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Unicorn Management
Consultants, LLC

**SITE HEALTH AND SAFETY PLAN
SITE INVESTIGATION ACTIVITIES
(September 2023)**

**UNION ROAD SITE
TOWN OF CHEEKTOWAGA
ERIE COUNTY, NEW YORK
(SITE REGISTRY NO. 9-15-128)**

Prepared for:

**AMERICAN PREMIER UNDERWRITERS, INC.
(FORMERLY THE PENN CENTRAL CORPORATION)
ONE EAST FOURTH STREET
CINCINNATI, OHIO 45202**

Prepared by:

**UNICORN MANAGEMENT CONSULTANTS, LLC
52 FEDERAL ROAD, SUITE 2C
DANBURY, CT 06810**

September 2023

Responsiveness

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Solutions

•

Quality



Document Authorization Form

**Site Health and Safety Plan
Site Investigation Activities
(Updated September 2023)**

**Union Road Site
Town of Cheektowaga
Erie County, New York
(Site Registry No. 9-15-128)**

Prepared for:

**American Premier Underwriters, Inc.
(Formerly The Penn Central Corporation)
One East Fourth Street
Cincinnati, Ohio 45202**

Prepared by:

**UNICORN MANAGEMENT CONSULTANTS, LLC
52 FEDERAL ROAD, SUITE 2C
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September 7, 2023

AUTHORIZATIONS:

**Michael O'Connor
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Date

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1.0 INTRODUCTION

Unicorn Management Consultants, LLC (UMC), prepared this updated Health and Safety Work Plan (HASP) on behalf of American Premier Underwriters, Inc. (APU), to conduct remedial investigation (RI) activities related to environmental impacts at the Union Road site ("the Site"). The Site is located at 333 Losson Road in Cheektowaga, New York and is defined as a Class 4 Site by the New York State Department of Environmental Conservation (NYSDEC) with a Site registry number of 915128.

This HASP has been developed to address the protection of public health, safety, and the response to contingencies that could impact public health, safety, and the environment. The intent of the HASP is to satisfy the requirements of the Occupational Safety and Health Guidance for Hazardous Waste Site Activities (June 1990, DHHS NIOSH Publication No. 90-117, or any updated version thereof), and the Occupational Safety and Health Administration, U.S. Department of Labor (OSHA) requirements cited below:

1. All Site activities shall be performed in such a manner as to ensure the safety and health of personnel so engaged. All Site activities shall be conducted in accordance with all pertinent general industry (29 CFR Part 1910) and construction (29 CFR Part 1926) OSHA standards, and EPA's *Standards Operating Safety Guides* (OSWER, 1988, or any updated version thereof), as well as any other applicable State and municipal codes or ordinances. All Site activities shall comply with those requirements set forth in OSHA's final rule entitled *Hazardous Waste Operations and Emergency Response*, 29 CFR §1910.120, Subpart H.
2. The HASP includes, at a minimum, the following items:
 - a. Plans showing the location and layout of any permanent or temporary structures to be constructed on or near the Site;
 - b. Description of the known hazards and evaluation of the risks associated with the Site and the potential health impacts related to the Site activities;
 - c. List of key personnel and alternates responsible for Site safety, response operations, and protection of the public;
 - d. Description of levels of protection (based on specified standards) to be utilized by all personnel;
 - e. Delineation and definitions of work zone (Exclusion Zone), decontamination (Contamination Reduction Zone), and safe zones, and the movement of such zones;
 - f. Description of decontamination procedures for personnel and equipment, and handling and removal of disposable clothing or equipment;
 - g. Incidental emergency procedures which address emergency care for personnel injuries and exposure problems, and containment measures. These procedures include evacuation routes, internal and external communication procedures for response to fire, explosion, or other emergencies, the name of the nearest hospital and the route to that hospital (Appendix A). Local agencies with the capability to respond to emergencies are identified and their capabilities are described;
 - h. Description of the personnel medical surveillance program in effect;
 - i. Description of monitoring for personnel safety and;

- j. Description of routine and special personnel training programs.

