux FOPs:

- 006 *Calibration and Maintenance of Combustible Gas/Oxygen Meter*
- 010 *Calibration and Maintenance of Flame Ionization Detector*
- 011 *Calibration and Maintenance of Portable Photoionization Detector*
- 084 *Calibration and Maintenance of Portable Particulate Meter*



FIELD OPERATING PROCEDURES

Stockpile Sampling Procedures for Chemical Analysis

**STOCKPILE SAMPLING PROCEDURES
FOR CHEMICAL ANALYSIS**

PURPOSE

This guideline presents a method for collecting representative soil samples from stockpiled borrow source material for chemical analysis.

GENERAL

In general, off-site soil that is brought to a Site for use as supplemental fill is subject to Quality Assurance sampling and analysis. If QA is required, all off-site soil proposed for use as Site backfill shall be documented by the subcontractor in writing to have originated from locations having no evidence of disposal or release of hazardous, toxic or radioactive substances, wastes or petroleum products. If the subcontractor designates a source as “virgin” soil, it shall be further documented in writing to be native soil material having not supported any known past industrial or commercial development or agricultural use. Borrow soils can be used as backfill once concentrations are confirmed to meet project designated criteria for the Constituents of Primary Concern (COPCs) and NYSDEC TAGM HWR-94-4046 recommended soil cleanup objectives (SCOs) or NYSDEC 6NYCRR Part 375 SCOs.

Sample collection equipment will include stainless steel mixing bowls, stainless steel mixing spoons, and a stainless steel hand auger with extension rods or a stainless steel spade or equivalent. It may be necessary to use a backhoe or drilling rig to facilitate sample collection.

**STOCKPILE SAMPLING PROCEDURES
FOR CHEMICAL ANALYSIS**

SAMPLING PLAN

1. Virgin Sources – Virgin borrow sources will be confirmed acceptable for use as site backfill through collection of a single composite soil sample representative of the borrow pit or stockpile.
2. Non-Virgin Sources – Prior to sampling, determine the amount of soil that will be sampled. The soil will be tested via collection of one composite sample per 250 cubic yards of material from each source area. If more than 1,000 cubic yards of soils are excavated from a given off-site source area and all samples of the first 1,000 cubic yards meet project designated criteria, the sample collection frequency may be reduced to one composite for each additional 1,000 cubic yards of soils from the same source area, up to 5,000 cubic yards. For borrow sources greater than 5,000 cubic yards, sampling frequency may be reduced to one sample per 5,000 cubic yards, providing all earlier samples meet project designated criteria. Sampling procedure for non-virgin sources is described in the next section.

SAMPLE COLLECTION AND HANDLING

The following procedure will be used to collect representative soil samples from a non-virgin soil stockpile.

1. Using a stainless steel spade (or hand auger), a backhoe, or drilling rig, penetrate the pile to a depth of approximately 2 to 3 feet and collect four (4) representative grab samples of approximate equal volume from the top, middle, and bottom.
2. Transfer each grab into a small stainless steel mixing bowl.
3. **VOC Analysis:** Using a clean stainless steel spoon, transfer equal amounts from each small mixing bowl into a laboratory-supplied, 4 oz. VOC sample jar. This should be performed by randomly transferring several small aliquots from each bowl, taking care to minimize disturbance of the soil.

**STOCKPILE SAMPLING PROCEDURES
FOR CHEMICAL ANALYSIS**

4. **Other COPCs:** Transfer equal aliquots from each small bowl into a large mixing bowl and homogenize the sample. Fill the remaining laboratory-supplied jars with the homogenized soil for all other project required COPCs (i.e., SVOCs, PCBs, Pesticides, Herbicides, inorganics, etc.).
5. Label each set of jars with the following information:
 - Project and site name
 - Sample Code
 - Project Number
 - Date/Time
 - Sample type (soil composite or grab)
 - Sampler's initials
 - Sample Preservation
 - Required analysis

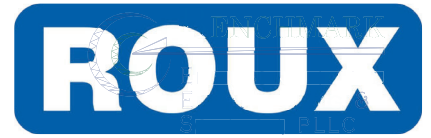
The sample code will consist of a unique, alphanumeric identification code keyed to the sampling location. Identify the sampling location on a field sketch.

6. Record all information associated with sample collection in the Project Field Book.
7. Label, store, and ship the samples in accordance with the Roux Field Operating Procedure for Sample Labeling, Storage and Shipment Procedures.
8. Clean the sampling and mixing equipment with Alconox and deionized water and repeat steps 1 through 7 for the remaining samples.

REFERENCES

Roux FOPs:

046 *Sample Labeling, Storage and Shipment Procedures*



FIELD OPERATING PROCEDURES

Waste Sampling Procedures

WASTE SAMPLING PROCEDURES

PURPOSE

This guideline describes the equipment and procedures that can safely be used to collect waste samples from open and closed units.

INTRODUCTION

Hazardous wastes are regulated by the USEPA under 40 CFR Parts 260-265. Therefore, many of the methods that are used to manage, store, treat, and dispose hazardous wastes and potential hazardous wastes are of concern to both the regulators and the regulated community. Samples are often required of regulated or potentially regulated materials. While it is understood that each facility and waste stream may present its own unique sampling and analytical challenges, this procedure will list equipment and enumerate procedures that have been used by the USEPA to safely and successfully sample specific waste units.

SAFETY

Sampling of waste units should be assessed for potential hazards by both the Project Manager (PM) and the site safety officer (SSO). It is the SSOs responsibility to enforce the site Health and Safety Plan (HASp), and to ensure that procedures used during waste sampling are in accordance with current company protocol. Sampling equipment contaminated during waste sampling investigations should be cleaned with laboratory detergent and rinsed with tap water prior to returning the equipment from the field. Contaminated sampling equipment that is to be discarded must be disposed of properly in accordance with the site-specific Work Plan.

It should be noted that although Roux does not readily perform field activities with highly hazardous materials, we do occasionally oversee contractors who do. Therefore, it is prudent on our part to recognize those situations and be prepared to ensure the activities of

WASTE SAMPLING PROCEDURES

our subcontractors comply with the site-specific HASP as well as those procedures discussed herein. Any reference within this procedure to personal protective equipment (PPE) upgrades above a modified level C (i.e., Tyvek, nitrile gloves, and full-face respirator) relates solely to our subcontractors.

QUALITY CONTROL PROCEDURES

In some instances, special decontamination procedures will be necessary and should be developed on a case-by-case basis according to the specific material encountered. Any cleaning procedures and equipment repairs conducted in the field deviating from those specified in the associated FOPs or the site-specific Work Plan, should be discussed with the Project Manager, and thoroughly documented in the Project Field Book.

All air monitoring and field analytical/screening equipment (i.e., photoionization detectors) should be checked and calibrated per manufacturer's specifications before being used to collect any waste stream unit sample (open or closed). The Field Team Leader should record all calibration results on appropriate field forms.

WASTE UNIT TYPES

Waste management units can be generally categorized into two types: open and closed. In general, open units are larger than closed units and include waste piles and surface impoundments whereas closed units include containers and tanks as well as ancillary tank equipment. Besides containers and tanks, sumps may also be considered closed units because they are designed to collect the spillage of liquid wastes and are sometimes configured as a confined space.

Although both may pose hazards, units that are open to the environment are generally less hazardous than closed units. Sampling of closed units is considered a higher hazard risk

WASTE SAMPLING PROCEDURES

because of the potential of exposure to toxic gases and flammable/explosive atmospheres. Because closed units prevent the dilution of the wastes by environmental influences, they are more likely to contain materials that have concentrated levels of hazardous constituents. While opening closed units for sampling purposes, investigators/contractor's shall use Level B PPE, air monitoring instruments to ensure that the working environment does not contain hazardous levels of flammable/explosive gasses or toxic vapors, and follow the appropriate safety requirements stipulated in the site-specific HASP.

Buried waste materials should be located and excavated with extreme caution. Once the buried waste is uncovered, the appropriate safety and sampling procedures utilized will depend on the type of waste unit.

Open Units

While open units may contain many types of wastes and come in a variety of shapes and sizes, they can be generally regarded as either waste piles or surface impoundments.

