



April 04, 2025

Diana Jakimoski  
Coventry Commons, LLC  
1201 East Fayette Street., Ste 26  
Syracuse, NY 13210

**Re: Revised 'Excavation Work Plan'  
Coventry Commons, 859036  
Village of Newark, Wayne County, New York**

Diana,

The New York State Department of Environmental Conservation – Division of Environmental Remediation (NYSDEC-DER) and New York State Department of Health – Bureau of Environmental Exposure Investigation (NYSDOH-BEEI), collectively referred to as the Departments, have completed their review of the revised 'Excavation Work Plan' (EWP) (electronically signed and received on April 03, 2025) as prepared by C&S Engineers, Inc.

In accordance with Title 6 of the New York Codes, Rules, and Regulations (NYCRR) part 375-1.6, the Departments have determined that the EWP substantially addresses the requirements of the Inactive Hazardous Waste Disposal Site Program (State Superfund) and the EWP is hereby **approved**.

Please contact me at [Joshuah.Klier@dec.ny.gov](mailto:Joshuah.Klier@dec.ny.gov) or at (585) 226-5357 to discuss any questions or concerns regarding this letter. Thank you for your continued efforts on this project.

Sincerely,

Joshuah J. Klier, G.I.T.  
Assistant Geologist | Project Manager  
*New York State Department of Environmental Conservation  
Division of Environmental Remediation  
Region 8 – Hazardous Waste Remediation*

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**C&S Engineers, Inc.**  
499 Colonel Eileen Collins Blvd.  
Syracuse, New York 13212



# Excavation Work Plan (EWP)

**Coventry Commons**  
**130-132 Harrison Street, Newark, New York**  
**NYSDEC Site No. 859036**

Prepared for:



Coventry Commons LLC  
1201 East Fayette Street  
Syracuse, New York

**Final Submitted: April 3, 2025**  
Draft Submitted: March 6, 2025

C&S Project No. W96.007.009

# Excavation Work Plan (EWP)

**Coventry Commons  
130-132 Harrison Street  
Newark, Wayne County, New York  
NYSDEC Site No. 859036**

Prepared by:



C&S Engineers, Inc.  
499 Colonel Eileen Collins Blvd  
Syracuse, New York 13212

Prepared for:



Coventry Commons LLC  
1201 East Fayette Street  
Syracuse, New York

I, H. Nevin Bradford, certify that I am currently a NYS registered professional engineer or Qualified Environmental Professional as defined in 6 NYCRR Part 375 and that this Work 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) and DER Green Remediation (DER-31).

A handwritten signature in blue ink that reads 'H. Nevin Bradford'.

H. Nevin Bradford  
State of New York Professional Engineer No. 086008



April 3, 2025

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Figure 2	Site Map

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Appendix A	Request to Import/Reuse Fill or Soil Form
Appendix B	Standard E&S Details and Specifications
Appendix C	Health and Safety Plan
Appendix D	Community Air Monitoring Plan
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## ACRONYMS

**CAMP** – Community Air Monitoring Program

**COC** – Certificate of Completion

**CVOC** – Chlorinated Volatile Organic Compound

**C&D** – Construction and Demolition

**EPA** – United States Environmental Protection Agency

**ESA** – Environmental Site Assessment

**EWP** – Excavation Work Plan

**HASP** – Health and Safety Plan

**ms/msd** – Matrix Spike / Matrix Spike Duplicate

**NYSDEC** – New York State Department of Environmental Conservation

**NYSDOH** – New York State Department of Health

**PCB** – Polychlorinated Biphenyl

**PCE** – Tetrachloroethylene

**PE** – Professional Engineer

**PFAS** – Polyfluoroalkyl Substances

**PID** – Photoionization Detector

**ppb** – Parts Per Billion

**ppm** – Parts Per Million

**QA/QC** – Quality Assurance / Quality Control

**QEP** – Qualified Environmental Professional

**SCO** – Soil Cleanup Objective

**SMP** – Site Management Plan

**SPDES** – State Pollutant Discharge Elimination System

**SSDS** – Sub-slab Depressurization System

**TAL** – Target Analyte List

**TCE** – Trichloroethylene

**TCL** – Target Compound List

**TOGS** – Division of Water Technical and Operational Guidance Series

**UST** – Underground Storage Tank

**ug/L** – Microgram Per Liter

**VOC** – Volatile Organic Compound

**wci** – Water Column Inches

## NOTIFICATION

This Excavation Work Plan (EWP) is a required element of the remedial program for the Coventry Commons site located in Newark, New York (hereinafter referred to as the “Site”). The Site location is provided in **Figure 1**. The Site is currently listed as a potential inactive hazardous waste disposal site, Site No. 859036. Coventry Commons, LLC., entered into an Order on Consent on February 24, 2025 with the New York State Department of Environmental Conservation (NYSDEC or Department) to investigate the Site. A figure showing the site location and boundaries of this site is provided in **Figure 2**. This EWP has been developed to establish guidelines and requirements to protect human health and the environment for all non-remedial work including, but not limited to:

- Demolition, alteration, or any other disturbances to building slabs, asphalt driveways, or other hardscape features
- All excavations
- Site grading
- Intrusive events which will disturb or otherwise come into contact potentially contaminated media

Remedial investigations and remedial actions are not subject to this guidance and must be conducted in accordance with a work plan which has been reviewed and approved by the New York State Department of Environmental Conservation – Division of Environmental Remediation (NYSDEC-DER) and the New York State Department of Health – Bureau of Environmental Exposure Investigation (NYSDOH-BEEI) project managers for the Site.

At least 15 days prior to the start of any of the above referenced activities, the site owner or their representative will notify the NYSDEC-DER and NYSDOH-BEEI project managers listed in the table below. These activities will not proceed without subsequent approval from the NYSDEC-DER and NYSDOH-BEEI project managers for the Site. **Table 1** includes contact information for notifications, and it will be updated as necessary to provide accurate contact information.

**Table 1: Notifications**

Name	Contact Information
NYSDEC - Project Manager Josh Klier	(585) 226-5357 <a href="mailto:Joshuah.Klier@dec.ny.gov">Joshuah.Klier@dec.ny.gov</a>
NYSDEC Project Manager Supervisor David Pratt	(585) 226-5449 <a href="mailto:David.Pratt@dec.ny.gov">David.Pratt@dec.ny.gov</a>
NYSDEC Site Control Kelly Lewandowski	(518) 402-9547 <a href="mailto:kelly.lewandowski@dec.ny.gov">kelly.lewandowski@dec.ny.gov</a>
NYSDOH Project Manager Megan Rivera	(518) 402-7877 <a href="mailto:Megan.Rivera@health.ny.gov">Megan.Rivera@health.ny.gov</a>

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

**Table 2: Site Contacts**

Name	Contact Information
Coventry Commons, LLC – Project Manager Diana Jakimoski	(315) 472-3820 <a href="mailto:djakimoski@housingvisions.org">djakimoski@housingvisions.org</a>
Allen & Desnoyers LLP – Legal Council Dale Desnoyers	(518) 426-2288 <a href="mailto:dale@allendesnoyers.com">dale@allendesnoyers.com</a>
C&S Engineers – Environmental Consultant Matt Walker	(315) 703-4323 <a href="mailto:mawalker@cscos.com">mawalker@cscos.com</a>

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, any modifications of truck routes, 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, and submittals (e.g., reports) to the NYSDEC documenting the completed intrusive work;**
- A summary of the applicable components of this EWP;
- A statement that the work will be performed in compliance with this EWP, 29 CFR 1910.120 and 29 CFR 1926 Subpart P;
- **A copy of the contractor’s health and safety plan (HASP), in electronic format, if it differs from the HASP appended to this Work Plan (provided as **Appendix C**);**
- Identification of disposal facilities for potential waste streams; and
- Identification of sources of any anticipated backfill, along with the required request to import form and all supporting documentation including, but not limited to, chemical testing results.

The NYSDEC project manager will review the notification and may impose additional requirements for the excavation that are not listed in this EWP.

## 1. BACKGROUND

This Excavation Work Plan has been prepared to define the methods to be employed to protect human health and the environment during all non-remedial invasive work as described in the notifications section. The following invasive activities are planned:

- Trenching for utility installation
- Excavation for subgrade building infrastructure
- Elevator pit excavation
- Limited existing subgrade building infrastructure removal
- Site grading for greenspace and parking

The location of the Site is shown on **Figure 1**.

## 2. NATURE AND EXTENT OF KNOWN CONTAMINATION

There were numerous historical operations at the Site that were significant with respect to the potential for environmental concerns. These included a machine shop, wastewater facility, and boiler room in the northwest portion of the Main Building, tinware manufacturing in the western portion of the Main Building, and cosmetics manufacturing in the eastern portion of the Main Building. In addition, underground storage tanks (USTs) were present on the north exterior. The locations of these former operations / features are shown on **Figure 2**.

### Soil

Soil exhibiting nuisance conditions such as staining, odors, and detectable photoionization detector (PID) readings are present in the vicinity of the former USTs on the northwest portion of the Site. The associated spill was closed by NYSDEC in 2022.

### Groundwater

Tetrachloroethene (PCE) and trichloroethene (TCE) are present in shallow groundwater, at levels below the NYSDEC Technical and Operational Guidance Series (TOGS) ambient water quality standard of 5 parts per billion (ppb). A Phase II Environmental Site Assessment (ESA) in 2023 included the advancement of 15 soil borings and the analysis of 15 soil samples for volatile organic compounds (VOCs). However, no apparent Chlorinated VOC (CVOC) soil source areas were identified.

Per- and polyfluoroalkyl substances (PFAS) are present at low concentrations in shallow groundwater. PFOS ranges from 0.0275 to 0.035 micrograms per liter (ug/L), as compared to a guidance value of 0.0027 ug/L. PFOA ranges from 0.0239 to 0.0448 ug/L, compared to a guidance value of 0.0067 ug/L. There are no known PFAS soil source areas onsite.

### Soil Vapor

Indoor air is impacted in the Site buildings. Per NYSDOH Decision Matrix A, mitigation for TCE is required. As such, C&S designed a sub-slab depressurization system (SSDS) for the Main Building and Annex. The system is designed to maintain a negative pressure of at least 0.004 water column inches (wci) below the entire floor slab.

### 3. SOIL SCREENING METHODS

Visual, olfactory, and instrument-based (e.g. PID) soil screening will be performed during all excavations.

A qualified environmental professional as defined in 6 NYCRR Part 375, a professional engineer (PE) who is licensed and registered in New York State, or a qualified person who directly reports to a PE who is licensed and registered in New York State will perform the screening. 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.

Existing environmental data, field screening results, and the general spatial area for generated materials will be used to segregate said generated materials into different stockpiles. Soils cannot be mixed prior to testing for reuse or disposal. Soils which demonstrate nuisance characteristics such as gross contamination, staining, petroleum or chemical odors, or PID readings of 5 ppm or greater will be stockpiled for disposal.

Soils which do not display these characteristics will be stockpiled separately to determine if the material can be reused on-site as soil beneath an installed cover system or if the material can be used to install cover soil.

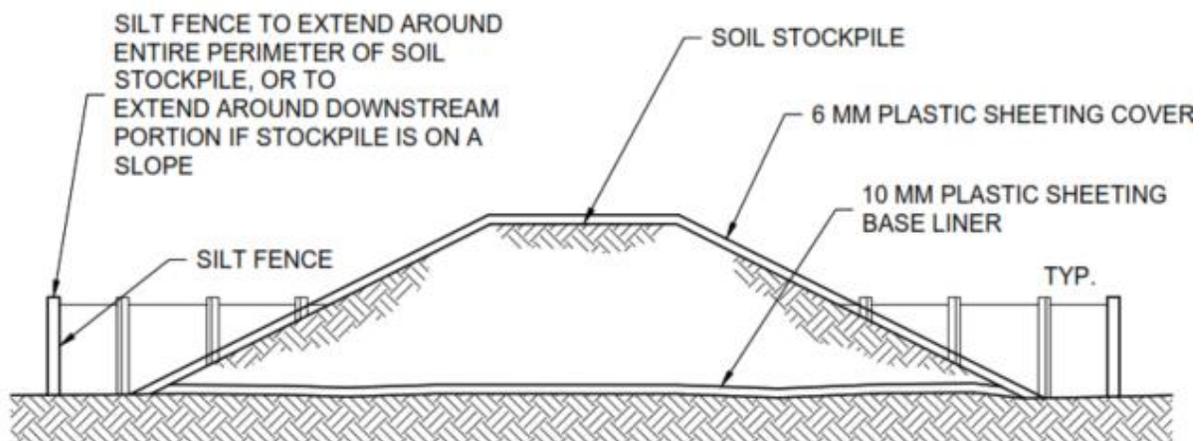
Soils which have elevated (5 ppm) PID readings, but do not exhibit evidence of gross contamination/staining, may be proposed for reuse on-site under an installed cover system provided they meet Restricted-Residential Soil Cleanup Objectives after undergoing a laboratory testing plan in accordance with DER-10 table 5.4(e)10 and with approval by the NYSDEC-DER and NYSDOH project managers.

## 4. 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.

All soil stockpiles, including certified clean imported materials, must be stockpiled according to this section. Imported materials which do not require chemical testing due to grain size (i.e. no. 2 crusher run) are exempt from this provision. Soil will be stockpiled on a stockpile containment pad that will be constructed with a plastic liner with silt fence around the perimeter to control run-on and run-off. A typical detail drawing for a stockpile containment pad is shown below.



During excavation, the remedial party will make efforts to minimize the environmental footprint. The contractor will attempt to reduce diesel fuel consumption by heavy construction machinery and equipment by:

- Selecting suitably sized and typed equipment for the intended task
- Avoiding engine idling and using machinery with automatic idle shutdown devices
- Performing routine, on-time maintenance such as oil changes to improve fuel efficiency
- Using newer more efficient models

The contractor will attempt to reduce greenhouse gas (GHG) and particulate matter (PM) emissions from mobile sources by:

- Using equipment with diesel particulate filters (DPF) and exhaust gas recirculation (EGR)
- Using equipment that burns ultra-low sulfur diesel or biodiesel from recycled byproducts

## 5. MATERIALS EXCAVATION AND LOAD-OUT

A qualified environmental professional as defined in 6 NYCRR Part 375, is a PE who is licensed and registered in New York State, or a qualified person who directly reports to a PE who is licensed and registered in New York State 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 EWP is posed by utilities or easements on the site. A site utility stakeout will be completed for all utilities prior to any ground intrusive activities at 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). Trucks transporting contaminated soil must have either tight-fitting opaque covers that are secured on the sides and/or back, or opaque covers that are locked on all sides.

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. Material accumulated from the street cleaning and egress cleaning activities will be disposed off-site at a permitted landfill facility in accordance with all applicable local, State, and Federal regulations.