2.0 SCOPE OF WORK

On October 31, 2022, the NYSDEC requested that a site investigation workplan (Workplan) be submitted for additional investigation activities within the former Roundhouse area of the Site (**Figure 1**). The NYSDEC indicated in their correspondence that the Roundhouse itself was not thoroughly investigated during initial remedial efforts that were conducted in the 1990s. Therefore, to confirm that the remaining soil is below NYSDEC's soil cleanup objectives, further assessment was required in this area. UMC subsequently submitted the requested Workplan to the NYSDEC on January 18, 2023 which was subsequently updated in September 2023.

The Workplan proposed that any soils that are present between each of the concrete spokes of the former Roundhouse will be sampled and analyzed for several chemicals of concern (COCs). A small excavator will be utilized to excavate several test pits within the former Roundhouse Area, and collect soil samples for laboratory analysis from each of these test pits.

3.0 SITE BACKGROUND

3.1 Site Description

The Site property is approximately 23 acres and is primarily wetlands, lightly forested areas and several creeks. The site is bordered on the west side by residential homes along Hillpine Road; on the north side, the site by Losson Road. The eastern and southern sides of the Site are bordered by Slate Bottom Creek in close proximity to residential homes on Slate Creek Drive and Topaz Drive. The Site is therefore primarily situated in a residential district, with a few industrial/business areas.

The central portion of the site includes a landfill area, previously installed during site remedial activities in the 1990s. A fence runs along the perimeter of the landfill area, and small equipment shed is present in the northwest corner of the landfill. The equipment shed houses controls that are utilized for the operation of a dewatering system associated with the landfill design. Several groundwater monitoring wells are also present within the landfill area.

A constructed wetlands area is located to the north of the landfill area. The wetlands area consists of a marsh filled with reeds, grasses and other wetland species. The Deer Lik Creek borders the site on the east. To protect the stream banks from erosion reno mattress have been installed. Slate Bottom Creek borders the site to the south. Deer Lik Creek discharges to Slate Bottom Creek, which flows westward off the property through a culvert.

The equipment shed, monitoring wells and overall Site property is entered via a locked gate and access road located off of Losson Road, along the northern extent of the Site boundary. Another access road exists off of Innsbruck drive, east of the Site. Both access points are dirt roads but the Innsbruck access road does not have a lock or a gate.

3.2 Historical Site Usage

The site operated as a large railroad yard (Gardenville Yard) for about 40 years (~1915-1955) and was mainly used as a railroad classification and maintenance facility. Aerial photographs indicate that the Site was already established and operating as a large railroad yard by 1927. By 1951, the railyard had installed a spur, leading down to a depression in the eastern wetlands on the Site. This spur was used to transport the railyard's waste for disposal into the depression. However, a 1960s photograph reveals that the railyard was abandoned, the spur leading to the depression had been removed and only ~50% of the original depression remained. By 1972, the surrounding land had been developed into a residential area and the railyard was thoroughly abandoned. The railyard facility disposed of its waste in the eastern wetland's depression between 1950-1960, at which time it was owned by New York Central Railroad.

3.3 Historical Site Investigations

3.3.1 Summary of Historical Investigations

In 1982, the Erie County Department of Environment and Planning responded to a complaint involving the Site. During their inspection, they investigated the depression where the railroad spur was previously operating. At the southern end of this depression, the county discovered an area (approximately 80 ft by 140 ft) that contained tar-like waste and 56 abandoned drums. After taking samples of the tar-like material and water that flowed out of the depression, the county concluded that the depression was man-made with the intention of disposing of the railyard's waste.

In 1986, as a part of a Superfund Site Investigation, it was revealed that the disposal area was situated in wetlands that drain into Slate Bottom Creek. Given that the area around the Site contained trails, fields and residential areas, the New York State Health Department was concerned about citizens accessing the Site. Therefore, a fence and sign were posted with warnings about potentially hazardous waste in the area.

In 1992, a Record of Decision (ROD) for the Site was signed between Penn Central Corporation and the NYSDEC. This ROD also included a Final Remedial Action Workplan (RAWP) dated June 18, 1993, and was implemented between 1995-1997. The remedial activities included the in-place stabilization of the tar pit materials and the construction of a bentonite slurry walled containment cell around the tar pit. Impacted materials from around the Site were relocated to within the containment cell for permanent storage. In order to prevent groundwater infiltration, a dewatering trench was included in the containment cell's design. Water is collected in this trench and discharged, under permit, to the Buffalo Sewer Authority's sewer system.