Definitions of these two types of open units from 40 CFR Part 260.10 are:

- Waste pile -- any non-containerized accumulation of solid, non-flowing hazardous waste that is used for treatment or storage and that is not a containment building.
- Surface impoundment -- "...a facility or part of a facility which is a natural topographic depression, man-made excavation, or diked area formed primarily of earthen materials (although it may be lined with man-made materials), which is designed to hold the accumulation of liquid wastes or wastes containing free liquids, and which is not an injection well. Examples of surface impoundments are holding, storage, settling and aeration pits, ponds, and lagoons."

One of the distinguishing features between waste piles and surface impoundments is the state of the waste. Waste piles typically contain solid or non-flowing materials whereas liquid wastes are usually contained in surface impoundments. The nature of the waste will also determine the mode of delivering the waste to the unit. Wastes are commonly pumped

WASTE SAMPLING PROCEDURES

or gravity fed into impoundments while heavy equipment or trucks may be used to dump wastes in piles. Once the waste has been placed in an open unit, the state of the waste may be altered by environmental factors (e.g., temperature, precipitation, etc.).

Surface impoundments may contain several phases such as floating solids, liquid phase(s), and sludges. Waste piles are usually restricted to solids and semi-solids. All of the potential phases contained in a waste unit should be considered in developing the sample design to meet the study's objective.

Closed Units

There are a variety of designs, shapes, sizes, and functions of closed units. In addition to the challenges of the various designs and the safety requirements for sampling them, closed units are difficult to sample because they may contain liquid, solid, semi-solid/sludge, or any combination of phases. Based on the study's design, it may be necessary to obtain a cross sectional profile of the closed unit in an attempt to characterize the unit. The following are definitions of types of closed waste units described in 40 CFR Part 260.10:

- Container-- any portable device in which a material is stored, transported, treated, disposed, or otherwise handled. Examples of containers are drums, overpacks, pails, totes, and roll-offs.
- Tank-- a stationary device, designed to contain an accumulation of hazardous waste constructed primarily of non-earthen materials, which provide structural support.

Portable tanks, tank trucks, and tank cars vary in size and may range from simple to extremely complex designs. Depending on the unit's design, it may be convenient to consider some of these storage units as tanks for sampling purposes even though they meet the definition of a container.

WASTE SAMPLING PROCEDURES

- Ancillary equipment (tank)-- any device including, but not limited to, such devices as piping, fittings, flanges, valves, and pumps that is used to distribute, meter, or control the flow of hazardous waste from its point of generation to a storage or treatment tank(s), between hazardous waste storage and treatment tanks to a point of disposal on-site, or to a point of shipment for disposal off-site.
- Sump-- any pit or reservoir that meets the definition of a tank and those troughs/trenches connected to it that serve to collect hazardous wastes.

Note: some outdoor sumps may be considered open units/surface impoundments.

Although any of the closed units may not be completely sealed and may be partially open to the environment, the unit needs to be treated as a closed unit for sampling purposes until a determination can be made. Once a closed unit is opened, a review of the proposed sampling procedures and level of protection can be performed to determine if the (PPE) is suitable for the site conditions.

Samples collected from different waste units should not be composited into one sample container without additional analytical and/or field screening data to determine if the materials are compatible and will not cause an inadvertent chemical reaction.

EQUIPMENT

Selecting appropriate equipment to sample wastes is a challenging task due to the uncertainty of the physical characteristics and nature of the wastes. It may be difficult to separate, homogenize and/or containerize a waste due to its physical characteristics (viscosity, particle size, etc.). In addition, the physical characteristics of a waste may change with temperature, humidity, or pressure. Waste streams may vary depending on how and when a waste was generated, how and where it was stored/disposed, and the conditions under which it was

WASTE SAMPLING PROCEDURES

stored/disposed. Also, the physical location of the wastes or the unit configuration may prevent the use of conventional sampling equipment.

Given the uncertainties that a waste may present, it is desirable to select sampling equipment that will facilitate the collection of samples that will meet the study's objective, and that will not unintentionally bias the sample by excluding some of the sample population that is under consideration. However, due to the nature of some waste matrices or the physical constraints of some waste units, it may be necessary to collect samples knowing that a portion of the desired population was omitted due to limitations of the equipment. Any deviations from the study plan or difficulties encountered in the field concerning sample collection that may have an effect on the study's objective should be documented in a log book, reviewed with the analytical data, and presented in the report.

WASTE SAMPLING EQUIPMENT

Waste sampling equipment should be made of non-reactive materials that will neither add to nor alter the chemical or physical properties of the material that is being sampled. The attached Table 1 lists some conventional equipment for sampling waste units/phases and some potential limitations of the equipment. Another reference for selecting sampling equipment is the ASTM, Standard Guide for Selection of Sampling Equipment for Wastes and Contaminated Media Data Collection Activities, D6232-98.

WASTE SAMPLING PROCEDURES

Waste Piles

Waste piles vary in size, shape, composition, and compactness, and may vary in distribution of hazardous constituents and characteristics (strata). These variables will affect safety and access considerations. The number of samples, the type of sample(s), and the sample location(s) should be based on the study's objectives. Commonly used equipment to collect

WASTE SAMPLING PROCEDURES

samples from waste piles are listed in Table 1. All equipment should be compatible with the waste and should have been cleaned to prevent any cross contamination of the sample.

Surface Impoundments

Surface impoundments vary in size, shape, and waste content, and may vary in distribution of hazardous constituents and characteristics (strata). The number of samples, the type of sample(s), and the sample location(s) should be based on the study's objectives. Commonly used equipment to collect samples from surface impoundments are listed in Table 1. All equipment should be compatible with the waste and should have been cleaned to prevent any cross contamination of the sample.

Because of the potential danger of sampling waste units suspected of containing elevated levels of hazardous constituents, personnel should never attempt to sample surface impoundments used to manage potentially hazardous wastes from a boat. All sampling should be conducted from the banks or piers of surface impoundments. Any exception must be approved by the appropriate site safety officer and/or the Occupational Health and Safety Designee (OHSD).

Drums

Drums are the most frequent type of containers sampled by field investigators for chemical analyses and/or physical testing. Caution should be exercised by the field investigators when sampling drums because of the potential presence of explosive/flammable gases and/or toxic vapors. Therefore, the following procedures should be used when collecting samples from drums of unknown material:

1. Visually inspect all drums that are being considered for sampling for the following:
 - pressurization (bulging/dimples);
 - crystals formed around the drum opening;
 - leaks, holes, stains;

WASTE SAMPLING PROCEDURES

- labels, markings;
- composition and type (steel/poly and open/bung);
- condition, age, rust
- sampling accessibility

Drums showing evidence of pressurization and crystals should be furthered assessed to determine if remote drum opening is needed. If drums cannot be accessed for sampling, heavy equipment is usually necessary to stage drums for the sampling activities. Adequate time should be allowed for the drum contents to stabilize after a drum is handled.

2. Identify each drum that will be opened (e.g., paint sticks, spray paint, cones, etc).

LEVEL "B" PROTECTION IS REQUIRED FOR THE FOLLOWING PROCEDURES.

3. Before opening, ground each metal drum that is not in direct contact with the earth using grounding wires, alligator clips, and a grounding rod or metal structure. If a metal drum is in an overpack drum, the metal drum should be grounded.
4. Touch the drum opening equipment to the bung or lid and allow an electrical conductive path to form. Slowly remove the bung or drum ring and/or lid with spark resistant tools (brass/beryllium).
5. Screen drums for explosive gases and toxic vapor with air monitoring instruments as bung or drum lid is removed. Depending on site conditions screen for one or more of the following:
 - radioactivity
 - cyanide fumes
 - halogen vapors
 - pH
 - flash point (requires sample for testing)

Note the state, quantity, phases, and color of the drum contents. Record all relevant results, observations, and information in a logbook.

WASTE SAMPLING PROCEDURES

6. Select the appropriate sampling equipment based on the state of the material and the type of container. Sampling equipment should be made of non-reactive materials that will meet the study's objective(s).
7. Place oil wipe (as necessary), sampling equipment, and sample containers near drum(s) to be sampled.