To reduce fuel consumed during transfer of excavated soil or other materials to landfills, the contractor will attempt to:

- Select the closest waste receiver
- Use tractor trailers in lieu of 10-wheel dump trucks
- Reuse soils onsite as permitted by this Plan
- Investigate alternate shipping methods such as rail lines
- Identify opportunities for resource sharing with other waste haulers

The contractor will also attempt to reduce GHG and PM emissions from mobile sources by:

- Using equipment with diesel particulate filters (DPF) and exhaust gas recirculation (EGR)
- Using equipment that burns ultra-low sulfur diesel or biodiesel from recycled byproducts

## 6. 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 either tight-fitting opaque covers that are secured on the sides and/or back, or opaque covers that are locked on all sides. 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 routes will be identified when submitting a given EWP notification. The proposed routes will take 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; and community input where necessary.

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.

## 7. MATERIAL RECYCLING AND 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 off-site in a permitted facility in accordance with all local, State 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 project manager.

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 project manager. Unregulated off-site management of materials from this site will not occur without formal NYSDEC project manager 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, (e.g. hazardous waste disposal facility, solid waste landfill, petroleum treatment facility, C&D debris recovery facility) Actual disposal quantities and associated documentation will be reported to the NYSDEC. This documentation will include, but will not be limited to 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 consistent with 6 NYCRR Parts 360, 361, 362, 363, 364 and 365. Material that does not meet Unrestricted SCOs is prohibited from being taken to a New York State C&D debris recovery facility (6 NYCRR Subpart 360-15 registered or permitted facility).

Asphalt millings and concrete will be taken to a permitted C&D facility.

## 8. MATERIALS REUSE ON-SITE

The qualified environmental professional as defined in 6 NYCRR part 375 will ensure that procedures defined for materials reuse in this EWP are followed and that unacceptable material (i.e. contaminated) does not remain on-site as part of an **installed cover system**. Contaminated on-site material, including historic fill and contaminated soil, **that is acceptable for re-use on-site will be placed below an installed demarcation layer and an installed cover system**. The material will not be reused within the installed cover system, landscaping berms, or as backfill for subsurface utilities.

Proposed materials for reuse on-site must be sampled for full suite analytical parameters including per- and polyfluoroalkyl substances (PFAS) and 1,4-dioxane. The sampling frequency will be in accordance with DER-10 Table 5.4(e)10 unless prior approval is obtained from the NYSDEC project manager for modification of the sampling frequency.

**Table 3: DER-10 Testing Requirements**

Number of Soil Samples for Soil Imported to or Exported From a Site			
Contaminant	VOCs	SVOCs, Inorganics, PCBs, Pesticides, PFAS	
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	
800-1000	7	2	
> 1000	Add an additional 2 VOC and 1 composite for each additional 1000 Cubic yards or consult with DER		

The analytical results of soil/fill material testing must meet the site use criteria presented in NYSDEC DER-10 Appendix 5 – Allowable Constituent Levels for Imported Fill or Soil for all constituents listed, and the NYSDEC Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (**April 2023** or date of current version, whichever is later) guidance values. Approvals for modifications to the analytical parameters must be obtained from the NYSDEC project manager prior to the sampling event.

Soil/fill material for reuse on-site will be segregated and staged as described in Sections 2 and 3 of this EWP. The anticipated size and location of stockpiles will be provided in the 15-day notification to the NYSDEC project manager. Stockpile locations will be based on the location of site excavation activities and proximity to nearby site features. Material reuse on-site will comply

with requirements of NYSDEC DER-10 Section 5.4(e)4. Any modifications to the requirements of DER-10 Section 5.4(e)4 must be approved by the NYSDEC project manager.

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 may only be reused on-site with written approval from the NYSDEC project manager.**

Sampling conducted to determine acceptable reuse must include collection of all necessary quality assurance/quality control (QA/QC) samples, including, matrix spike/matrix spike duplicate (MS/MSD) samples, duplicate samples, equipment blanks for applicable parameters, etc. Laboratory deliverables will be Category B deliverables. Laboratory reporting limits will be sufficient to determine compliance with the soil cleanup objectives (SCOs). VOC samples will be collected in accordance with EPA Method 5035.

## 9. 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 off-site at a permitted facility 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 State Pollutant Discharge Elimination System (SPDES) permit.

## 10. COVER SYSTEM INSTALLATION

After the completion of soil removal and any other invasive activities, a cover system will be installed. The installed cover system will be comprised of one or more of the following: 24 inches of clean soil, asphalt pavement, concrete covered sidewalks and concrete building, etc. A demarcation layer, consisting of orange snow fencing material, white geotextile or equivalent material, etc. will be installed below the cover system to provide a visual reference to the top of the presumed contamination zone.

## 11. EXISTING HARDSCAPE AREAS

The existing cover system is comprised of hardscape surfaces, including building foundations, sidewalks, and pavement.

## 12. BACKFILL FROM OFF-SITE SOURCES

All materials proposed for import onto the site will be approved by the qualified environmental professional, as defined in 6 NYCRR Part 375, and will be in compliance with provisions in this EWP prior to receipt at the site. A Request to Import/Reuse Fill or Soil form, which can be found at [Request To Reuse Soil](#) will be prepared and submitted to the NYSDEC project manager allowing a minimum of 5 business days for review. A copy of the form is presented in **Appendix A**.

Material from industrial sites, spill sites, 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) and DER-10 Appendix 5 for restricted residential use. Based on an evaluation of the land use, protection of groundwater and protection of ecological resources criteria, the resulting soil quality standards are provided in the **Attached Table of Part 375 SCOs**. Soils that meet 'general' fill requirements under 6 NYCRR Part 360.13, but do not meet backfill or cover soil objectives for this site, will not be imported onto the site without prior approval by NYSDEC project manager. Soil material will be sampled for the full suite of analytical parameters, including PFAS and 1, 4-dioxane. Solid waste will not be imported onto the site.

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.

As required in the Import/Reuse Fill or Soil form, each source of backfill material will provide the following:

- Source Operator Name (i.g. "Company name" leaser of farm land or owner/operator of source)
- Location of the Fill Source (i.g. mine location address)
- State or Local Approvals (i.g. mining permits, etc.)
  - If not provided, a brief description of the history of the source land use
- Specify if the material being imported contains less than 10% fines passing a 100 sieve
  - If the material does not meet this requirement analytical samples will be collected for the following analytics and a rate as specified in DER-10, Table 5.4(e)10:
    - full suite analytical parameters including per- and polyfluoroalkyl substances (PFAS) and 1,4-dioxane
- Summary of sampling methodology and a summary of results compared to the 6NYCRR 375-6.7(d) and DER-10 Appendix 5 standards
- The following documents will be attached to each form:
  - Mining permit
  - Any historical documents
  - Analytical reports
  - Sieve or proctor reports

- Source letters

A QEP or PE or someone under their direct supervision will maintain a log of trucks delivering fill from off-site sources. The log will include the hauler, source, and date and time delivered. Each load of imported soil will be accompanied by a bill-of-lading or similar showing the material's source. All imported materials which required analytical sampling will be stockpiled as described in Section 4 above.

To reduce fuel consumed during transfer of material to the site, the contractor will attempt to:

- Select the closest providers for soil, aggregate, pavement, and concrete
- Use tractor trailers in lieu of 10-wheel dump trucks
- Reuse soils onsite as permitted by this Plan
- Identify opportunities for resource sharing with other haulers

### 13. STORMWATER POLLUTION PREVENTION

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.

Storm drain inlet protection will be installed and maintained per manufactures instructions.

A stabilized construction entrance for controlling tracking of sediment will be installed and properly operated.

Standard erosion and sediment control detail drawings and specifications are provided in **Appendix B**.

## 14. 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. **The NYSDEC-DER Project Manager will be notified the same day of the discovery by e-mail.** The location of tanks or other sources will be surveyed. Any excavations conducted pursuant to this section will be surveyed to document the area addressed. **At a minimum the following will be completed:**

- The tank will be registered upon discovery and deregistered upon closure.
- Limits of the excavations will be screened using a PID to identify clean sidewalls and bottom
- Confirmation samples will be collected to document the limits of the impacted area limits was met; the number of samples will comply with DER-10.
- If an underground tank is present, the tanks will be closed and removed using the methods outlined within DER-10.
  - Any product within the tank will be removed as soon as possible.
  - Any tanks will be registered/deregistered
- The contractor completing the work under the EWP will be prepared to control any free products observed within an excavation or leaking from a tank if encountered.

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 (including 1,4-dioxane), TCL pesticides and PCBs, and PFAS], 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 project manager for approval prior to sampling. Any tanks will be closed as per NYSDEC regulations and guidance.

Identification of unknown or unexpected contaminated media identified by screening or if an underground tank is discovered during invasive site work, it will be promptly communicated by phone within two hours to the NYSDEC Spill Hotline by calling 1-800-457-7362.

## 15. GREEN REMEDIATION IMPLEMENTATION

This EWP was prepared consistent with the guidance document: NYSDEC *DER-31, Green Remediation Issued August 11, 2010*.

### 15.1 Best Management Practices

In addition to green remediation practices described elsewhere in this plan, this section describes the Best Management Practices (BMPs) which will be implemented to achieve the green remediation concepts described within the NYSDEC DER-31. The following BMPs were identified for implementation:

- Minimize Mobilizations – C&S will schedule work to ensure excavation activities can be completed within minimal mobilizations. C&S will coordinate site activities in conjunction with other site activities (as possible) to minimize the number of trips to site for field staff.
- Sampling Equipment:
  - Rechargeable Battery-Powered Sampling Equipment – CAMP equipment (PIDs, DusTraks, Tharmis Antenna), GeoPump Peristaltic Pump, Horiba water quality meter, data loggers, and any other battery-operated equipment will be charged at the C&S facility. C&S estimated in 2022 that 26% of the electricity used at their facility is generated on-site through use of solar panels. This practice will reduce the load on the electrical grid and allow for the use of renewable sources of energy.

Personnel protective equipment (PPE) and disposable materials and supplies will need to be disposed of and cannot be recycled. Care will be taken to ensure cleanable sampling equipment and materials will be used, when possible.

All site activities related to the BMPs described above will be recorded and tracked on a C&S Green Remediation BMP Tracker, which is equivalent to the NYSDEC Form A, Summary of Green Remediation Metrics. A copy of the BMP Tracking Form is provided in **Appendix E**.

## 16. HEALTH AND SAFETY PLAN

To verify the safety of the workers and the local community during the performance of the work, monitoring practices of the work environment will be in place during all phases of EWP activities. A Health and Safety Plan (HASP) that details procedures for maintaining safe working conditions and minimizing the potential for exposure to hazardous material is provided in **Appendix C**.

## 17. COMMUNITY AIR MONITORING PLAN (CAMP)

Air sampling locations will be determined **in the field and adjusted on a daily or more frequent basis**. 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.

Community air monitoring will be conducted per the CAMP in **Appendix D**. If particulate levels at the site exceed the thresholds listed in the CAMP or **if visible airborne dust or nuisance odors / VOCs are observed on the site or leaving the site, then dust and / or odor / VOC suppression techniques listed below will be employed**. The intent of the CAMP is not to preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around work areas. The remedial party will also take measures listed below to prevent dust production on the site.

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.

## 18. ODOR CONTROL PLAN

This odor control plan is capable of controlling emissions of nuisance odors off-site, as well as onsite for occupied sites. Specific odor control methods to be used on a routine basis is not anticipated to be necessary. 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.

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.

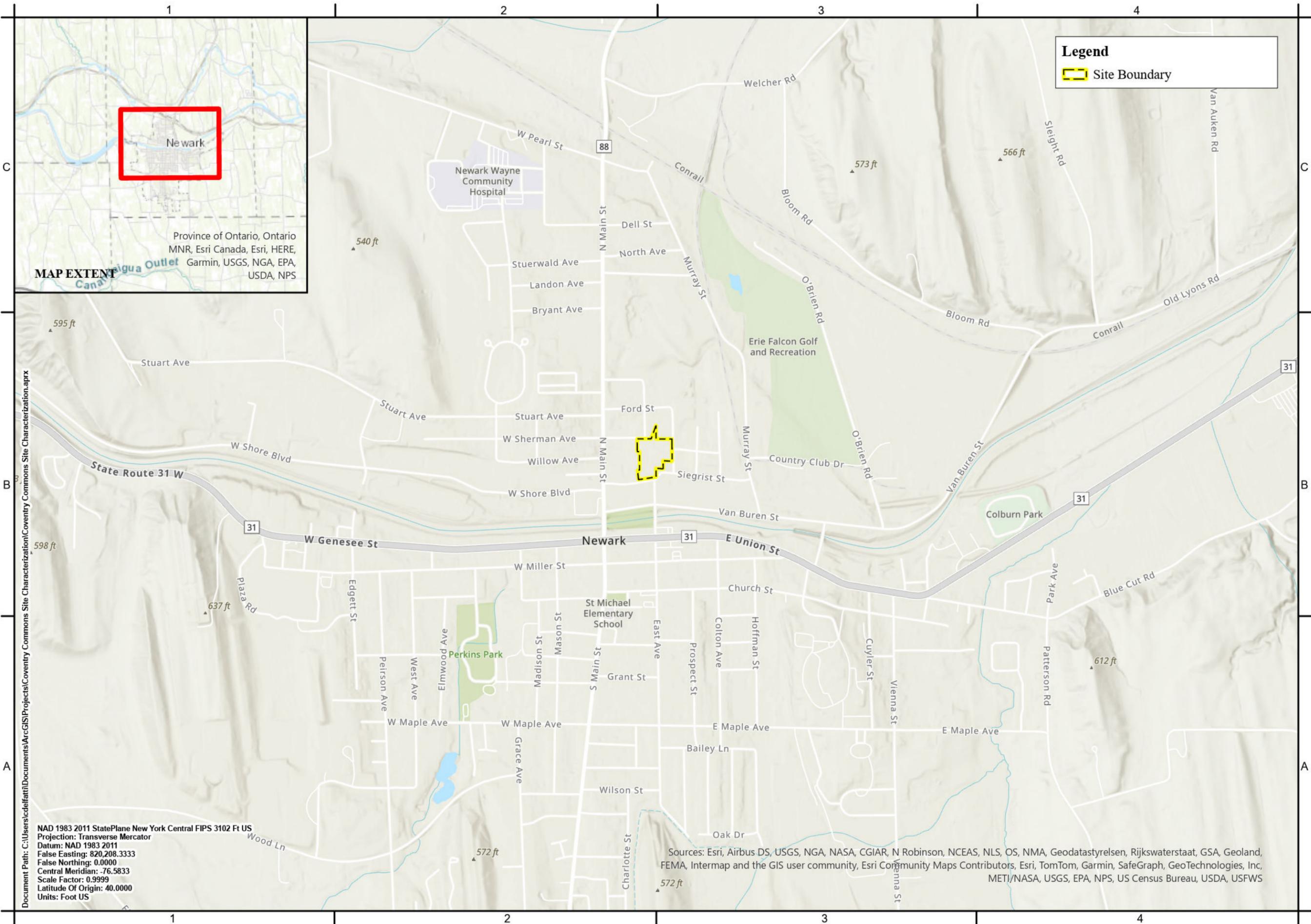
If nuisance odors develop during intrusive work that cannot be corrected, or where the control of nuisance odors cannot otherwise be achieved due to on-site conditions or close proximity to sensitive receptors, odor control will be achieved by sheltering the excavation and handling areas in a temporary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

## 19. OTHER NUISANCES

If necessary, the contractor will develop plans to address rodent control and ensure compliance with local noise control ordinances.