The remedial activities also included stream restoration and erosion control along portions of Deer Lik Creek and Slate Bottom Creeks. This included the construction of the Conrail culvert "wing wall" near the southern end of the Site. Lastly, the remedial activities included the placement of a 6-inch soil cap over the roundhouse area to prevent exposure to arsenic and other impacted soils identified near the roundhouse.

The Site is currently in an ongoing Operations and Maintenance phase, which includes quarterly discharge sampling for the Buffalo Sewer Authority (BSA) permit compliance, an annual site inspection, and groundwater monitoring activities once every two years.

3.3.2 Summary of Contaminants of Concern

Due to the past industrial use of the Site, various COCs may potentially be encountered during the course of the investigation and operation and maintenance activities described. These COCs include lead, VOCs and other hydrocarbon-related compounds.

4.0 HEALTH AND SAFETY PERSONNEL

Name:	Responsibility:
Francisco Trejo, UMC	Project Coordinator
Michael O’Connor, UMC	Manager of Environmental Projects
Michael Ghiourelotis, UMC	Project Engineer
Rigby Michaelsen, UMC	Site Health & Safety Officer/Site Supervisor

The Site Health and Safety Officer (HSO) and Site Supervisor are responsible for ensuring that the policies and procedures detailed in this plan are implemented.

This program is largely dependent on individual Site worker participation and open communication. Therefore, if observed, Site workers are responsible for reporting suspected overexposures and other suspected unsafe or unhealthy conditions. All Site workers and subcontractors will comply with this HASP.

5.0 EMERGENCY INFORMATION

The Site HSO shall be notified of any on-Site emergencies and is responsible for ensuring that the appropriate actions are taken. The following information shall available for reference during all field activities:

5.1 Emergency Services

Name:	Location:	Number:
Fire- Emergency Police - Emergency Medical - Emergency	Cheektowaga, NY Cheektowaga, NY	911 or 0 Stay on line
Hospital: Erie County Medical Center	462 Grider St, Buffalo, NY 14215	(716) 898-3000 (call 911 for local ambulance service)
Poison Control Center:	Syracuse, NY	1-800-222-1222
Fire Non – Emergency Police Non – Emergency Dig Safely New York	Cheektowaga, NY Cheektowaga, NY	(716)-908-3475 (716)-686-3501 1-800-962-7962

5.2 AGENCY NOTIFICATIONS

If a reportable spill (oil or a reportable quantity (RQ) of a hazardous substance) or other emergency occurs, the following agencies will be notified as required.

Organization:	Number:
NY DEC (business hours only)	(716)-851-7220

24-hour State Police Dispatch	1-800-842-2233
National Spill Response Center	1-800-424-8802

5.3 EMERGENCY/FIRST RESPONDER PROCEDURES

5.3.1 PERSONAL INJURY

- a) In the event of a personal injury, the Site HSO will be notified immediately.
- b) If necessary, the Site may be evacuated on direction of the Site HSO or on instruction from the Fire Department.
- c) If the victim is ambulatory without causing discomfort and the mechanism of injury and condition of the victim clearly indicates that immobilization is unnecessary, the victim may be moved, if required. This action should be taken with the acquiescence of the victim assuming unimpaired mental status.
- d) Emergency Medical Services (EMS) will be notified via 911 and a UMC staff member shall remain in contact with EMS until their arrival. First Aid may be administered by any team member that is appropriately trained on a voluntary basis while awaiting the arrival of EMS.
- e) The Site HSO will ensure that a Site worker is positioned to meet EMS to safely direct them to the accident location or nearest accessible point.

5.3.2 FIRE / EXPLOSION

- a) The Fire Department and Site HSO shall be notified immediately.
- b) All construction equipment will be shut down at the earliest safe opportunity.
- c) All Site workers will egress to the designated refuge area (open field immediately south of the Site). Access to the affected area must be kept clear for responding emergency services vehicles.
- d) Limited incipient fires can be addressed with fire extinguishers or water hose lines, but the Fire Department must be called regardless of fire size.