AIR MONITORING FOR TOXIC VAPORS AND EXPLOSIVE GASES AND OXYGEN DEFICIENT ATMOSPHERES SHOULD BE CONDUCTED DURING DRUM SAMPLING.

Liquids -- Slowly lower the COLIWASA or drum thief to the bottom of the container. Close the COLIWASA with the inner rod or create a vacuum with the sampler's gloved thumb on the end of the thief and slowly remove the sampling device from the drum. Release the sample from the device into the sample container. Repeat the procedure until a sufficient sample volume is obtained.

Solids/Semi-Solids -- Use a push tube, bucket auger, or screw auger or if conditions permit a pneumatic hammer/drill to obtain the sample. Carefully use a clean stainless steel spoon to place the sample into container(s) for analyses.

8. Close the drums when sampling is complete. Segregate contaminated sampling equipment and investigative derived wastes (IDW) containing incompatible materials as determined by the drum screening procedure (Step #5). At a minimum, contaminated equipment should be cleaned with laboratory detergent and rinsed with tap water prior to returning it from the field.

Tanks

Sampling tanks is considered hazardous due to the potential for them to contain large volumes of hazardous materials and therefore, appropriate safety protocols must be followed. Unlike drums, tanks may be compartmentalized or have complex designs.

WASTE SAMPLING PROCEDURES

Preliminary information about the tank's contents and configuration should be reviewed prior to the sampling operation to ensure the safety of sampling personnel and that the study's objectives can be achieved.

In addition to having discharge valves near the bottom of tanks and bulk storage units, most tanks have hatches at the top. It is desirable to collect samples from the top hatch because of the potential for the tank's contents to be stratified. Additionally, when sampling from the discharge valve, there is a possibility of a stuck or broken valve which could cause an uncontrolled release. Investigators should not utilize valves on tanks or bulk storage devices unless they are operated by the owner or operator of the facility, or a containment plan is in place should the valve stick or break. If the investigator must sample from a tank discharge valve, the valving arrangement of the particular tank must be clearly understood to insure that the compartment(s) of interest is sampled.

Because of the many different types of designs and materials that may be encountered, only general sampling procedures that outline sampling a tank from the top hatch are listed below:

1. All relevant information concerning the tank such as the type of tank, the tank capacity, markings, condition, and suspected contents should be documented in a logbook.
2. The samplers should inspect the ladder, stairs, and catwalk that will be used to access the top hatch to ensure that they will support the samplers and their equipment.

LEVEL "B" PROTECTION IS REQUIRED FOR THE FOLLOWING PROCEDURES.

3. Before opening, ground each metal tank using grounding wires, alligator clips, and a grounding rod or metal structure.

WASTE SAMPLING PROCEDURES

4. Any vents or pressure release valves should be slowly opened to allow the unit to vent to atmospheric pressure. Air monitoring for explosive/flammable gases and toxic vapors should be conducted during the venting with the results recorded in a log book. If dangerous concentrations of gases evolve from the vent or the pressure is too great, leave the area immediately.
5. Touch tank opening equipment to the bolts in the hatch lid and allow electrical conductive path to form. Slowly remove bolts and/or hatch with spark resistant tools (brass/beryllium). If a pressure build up is encountered or detected, cease opening activities and leave the area.
6. Screen tanks for explosive/flammable gases and toxic vapors with air monitoring instruments. Depending on the study objectives and site conditions, conduct characteristic screening (e.g., pH, halogen, etc.) as desired. Collect a small volume of sample for flash point testing, if warranted. Note the state, quantity, number of phases, and color of the tank contents. Record all relevant results, observations, and information in a logbook. Compare the screening results with any pre-existing data to determine if the tank should be sampled.
7. Select the appropriate sampling equipment based on the state of the material and the type of tank. Sampling equipment should be constructed of non-reactive materials that will meet the study's objective(s).
8. Place oil wipe (as necessary), sampling equipment, and sample containers near tanks(s) to be sampled.

AIR MONITORING FOR TOXIC VAPORS, EXPLOSIVE GASES AND OXYGEN DEFICIENT ATMOSPHERES SHOULD BE CONTINUOUS DURING TANK SAMPLING.

Liquids -- Slowly lower the bailer, bacon bomb, Dipstick™, COLIWASA, or Teflon® tubing to the desired sampling depth. (NOTE: In work areas where explosive/flammable atmospheres could occur, peristaltic pumps powered by 12 V. batteries should not be used.) Close the sampling device or create a vacuum and slowly remove the sampling device from

WASTE SAMPLING PROCEDURES

the tank. Release the sample from the device into the sample container. Repeat the procedure until a sufficient sample volume is obtained.

Solids/Semi-Solids - Use a push tube, bucket auger, screw auger, Mucksucker™, or if conditions permit a pneumatic hammer/drill to obtain the sample. Carefully extrude the sample from the sampling device or use a clean stainless steel spoon to place the sample into containers for analyses.

9. Close the tank when sampling is complete. Segregate contaminated sampling equipment and investigative derived wastes (IDW) containing incompatible materials as determined by the screening procedure (Step #6). At a minimum, contaminated equipment should be cleaned with laboratory detergent and rinsed with tap water prior to returning it from the field. IDW should be managed according to Section 5.15, and Region 4's Contaminated Media Policy.

Miscellaneous Contaminated Materials

Sampling may be required of materials or equipment (e.g., documents, building materials, equipment, etc.) to determine whether or not various surfaces are contaminated by hazardous constituents, or to evaluate the effectiveness of decontamination procedures.

Wipe or swab samples may be taken on non-absorbent, smooth surfaces such as metal, glass, plastic, etc. The wipe materials must be compatible with the solvent used and the analyses to be performed, and should not come apart during use. The wipes are saturated with a solvent; methylene chloride, hexane, isopropanol or analyte free water depending on the parameters to be analyzed. The laboratory performing the analyses can provide the appropriate solvent. Wipe samples should not be collected for volatile organic compounds analysis. Sampling personnel should be aware of hazards associated with the selected solvent and should take appropriate precautions to prevent any skin contact or inhalation of these solvents. All surfaces and areas selected for sampling should be based on the study's

WASTE SAMPLING PROCEDURES

objectives. Typically, 10 cm by 10 cm templates are prepared from aluminum foil which are secured to the surface of interest. The prepared (saturated with solvent) wipe(s) is removed from its container with tongs or gloves, and used to wipe the entire area with firm strokes using only one side of the wipe. The goal is to systematically wipe the whole area. The wipe is then folded with the sample side inward and placed into the sample container. This procedure is repeated until the area is free of visible contamination or no more wipes remain. Care should be taken to keep the sample container tightly sealed to prevent evaporation of the solvent. Samplers must also take care to not touch the used side of the wipe.

For items with porous surfaces such as documents (usually business records), insulation, wood, etc., actual samples of the materials are required. It is therefore important, that during the collection and/or analyses of the sample that evidentiary material is not destroyed.

All secondary containing pails will be secured in the vehicles while transporting the samples from the field to the laboratory for analyses. In addition, each pail should indicate when protective equipment is recommended to handle the actual waste/sample material

REFERENCES

United States Environmental Protection Agency. November 2001. *Environmental Investigations Standard Operating Procedures and Quality Assurance Manual*.