## Figures

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**Legend**  
 Site Boundary



C&S Engineers, Inc.  
 499 Col. Eileen Collins Blvd.  
 Syracuse, New York 13212  
 Phone: 315-455-2000  
 Fax: 315-455-9667  
 www.cscs.com

MAP EXTENT

Province of Ontario, Ontario  
 MNR, Esri Canada, Esri, HERE,  
 Garmin, USGS, NGA, EPA,  
 USDA, NPS

0 1,250 Feet  
 1 inch equals 1,250 feet

**Site Characterization**  
**Coventry Commons**  
 130-132 Harrison Street, Newark, New York

PROJECT NO:	W96.007.009
DATE:	February 2025
SCALE:	AS SHOWN
DRAWN BY:	CND
DESIGNED BY:	CND
CHECKED BY:	MLW

**SITE LOCATION**

**Figure 1**

NAD 1983 2011 StatePlane New York Central FIPS 3102 Ft US  
 Projection: Transverse Mercator  
 Datum: NAD 1983 2011  
 False Easting: 820,208.3333  
 False Northing: 0.0000  
 Central Meridian: -76.5833  
 Scale Factor: 0.9999  
 Latitude Of Origin: 40.0000  
 Units: Foot US

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community, Esri Community Maps Contributors, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS



**Legend**

- Site Boundary
- Warehouse to be Demolished



C&S Engineers, Inc.  
 499 Col. Eileen Collins Blvd.  
 Syracuse, New York 13212  
 Phone: 315-455-2000  
 Fax: 315-455-9667  
 www.cscs.com



0 80  
 Feet  
 1 inch equals 80 feet

**Site Characterization**  
**Coventry Commons**  
 130-132 Harrison Street, Newark, New York

PROJECT NO:	W96.007.009
DATE:	February 2025
SCALE:	AS SHOWN
DRAWN BY:	CND
DESIGNED BY:	CND
CHECKED BY:	MLW

**SITE MAP**

**Figure 2**

Document Path: C:\Users\cdelfat\Documents\ArcGIS\Projects\Coventry Commons Site Characterization\Coventry Commons Site Characterization.aprx

NAD 1983 2011 StatePlane New York Central FIPS 3102 Ft US  
 Projection: Transverse Mercator  
 Datum: NAD 1983 2011  
 False Easting: 820,208.3333  
 False Northing: 0.0000  
 Central Meridian: -76.5833  
 Scale Factor: 0.9999  
 Latitude Of Origin: 40.0000  
 Units: Foot US

Sources: Esri, Airphoto, USGS, NGA, NASA, CGIAR, N. Robinson, NCEAS, NLS, OS, INMA, Geobase, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap, and the GIS user community, Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS

## Tables

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(b) Restricted use soil cleanup objectives.

**Table 375-6.8(b): Restricted Use Soil Cleanup Objectives**

Contaminant	CAS Number	Protection of Public Health				Protection of Ecological Resources	Protection of Ground-water
		Residential	Restricted-Residential	Commercial	Industrial		
<b>Metals</b>							
Arsenic	7440-38-2	16 <sup>f</sup>	16 <sup>f</sup>	16 <sup>f</sup>	16 <sup>f</sup>	13 <sup>f</sup>	16 <sup>f</sup>
Barium	7440-39-3	350 <sup>f</sup>	400	400	10,000 <sup>d</sup>	433	820
Beryllium	7440-41-7	14	72	590	2,700	10	47
Cadmium	7440-43-9	2.5 <sup>f</sup>	4.3	9.3	60	4	7.5
Chromium, hexavalent <sup>h</sup>	18540-29-9	22	110	400	800	1 <sup>e</sup>	19
Chromium, trivalent <sup>h</sup>	16065-83-1	36	180	1,500	6,800	41	NS
Copper	7440-50-8	270	270	270	10,000 <sup>d</sup>	50	1,720
Total Cyanide <sup>h</sup>		27	27	27	10,000 <sup>d</sup>	NS	40
Lead	7439-92-1	400	400	1,000	3,900	63 <sup>f</sup>	450
Manganese	7439-96-5	2,000 <sup>f</sup>	2,000 <sup>f</sup>	10,000 <sup>d</sup>	10,000 <sup>d</sup>	1600 <sup>f</sup>	2,000 <sup>f</sup>
Total Mercury		0.81 <sup>j</sup>	0.81 <sup>j</sup>	2.8 <sup>j</sup>	5.7 <sup>j</sup>	0.18 <sup>f</sup>	0.73
Nickel	7440-02-0	140	310	310	10,000 <sup>d</sup>	30	130
Selenium	7782-49-2	36	180	1,500	6,800	3.9 <sup>f</sup>	4 <sup>f</sup>
Silver	7440-22-4	36	180	1,500	6,800	2	8.3
Zinc	7440-66-6	2200	10,000 <sup>d</sup>	10,000 <sup>d</sup>	10,000 <sup>d</sup>	109 <sup>f</sup>	2,480
<b>PCBs/Pesticides</b>							
2,4,5-TP Acid (Silvex)	93-72-1	58	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	3.8
4,4'-DDE	72-55-9	1.8	8.9	62	120	0.0033 <sup>e</sup>	17
4,4'-DDT	50-29-3	1.7	7.9	47	94	0.0033 <sup>e</sup>	136
4,4'-DDD	72-54-8	2.6	13	92	180	0.0033 <sup>e</sup>	14
Aldrin	309-00-2	0.019	0.097	0.68	1.4	0.14	0.19
alpha-BHC	319-84-6	0.097	0.48	3.4	6.8	0.04 <sup>g</sup>	0.02
beta-BHC	319-85-7	0.072	0.36	3	14	0.6	0.09
Chlordane (alpha)	5103-71-9	0.91	4.2	24	47	1.3	2.9

**Table 375-6.8(b): Restricted Use Soil Cleanup Objectives**

Contaminant	CAS Number	Protection of Public Health				Protection of Ecological Resources	Protection of Ground-water
		Residential	Restricted-Residential	Commercial	Industrial		
delta-BHC	319-86-8	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	0.04 <sup>g</sup>	0.25
Dibenzofuran	132-64-9	14	59	350	1,000 <sup>c</sup>	NS	210
Dieldrin	60-57-1	0.039	0.2	1.4	2.8	0.006	0.1
Endosulfan I	959-98-8	4.8 <sup>i</sup>	24 <sup>i</sup>	200 <sup>i</sup>	920 <sup>i</sup>	NS	102
Endosulfan II	33213-65-9	4.8 <sup>i</sup>	24 <sup>i</sup>	200 <sup>i</sup>	920 <sup>i</sup>	NS	102
Endosulfan sulfate	1031-07-8	4.8 <sup>i</sup>	24 <sup>i</sup>	200 <sup>i</sup>	920 <sup>i</sup>	NS	1,000 <sup>c</sup>
Endrin	72-20-8	2.2	11	89	410	0.014	0.06
Heptachlor	76-44-8	0.42	2.1	15	29	0.14	0.38
Lindane	58-89-9	0.28	1.3	9.2	23	6	0.1
Polychlorinated biphenyls	1336-36-3	1	1	1	25	1	3.2
<b>Semivolatiles</b>							
Acenaphthene	83-32-9	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	20	98
Acenaphthylene	208-96-8	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	107
Anthracene	120-12-7	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	1,000 <sup>c</sup>
Benz(a)anthracene	56-55-3	1 <sup>f</sup>	1 <sup>f</sup>	5.6	11	NS	1 <sup>f</sup>
Benzo(a)pyrene	50-32-8	1 <sup>f</sup>	1 <sup>f</sup>	1 <sup>f</sup>	1.1	2.6	22
Benzo(b)fluoranthene	205-99-2	1 <sup>f</sup>	1 <sup>f</sup>	5.6	11	NS	1.7
Benzo(g,h,i)perylene	191-24-2	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	1,000 <sup>c</sup>
Benzo(k)fluoranthene	207-08-9	1	3.9	56	110	NS	1.7
Chrysene	218-01-9	1 <sup>f</sup>	3.9	56	110	NS	1 <sup>f</sup>
Dibenz(a,h)anthracene	53-70-3	0.33 <sup>e</sup>	0.33 <sup>e</sup>	0.56	1.1	NS	1,000 <sup>c</sup>
Fluoranthene	206-44-0	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	1,000 <sup>c</sup>
Fluorene	86-73-7	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	30	386
Indeno(1,2,3-cd)pyrene	193-39-5	0.5 <sup>f</sup>	0.5 <sup>f</sup>	5.6	11	NS	8.2
m-Cresol	108-39-4	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	0.33 <sup>e</sup>
Naphthalene	91-20-3	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	12

**Table 375-6.8(b): Restricted Use Soil Cleanup Objectives**

Contaminant	CAS Number	Protection of Public Health				Protection of Ecological Resources	Protection of Ground-water
		Residential	Restricted-Residential	Commercial	Industrial		
o-Cresol	95-48-7	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	0.33 <sup>e</sup>
p-Cresol	106-44-5	34	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	0.33 <sup>e</sup>
Pentachlorophenol	87-86-5	2.4	6.7	6.7	55	0.8 <sup>e</sup>	0.8 <sup>e</sup>
Phenanthrene	85-01-8	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	1,000 <sup>c</sup>
Phenol	108-95-2	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	30	0.33 <sup>e</sup>
Pyrene	129-00-0	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	1,000 <sup>c</sup>
<b>Volatiles</b>							
1,1,1-Trichloroethane	71-55-6	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	0.68
1,1-Dichloroethane	75-34-3	19	26	240	480	NS	0.27
1,1-Dichloroethene	75-35-4	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	0.33
1,2-Dichlorobenzene	95-50-1	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	1.1
1,2-Dichloroethane	107-06-2	2.3	3.1	30	60	10	0.02 <sup>f</sup>
cis-1,2-Dichloroethene	156-59-2	59	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	0.25
trans-1,2-Dichloroethene	156-60-5	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	0.19
1,3-Dichlorobenzene	541-73-1	17	49	280	560	NS	2.4
1,4-Dichlorobenzene	106-46-7	9.8	13	130	250	20	1.8
1,4-Dioxane	123-91-1	9.8	13	130	250	0.1 <sup>e</sup>	0.1 <sup>e</sup>
Acetone	67-64-1	100 <sup>a</sup>	100 <sup>b</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	2.2	0.05
Benzene	71-43-2	2.9	4.8	44	89	70	0.06
Butylbenzene	104-51-8	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	12
Carbon tetrachloride	56-23-5	1.4	2.4	22	44	NS	0.76
Chlorobenzene	108-90-7	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	40	1.1
Chloroform	67-66-3	10	49	350	700	12	0.37
Ethylbenzene	100-41-4	30	41	390	780	NS	1
Hexachlorobenzene	118-74-1	0.33 <sup>e</sup>	1.2	6	12	NS	3.2
Methyl ethyl ketone	78-93-3	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	100 <sup>a</sup>	0.12

**Table 375-6.8(b): Restricted Use Soil Cleanup Objectives**

Contaminant	CAS Number	Protection of Public Health				Protection of Ecological Resources	Protection of Ground-water
		Residential	Restricted-Residential	Commercial	Industrial		
Methyl tert-butyl ether	1634-04-4	62	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	0.93
Methylene chloride	75-09-2	51	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	12	0.05
n-Propylbenzene	103-65-1	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	3.9
sec-Butylbenzene	135-98-8	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	11
tert-Butylbenzene	98-06-6	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	NS	5.9
Tetrachloroethene	127-18-4	5.5	19	150	300	2	1.3
Toluene	108-88-3	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	36	0.7
Trichloroethene	79-01-6	10	21	200	400	2	0.47
1,2,4-Trimethylbenzene	95-63-6	47	52	190	380	NS	3.6
1,3,5- Trimethylbenzene	108-67-8	47	52	190	380	NS	8.4
Vinyl chloride	75-01-4	0.21	0.9	13	27	NS	0.02
Xylene (mixed)	1330-20-7	100 <sup>a</sup>	100 <sup>a</sup>	500 <sup>b</sup>	1,000 <sup>c</sup>	0.26	1.6

All soil cleanup objectives (SCOs) are in parts per million (ppm).

NS=Not specified. See [Technical Support Document \(TSD\)](#).

**Footnotes**

<sup>a</sup> The SCOs for residential, restricted-residential and ecological resources use were capped at a maximum value of 100 ppm. See TSD section 9.3.

<sup>b</sup> The SCOs for commercial use were capped at a maximum value of 500 ppm. See TSD section 9.3.

<sup>c</sup> The SCOs for industrial use and the protection of groundwater were capped at a maximum value of 1000 ppm. See TSD section 9.3.

<sup>d</sup> The SCOs for metals were capped at a maximum value of 10,000 ppm. See TSD section 9.3.

<sup>e</sup> For constituents where the calculated SCO was lower than the contract required quantitation limit (CRQL), the CRQL is used as the SCO value.

<sup>f</sup> For constituents where the calculated SCO was lower than the rural soil background concentration as determined by the Department and Department of Health rural soil survey, the rural soil background concentration is used as the Track 2 SCO value for this use of the site.

<sup>g</sup> This SCO is derived from data on mixed isomers of BHC.

<sup>h</sup> The SCO for this specific compound (or family of compounds) is considered to be met if the analysis for the total species of this contaminant is below the specific SCO.

<sup>i</sup> This SCO is for the sum of endosulfan I, endosulfan II, and endosulfan sulfate.

<sup>j</sup> This SCO is the lower of the values for mercury (elemental) or mercury (inorganic salts). See TSD Table 5.6-1.

## **Appendices**

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## **Appendix A**

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### Request to Import/Reuse Fill or Soil Form



**NEW YORK STATE  
DEPARTMENT OF ENVIRONMENTAL CONSERVATION**



**Request to Import/Reuse Fill or Soil**

\*This form is based on the information required by DER-10, Section 5.4(e) and 6NYCRR Part 360.13. Use of this form is not a substitute for reading the applicable regulations and Technical Guidance document.\*

**SECTION 1 – SITE BACKGROUND**

The allowable site use is:

Have Ecological Resources been identified?

Is this soil originating from the site?

How many cubic yards of soil will be imported/reused?

If greater than 1000 cubic yards will be imported, enter volume to be imported:

**SECTION 2 – MATERIAL OTHER THAN SOIL**

Is the material to be imported gravel, rock or stone?

Does it contain less than 10%, by weight, material that passes a size 100 sieve?

Is this virgin material from a permitted mine or quarry?

Is this material recycled concrete or brick from a DEC registered processing facility?