6.0 SITE CONTROL AND SECURITY

Site control measures are intended to meet several objectives:

- Prevent the public from inadvertently approaching work areas which may contain physical or chemical hazards;
- Protect private and commercial properties from inadvertent incursion or damage during work activities;
- Prevent unauthorized vehicular traffic, which would pose a hazard to workers and bystanders, vehicle occupants, property, and can possibly act to cross-contaminate public or private property; and
- Ensure the security of UMC and subcontractor property and equipment.

6.1 GENERAL RULES AND PROCEDURES

Work hours will be 8:00 a.m. to 5:00 p.m., from Monday through Friday. All Site workers will sign-in with UMC personnel when starting the workday, and sign-out when leaving. A daily log will be

established for this purpose. This log is not intended as a record of employment attendance, but only as a means of determining the presence of individuals in the work areas for safety reasons.

UMC employees or subcontractors are not permitted on any private property (residential or commercial) unless expressly permitted by the owner or resident. If requested to leave the property, Site workers will do so promptly and courteously, after first securing the Site as necessary to protect public health and safety. The Site Supervisor should then be informed of the situation.

UMC employees or subcontractors are not permitted on any property adjacent to intended work areas unless expressly and directly instructed to do so by the Site Supervisor.

6.2 DELINEATION AND DEFINITION OF WORK AREAS

For the purposes of this HASP, work areas are considered to consist of the proposed staging area, and the proposed test pit locations within the Former Roundhouse, as well as decontamination areas established proximate to these areas. In order to minimize potential contaminant migration by workers, three zones will be established in individual work areas.

6.2.1 EXCLUSION ZONE

The exclusion zone is considered to be the immediate vicinity of excavator where a test pit is being excavated, and the highest potential for physical or chemical hazards exists. All workers entering the area must be wearing the appropriate personal protective equipment (PPE) established in the HASP. Generally speaking, only equipment operators should enter this area with the exception of UMC personnel who must enter this area in order to collect samples. Environmental soil samples will be collected and placed in laboratory-supplied containers which in turn will be placed in zip-lock bags consistent with UMCs' applicable standard operating procedures (SOPs).

Excavated soils from various depths at each of the proposed test pit locations will initially be field-screened with a photoionization detector (PID). Soils that have elevated PID readings, or that have obvious visual signs of contamination (i.e., staining) will be stockpiled on and covered with plastic sheeting having a thickness of 10-millimeters or greater. All soil staging areas will all be present within the exclusion zone. If necessary, UMC will arrange for the proper transport and disposal of the stockpiled soil. Otherwise, the excavated soils will be placed back into the test pits.

6.2.2 CONTAMINATION / REDUCTION ZONE

Decontamination of excavator bucket, and sampling tools will be conducted in the Contamination Reduction Zone (CRZ). The CRZ is a transition area between the exclusion zone and the support zone. This zone is designed to minimize the migration of potential contaminants to other portions of the Site and between each test pit area. It will be defined by a visual barrier consisting of traffic cones or, as appropriate, yellow caution tape or high visibility fencing. Only UMC and subcontractor personnel will be allowed inside the barrier without Site Supervisor permission. All workers entering the area must be wearing the appropriate PPE established in the HASP.

6.2.3 SUPPORT ZONE

At the discretion of the Site Supervisor and subcontractor personnel, certain equipment including heavy equipment and associated tooling, and hand tools may be stored in the secured support zone. This zone will be located immediately to the south of the Former Roundhouse Area. Decontaminated sampling equipment, laboratory-supplied sample containers, and miscellaneous field supplies and equipment will be staged inside vehicles or within the beds of pickup trucks present in the support zone. Final preparation of samples for transport to an analytical laboratory, including sample logging, packing of the samples in coolers on ice, and preparation of chains-of-custody will be conducted in this area as well.

6.3 SITE SPECIFIC TRAINING

As appropriate, Site Workers shall have received and provided documentation for the following Occupational Safety and Health Administration (OSHA) Health and Safety and Site-specific training:

- Site workers will document having completed 40 hours of Hazardous Waste Operations and Emergency Response (HAZWOPER) training consistent with OSHA standard 29 CFR Part 1910.120.
- Site Workers will document having completed a minimum of 3 days of on-Site training and work under supervision to meet OSHA 29 CFR 1910.120(e)(3)(i) General Site Worker criteria.
- Site Workers will also document that the annual 8-hour refresher training requirements under 29 CFR 1910.120(e)(8) are met.
- The Site Supervisor and Site HSO will each document HAZWOPER training and an additional 8 hours of Site Supervisor training in accordance with OSHA CFR 1910.120(e)(4).