Roux FOPs:

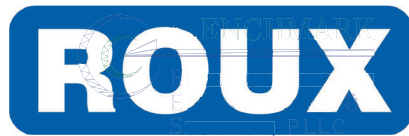
011 *Calibration and Maintenance of Portable Photoionization Detector*

046 *Sample Labeling, Storage and Shipment Procedures*

WASTE SAMPLING PROCEDURES

TABLE 1
SAMPLING EQUIPMENT for VARIOUS WASTE UNITS

Equipment	Waste Units/Phases	Limitations
scoop with bracket/conduit	impoundments, piles, containers, tanks/liquids, solids, sludges	Can be difficult to collect deeper phases in multiphase wastes. Depth constraints.
spoon	impoundments, piles, containers/solids, sludges	Similar limitations as the scoop. Generally not effective in sampling liquids.
push tube	piles, containers/cohesive solids, sludges	Should not be used to sample solids with dimensions $>1/2$ the diameter of the tube. Depth constraints
auger	impoundments, piles, containers / solids	Can be difficult to use in an impoundment or a container, or for solidified wastes.
sediment sampler	impoundments, piles/solids, sludges	Should not be used to sample solids with dimensions $>1/2$ the diameter of the tube.
ponar dredge	impoundments/solids, sludges	Must have means to position equipment to desired sampling location. Difficult to decon.
COLIWASA or drum	impoundments, containers,	Not good with viscous wastes. Devices $> 7'$
thief	tanks/liquids	Require 2 samplers to use effectively.
Dipstick™ /	impoundments, containers,	Not recommended for tanks >11 feet deep.
Mucksucker™	tanks/liquids, sludges	Devices $> 7'$ require 2 samplers to use effectively
bacon bomb	impoundments, tanks/liquids	Not good with viscous wastes.
bailer	impoundments, tanks/liquids	Only if waste is homogeneous. Not good with viscous wastes
peristaltic pump with vacuum jug assembly	impoundments, tanks/liquids	Cannot be used in flammable atmospheres. Not good with viscous wastes
back-hoe bucket	piles/solids, sludges	May be difficult to access desired sampling location. Difficult to decon. Can lose volatiles.
split-spoon	piles/solids	Requires drill rig or direct push equipment.
roto-hammer	piles, containers/solids	Physically breaks up sample. May release volatiles. Not for flammable atmospheres.



FIELD OPERATING PROCEDURES

Calibration & Maintenance of Portable Particulate Meter

**CALIBRATION AND MAINTENANCE OF PORTABLE
PARTICULATE METER**

PURPOSE

This guideline describes a method for calibration of a portable particulate meter, specifically the Thermo Electron Corporation MIE DataRAM 4 (Model DR-4000). The DataRAM 4 measures the concentration of airborne particulate matter (liquid or solid), as well as mean particle size, air temperature, and humidity, providing direct and continuous readout as well as electronic recording of the information. This parameter is of interest both as a general indicator of air quality, and because of its pertinence to community air monitoring typically required at most construction/remediation/investigation sites. The DataRAM covers a wide measurement range from 0.0001 mg/m³ to 400 mg/m³. With its large capacity internal data logging capabilities with data retrieval on screen or downloaded, the DataRAM can store up to 50,000 data points, including individual point averages, particle size, temperature, and humidity with time stamp as well as overall average and maximum concentration.

Because the DataRAM meter must be factory calibrated once a year, this guideline presents a method for start-up, operation, and maintenance, which is performed to verify instrument function. All field instruments will be calibrated, verified and recalibrated at frequencies required by their respective operating manuals or manufacturer's specifications, but not less than once each year. Field personnel should have access to all operating manuals for the instruments used for the field measurements. This procedure also documents critical maintenance activities for this meter. The user should reference the manufacturer's instruction manual prior to operating this unit.

ACCURACY & PRECISION

The calibrated accuracy of the DataRAM 4 particulate meter is within $\pm 2\%$ of reading $\pm$ precision over the temperature range of -4° to 158° F (-10° to 50° C) and 10 to 95% relative humidity (non-condensing). The precision is $\pm 1\%$ of reading or ± 0.001 mg/m³, whichever

CALIBRATION AND MAINTENANCE OF PORTABLE PARTICULATE METER

INSTRUMENT PANEL VIEW



If the DataRAM 4 is to be operated without its charger/power supply, i.e., deriving power from its internal battery, this battery should be fully charged before initiating a run. The

**CALIBRATION AND MAINTENANCE OF PORTABLE
PARTICULATE METER**

DataRAM 4 charger/power supply can be connected continuously to the instrument whether the DataRAM 4 is on or off. If the charger/power supply is not connected, the internal battery will discharge very slowly depending on storage temperature. Low storage temperature reduces battery capacity. High storage temperatures, however, reduce battery life which is of the order of 8 years at 20°C (68°F), and only 2 years at 40°C (104°F).

In general, the user should maintain the battery charge as high as possible in order to extend its charge/discharge cycling capacity (this characteristic differs from that of nickel-cadmium batteries).

Instrument Storage

If the DataRAM 4 is to be stored for an extended period of time (i.e., 3 months or more), place the 3-position switch on the back panel in its OFF position (mid-position), in order to minimize gradual battery discharge. This will have no effect on data retention or internal clock function. It is recommended, however, that the battery be recharged every 3 months in order to prolong battery life.

During storage always snap on quick-connect cap over the instrument inlet to protect the sensing optics from gradual dust contamination. Store DataRAM 4 in a dry environment.

Filter Replacement

To replace either of two types of filters used with DataRAM 4, place the instrument on its back rubber feet (front panel facing upward). On the bottom surface of the DataRAM, locate the large threaded plastic filter cover and holding the cross bar, rotate this cover counterclockwise. Remove cover and the filter holder within the open cavity.

HEPA Filter Cartridge Replacement

The DataRAM 4 is shipped from the factory with the HEPA filter cartridge installed. This cartridge can be identified by its metallic cover. Remove this cartridge. Clean the internal black rubber gasket against which the cartridge is normally compressed. Install new HEPA-type cartridge (MIE part no. MSA-95302) by inserting its wider ridged end first. Reposition threaded plastic cover engaging threads carefully; rotate cover clockwise, hand tightening firmly. Properly dispose of used cartridge to prevent inadvertent re-use.

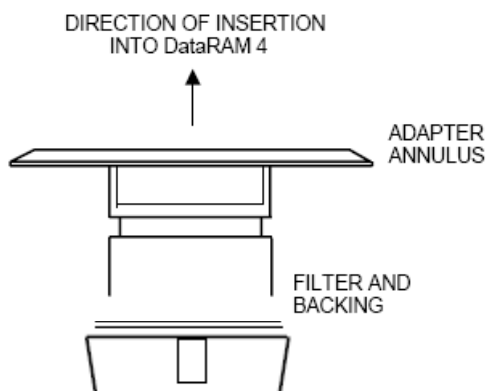
**CALIBRATION AND MAINTENANCE OF PORTABLE
PARTICULATE METER**

Analytic Filter Installation/Replacement

In order to install or replace the analytical filter holder, proceed as follows. Remove the HEPA cartridge normally in place. Remove (separate) the inlet cover (with the blue plug) of the Millipore plastic filter holder from the rest of that holder assembly containing the white membrane filter. Insert firmly the gray plastic adapter annulus into the open face of the filter holder assembly. Remove the red plastic plug from the exhaust nipple of the filter holder assembly. Ensure that all three components of the holder assembly are fully compressed to preclude any leakage. Insert the assembly into the filter cavity of the DataRAM 4 with the gray plastic adapter annulus bearing against the internal black gasket (adapter annulus inserted first). Reposition threaded plastic cover and hand-tighten carefully and firmly. Set aside HEPA cartridge for future use.

In order to remove and/or to replace the membrane filter within its holder, remove the gray plastic adapter annulus and separate (pry apart) the two transparent plastic rings that compress the membrane filter. Make sure to remove and replace only the membrane filter (using tweezers), leaving the white backing disc in the holder. A new membrane filter should then be placed over that backing and the sealing ring should then be inserted to trap and compress the filter and backing discs. For storage, the inlet cap with the blue plug should be inserted as well as the red plug on the back of the filter holder.

Analytical filter holder with adapter annulus inserted



**CALIBRATION AND MAINTENANCE OF PORTABLE
PARTICULATE METER**

Cleaning of Optical Sensing Chamber

Although the DataRAM 4 incorporates filtered air shielding of the critical optical sensing surfaces, continued sampling of airborne particles at high concentrations may result in gradual build-up of contamination on those interior surfaces of the sensing chamber components. This may cause an excessively high optical background level. If this background level does become excessive, the DataRAM 4 will alert the user at the completion of the zeroing sequence by the display of a BACKGROUND HIGH message. If this message is presented, the DataRAM 4 can continue to be operated providing accurate measurements. However, it is then advisable to clean the front surfaces of the optical lenses within the sensing chamber at the first convenient opportunity, as described below. The tools required for this cleaning are: an intense concentrated light source (e.g., flash light) to view the inside of the sensing chamber, denatured alcohol, a soft lint-free cloth, and the special cleaning tool provided with the DataRAM 4 consisting of a cut-off cotton swab inserted in a plastic sleeve and held by a right-angle Allen wrench.