**SECTION 3 - SAMPLING**

Provide a brief description of the number and type of samples collected in the space below:

-----  
*Example Text: 5 discrete samples were collected and analyzed for VOCs. 2 composite samples were collected and analyzed for SVOCs, Inorganics & PCBs/Pesticides.*

*If the material meets requirements of DER-10 section 5.4(e)5 (other material), no chemical testing needed.*

### SECTION 3 CONT'D - SAMPLING

Provide a brief written summary of the sampling results or attach evaluation tables (compare to DER-10, Appendix 5):

---

*Example Text: Arsenic was detected up to 17 ppm in 1 (of 5) samples; the allowable level is 16 ppm.*

*If Ecological Resources have been identified use the "If Ecological Resources are Present" column in Appendix 5.*

### SECTION 4 – SOURCE OF FILL

Name of person providing fill and relationship to the source:

Location where fill was obtained:

Identification of any state or local approvals as a fill source:

If no approvals are available, provide a brief history of the use of the property that is the fill source:

Provide a list of supporting documentation included with this request:

The information provided on this form is accurate and complete.

---

Signature

---

Date

---

Print Name

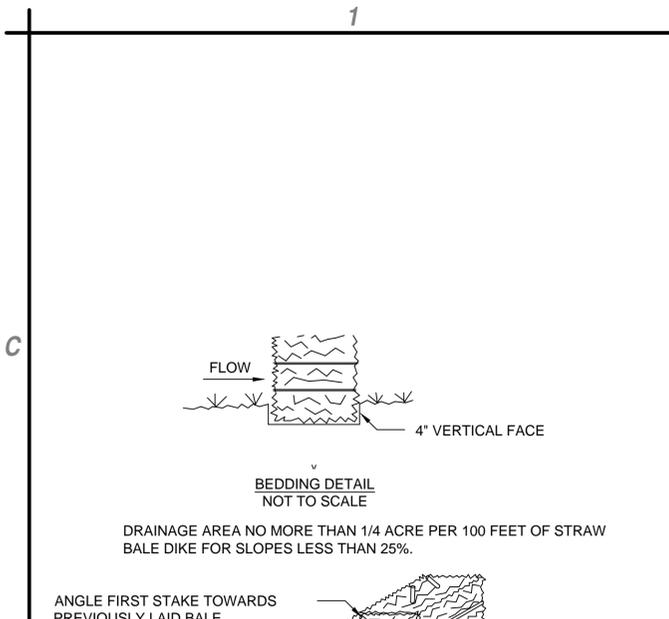
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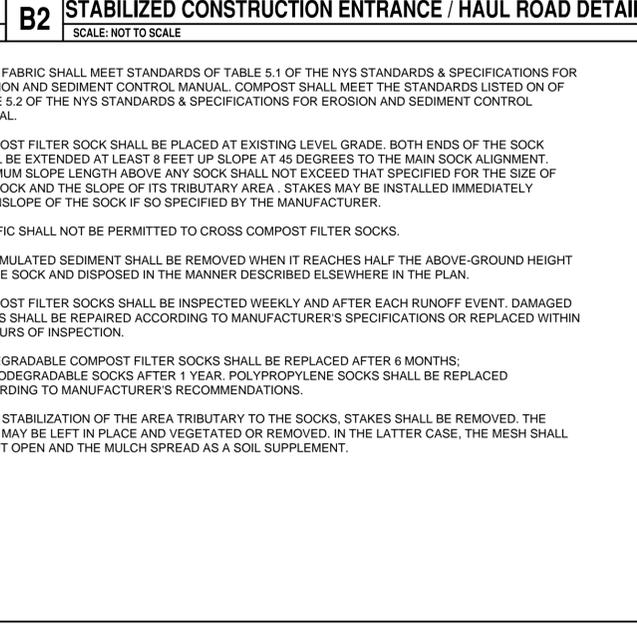
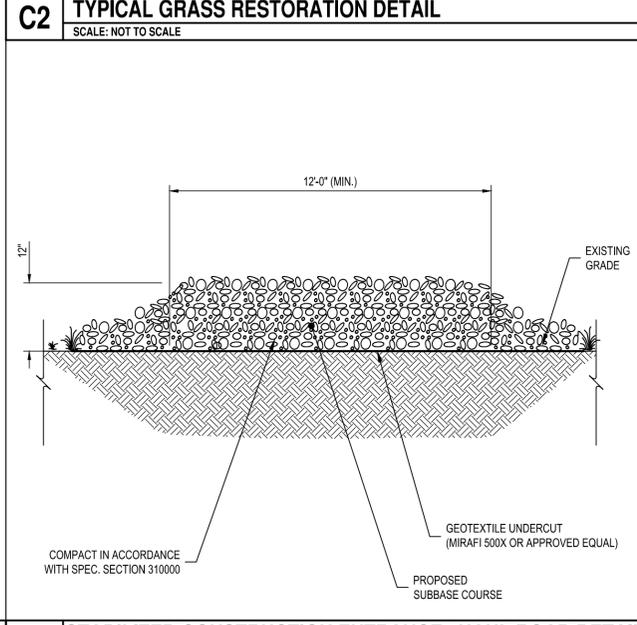
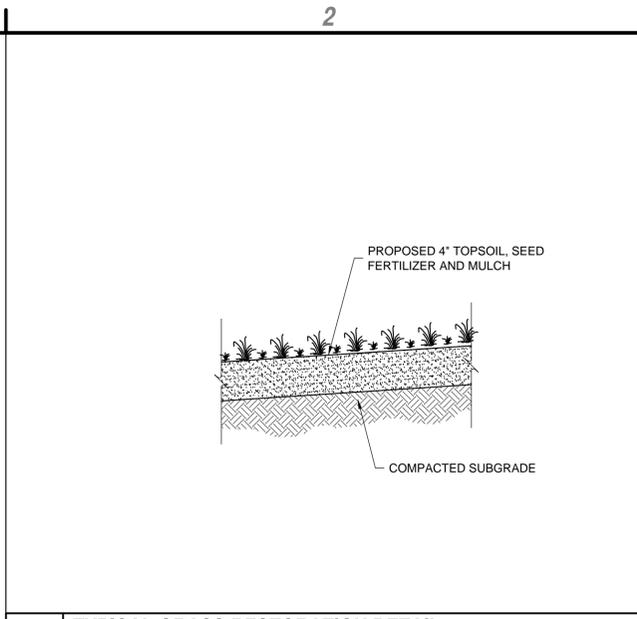
## **Appendix B**

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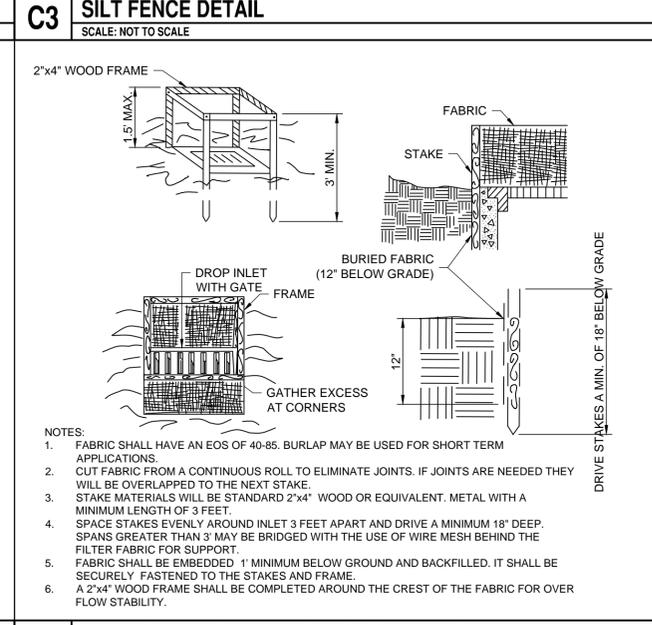
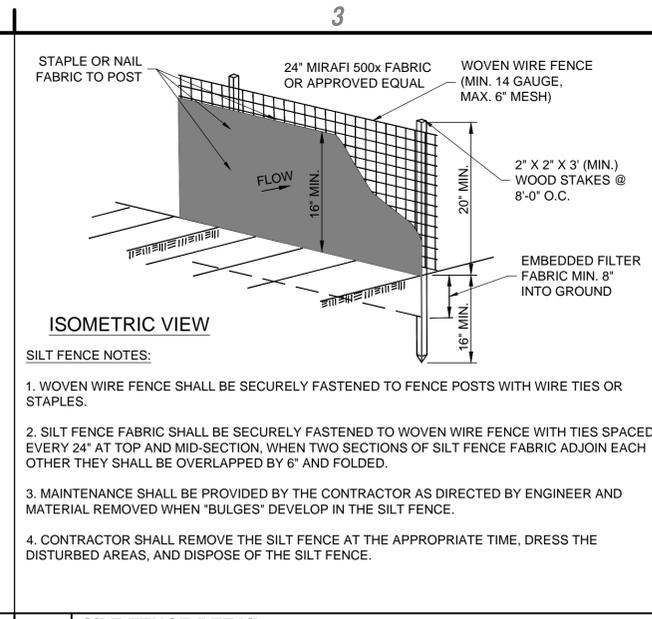
### Standard E&S Details and Specifications



- B1 STRAW BALE DIKE DETAIL**  
SCALE: NOT TO SCALE
- BALES SHALL BE PLACED AT THE TOE OF A SLOPE OR ON THE CONTOUR AND IN A ROW WITH ENDS TIGHTLY ABUTTING THE ADJACENT BALES.
  - EACH BALE SHALL BE EMBEDDED IN THE SOIL A MINIMUM OF (4) INCHES, AND PLACED SO THE BINDINGS ARE HORIZONTAL.
  - BALES SHALL BE SECURELY ANCHORED IN PLACE BY EITHER TWO STAKES OR RE-BARS DRIVEN THROUGH THE BALE. THE FIRST STAKE IN EACH BALE SHALL BE DRIVEN TOWARD THE PREVIOUSLY LAID BALE AT AN ANGLE TO FORCE THE BALES TOGETHER. STAKES SHALL BE DRIVEN FLUSH WITH THE BALE.
  - INSPECTION SHALL BE FREQUENT AND REPAIR REPLACEMENT SHALL BE MADE PROMPTLY AS NEEDED.
  - BALES SHALL BE REMOVED WHEN THEY HAVE SERVED THEIR USEFULNESS SO AS NOT TO BLOCK OR IMPEDE STORM FLOW OR DRAINAGE.



**B3 VEHICLE DECONTAMINATION PAD DETAIL**  
SCALE: NOT TO SCALE



**C3 COMPOST FILTER SOCK DETAIL**  
SCALE: NOT TO SCALE

1. SOCK FABRIC SHALL MEET STANDARDS OF TABLE 5.1 OF THE NYS STANDARDS & SPECIFICATIONS FOR EROSION AND SEDIMENT CONTROL MANUAL. COMPOST SHALL MEET THE STANDARDS LISTED ON OF TABLE 5.2 OF THE NYS STANDARDS & SPECIFICATIONS FOR EROSION AND SEDIMENT CONTROL MANUAL.

2. COMPOST FILTER SOCK SHALL BE PLACED AT EXISTING LEVEL GRADE. BOTH ENDS OF THE SOCK SHALL BE EXTENDED AT LEAST 8 FEET UP SLOPE AT 45 DEGREES TO THE MAIN SOCK ALIGNMENT. MAXIMUM SLOPE LENGTH ABOVE ANY SOCK SHALL NOT EXCEED THAT SPECIFIED FOR THE SIZE OF THE SOCK AND THE SLOPE OF ITS TRIBUTARY AREA. STAKES MAY BE INSTALLED IMMEDIATELY DOWNSLOPE OF THE SOCK IF SO SPECIFIED BY THE MANUFACTURER.

3. TRAFFIC SHALL NOT BE PERMITTED TO CROSS COMPOST FILTER SOCKS.

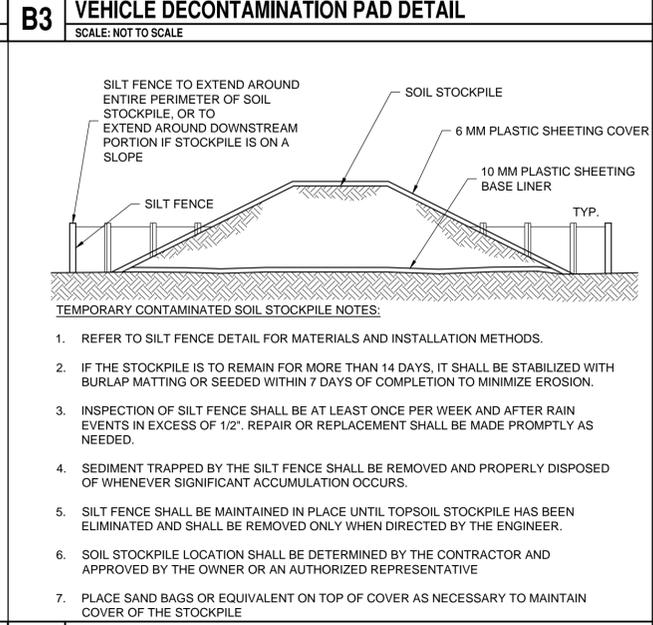
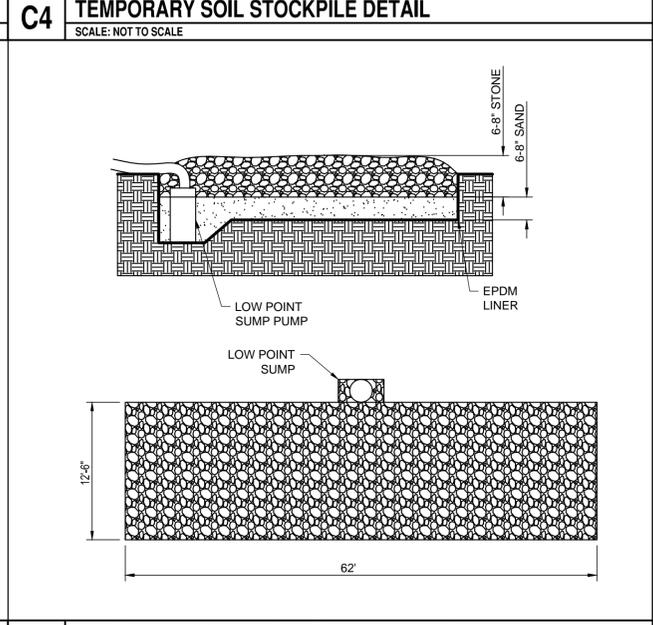
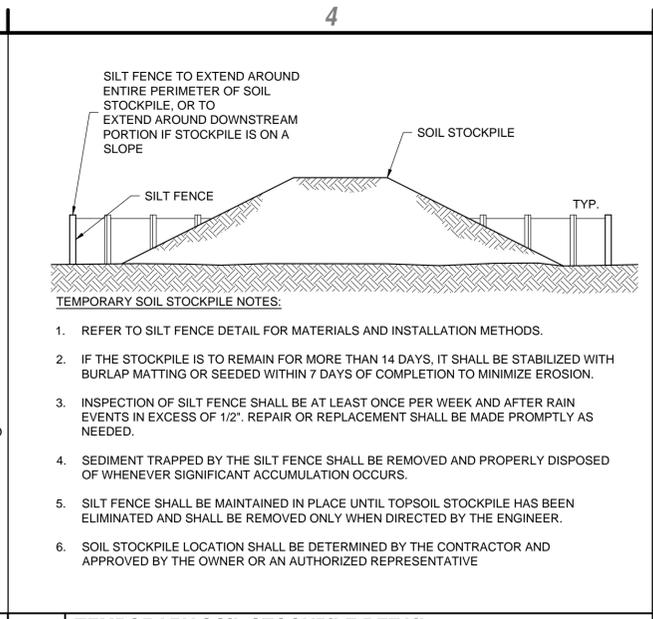
4. ACCUMULATED SEDIMENT SHALL BE REMOVED WHEN IT REACHES HALF THE ABOVE-GROUND HEIGHT OF THE SOCK AND DISPOSED IN THE MANNER DESCRIBED ELSEWHERE IN THE PLAN.