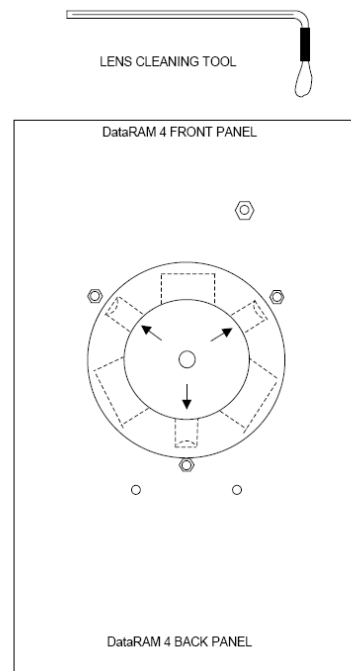
Proceed as follows to clean the lens surfaces within the sensing chamber:

- **Make sure to shut off power completely before proceeding with cleaning**
- Install the stainless steel cover on the inlet of the DataRAM 4 to protect this fitting.
- Place the DataRAM 4 upside down on a table, resting the instrument on the inlet cover and the rear protective bumper.
- Unscrew the gray plastic cover of the filter cavity on the bottom surface of the DataRAM 4.
- Remove the filter cartridge from its cavity.
- Carefully clean the black soft filter-sealing gasket within the filter cavity by wiping it with the lint-free soft cloth. Use alcohol if necessary.
- Shine the concentrated light source into the sensing chamber located about 3 cm (1¼ in.) beyond the soft-sealing gasket in the filter cavity.
- Locate the three smaller side cavities inside the sensing chamber, identified by the arrows on that figure (see page 6). These three cavities contain the lenses of the two sources and the common detector of the DataRAM 4. The frontal surfaces of these lenses are likely to require cleaning if the instrument indicates BACKGROUND HIGH.
- Wet the cotton swab of the lens-cleaning tool with alcohol (e.g., methanol, ethanol, or rubbing alcohol).

**CALIBRATION AND MAINTENANCE OF PORTABLE
PARTICULATE METER**

- Holding the cleaning tool by its long handle, insert this tool into the sensing chamber without touching the walls of this chamber.
- Direct the cotton swab tip towards the opening of one of the three smaller cavities as indicated by the arrows of the figure below, and insert the cotton tip into this cavity as far as it will go. Gently wipe that internal surface touched by the swab tip by a rotating motion. Carefully withdraw the swab tip from the cavity.
- Repeat previous cleaning step for the other two small cavities.
- Carefully remove the cleaning tool from the sensing chamber. Allow the alcohol to dry leaving the filter cavity open for about 15 minutes.
- Re-insert the filter cartridge into its cavity and close it with its gray plastic cover, hand-tightening it firmly. Remove the inlet cap and store on its pod on the back panel.
- Place the DataRAM 4 right side up and key ON. Proceed to check its optical background by running the ZERO/INITIALIZE check as. The message READY! should appear at the end of this check indicating that the lens contamination has been eliminated. Should the message BACKGROUND HIGH persist after completion of the above-described lens cleaning procedure, please contact the factory.

Lens cleaning tool and bottom view of open filter cavity showing location of sensor chamber lens cavities (arrows).



**CALIBRATION AND MAINTENANCE OF PORTABLE
PARTICULATE METER**

FACTORY CALIBRATION

For mass concentration measurements, each DataRAM 4 is factory calibrated against a set of reference monitors that, in turn, are periodically calibrated against a gravimetric standard traceable to the National Institute of Standards and Testing (NIST).

The primary factory reference method consists of generating a dust aerosol by means of a fluidized bed generator, and injecting continuously the dust into a mixing chamber from which samples are extracted concurrently by two reference filter collectors and by two master real-time monitors that are used for the routine calibration of every DataRAM 4.

The primary dust concentration reference value is obtained from the weight increase of the two filters due to the dust collected over a measured period of time, at a constant and known flow rate. The two master real-time monitors are then adjusted to agree with the reference mass concentration value (obtained from averaging the measurements of the two gravimetric filters) to within $\pm 1\%$.

Three primary, NIST traceable, measurements are involved in the determination of the reference mass concentration: the weight increment from the dust collected on the filter, the sampling flow rate, and the sampling time. Additional conditions that must be met are: a) suspended dust concentration uniformity at all sampling inlets of the mixing chamber; b) identical sample transport configurations leading to reference and instrument under calibration; and c) essentially 100% collection efficiency of filters used for gravimetric reference for the particle size range of the test dust.

**CALIBRATION AND MAINTENANCE OF PORTABLE
PARTICULATE METER**

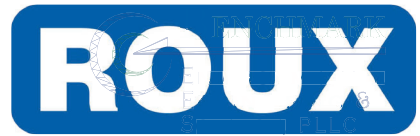
The test dust used for the MIE factory calibration of the DataRAM 4 is SAE Fine (ISO Fine) supplied by Powder Technology, Inc. It has the following physical characteristics (as dispersed into the mixing chamber):

- Mass median aerodynamic particle diameter: 2 to 3 μm
- Geometric standard deviation of lognormal size distribution: 2.5
- Bulk density: 2.60 to 2.65 g/cm³
- Refractive index: 1.54

In addition to the mass calibration described above, the DataRAM 4 is factory calibrated using a gas with known scattering coefficient in order to adjust the relative scattering irradiance at the two source wavelengths.

ATTACHMENTS

None



FIELD OPERATING PROCEDURES

Field Quality Control Procedures

FIELD QUALITY CONTROL PROCEDURES

PURPOSE

In addition to traditional environmental samples (e.g., soil, groundwater, wipe, vapor etc.) described in each project work plan, site-specific field quality assurance/quality control (QA/QC) samples are typically collected and analyzed to support the required third-party data usability assessment effort of a project. Site-specific QA/QC samples generally include matrix spikes, matrix spike duplicates, blind duplicates (where appropriate), and trip blanks which accompany aqueous volatile organic compound (VOC) samples only.

The number of QA/QC field samples (blind duplicate, matrix spike/matrix spike duplicate, trip blank, field blank, or equipment blank) will be designated prior to field mobilization, but final QC sample locations will be contingent upon field conditions. This procedure outlines and discusses each QA/QC sample that may be required during a project.

PROCEDURE

A brief summary of each QA/QC sample identified above is presented below. Where appropriate, the procedure to be used to collect these samples is also presented.

- **Trip Blanks** – A sufficient number of trip blanks for VOC analysis must be prepared by the laboratory and delivered to the sampling team prior to a sampling event, typically two or three 40-ml VOA vials with organic free reagent water. One sealed blank will be carried into the field per day along with the sample containers for each day that water matrix volatile organic samples are collected. Trip blanks will be transported and handled in the same manner as the actual samples. The results of the trip blank analysis will be reviewed to evaluate if the potential for sample contamination during transportation and handling exists. The trip blanks will be analyzed for the same VOCs (and method) as the project groundwater samples.
- **Blind Duplicate** – One blind duplicate must be collected and analyzed per 20 samples collected per matrix (i.e., soil, groundwater, soil vapor, etc.). The location

FIELD QUALITY CONTROL PROCEDURES

of the sample collection point will not be disclosed to the analytical laboratory, therefore the field sample containers will be returned to the laboratory identified only as the “blind duplicate.” The well or sample location will be recorded in the Project Field Book or handheld RuggedReader® Pocket PC and on the field data sheets, and the results will be compared to review analytical precision. Sample analysis will be identical to the original sample per the project work plan. The Blind Duplicate sample must be collected simultaneously from the same source under identical conditions as the original sample.