5. COMPOST FILTER SOCKS SHALL BE INSPECTED WEEKLY AND AFTER EACH RUNOFF EVENT. DAMAGED SOCKS SHALL BE REPAIRED ACCORDING TO MANUFACTURER'S SPECIFICATIONS OR REPLACED WITHIN 24 HOURS OF INSPECTION.

6. BIODEGRADABLE COMPOST FILTER SOCKS SHALL BE REPLACED AFTER 6 MONTHS; PHOTODEGRADABLE SOCKS AFTER 1 YEAR. POLYPROPYLENE SOCKS SHALL BE REPLACED ACCORDING TO MANUFACTURER'S RECOMMENDATIONS.

7. UPON STABILIZATION OF THE AREA TRIBUTARY TO THE SOCKS, STAKES SHALL BE REMOVED. THE SOCK MAY BE LEFT IN PLACE AND VEGETATED OR REMOVED. IN THE LATTER CASE, THE MESH SHALL BE CUT OPEN AND THE MULCH SPREAD AS A SOIL SUPPLEMENT.

**A3 COMPOST FILTER SOCK DETAIL**  
SCALE: NOT TO SCALE



**A4 TEMPORARY CONTAMINATED SOIL STOCKPILE DETAIL**  
SCALE: NOT TO SCALE

**C&S Engineers, Inc.**  
499 Col. Eileen Collins Blvd.  
Syracuse, New York 13212  
Phone: 315-455-2000  
Fax: 315-455-9667  
www.cscos.com

MARK	DATE	DESCRIPTION
REVISIONS		
PROJECT NO:		
DATE:		
DRAWN BY:		
DESIGNED BY:		
CHECKED BY:		
NO ALTERATION PERMITTED HEREON EXCEPT AS PROVIDED UNDER SECTION 7209 SUBDIVISION 2 OF THE NEW YORK EDUCATION LAW		

**EROSION CONTROL DETAILS**

## **Appendix C**

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### Health and Safety Plan



**C&S Engineers, Inc.**  
499 Colonel Eileen Collins Blvd.  
Syracuse, New York 13212



# Health and Safety Plan

**Coventry Commons**  
**130-132 Harrison Street, Newark, New York**  
**NYSDEC Site No. 859036**

Prepared for:



Coventry Commons LLC  
1201 East Fayette Street  
Syracuse, New York

February 2025

# Health and Safety Plan

**Coventry Commons  
130-132 Harrison Street  
Newark, Wayne County, New York  
NYSDEC Site No. 859036**

**Prepared by:**



C&S Engineers, Inc.  
499 Colonel Eileen Collins Blvd  
Syracuse, New York 13212

**Prepared for:**



Coventry Commons LLC  
1201 East Fayette Street  
Syracuse, New York

## **EMERGENCY PHONE NUMBERS**

Emergency Service.....	911
<u>Police</u> : Newark Police Department.....	(315) 331-3701
<u>Fire</u> : Newark Fire Department.....	(315) 331-1451
<u>Hospital</u> : RRH Newark-Wayne Community Hospital.....	(315) 332-2022
Department of Public Works.....	(315) 331-6199
National Response Center.....	(800) 424-8802
Poison Control Center .....	(800) 222-1222
Center for Disease Control.....	(800) 311-3435
NYSDEC Region 8 (Avon, New York).....	(585) 226-8139
C&S Engineers .....	(315) 455-2000

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**APPENDICES**

**Appendix A** – Map and Directions to Hospital

**Appendix B** – Guidance on Incident Investigation and Reporting



**SECTION 1 – GENERAL INFORMATION**

This Health and Safety Plan (HASP) addresses health and safety considerations for soil disturbance activities that contractors and staff may engage in during the redevelopment or future operation of the Site at 130-132 Harrison Street, Newark, New York; hereby, referred to as (Site). Personnel engaged in the handling of contaminated soil are required to maintain current HAZWOPER training, including initial 40-hour training, on-the-job training, and consistent annual 8-hour refresher training, as per the requirements of 29 CFR 1910.120.

The content of the HASP may change or undergo revision based upon receipt of additional information.

**1.1 Responsibilities**

Project Manager.....	Name: Phone: Cell:
Health and Safety Manager.....	Name: Phone: Cell:
Site Health and Safety Officer.....	Name: Phone: Cell:
Emergency Coordinator.....	Name: Phone: Cell:

## 1.2 Applicable Standards and Regulations References

- A. The publications listed below form a part of this specification to the extent referenced. The publications are referred to in the text by basic designation only. Where a conflict or overlap among regulations and/or these specifications exist, the most stringent requirements shall apply. The Project Manager will determine which requirements are most stringent.

### 1. AMERICAN NATIONAL STANDARDS INSTITUTE (ANSI)

- a. ANSI Z89.1, Personnel Protective Equipment-Protective Headwear for Industrial Workers-Requirements (Latest Revision)
- b. ANSI Z87.1, Occupational and Educational Personal Eye and Face Protection Devices
- c. ANSI Z9.2, Fundamentals Governing the Design and Operation of Local Exhaust Systems
- d. ANSI Z88.2-80, Practices for Respiratory Protection

### 2. CODE OF FEDERAL REGULATIONS (CFR)

- a. 29 CFR Subpart D Walking-Working Surfaces
- b. 29 CFR 1910 Occupational Safety and Health Standards-All Sections
- c. 29 CFR 1926 Safety and Health Regulations for Construction-All Sections
- d. 40 CFR 50.6 National Primary and Secondary Ambient Air Quality Standards for Particulate Matter
- e. 40 CFR 61 National Emissions Standards for Hazardous Air Pollutants (NESHAPS)-Subpart A-General Provisions
- f. 49 CFR 172 Hazardous Material Table, Special Provisions, Hazardous Materials Communications, Emergency Response Information, and Training Requirements

### 3. NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH (NIOSH)

- a. Publication Number 87-108 Respiratory Decision Logic
- b. NIOSH/OSHA Booklet 3142 Lead in Construction
- c. Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities (NIOSH Publication 85-115)

### 4. U.S. DEPARTMENT OF LABOR, OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA)

- a. PUB 3126 Working with Lead in the Construction Industry
- b. 29 CFR 1910, Subpart I, Appendix B-Non-Mandatory Compliance Guidelines for Hazard Assessment and Personal Protective Equipment Selection

## SECTION 2 – HEALTH AND SAFETY PERSONNEL

The following information briefly describes the health and safety designations and general responsibilities for this Site.

### 2.1 Project Manager (PM)

The PM is responsible for the overall project including the implementation of the HASP. Specifically, this includes allocating adequate manpower, equipment, and time resources to conduct Site activities safely.

### 2.2 Health and Safety Manager

- Has the overall responsibility for coordinating and reporting health and safety activities and the health and safety of Site Workers.
- Must have completed, at a minimum, the OSHA 30-Hour Construction Safety Training, and either the 24-Hour training course for the Occasional Hazardous Waste Site Worker or the 40-Hour training course for the Hazardous Waste Operations Worker that meets OSHA 29 CFR 1910.
- Must have completed the 8-Hour Site supervisor/manager's course for supervisors and managers having responsibilities for hazardous waste Site operations and management.
- Directs and coordinates health and safety monitoring activities.
- Ensures that field teams utilize proper personal protective equipment (PPE).
- Conducts initial on-site specific training prior to Site Workers commencing work.
- Conducts and documents daily and periodic safety briefings.
- Ensures that field team members comply with this HASP.
- Immediately notifies the Project Manager of all accident / incidents.
- Determines upgrading or downgrading of PPE based on Site conditions and/or real time monitoring results.
- Ensures that monitoring instruments are calibrated daily or as the manufacturer's instructions determine.
- Provides daily summaries of field operations and progress to the Project Manager.
- Submits and maintains all documentation required in this HASP and any other pertinent health and safety documentation.

### 2.3 Health and Safety Officer (HSO)

- Must be designated by the Health and Safety Manager and at a minimum, have the OSHA 10-Hour Construction Safety Training.
- Must schedule and attend a Pre-Construction Safety Meeting with the Health and Safety Manager to discuss the Subcontractor Safety Requirements and must attend the Weekly Subcontractor Coordination Meeting.
- Responsible for ensuring subcontractors and their lower tier contractors comply with project safety requirements.

- Must make frequent and regular inspections of their work areas and activities and ensure hazards that are under their control are corrected immediately and all other hazards are reported to the Project Manager and Health and Safety Manager.
- Must report all work-related injuries, regardless of severity, to the Project Manager and the Health and Safety Manager within 24 hours after they occur.

## **2.4 Emergency Coordinator**

- The Emergency Coordinator or his on-site designee will, in coordination with the Authority / Agency having Jurisdiction, implement the emergency response procedures outlined in Section 12 whenever conditions at the Site warrant such action.
- The Emergency Coordinator or his on-site designee will be responsible for assuring the evacuation, emergency treatment, emergency transport of personnel as necessary, and notification of emergency response units (refer to phone listing in the beginning of this HASP) and the appropriate management staff.

## **2.5 Site Workers**

- Report any unsafe or potentially hazardous conditions to the HSO and the Health and Safety Manager.
- Maintain knowledge of the information, instructions, and emergency response actions contained in the HASP.
- Comply with rules, regulations, and procedures as set forth in this HASP, including any revisions that are instituted.
- Prevent unauthorized personnel from entering work Site.

## SECTION 3 – SITE HAZARDS EVALUATION

### 3.1 Chemical Hazards

#### Site History and Nature of Chemical Hazards

The Site was historically utilized for industrial purposes including machining, tinware manufacturing, cosmetics manufacturing, jewelry manufacturing, which involved electroplating, plating, anodizing, coloring, and the generation of hazardous waste. These types of businesses utilize petroleum products and chemicals such as chlorinated solvents and potentially per- and polyfluoroalkyl substances (PFAS).

Site investigations were performed in 2020, 2022, 2023, and 2024, which included the advancement of 24 soil borings and collection and analysis of 24 soil samples, the installation and sampling of six temporary groundwater monitoring wells, and the collection and analysis of air samples. The samples did not indicate an exceedance of a soil or groundwater standard for VOCs, although low levels of chlorinated solvents are present in groundwater which may be a contributing factor to soil vapor intrusion. Air sampling data indicated exceedances of NYSDOH criteria at concentrations that requires mitigation.

Six soil and three groundwater samples were analyzed for PFAS. The majority of the PFAS compound concentrations in the soil were below laboratory detection limits. The concentration of PFOS in the sample from one boring was 0.00293 parts per million (ppm), which exceeded the Unrestricted Use Soil Cleanup Objective (SCO) of 0.00088 ppm, but is below the Restricted Residential Use SCO of 0.044 ppm. The soil results show compliance with the guidance values intended for a site with a multi-family apartment. Perfluorooctanesulfonic Acid (PFOS) in MW-202 and MW-203 ranged from 0.0275 to 0.035 micrograms per cubic liter (ug/L), as compared to a guidance value of 0.0027 ug/L. Perfluorooctanoic Acid (PFOA) in the same two wells ranged from 0.0239 to 0.0448 ug/L, compared to a guidance value of 0.0067 ug/L. MW-202 is located to the north of the building on the anticipated downgradient side of the Site, while MW-203 is located to the south of the building on the anticipated upgradient side of the Site. Although concentrations at these two locations exceed the current guidance values, the concentrations are not indicative of a groundwater source in the immediate area.

Two 12,000-gallon no. 2 fuel oil underground storage tanks (USTs) were installed some time before 1986 and removed and closed in October 2013. At the time of closure, contamination was encountered around the tanks and spill no. 1307418 was assigned. Closeout soil samples indicated only two slight exceedances of semi-volatile organic compounds (SVOCs). Benzo(b)fluoranthene was detected at 1.2 ppm compared to the Restricted Residential Use SCO of 1 ppm. Indeno(1,2,3-cd)pyrene was detected at 0.556 ppm compared to the Restricted Residential Use SCO of 0.5 ppm. Approximately 200 tons of petroleum contaminated soil was excavated and transported to the Ontario County Landfill. According to existing records, no further remedial work was required and the New York State Department of Environmental Conservation (NYSDEC) closed the spill as not meeting standards. It is expected that subsurface soil in this area may exhibit nuisance

characteristics of petroleum impacts such as odors, staining, and detectable photoionization detector (PID) readings.

Another area of potential impacts are former rail spurs that provided service to the rear and east side of the building. It is unknown if there are impacts along the former spurs. However, there is potential that herbicides were applied and hazardous substances could have spilled from the rail cars.

**Common Routes of Exposure**

The contaminants at the Site may enter the human body in a variety of ways. Based on the nature of site contaminants, the chemical routes of exposure anticipated from the remedial activities at this site include:

Route	Mechanism	Control
Absorption	Dermal (skin) contact with impacted soil on-site resulting in absorption of chemicals of concern through the skin and into the blood stream.	Proper use of PPE will minimize risks of exposure at the site.
Ingestion	Chemicals / materials of concern can come in direct contact with the mouth from soil or other contaminated areas (PPE, skin, tools, etc.) and enter the bloodstream through the stomach lining.	Proper care in handling PPE and tools, refraining from eating and drinking at the Site, and frequent hand washing with soap and water will minimize risks of exposure.
Inhalation	Volatile vapors and/or contaminants attached to dust and particulates can be entrained by wind and become airborne across the site and be subsequently inhaled through the nose and / or mouth. This exposure route is the most likely way for worker exposure to occur.	Conduct monitoring of air quality for VOCs in worker breathing zones. Employ methods that minimize the creation of dust and utilize dust suppression techniques to minimize dust and particulates. Respirators with appropriate filtration and organic adsorption cartridges should be available to on-site workers in case volatile compounds become a nuisance or health hazard.

### 3.2 Physical Hazards

Based upon the anticipated field activities, the following potential physical hazardous conditions may exist:

Category	Mechanism	Control
Mechanical Equipment	The use of typical mechanical equipment can create a potential for crushing and pinching hazards due to movement and positioning of the equipment, movement of lever arms and hydraulics, and entanglement of clothing and appendages in exposed drives and tracks. Mechanical equipment can also create a potential for impact of steel tools, masts, and cables should equipment rigging fail, or other structural failures occur during hydraulic equipment operation.	Heavy equipment work must be conducted only by trained, experienced personnel. If possible, personnel must remain outside the turning radius of large, moving equipment. At a minimum, personnel must maintain visual contact with the equipment operator. When not operational, equipment must be set and locked so that it cannot be activated, released, dropped, etc. The mechanical equipment stated above represents typical equipment that is ordinarily used during this scope of work, but is not meant to be an all-inclusive list. Similar precautions should be used around other mechanical equipment deployed to the Site that is not listed above.
Excavations and Trenches	The use of excavation/trenching such as removal of soils, installation of utilities, and site grading operations can cause potential for suffocation, crushing, or other injury from falling material. Advancement of excavation and trenches can also create possible damage/failure of any installed underground utility services and create hazards. Other hazards created can include tripping, slipping, or falling. Entering an excavation or trench could have the possibility of an explosive, flammable, toxic, or oxygen-deficient atmosphere within the excavation or trench.	Ensure compliance with OSHA's construction standard for excavations (29 CFR 1926 Subpart P). Designate a Competent Person responsible for selecting and implementing the appropriate protective system(s), assuring appropriate means of access and egress for excavations greater than four (4) feet in depth, and for ensuring that potential atmospheric and physical hazards associated with any excavation / trenching activities are completed in accordance with Subpart P and other applicable OSHA Standards.
Noise	Work around large equipment often creates excessive noise. Noise can cause workers to be startled, annoyed, and/or distracted; as well as causing pain, physical damage to the ear, and temporary and/or permanent hearing loss; and can interfere with communication.	If workers are subjected to noise exceeding an 8-hour time-weighted average sound level of 85 dBA, hearing protection will be required with an appropriate noise reduction rating to comply with 29 CFR 1910.95 and to reduce noise levels below levels of concern.
Slips/Trips/Falls	Personnel may encounter slip, trip, and fall hazards associated with	In the event slip, trip, and fall hazards cannot be removed or minimized, site

Category	Mechanism	Control
	excavations, manways, and construction debris and materials. Precautionary measures should be taken by identifying and removing slip, trip, and fall hazards prior to commencing work.	workers will be shown the location of the physical hazard and be asked to avoid it during work activities.
Fire/Explosion	The potential for fire and/or explosion emergencies is always present on the Site.	Field vehicles will be equipped with a fire extinguisher. Employees, contractors and workers must be trained in the proper use of fire suppression equipment. However, large fires that cannot be controlled with a fire extinguisher shall be handled by professionals. The proper authorities shall be notified in these instances, as well as the HSO and Health and Safety Manager.
Cold Exposure	<p>Persons working in the outdoors in temperatures at or below freezing may be subject to frostbite. Extreme cold for a short time may cause injury to exposed body surfaces or result in a profound generalized cooling which can cause death. Areas of the body such as fingers, toes, and ears, are the most susceptible to cold stress. Ambient air temperature and wind velocity are two factors which influence the development of a cold weather injury. Local injury resulting from exposure to cold temperatures is known as "frostbite." There are several degrees of damage in which frostbite of the extremities can be categorized, as follows:</p> <ul style="list-style-type: none"> <li>○ Frost nip or incipient frostbite is characterized by sudden bleaching or whitening of the skin.</li> <li>○ Superficial frostbite occurs when the skin has a waxy or white appearance and is firm to the touch, but tissue beneath is resilient.</li> <li>○ Deep frostbite is characterized by tissues that are cold, pale,</li> </ul>	<p>Wear several layers of dry clothes so that you can vary the amount of clothing to match the conditions. If there is wind, wear a windbreaker, since wind increases the effects of cold air and in turn lowers your body's core temperature even faster. Don't get overheated. Sweat can dampen clothing and in turn lead to over-cooling. Keep hands, feet, ears, and face warm. These are the areas of the body where frostbite tends to strike first. Heart disease and the use of sedatives or excessive alcohol will make you more susceptible to cold stress. If you feel chilly or sleepy, or have pain in your extremities, go to a warm shelter to recover.</p>

Category	Mechanism	Control
	and solid; this is an extremely serious injury.	
Heat Exposure/Stress	<p>Heat stress can result from a number of contributing factors, including environmental conditions, clothing, and workload as well as the physical condition of the individual. Since heat stress is one of the most common injuries / symptoms associated with outdoor work conducted with direct solar load, and, in particular, because wearing PPE can increase the risk of developing heat stress, workers must be capable of recognizing the signs and symptoms of heat-related illnesses. Signs and symptoms of heat-related illnesses which all on-site personnel should be aware, include the following:</p> <ul style="list-style-type: none"> <li>○ Heat rash may result from continuous exposure to heat or humid air.</li> <li>○ Heat cramps are caused by heavy sweating and may include muscle spasms and pain in the hands, feet, and abdomen.</li> <li>○ Heat exhaustion is indicated by pale, cool, and moist skin; heavy sweating; dizziness; nausea; and fainting.</li> <li>○ Heat stroke is indicated by red, hot, and unusually dry skin; lack of or reduced perspiration; nausea; dizziness and confusion; rapid pulse; and coma. Immediate action must be taken to cool the body before serious injury or death occurs.</li> </ul>	<p>The following will steps will be taken to limit heat exposure: adjust schedules, take breaks, limit heavy work in protective clothing or in a hot environment may require more time resting than working. Schedule heavy work in the coolest part of the day. Have shaded rest shelters with chairs or benches. Drink Fluids. Sweating cools the body, but it also robs the body of fluid. Drink enough fluids to replace what you lose. You may not feel thirsty until you've become dehydrated. Drink regularly throughout the day. Don't wait until you're thirsty.</p> <p>Monitor for signs of potential heat exposure and stress through use of the "buddy system", with frequent communication between site personnel. Take scheduled breaks and hydrate frequently throughout the day. Maintain an adequate supply of cold water and electrolyte containing drinks in support zone of site.</p> <p>In the event that personnel are observed to exhibit dizziness, disorientation, heat rash, slurred speech, dry mouth, heat cramps, or other symptoms of heat stress, discontinue work immediately and move affected person(s) to a location that is free from direct sunlight and provide fluids (preferably "Gatorade" or similar product that will replenish electrolytes). Monitor condition during to evaluate whether there is notable improvement in their condition.</p>
Utilities	Overhead and underground utilities may exist within the Work Area, which may expose workers to electrocution hazards, explosive hazards, and volatile vapors.	Dig Safely New York shall be contacted a minimum of three business days prior to initiating the field activities, to arrange for the identification and markout of buried utilities at the site. The contact number for Dig Safely New York is 1-800-962-7962.

Category	Mechanism	Control
		In the event of inadvertent damage to buried utilities, all work shall cease, and the situation shall be evaluated by the HSO.

### 3.3 Environmental Hazards

Based upon the anticipated field activities, the following potential environmental hazardous conditions may exist:

Category	Hazard	Control
Biological	Ticks, bees / wasps, mosquitos, spiders, snakes, rabid animals	<p>There are no known species of poisonous spiders or snakes common to the area.</p> <p>Minimize potential exposure to by wearing wear long pants and safety shoes. Change clothing and carefully examine for evidence of insects and ticks upon undressing, immediately following return from the site.</p> <p>Avoid contact with any animals, either wild or domestic, that may be encountered while conducting the field activities and notify the local office of the New York State Department of Health (NYSDOH) in the event that animals are observed to elicit strange behavior. In the event of contact with an animal that is behaving in a strange manner, the NYSDOH should be contacted immediately.</p>
Biological	Poison Ivy, Poison Oak, Giant Hogweed	Familiarize yourself with the characteristics and appearance of poison ivy, poison oak, and Giant Hogweed. Be cognizant of vegetation while conducting work activities. Minimize potential exposure to by wearing wear long pants and safety shoes. Change clothing immediately following return from the site.
Weather	Wet surfaces, lightning, high winds (falling objects, contaminated dust), hail, excessive heat, extreme cold, snow and ice.	Remain cognizant of weather conditions, forecasts, and changing weather conditions. Exercise extra caution during wet and inclement site conditions to minimize risk of slips and falls. Avoid work during periods of high winds to reduce risk of injury from falling objects and airborne contaminant migration. Cease work and monitor conditions in the event that lightning is observed or suspected in the area, or in the event that other weather conditions pose a health or safety hazard.

## **SECTION 4 – TRAINING**

### **4.1 Site-Specific Training**

Training will be provided that specifically addresses the activities, procedures, monitoring, and equipment for the Site operations prior to going on Site. Training will include familiarization with Site and facility layout, known and potential hazards, and emergency services at the Site, and details all provisions contained within this HASP. This training will also allow Site Workers to clarify anything they do not understand and to reinforce their responsibilities regarding safety and operations for their particular activity.

### **4.2 Safety Briefings**

Project personnel will be given briefings by the HSO on a daily or as needed basis to further assist Site workers in conducting their activities safely. Pertinent information will be provided when new operations are to be conducted. Changes in work practices must be implemented due to new information made available, or if Site or environmental conditions change. Briefings will also be given to facilitate conformance with prescribed safety practices. When conformance with these practices is not occurring or if deficiencies are identified during safety audits, the project manager will be notified.

### **4.3 Daily Tailgate Safety Meeting**

The HSO or the HSO designee will be responsible for conducting a daily tailgate safety meeting prior to start of any work activities. The contractor and workers will be responsible for attending daily tailgate safety meetings, as well as providing any additional insight into any possible hazards which might be anticipated or encountered throughout the day on the Site. The meeting will discuss any measures which will be implemented throughout the day to mitigate any hazards. The meetings are designed to create awareness of any hazards and their associated mitigation measures at the Site. If conditions at the Site change and new hazards are determined to be present, work will be stopped and an additional safety meeting will be conducted. The daily tailgate meetings discussions will be logged, as well as all who attended.

## SECTION 5 – COMMUNICATIONS

### 5.1 Communications

A phone will be located on Site to be utilized by personnel. Cell phones will be the primary means of communicating with emergency support services/facilities.

## SECTION 6 – PERSONAL PROTECTIVE EQUIPMENT

### 6.1 Personal Protective Equipment – General

The level of protection to be worn by field personnel will be defined and controlled by the HSO. Depending upon the type and levels of material present or anticipated at the site, varying degrees of protective equipment will be needed. If the possible hazards are unknown, a reasonable level of protection will be taken until sampling and monitoring results can ascertain potential risks. The levels of protection listed below are based on USEPA Guidelines. A list of the appropriate clothing for each level is also provided.

Level A protection must be worn when a reasonable determination has been made that the highest available level of respiratory, skin, eye, and mucous membrane protection is needed. It should be noted that while Level A provides maximum available protection, it does not protect against all possible hazards. Consideration of the heat stress that can arise from wearing Level A protection should also enter into the decision-making process. Level A protection includes:

- Open circuit, pressure-demand self-contained breathing apparatus (SCBA)
- Totally encapsulated chemical resistant suit
- Gloves, inner (surgical type)
- Gloves, outer, chemical protective
- Boots, chemical protective

Level B protection must be used when the highest level of respiratory protection is needed, but hazardous material exposure to the few unprotected areas of the body (e.g., the back of the neck) is unlikely. Level B protection includes:

- Open circuit, pressure-demand SCBA or pressure airline with escape air bottle
- Chemical protective clothing: Overalls and long-sleeved jacket; disposal chemical resistant coveralls; coveralls; one or two piece chemical splash suit with hood
- Gloves, inner (surgical type)
- Gloves, outer, chemical protective
- Boots, chemical protective

Level C must be used when the required level of respiratory protection is known, or reasonably assumed to be, not greater than the level of protection afforded by air purifying respirators; and hazardous materials exposure to the few unprotected areas of the body (e.g. the back of the neck) is unlikely. Level C protection includes:

- Full or half face air-purifying respirator
- Chemical protective clothing: Overalls and long-sleeve jacket; disposable chemical resistant coveralls; coveralls; one- or two-piece chemical splash suit
- Gloves, inner (surgical type)
- Gloves, outer, chemical protective
- Boots, chemical protective

Level D is the basic work uniform. It cannot be worn on any site where respiratory or skin hazards exist. Level D protection includes:

- Safety boots/shoes
- Safety glasses
- Hard hat with optional face shield

Note that the use of SCBA and airline equipment is contingent upon the user receiving special training in the proper use and maintenance of such equipment.

## **6.2 Personal Protective Equipment – Site Specific**

Level D with some modification will be required when working on this Site. In addition to the basic work uniform specified by Level D protection, Nitrile gloves will be required when contacting contaminated soil. Hearing protection will be worn when power equipment is used to perform subsurface work. An upgrade to a higher level (Level C) of protection may occur if determined necessary by the HSO.

## SECTION 7 – MONITORING PROCEDURES

### 7.1 Monitoring During Site Operations

All Site environmental monitoring should be accompanied by periodic meteorological monitoring of appropriate climatic conditions.

#### 7.1.2 Excavation and Trenching

If soil appears to be impacted by petroleum or chemicals, monitoring will be performed during the conduct of work. A PID equipped with a 10.6 eV lamp will be utilized to monitor for the presence of volatile organic vapors within the breathing zone. Excavation spoils will also be monitored by use of the PID. The PID will be field checked for calibration accuracy three times per day (morning, lunch, and end of day). If subsurface conditions warrant, a combustible gas indicator (CGI) with oxygen alarm may also be used to monitor for the presence of combustible gases.

### 7.2 Action Levels

If readings on the PID exceed 15 ppm for more than fifteen minutes consecutively, then personal protective equipment should be upgraded to Level C. The air purifying respirator used with Level C protective equipment must be equipped with organic vapor cartridges. If readings on the explosive gas meter are within a range of 10%-25% of the lower exposure limit (LEL) then continuous monitoring will be implemented. Readings above 25% of the LEL indicate the potential for an explosive condition. Sources of ignition should be removed and the Site should be evacuated.

### 7.3 Personal Monitoring Procedures

Personal monitoring shall be performed as a contingency measure in the event that VOC concentrations are consistently above the 15-ppm action level as detected by the PID. If the concentration of VOCs is above this action level, then amendments to the HASP must be made before work can continue at the Site.