- **Matrix Spike/Matrix Spike Duplicate (MS/MSD)** – A sufficient volume of sample will be collected at one sampling location per sampling event for MS/MSD analysis per matrix (i.e., soil and groundwater only). The laboratory will report the results of the MS/MSD analysis, which will be reviewed for sampling and analysis precision and accuracy. Sample analysis will be identical to the original sample per the project work plan. The MS/MSD sample must be collected simultaneously from the same source under identical conditions as the original sample.
- **Equipment (Rinsate) Blank** – In general, dedicated sampling equipment is used to minimize field decontamination time and avoid the need for equipment blanks; however there may be instances where the use of non-dedicated equipment cannot be avoided. An equipment blank will be collected for each day of sampling activity when non-dedicated sampling equipment is used. These equipment blank samples will be used as a QC check of the decontamination procedures for sampling equipment. Sample analysis for the equipment blank will consist of the most comprehensive parameter list used for risk assessment in which the non-dedicated equipment was used for environmental sample collection. During most projects, every effort to use dedicated sampling equipment should be made in order to minimize field decontamination time and avoid the need for equipment blanks. Equipment Blank sampling procedure is as follows:
 - Non-dedicated equipment are to be decontaminated in accordance with Roux’s Non-disposable and Non-dedicated Sampling Equipment Decontamination procedures prior to use in the field. If organic-free

FIELD QUALITY CONTROL PROCEDURES

- deionized water (generally provided by the laboratory) is not available for decontamination, equipment will be allowed to thoroughly air dry.
- Once properly rinsed or allowed to air dry, analyte-free water (provided by the laboratory) is poured appropriately over or through the decontaminated sample collection device, collected in a sample container, and returned to the laboratory as a sample.
 - **Field Blank** – A field blank is a sample of the unused final decontamination rinse water that is collected at the sampling site and returned to the laboratory as a sample. Sample analysis for the field blank will consist of the most comprehensive parameter list used during the investigation.
 - **Split Sample** – A split sample is a sample that has been portioned into two or more containers from a single sample container or sample mixing container. Samples for VOC analysis should never be mixed prior to splitting.
 - **Blank Wipe Samples** – There are two types of blank wipe samples, an equipment blank and a field blank that may be required per the project work plan, both are described below:
 - Equipment Blank – Required only if reusable templates are used for wipe sample collection. The decontaminated template is wiped with a hexane saturated swab. The swab is placed in the appropriate sample container and returned to the laboratory as a sample.
 - Field Blank – Clean disposable gloves are wiped with a hexane saturated swab. The swab is placed in the appropriate sample container and returned to the laboratory as a sample.

REFERENCES

Roux FOPs:

040 *Non-disposable and Non-dedicated Sampling Equipment Decontamination*

APPENDIX I

QUALITY ASSURANCE PLAN

QUALITY ASSURANCE PROJECT PLAN

**FORMER DAYS INN SITE
23 RIVERSIDE DRIVE
CORNING, NEW YORK
SITE NO. 851054**

February 2016

0353-015-001

Prepared for:

Fitzpatrick Holdings, Inc.

Prepared By:

Roux Environmental Engineering & Geology, D.P.C.
2558 Hamburg Turnpike, Suite 300
Buffalo, New York

QUALITY ASSURANCE PROJECT PLAN (QAPP)

Former Days Inn Site
23 Riverside Drive
Corning, New York
Site No. 851054
Table of Contents

1.0	INTRODUCTION.....	1
1.1	Site Location and Description.....	1
1.2	Scope of the QAPP	1
2.0	PROJECT ORGANIZATION AND RESPONSIBILITY.....	3
2.1	NYSDEC and NYSDOH	3
2.2	Property Owner	3
2.3	Project Manager	3
2.4	Field Team Leader:	4
2.5	Quality Assurance (QA) Officer	5
2.6	Laboratory Responsibilities	5
3.0	QUALITY ASSURANCE OBJECTIVES FOR MEASUREMENT DATA	7
3.1	Level of QC Effort for Sample Parameters.....	7
4.0	SAMPLE CUSTODY PROCEDURES	9
4.1	Field Custody Procedures	9
4.1.1	<i>Sample Storage</i>	9
4.1.2	<i>Sample Custody</i>	9
4.1.3	<i>Sample Tracking</i>	11
5.0	CALIBRATION PROCEDURES AND FREQUENCY	12
5.1	Field Instrument Calibration	12
5.2	Preventative Maintenance	12
6.0	DATA VALIDATION AND REPORTING	13
6.1	Data Usability Evaluation	13
6.1.1	<i>Procedures Used to Evaluate Field Data Usability</i>	13
6.1.2	<i>Procedures Used to Evaluate Laboratory Data Usability</i>	13
6.2	Data Reporting	14
6.2.1	<i>Field Data Reporting</i>	14
6.2.2	<i>Laboratory Data Reporting</i>	14
7.0	CORRECTIVE ACTION.....	15
7.1	Field Corrective Action.....	15
7.2	Laboratory Corrective Action	16
7.3	Data Validation & Assessment Corrective Action	16

QUALITY ASSURANCE PROJECT PLAN (QAPP)

**Former Days Inn Site
23 Riverside Drive
Corning, New York
Site No. 851054
Table of Contents**

LIST OF TABLES

Table 1	Sample Container, Volume, Preservative, and Holding Time Requirements

1.0 INTRODUCTION

This Quality Assurance Project Plan (QAPP) is an appendix to the Site Management Plan (SMP), which is required as an element of the remedial program at the Former Days Inn Site (hereinafter referred to as the “Site”) under the New York State (NYS) Inactive Hazardous Waste Program (IHWP), administered by New York State Department of Environmental Conservation (NYSDEC).

1.1 Site Location and Description

The Site is located at 23 Riverside Drive, in the City of Corning, Steuben County, New York. It is the location of the former Days Inn Hotel and has been redeveloped as a Hilton Gardens Inn hotel by Fitzpatrick Holdings, Inc. The Site is approximately 1.35-acre area and is bounded by a commercial property to the north, Riverside Drive to the south, commercial properties to the east, and Ferris Street to the west.

1.2 Scope of the QAPP

This QAPP was prepared to provide quality assurance (QA) guidelines to be implemented post-remedial activities. The QAPP will assure the accuracy and precision of data collection during post-remedial Site redevelopment and data interpretation. The QAPP identifies procedures for sample collection to mitigate the potential for cross-contamination, as well as analytical requirements necessary to allow for independent data validation. The QAPP has been prepared in accordance with USEPA’s Requirements for Quality Assurance Project Plans for Environmental Data Operations; the EPA Region II CERCLA Quality Assurance Manual, and NYSDEC’s DER-10 Technical Guidance for Site Investigation and Remediation (May 2010). This document may be modified for subsequent phases of investigative work, as necessary.

The QAPP provides:

- A means to communicate to the persons executing the various activities exactly what is to be done, by whom, and when;

- A culmination to the planning process that ensures that the program includes provisions for obtaining quality data (e.g., suitable methods of field operations);
- A document that can be used by the Project Manager's and QA Officer to assess if the activities planned are being implemented and their importance for accomplishing the goal of quality data;
- A plan to document and track project data and results; and,
- Detailed descriptions of the data documentation materials and procedures, project files, and tabular and graphical reports.

The QAPP is primarily concerned with the quality assurance and quality control aspects of the procedures involved in the collection, preservation, packaging, and transportation of samples; field testing; record keeping; data management; chain-of-custody procedures; laboratory analyses; and other necessary matters to assure that the investigation activities, once completed, will yield data whose integrity can be defended.

QA refers to the conduct of all planned and systematic actions necessary to perform satisfactorily all task-specific activities and to provide information and data confidence as a result of such activities. The QA for task-specific activities includes the development of procedures, auditing, monitoring and surveillance of the performance.

QC refers to the activity performed to determine if the work activities conform to the requirements. This includes activities such as inspections of the work activities in the field (e.g., verification that the items and materials installed conform to applicable codes and design specifications). QA is an overview monitoring of the performance of QC activities through audits rather than first time inspections.

2.0 PROJECT ORGANIZATION AND RESPONSIBILITY

The following section provides a generic organization for sampling activities, including roles, responsibilities, and required qualifications of these organizations.

2.1 NYSDEC and NYSDOH

It is the responsibility of the New York State Department of Environmental Conservation (NYSDEC), in conjunction with the New York State Department of Health, to review the project documents for completeness and conformance with the site-specific cleanup objectives and to make a decision to accept or reject these documents based on this review. The NYSDEC also has the responsibility and authority to review and approve all QA documentation collected during brownfield cleanup construction and to confirm that the QA Plan was followed.