## SECTION 8 – SAFETY CONSIDERATIONS FOR SITE OPERATIONS

### 8.1 General

Standard safe work practices that will be followed include:

- Do not climb over/under drums, or other obstacles.
- Do not work on the Site alone.
- Practice contamination avoidance, on and off-site.
- Plan activities ahead of time, and use caution when conducting concurrently running activities.
- No eating, drinking, chewing or smoking is permitted when handling contaminated material.
- Apply immediate first aid to any and all cuts, scratches, abrasions, etc.
- Be alert to your own physical condition. Watch your buddy for signs of fatigue, exposure, etc.
- A work/rest regimen will be initiated when ambient temperatures and protective clothing create a potential heat or cold stress situation.
- No work will be conducted without adequate natural light or without appropriate supervision.
- Task safety briefings will be held prior to onset of task work.
- Ignition of flammable liquids within or through improvised heating devices (barrels, etc.) or space heaters is forbidden.
- Entry into areas of spaces where toxic or explosive concentrations of gases or dust may exist without proper equipment is prohibited.
- Any injury or unusual health effect must be reported to the Site HSO.
- Prevent splashing or spilling of potentially contaminated materials.
- Use of contact lenses is prohibited while on site.
- Beards and other facial hair that would impair the effectiveness of respiratory protection are prohibited if respiratory protection is necessary.
- Field crew members should be familiar with the physical characteristics of the work, including but not limited to:
  - Wind direction in relation to potential sources
  - Accessibility to co-workers, equipment, and vehicles
  - Communication
  - Hot zones (areas of known or suspected contamination)
  - Site access
  - Nearest water sources
- The number of personnel and equipment in potentially contaminated areas should be minimized consistent with site operations.

## 8.2 Field Operations

The HSO or designee will be present on-site during all intrusive work (e.g. excavations, trenching) and will provide monitoring to oversee that appropriate levels of protection and safety procedures are utilized by personnel. The use of salamanders or other equipment with an open flame is prohibited and the use of protective clothing, especially hard hats and boots, will be required during drilling or other heavy equipment operations.

## SECTION 9 – DECONTAMINATION PROCEDURES

### 9.1 General Decontamination

Decontamination involves physically removing contaminants and/or converting them chemically into innocuous substances. Only general guidance can be given on methods and techniques for decontamination. Decontamination procedures are designed to:

- Remove contaminant(s).
- Avoid spreading the contamination off Site.
- Avoid exposing unprotected personnel off Site to contaminants.

### 9.2 Contamination Avoidance

Contamination avoidance is the first and best method for preventing spread of contamination from a hazardous site. Each person involved in site operations must practice the basic methods of contamination avoidance listed below. Additional precautions may be required in the HASP.

- Know the limitations of all protective equipment being used.
- Use the proper tools necessary to safely conduct the work.

### 9.3 Reducing Contamination

Specific methods that may reduce the chance of contamination are:

- Use of remote sampling techniques.
- Opening containers by non-manual means.
- Bagging monitoring instruments.
- Use of drum grapples.
- Watering down dusty areas.

### 9.4 Equipment Decontamination

Equipment which will need to be decontaminated includes tools, equipment, monitoring equipment, and personal protective equipment. Items to be decontaminated will be brushed off, rinsed, and dropped into a plastic container supplied for that purpose. They will then be washed with a detergent solution and rinsed with clean water. Instrumentation that is contaminated during field operations will be carefully wiped down. Heavy equipment, if utilized for operations where it may be contaminated, will have prescribed decontamination procedures to prevent contaminant materials from potentially leaving the Site. On-site contractors, such as backhoe operators, will be responsible for decontaminating all construction equipment prior to demobilization.

## SECTION 10 – DISPOSAL PROCEDURES

All discarded materials, waste materials, or other objects shall be handled in such a way as to reduce or eliminate the potential for spreading contamination, creating a sanitary hazard, or causing litter to be left on-site. All potentially contaminated materials, e.g., clothing, gloves, etc., will be bagged or drummed as necessary and segregated for proper disposal. All contaminated waste materials shall be disposed of as required by the provisions included in the contract and consistent with regulatory provisions. All non-contaminated materials shall be collected and bagged for appropriate disposal.

Spoils that are free from physical indications of contamination such as odors, staining, and sheens can be reused onsite. In cases where physical indications of contamination are evident, the affected media will be managed per applicable local, state, and federal regulations. Samples may be analyzed for toxicity characteristic leaching procedure (TCLP) VOCs, SVOCs, pesticides, herbicides, and metals; PCBs; pH (corrosivity), flash point (ignitability); reactivity; and paint filter (free liquids).

## SECTION 11 – EMERGENCY RESPONSE PROCEDURES

As a result of the hazards at the Site, and the conditions under which operations are conducted, there is the possibility of emergency situations. This section establishes procedures for the implementation of an emergency plan.

### 11.1 Emergency Coordinator

The Emergency Coordinator or his on-site designee will, in coordination with the Authority / Agency having Jurisdiction, implement the emergency response procedures whenever conditions at the site warrant such action. The Emergency Coordinator or his on-site designee will be responsible for assuring the evacuation, emergency treatment, emergency transport of personnel or workers as necessary, and notification of emergency response units (**refer to phone listing** in the beginning of this HASP) and the appropriate management staff.

### 11.2 Evacuation

In the event of an emergency situation, such as fire, explosion, significant release of toxic gases, etc., all personnel will evacuate and assemble in a designated assembly area. The Emergency Coordinator or his on-site designee will have authority to contact outside services as required. Under no circumstances will incoming personnel or visitors be allowed to proceed into the area once the emergency signal has been given. The Emergency Coordinator or his on-site designee must see that access for emergency equipment is provided and that all ignition sources have been shut down once the emergency situation is established. Once the safety of all personnel is established, the Fire Department and other emergency response groups will be notified by telephone of the emergency.

### 11.3 Potential / Actual Fire or Explosion

Immediately evacuate the Site and notify local fire and police departments, and other appropriate emergency response groups, if LEL values are above 25% in the work zone or if an actual fire or explosion has taken place.

### 11.4 Environmental Incident (Spread or Release of Contamination)

Control or stop the spread of contamination if possible. Notify the Emergency Coordinator and the Project Manager. Other appropriate response groups will be notified as appropriate.

### 11.5 Personnel Injury

Emergency first aid shall be applied on-site as necessary. Then, decontaminate (en route if necessary) and transport the individual to nearest medical facility if needed. The ambulance / rescue squad shall be contacted for transport as necessary in an emergency. A map of directions to the nearest hospital is shown in **Attachment A**.

## 11.6 Personnel Exposure

- *Skin Contact:* Use copious amounts of soap and water. Wash/rinse affected area thoroughly, and then provide appropriate medical attention. Eyes should be thoroughly rinsed with water for at least 15 minutes.
- *Inhalation:* Move to fresh air and/or, if necessary, decontaminate and transport to emergency medical facility.
- *Ingestion:* Decontaminate and transport to emergency medical facility.
- *Puncture Wound/Laceration:* Decontaminate, if possible, and transport to emergency medical facility.

## 11.7 Adverse Weather Conditions

In the event of adverse weather conditions, the HSO will determine if work can continue without sacrificing the health and safety of field workers.

## 11.8 Incident Investigation and Reporting

In the event of an incident, procedures discussed in the Medical Emergency / Incident Response Protocol, presented in **Appendix B** of this HASP, shall be followed.

## **Attachment A**

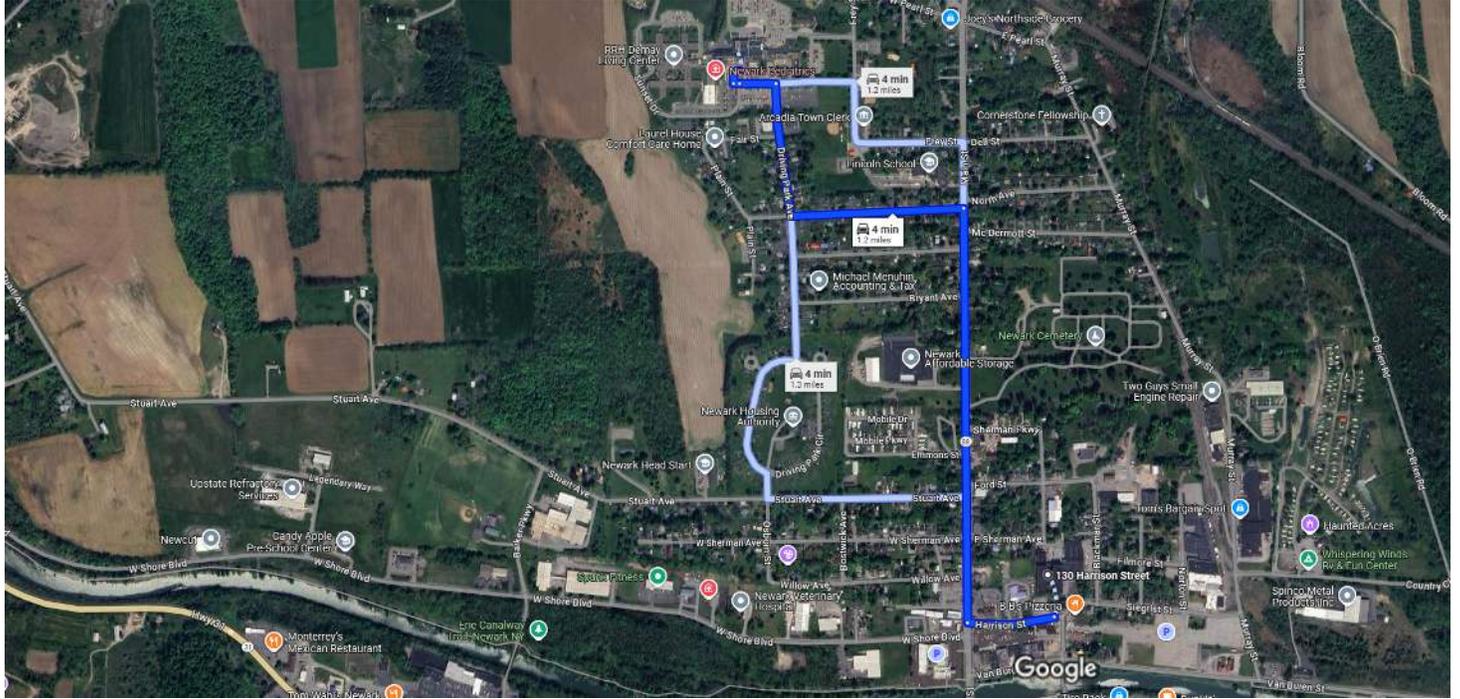
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### **Map and Directions to Hospital**



130 Harrison St, Newark, NY 14513 to RRH Newark-Wayne Community Hospital,  
1200 Driving Park Ave, Newark, NY 14513

Drive 1.2 miles, 4 min



Imagery ©2024 Airbus, CNES / Airbus, Maxar Technologies, Map data ©2024 500 ft

-  **via Main St** **4 min**  
Fastest route 1.2 miles

---

-  **via Main St and Frey St** **4 min**  
1.2 miles

---

-  **via Driving Park Ave** **4 min**  
1.3 miles

### Explore nearby RRH Newark-Wayne Community Hospital

-  Restaurants
-  Hotels
-  Gas stations
-  Parking Lots
-  More

## Appendix B

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# Guidance on Incident Investigation and Reporting

# Medical Emergency / Incident Response Protocol

Prepared by:



C&S Engineers, Inc.  
499 Col Eileen Collins Blvd.  
Syracuse, New York 13212

## **SECTION 1 – PURPOSE**

From time to time employees of C&S Engineers, Inc. will sustain an injury while working on the job. While every effort is being made to prevent this, in the event of an injury or illness on the job, the following procedures will be implemented. This format may also be utilized in the event of a property damage incident.

## **SECTION 2 – SCOPE**

This guideline applies to all C&S Engineers, Inc. job sites and employees.

## **SECTION 3 – GUIDELINES**

### **3.1 First Response Procedures**

Upon notification or awareness of an incident/accident with injuries or illness the Emergency Coordinator or his On-Site Designee will:

1. Ensure that the injured employee is receiving immediate first aid and medical care.
2. Notify Emergency Services (911) if injuries are severe.
3. Stabilize the work area; ensure that no one else can be injured.
4. Notify the Project Manager at the earliest possible convenience.
5. Notify the Owner/Client at the earliest possible convenience.

To assist the Health and Safety Manager in the root cause analysis, the Emergency Coordinator or his On-Site Designee will also make an attempt to:

1. Obtain the names and phone numbers of witnesses.
2. Preserve the accident scene if possible for analysis.

### **3.2 Injury Management**

1. If the patient is stable with non-life threatening injuries, the foreman will ensure the employee is transported to the emergency medical facility listed in Section 1 of the HASP. Directions to the nearest emergency medical facility are located in **Attachment A** of the HASP.

**At no time will an injured employee drive themselves to medical care.**

2. If the patient has serious or life threatening injuries, the emergency coordinator or his on-site designee will notify the emergency services for the area for treatment and transport to a hospital or emergency room. Serious injuries can be considered but not limited to head injuries, loss of consciousness, severe laceration or amputation, fractured bones, burns and eye injuries.

3. Following the treatment and care of the injured employee, the emergency coordinator or his on-site designee and the project manager will initiate the completion of the first injury report. The Health & Safety Manager will assist.

### **3.3 Project Manager**

1. Upon notification of a personal injury or illness on the job site, will notify C&S Engineers, Inc, President, Corporate Legal, and C&S Companies Health and Safety Manager.
2. Will report to the worksite to initiate the first injury report.
3. Will report to the treatment facility to check on the well-being of the injured employee.
4. The project manager will ensure that the treatment facility is aware that this is a workers compensation case.
5. Will assist the Health and Safety Manager in the analysis of the incident.

### **3.4 Health & Safety Manager**

1. Upon notification of the personal injury will determined if it is necessary to report to the treatment facility or the accident site, depending on the nature of the injuries and the circumstances of the accident.
2. Will report to the worksite to begin a root cause analysis investigation of the accident.
3. The investigation may include interview of witnesses, field crew, and project manager, the photographing of the scene, reconstruction of the accident scene, using test instruments and taking measurements. The Health and Safety Manager may draw diagrams from the information learned.
4. The Health and Safety Manager will work with the owner/client as necessary to investigate the accident.
5. The Health & Safety manager will ensure that the site is safe to resume work.
6. The Health & Safety Manager shall initiate the New York State Compensation form requirements (C-2) and forward a copy of the C-2 to the C & S Engineers, Inc. controller for transmittal to the Compensation Carrier within 8 hours of notification of the incident or by the end of the next business day.
7. The Health and Safety manager, upon completion of the investigation, will provide the
8. Project Manager with a written investigative report (copy to the President)
9. The accident will be reviewed at the next Project Managers meeting with the intent to prevent further or similar events on other projects.
10. The Health & Safety Manager will assess the incident to determine OSHA record ability and make record if necessary on the OSHA 300 form, within five working days.



## **SECTION 4 - INCIDENT RESPONSE**

### **4.1 Purpose**

To prevent the occurrence of accidents on C&S Engineers, Inc., work sites and to establish a procedure for investigation and reporting of incidents occurring in, or related to C&S work activities.

### **4.2 Scope**

Applies to all incidents related to C&S Engineers, Inc. work activities.

### **4.3 Definitions**

Accident - An undesired event resulting in personal injury and/or property damage, and/or equipment failure.

Fatality - An injury or illness resulting in death of the individual.

Incident - Any occurrence which results in, or could potentially result in, the need for medical care or property damage. Such incidents shall include lost time accidents or illness, medical treatment cases, unplanned exposure to toxic materials or any other significant occurrence resulting in property damage or in "near misses."

Incidence Rate - the number of injuries, illnesses, or lost workdays related to a common exposure base of 100 full-time workers. The rate is calculated as:

$$N/EH \times 200,000$$

N = number of injuries and illnesses or lost workday cases; EH = total hours worked by all associates during calendar year. 200,000 = base for 100 full-time equivalent workers (working 40 hours per week, 50 weeks per year).

Injury - An injury such as a cut, fracture, sprain, amputation, etc. which results from a work accident or from a single instantaneous event in the work environment.

Lost Workday Case - A lost workday case occurs when an injured or ill employee experiences days away from work beginning with the next scheduled work day. Lost workday cases do not occur unless the employee is effected beyond the day of injury or onset of illness.

Recordable Illness - An illness that results from the course of employment and must be entered on the OSHA 300 Log and Summary of Occupational Injuries and Illnesses. These illnesses require medical treatment and evaluation of work related injury. For example, dermatitis, bronchitis, irritation of eyes, nose, and throat can result from work and non-work related incidents.



Recordable Injury - An injury that results from the course of employment and must be entered on the OSHA 300 Log and Summary of Occupational Injuries and Illnesses. These injuries require medical treatment; may involve loss of consciousness; may result in restriction of work or motion or transfer to another job; or result in a fatality.

Near Miss - An incident which, if occurring at a different time or in a different personnel or equipment configuration, would have resulted in an incident.

#### **4.4 Responsibilities**

Employees - It shall be the responsibility of all C&S Engineers, Inc. employees to report all incidents as soon as possible to the HSC, regardless of the severity.

Human Resources - has overall responsibility for maintaining accident/ incident reporting and investigations according to current regulations and recording injuries/ illness on the OSHA 300 log, and posting the OSHA 300 log.

Emergency Coordinator - It is the responsibility of the Emergency Coordinator to investigate and prepare an appropriate report of all accidents, illnesses, and incidents occurring on or related to C&S Engineers, Inc. work. The Emergency Coordinator shall complete Attachment A within 24 hours of the incident occurrence.

Health and Safety Manager (HSM) - It is the responsibility of the HSM to investigate and prepare an appropriate report of all lost time injuries and illnesses and significant incidents occurring on or related to C&S Companies. The HSM shall maintain the OSHA 300 form.

Project Managers (PM) - It shall be the PM's responsibility to promptly correct any deficiencies in personnel, training, actions, or any site or equipment deficiencies that were determined to cause or contribute to the incident investigated.

### **SECTION 5 – GUIDELINES**

#### **5.1 Incident Investigation**

The Project Manager will immediately investigate the circumstances surrounding the incident and will make recommendations to prevent recurrence. The HSM shall be immediately notified by telephone if a serious accident/ incident occurs. The incident shall be evaluated to determine whether it is OSHA recordable. If the incident is determined to be OSHA 300 recordable, it shall be entered on the OSHA 300 form.

The Project Manager with assistance from the HSM must submit to the office an incident report form pertaining to any incident resulting in injury or property damage.



## **5.2 Incident Report**

The completed incident report must be completed by the Project Manager within 12 hours of the incident and distributed to the HSM, and Human Resources. This form shall be maintained by Human Resources for at least five years for all OSHA recordable cases. This form serves as an equivalent to the OSHA 101 form.

## **5.3 Incident Follow-up Report**

The Incident Follow-Up Report (Attachment B) shall be distributed with the Incident Report within one week of the incident. Delay in filing this report shall be explained in a brief memorandum.

## **5.4 Reporting of Fatalities or Multiple Hospitalization Accidents**

Fatalities or accidents resulting in the hospitalization of three or more employees must be reported to OSHA verbally or in writing within 8 hours. The report must contain 1) circumstances surrounding the accident(s), 2) the number of fatalities, and 3) the extent of any injuries.

## **5.5 OSHA 300A Summary Form**

Recordable cases must be entered on the log within six workdays of receipt of the information that a recordable case has occurred. The OSHA log must be kept updated to within 45 calendar days.

OSHA 300 forms must be updated during the 5 year retention period, if there is a change in the extent or outcome of an injury or illness which affects an entry on a log. If a change is necessary, the original entry should be lined out and a corrected entry made on that log. New entries should be made for previously unrecorded cases that are discovered or for cases that initially weren't recorded but were found to be recordable after the end of the year. Log totals should also be modified to reflect these changes.

## **5.6 Posting**

The log must be summarized at the end of the calendar year and the summary must be posted from February 1 through May 31.

## **5.7 OSHA 300A**

Facilities selected by the Bureau of Labor Statistics (BLS) to participate in surveys of occupational injuries and illnesses will receive the OSHA 300A. The data from the annual summary on the OSHA 300 log should be transferred to the OSHA 300A, other requested information provided and the form returned as instructed by the BLS.



## **5.8 Access to OSHA Records**

All OSHA records (accident reporting forms and OSHA 300 logs) should be available for inspection and copying by authorized Federal and State government officials.

Employees, former employees, and their representatives must be given access for inspection and copying to only the log, OSHA No. 300, for the establishment in which the employee currently works or formerly worked.

## **SECTION 6 – REFERENCES**

29 CFR Part 1904

## **SECTION 7 ATTACHMENTS**

Attachment A - Incident Investigation Form

Attachment B - Incident Follow-Up Report

Attachment C - Establishing Recordability



**ATTACHMENT A**

**INCIDENT INVESTIGATION FORM**

Accident investigation should include:

Location: \_\_\_\_\_

Time of Day: \_\_\_\_\_

Accident Type: \_\_\_\_\_

Victim: \_\_\_\_\_

Nature of Injury: \_\_\_\_\_

Released Injury: \_\_\_\_\_

Hazardous Material: \_\_\_\_\_

Unsafe Acts: \_\_\_\_\_

Unsafe Conditions: \_\_\_\_\_

Policies, Decisions: \_\_\_\_\_

\_\_\_\_\_

Personal Factors: \_\_\_\_\_

\_\_\_\_\_

Environmental Factors: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



**ATTACHMENT B**

**INCIDENT FOLLOW-UP REPORT**

Date \_\_\_\_\_

Foreman: \_\_\_\_\_

Date of Incident: \_\_\_\_\_

Site: \_\_\_\_\_

Brief description of incident: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Outcome of incident: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Physician's recommendations: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date the injured returned to work: \_\_\_\_\_

Project Manager Signature: \_\_\_\_\_

Date: \_\_\_\_\_

ATTACH ANY ADDITIONAL INFORMATION TO THIS FORM



## ATTACHMENT C

### ATTACHMENT ESTABLISHING RECORDABILITY

1. Deciding whether to record a case and how to classify the case.

Determine whether a fatality, injury or illness is recordable.

A fatality is recordable if:

- Results from employment

An injury is recordable if:

- Results from employment and
- It requires medical treatment beyond first aid or
- Results in restricted work activity or job transfer, or
- Results in lost work day or
- Results in loss of consciousness

An illness is recordable if:

- It results from employment

2. Definition of "Resulting from Employment"

Resulting from employment is when the injury or illness results from an event or exposure in the work environment. The work environment is primarily composed of: 1) The employer's premises, and 2) other locations where associates are engaged in work-related activities or are present as a condition of their employment.

The employer's premises include company rest rooms, hallways, cafeterias, sidewalks and parking lots. Injuries occurring in these places are generally considered work related.

The employer's premises EXCLUDES employer controlled ball fields, tennis courts, golf courses, parks, swimming pools, gyms, and other similar recreational facilities, used by associates on a voluntary basis for their own benefit, primarily during off work hours.

Ordinary and customary commute, is not generally considered work related.

Employees injured or taken ill while engaged in consuming food, as part of a normal break or activity is not considered work related. Employees injured or taken ill as the result of smoking, consuming illegal drugs, alcohol or applying make up are generally not considered work related. Employee injured by an authorized horseplay is generally not considered work related, however, an employee injured as a result of a fight or other

workplace violence act, may be considered work related. Associates who travel on company business are considered to be engaged in work related activities all the time they spend in the interest of the company. This includes travel to and from customer contacts, and entertaining or being entertained for purpose of promoting or discussing business. Incidents occurring during normal living activities (eating, sleeping, recreation) or if the associate deviates from a reasonably direct route of travel are not considered OSHA recordable.

3. Distinction between Medical Treatment and First Aid.

First aid:

Any one-time treatment, and any follow up visit for the purpose of observation, of minor scratches, cuts, burns, splinters, etc., which do not ordinarily require medical care. Such one time treatment, and follow up visit for the purpose of observation, is considered first aid even though provided by a physician or registered professional personnel.

Medical Treatment (recordable):

- a) Must be treated only by a physician or licensed medical personnel.
- b) Impairs bodily function (i.e. normal use of senses, limbs, etc.).
- c) Results in damage to physical structure of a non-superficial nature (fractures).
- d) Involves complications requiring follow up medical treatment.

## **Appendix D**

---

# Community Air Monitoring Plan



# Community Air Monitoring Plan

**Coventry Commons**

**130-132 Harrison Street, Newark, New York**

**NYSDEC Site No. 859036**

Prepared for:



Coventry Commons LLC  
1201 East Fayette Street  
Syracuse, New York

March 2025

C&S Project No. W96.007.009

# Community Air Monitoring Plan (CAMP)

**Coventry Commons  
130-132 Harrison Street  
Newark, Wayne County, New York  
NYSDEC Site No. 859036**

Prepared by:



C&S Engineers, Inc.  
499 Colonel Eileen Collins Blvd  
Syracuse, New York 13212

Prepared for:



Coventry Commons LLC  
1201 East Fayette Street  
Syracuse, New York

March 2025

C&S Project#: W96.007.009



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## 1.0 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.

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.

- **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.

## 2.0 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, such as isobutylene. 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.

### 3.0 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 ( $\mu\text{g}/\text{m}^3$ ) 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.
2. 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.
3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

#### 3.1 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/m<sup>3</sup> (1 to 400,000 µg/m<sup>3</sup>);
  - c. Precision (2-sigma) at constant temperature: +/- 10 µg/m<sup>3</sup> for one second averaging; and +/- 1.5 g/m<sup>3</sup> for sixty second averaging;
  - d. Accuracy: +/- 5% of reading +/- precision (Referred to gravimetric calibration with SAE fine test dust [mmd= 2 to 3 µm, g= 2.5], as aerosolized);
  - e. Resolution: 0.1% of reading or 1 g/m<sup>3</sup>, 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); and
  - 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 µg/m<sup>3</sup> (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 µg/m<sup>3</sup>, the upwind background level must be confirmed immediately. If the working site particulate measurement is greater than 100 µg/m<sup>3</sup> 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 bullet point 7). Should the action level of 150 µg/m<sup>3</sup> 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 PM-10 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.
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 miles per hour (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 150 µg/m<sup>3</sup> 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.

## 4.0 SPECIAL REQUIREMENTS

In addition or in combination with the above, the following special requirements apply 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 particulates will 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 will be considered to prevent exposures related to the work activities and to control dust and odors. Consideration will 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 will occur within the occupied structure(s). Depending upon the nature of contamination, chemical-specific colorimetric tubes of sufficient sensitivity may be necessary for comparing the exposure point concentrations with appropriate pre-determined response levels (response actions should also be pre-determined). 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  $\mu\text{g}/\text{m}^3$ , work activities will be suspended until controls are implemented and are successful in reducing the total particulate concentration to 150  $\mu\text{g}/\text{m}^3$  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.

Unless a self-contained, negative-pressure enclosure with proper emission controls will encompass the work area, all individuals not directly involved with the planned work must be absent from the room in which the work will occur. Monitoring requirements are as stated above under "Special Requirements for Work within 20 Feet of Potentially Exposed Individuals or Structures" except that in this instance "nearby / occupied structures" would be adjacent occupied rooms. Additionally, the location of all exhaust vents in the room and their discharge points, as well as potential vapor pathways (openings, conduits, etc.) relative to adjoining rooms, shall be understood and the monitoring locations established accordingly. In these situations, exhaust fans or other engineering controls will be used to create negative air pressure within the work area during remedial activities. Additionally, the planned work will be implemented during hours (e.g. weekends or evenings) when building occupancy is at a minimum.

## **Appendix E**

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### Best Management Practices Tracking Form



### (Date(s)) GREEN REMEDIATION METRICS TRACKING LOG

(to be used for Daily / Weekly / or Phase Tracking)

**Project Number / Name:**

**Client:**

**Address:**

**Project Start Date:** \_\_\_\_\_ **Project End Date:** \_\_\_\_\_ of \_\_\_\_\_

#### Equipment Emissions

Equipment Type	Fuel Type	Hours of Operation	Time of Idling or not in Use
On-site diesel equipment			
Other:			

#### VOC Emissions

Type of Equipment	Hours of Operation	Volume of VOCs Emitted	lbs VOCs Emitted
Soil remediation equipment			
Groundwater remediation equipment			
Other:			
Other:			

#### Materials & Waste Totals

(See truck logs for more detail)

#### Imported Materials

Type of Material	Total Quantity	Origin	# of Trips	Miles from Site
Topsoil				
Fill				
Silt Fence				
Silt Logs				
Aggregate Base Course				
Geotextile				
Solidification Additives				
Activated Carbon				
Other:				
Other:				

#### Total Waste Generated On-Site

Type of Material	Total Quantity	Origin	Exported?	Miles from Site
Remedy Generated Waste				
Contractor Generated Waste				
Other:				
Other:				

#### Solid Waste Disposal and Diversion

Type of Material	Total Quantity	Disposal Location	# of Trips	Miles from Site
TSCA Contaminated Sediment				
Non-TSCA Contaminated Sediment				
Cleared Vegetation				
Spent Granular Activated Carbon				
Monitoring Well Removal Debris				
Other:				
Other:				

**Recycled / Bio-Based Products**

Type of Material	Total \$ Value	% Recycled Content	% Bio-based Content

**Energy Usage**

Energy Type	KWh	Total Used	Type of Generation
<b>Total Electricity Usage</b>			
Total Renewable			
Other:			
Other:			

**Water Usage**

Type of Water	Gallons	Reason for Usage	Provider
<b>Total Water Usage</b>			
Public potable water supply			
Surface water			
On-site treated groundwater			
Reclaimed treated groundwater			
Collected or diverted storm water			
Re-Injected groundwater			
Other:			
Other:			

**Land / Ecosystem Tracking**

Land Disturbance Type	Total Area	Land Finished / Restored Type	COC Type
Total land area disturbed			
total land area restored			
Increase in area for storm water infiltration (vs pre-disturbed)			
Increase in area of native species plantings (vs pre-disturbed)			
Total area of land impacted by contamination			
Total area of land remediated to unrestricted use			
Total area of land remediated to other future use			

**Additional Comments:**

See Daily CAMP Log or Daily Truck Log for more details on work completed, materials imported/exported, and materials/resources used.