2.2 Property Owner

The property owner (Owner), or remedial party (RP) will be responsible for complying with the QA requirements as specified herein and for monitoring and controlling the quality of cleanup activities either directly or through their designated environmental consultant and/or legal counsel. The Owner will also have the authority to select Contractor(s) to assist them in fulfilling these responsibilities. The Owner is responsible for implementing the project, and has the authority to commit the resources necessary to meet project objectives and requirements.

2.3 Project Manager

The Project Manager has the responsibility for ensuring that the project meets the overall project objectives, reports directly to the Owner, coordinates with the NYSDEC/NYSDOH Project Coordinators, and is responsible for technical and project oversight. The PM will:

- o Define project objectives and develop a detailed work plan schedule.
- o Establish project policy and procedures to address the specific needs of the project as a whole, as well as the objectives of each task.

- o Acquire and apply technical and corporate resources as needed to assure performance within budget and schedule constraints.
- o Develop and meet ongoing project and/or task staffing requirements, including mechanisms to review and evaluate each task product.
- o Review the work performed on each task to assure its quality, responsiveness, and timeliness.
- o Review and analyze overall task performance with respect to planned requirements and authorizations.
- o Review and approve all deliverables before their submission to NYSDEC.
- o Develop and meet ongoing project and/or task staffing requirements, including mechanisms to review and evaluate each task product.
- o Ultimately be responsible for the preparation and quality of interim and final reports.
- o Represent the project team at meetings.

2.4 Field Team Leader:

The Field Team Leader (FTL) has the responsibility for implementation of specific project tasks identified at the Site, and is responsible for the supervision of project field personnel, subconsultants, and subcontractors. The FTL reports directly to the Project Manager. The FTL will:

- o Define daily develop work activities.
- o Orient field staff concerning the project's special considerations.
- o Monitor and direct subcontractor personnel.
- o Review the work performed on each task to ensure its quality, responsiveness, and timeliness.
- o Assure that field activities, including sample collection and handling, are carried out in accordance with this QAPP.

2.5 Quality Assurance (QA) Officer

The QA Officer will have direct access to corporate executive staff as necessary, to resolve any QA dispute, and is responsible for auditing the implementation of the QA program in conformance with the demands of specific investigations and policies, and NYSDEC requirements. Specific function and duties include:

- o Performing QA audits on various phases of the field operations.
- o Reviewing and approving QA plans and procedures.
- o Providing QA technical assistance to project staff.
- o Reporting on the adequacy, status, and effectiveness of the QA program on a regular basis to the Project Manager for technical operations.
- o Responsible for assuring third party data review of all sample results from the analytical laboratory.

2.6 Laboratory Responsibilities

Any environmental laboratory utilized for sample analysis for this Site must be an independent, NY State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP)-certified facility approved to perform the analyses prescribed herein.

- Laboratory Director:

The Laboratory Director is a technical advisor and is responsible for summarizing and reporting overall unit performance. Responsibilities of the TestAmerica Laboratory Director include:

- o Provide technical, operational, and administrative leadership.
- o Allocation and management of personnel and equipment resources.
- o Quality performance of the facility.
- o Certification and accreditation activities.
- o Blind and reference sample analysis.

- *Quality Assurance Manager (QA Manager):*

The QA Manager has the overall responsibility for data after it leaves the laboratory. The QA Manager will be independent of the laboratory but will communicate data issues through the Laboratory Director. In addition, the QA Manager will:

- o Oversee laboratory QA.
- o Oversee QA/QC documentation.
- o Conduct detailed data review.
- o Determine whether to implement laboratory corrective actions, if required.
- o Define appropriate laboratory QA procedures.
- o Prepare laboratory SOPs.

3.0 QUALITY ASSURANCE OBJECTIVES FOR MEASUREMENT DATA

The overall objectives and criteria for assuring quality for this effort are discussed below. This QAPP addresses how the acquisition and handling of samples and the review and reporting of data will be documented. The objectives of this QAPP are to address the following:

- The procedures to be used to collect, preserve, package, and transport soil, groundwater and air samples.
- Field data collection.
- Record keeping.
- Data management.
- Chain-of-custody procedures.
- Precision, accuracy, completeness, representativeness, for sample analysis and data management under EPA analytical methods.

3.1 Level of QC Effort for Sample Parameters

Field blank, method blank, trip blank, field duplicate, laboratory duplicate, laboratory control, standard reference materials (SRM) and matrix spike samples will be analyzed to assess the quality of the data resulting from the field sampling and analytical programs. QC samples are discussed below.

- Field and trip blanks consisting of distilled water will be submitted to the analytical laboratories to provide the means to assess the quality of the data resulting from the field-sampling program. Field (equipment) blank samples are analyzed to check for procedural chemical constituents at the facility that may cause sample contamination. Trip blanks are used to assess the potential for contamination of samples due to contaminant migration during sample shipment and storage.
- Method blank samples are generated within the laboratory and used to assess contamination resulting from laboratory procedures.

- Duplicate samples are analyzed to check for sampling and analytical reproducibility.
- MS/MSD and MS/Duplicate samples provide information about the effect of the sample matrix on the digestion and measurement methodology. Depending on site-specific circumstances, one MS/MSD or MS/Duplicate should be collected for every 20 or fewer investigative samples to be analyzed for organic and inorganic chemicals of a given matrix.

The general level of QC effort will be one field (blind) duplicate and one field blank (when non-dedicated equipment is used) for every 20 or fewer investigative samples of a given matrix. Additional sample volume will also be provided to the laboratory to allow one site-specific MS/MSD or MS/Duplicate for every 20 or fewer investigative samples of a given matrix. One trip blank consisting of distilled, deionized water will be included along with each sample delivery group of aqueous VOC samples.

4.0 SAMPLE CUSTODY PROCEDURES

Sample custody is controlled and maintained through the chain-of-custody procedures. Chain of custody is the means by which the possession and handling of samples will be tracked from the source (field) to their final disposition, the laboratory. A sample is considered to be in a person's custody if it is in the person's possession or it is in the person's view after being in his or her possession or it was in that person's possession and that person has locked it in a vehicle or room. Sample containers will be cleaned and preserved at the laboratory before shipment to the Site.

4.1 Field Custody Procedures

Sample custody is controlled and maintained through the chain-of-custody procedures. Chain of custody is the means by which the possession and handling of samples will be tracked from the source (field) to their final disposition, the laboratory. A sample is considered to be in a person's custody if it is in the person's possession or it is in the person's view after being in his or her possession or it was in that person's possession and that person has locked it in a vehicle or room. Sample containers will be cleaned and preserved at the laboratory before shipment to the Site.

4.1.1 Sample Storage

Samples are stored in secure limited-access areas. Walk-in coolers or refrigerators are maintained at 4°C, $\pm$ 2°C, or as required by the applicable regulatory program. The temperatures of all refrigerated storage areas are monitored and recorded a minimum of once per day. Deviations of temperature from the applicable range require corrective action, including moving samples to another storage location if necessary. Sample parameter lists, holding times and sample container requirements are summarized on Table 1.

4.1.2 Sample Custody

Sample custody is defined by this document as when any of the following occur:

- It is in someone's actual possession.
- It is in someone's view after being in his or her physical possession.

- It was in someone's possession and then locked, sealed, or secured in a manner that prevents unsuspected tampering.
- It is placed in a designated and secured area.

Samples are removed from storage areas by the sample custodian or analysts and transported to secure laboratory areas for analysis. Access to the laboratory and sample storage areas is restricted to laboratory personnel and escorted visitors only; all areas of the laboratory are therefore considered secure. If required by the applicable regulatory program, internal chain-of-custody is documented in a log by the person moving the samples between laboratory and storage areas.

Laboratory documentation used to establish COC and sample identification may include the following:

- Field COC forms or other paperwork that arrives with the sample.
- The laboratory COC.
- Sample labels or tags are attached to each sample container.
- Sample custody seals.
- Sample preparation logs (i.e., extraction and digestion information) recorded in hardbound laboratory books that are filled out in legible handwriting, and signed and dated by the chemist.
- Sample analysis logs (e.g., metals, GC/MS, etc.) information recorded in hardbound laboratory books that are filled out in legible handwriting, and signed and dated by the chemist.
- Sample storage log (same as the laboratory COC).
- Sample disposition log, which documents sample disposal by a contracted waste disposal company.

4.1.3 Sample Tracking

All samples are maintained in the appropriate coolers prior to and after analysis. The analysts remove and return their samples as needed. Samples that require internal COC are relinquished to the analysts by the sample custodians. The analyst and sample custodian must sign the original COC relinquishing custody of the samples from the sample custodian to the analyst. When the samples are returned, the analyst will sign the original COC returning sample custody to the sample custodian. Sample extracts are relinquished to the instrumentation analysts by the preparatory analysts. Each preparation department tracks internal COC through their logbooks/spreadsheets.

Any change in the sample during the time of custody will be noted on the COC (e.g., sample breakage or depletion).

5.0 CALIBRATION PROCEDURES AND FREQUENCY

This section describes the calibration procedures and the frequency at which these procedures will be performed for both field and laboratory instruments.

5.1 Field Instrument Calibration

Quantitative field data to be obtained during groundwater sampling include pH, turbidity, specific conductance, temperature, dissolved oxygen and depth to groundwater. Quantitative water level measurements will be obtained with an electronic sounder or steel tape, which require no calibration. Quantitative field data to be obtained during soil sampling include screening for the presence of volatile organic constituents using a photoionization detector (PID).

5.2 Preventative Maintenance

Each piece of field equipment is checked according to its routine maintenance schedule and before field activities begin. Field equipment that may be used at the Site includes:

- Photoionization detector (PID)
- Water quality meters (includes pH, turbidity, temperature, Eh, and specific conductance)
- Electric water level indicator

Field personnel will report all equipment maintenance and/or replacement needs to the Project QA Officer and will record the information on the daily field record.

6.0 DATA VALIDATION AND REPORTING

All data generated through field activities, or by the laboratory operation shall be reduced and validated (as required in the SMP) before reported.

6.1 Data Usability Evaluation

If requested by the NYSDEC, data evaluation will be performed by a third party data validator using the most current methods and quality control criteria from the USEPA's Contract Laboratory Program (CLP) *National Functional Guidelines for Organic Data Review*, and Contract Laboratory Program, *National Functional Guidelines for Inorganic Data Review*.

6.1.1 Procedures Used to Evaluate Field Data Usability

The performance of all field activities, calibration checks on all field instruments at the beginning of each day of use, manual checks of field calculations, checking for transcription errors and review of field log books is the responsibility of the Field Team Leader.

6.1.2 Procedures Used to Evaluate Laboratory Data Usability

Data evaluation will be performed by the third party data validator using the most current methods and quality control criteria from the USEPA's Contract Laboratory Program (CLP) *National Functional Guidelines for Organic Data Review*, and Contract Laboratory Program, *National Functional Guidelines for Inorganic Data Review*. The data review guidance will be used only to the extent that it is applicable to the SW-846 methods; SW-846 methodologies will be followed primarily and given preference over CLP when differences occur. Also, results of blanks, surrogate spikes, MS/MSDs, and laboratory control samples will be reviewed/evaluated by the data validator. All sample analytical data for each sample matrix shall be evaluated. The third party data validation expert will also evaluate the overall completeness of the data package. Completeness checks will be administered on all data to determine whether deliverables specified in this QAPP are present. The reviewer will determine whether all required items are present and request copies of missing deliverables.

6.2 Data Reporting

6.2.1 Field Data Reporting

All field documents will be accounted for when they are completed. Accountable documents include items such as field notebooks, sample logs, field data records, photographs, data packages, computer disks, and reports.

6.2.2 Laboratory Data Reporting

Analytical data will be summarized in tabular format with such information as sample identification, sample matrix description, parameters analyzed and their corresponding detected concentrations, and the detection limit. Analytical results will be incorporated into reports as data tables, maps showing sampling locations and analytical results, and supporting text.

7.0 CORRECTIVE ACTION

Corrective action is the process of identifying, recommending, approving, and implementing measures to counter unacceptable procedures or out of quality control performance that can affect data quality. Corrective action can occur during field activities, laboratory analyses, data validation, and data assessment. All corrective action proposed and implemented should be documented in the regular quality assurance reports to management. Corrective action should be implemented only after approval by the Project Manager, or his/her designee. If immediate corrective action is required, approvals secured by telephone from the Project Manager should be documented in an additional memorandum.

7.1 Field Corrective Action

If errors in field procedures are discovered during the observation or review of field activities by the Project QA Officer or his/her designee, corrective action will be initiated. Nonconformance to the QA/QC requirements of the field operating procedures will be identified by field audits or immediately by project staff who know or suspect that a procedure is not being performed in accordance with the requirements. The Project QA Officer or his designee will be informed immediately upon discovery of all deficiencies. Timely action will be taken if corrective action is necessary.

Corrective action in the field may be needed when the sample network is changed (i.e., more/less samples, sampling locations other than those specified in the Work Plan, etc.) or when sampling procedures and/or field analytical procedures require modification due to unexpected conditions. In general, the Project Manager and QA Officer may identify the need for corrective action. The Project Manager will approve the corrective measure that will be implemented by the field team. It will be the responsibility of the Project Manager to ensure that corrective action has been implemented.

If the corrective action will supplement the existing sampling using existing and approved procedures in the QAPP, corrective action approved by the Project Manager will be documented. If the corrective actions result in less samples (or analytical fractions), alternate locations, etc., which may result in non-achievement of project QA objectives, it will be necessary that all levels of project management, including the NYSDEC Project Coordinator, concur with the proposed action.

Corrective actions will be implemented and documented in the project field record book. No staff member will initiate corrective action without prior communication of findings through the proper channels. If corrective actions are insufficient, work may be stopped by the NYSDEC Project Coordinator.

If at any time a corrective action issue is identified which directly impacts project data quality objectives, the NYSDEC Project Coordinator will be notified immediately.

7.2 Laboratory Corrective Action

Corrective actions may be initiated if the quality assurance goals are not achieved. The initial step in a corrective action is to instruct the analytical laboratory to examine its procedures to assess whether analytical or computational errors caused the anomalous result. If no error in laboratory procedures or sample collection and handling procedures can be identified, then the Project Manager will assess whether reanalysis or resampling is required or whether any protocol should be modified for future sampling events.

7.3 Data Validation & Assessment Corrective Action

The need for corrective action may be identified during the data validation or assessment processes. Potential types of corrective action may include resampling by the field team, or reinjection/reanalysis of samples by the laboratory.

These actions are dependent upon the ability to mobilize the field team, whether the data to be collected is necessary to meet the QA objectives (e.g., the holding time for samples is not exceeded, etc.). If the data validator identifies a corrective action situation, the Project Manager will be responsible for approving the corrective action implementation. All required corrective actions will be documented by the laboratory Quality Assurance Coordinator.

TABLE

TABLE 1**SAMPLE CONTAINER, VOLUME, PRESERVATION &
HOLDING TIME REQUIREMENTS****SITE MANAGEMENT PLAN****Former Days Inn Site
Corning, New York**

Matrix	Parameter ¹	Method	Container Type	Minimum Volume	Preservation (Cool to 2-4 °C for all samples)	Holding Time from Sample Date
Soil/Fill	Part 375 VOCs	8260B	WMG	4 oz.	Cool to 2-4 °C, Zero Headspace	14 days
	Part SVOCs	8270C	WMG	8 oz.	Cool to 2-4 °C	14 days extrac./40 days
	Part 375 Metals	6010B/7470A	WMG	8 oz.	Cool to 2-4 °C	6 months/Hg 28 days
	PCBs	8082	WMG	4 oz.	Cool to 2-4 °C	14 days extrac./40 days

References:

1. Test Methods for Evaluating Solid Wastes, USEPA SW-846, Update III, 1991.

Acronyms:

VOCs = Volatile Organic Compounds
SVOCs = Semi-Volatile Organic Compounds
TICs = Tentatively Identified Compounds
PCBS = Polychlorinated Biphenyls
WMG = Wide Mouth Glass