Upon initial employment at the Site and prior to work activity, employees will be provided thorough, documented instruction regarding all aspects of the Health and Safety Plan, with emphasis on:

- Potential Site contaminants;
- Location of Site work areas and control zones,
- Location of safety equipment;
- Personal protective equipment required;
- Emergency procedures; and
- General safe work practices, Site restrictions, policies and procedures.

The Site Supervisor will conduct safety meetings daily with all Site employees and representatives of Sub-contractors. These meetings will be documented in the field book. Typical topics would include:

- Review of hazards associated with new work activity or specific work conditions.
- Compliance issues, such as temporarily restricted areas.
- General safety training where deficiencies are evident or difficulties occur or are anticipated with safe equipment operation.

6.4 SITE WORKER DOCUMENTATION

UMC maintains a personnel file for all UMC workers. Upon request, all or any subcontractors will provide UMC with worker documentation that may include:

- Proof of the appropriate Class 2 or Commercial License for drivers operating a commercial vehicle on public roads.
- Cards evidencing current National Safety Council, Red Cross, or American Heart Association First Aid and CPR certifications (if applicable).
- Available documentation of 40 Hour HAZWOPER Training and most recent 8-hour refresher training. Certification of 8-hour Supervisor training (to be held by at least the Site Supervisor).
- Documentation of participation in the Medical Surveillance program.

6.5 VISITORS

All visitors and agency representatives must report directly to the Site Supervisor prior to entering the work areas. Visitors are not permitted in work areas unless accompanied by authorized Site personnel. All visitors and agency representatives will be required to sign-in and out on a visitor log administered by the Site HSO. Site visitors and agency representatives must all conform to PPE requirements as well as Site policies and procedures set forth in this HASP.

6.6 VEHICLE OPERATIONS

Vehicle driving or parking will be allowed only on those portions of the Site designated by the Site Supervisor. Only those vehicles essential to work activities or as otherwise authorized will be allowed to drive to the work areas. Generally speaking, all other vehicles will park in designated areas on the Site. Excessive speed or careless operation of a vehicle anywhere is grounds for disciplinary action. Seats belts, if provided in the vehicle, must be worn by all vehicle occupants whenever it is in motion. Backup alarms on the heavy equipment must be operational.

7.0 SITE WORKER PROTECTION

7.1 PHYSICAL HAZARDS

Mobilization and demobilization pose certain risks to employees involved in these activities. The major concerns during the mobilization and demobilization phases include:

- Ergonomic injuries related to lifting and repetitive tasks;
- Trips and falls related to moving bulky or heavy items; and
- Installation of equipment and temporary service utilities.

Only contractors licensed by the State of Vermont will perform any and all utility service hook-ups required on Site. Lockout/tagout procedures will apply where the contractor is not operating under the supervision of the utility service provider.

Physical hazards which can pose an imminent danger to Site Workers include:

Hazards	Locations	Engineering Controls
Uneven terrain can cause slips and falls.	Site wide	Safety shoes/boots meeting the ANSI Z41-1991 or ASTM F2413-05 standards required on the Site. Work conducted only during daylight hours.
Vehicular traffic.	Throughout the work area. Public and private roads.	Limit vehicle speeds to 10 mph on private roads. No tailgate or truck bed riders. Use of headlights during low visibility conditions.
Construction equipment.	Dependent on work plan phase.	Hard hats to be used in work areas during overhead work. Operator safe work practices enforced. Eye protection during vehicle maintenance. Safety shoes/boots meeting the ANSI Z41-1991 or ASTM F2413-05 standards required on the Site.
Insects such as ticks, mosquitoes, and fleas can transmit Lyme disease and Rocky Mountain Spotted Fever.	Present throughout the work area during warm months.	The insect repellent "Deep Woods OFF" is considered appropriate for use on PHAS-impacted sites and will be provided to Site workers.
Poisonous insect bites such as from bees and wasps pose extremely serious hazards of allergic reaction, including anaphylaxis.	Possible in all work areas.	Site workers informed of nest locations. Nests that pose a clear hazard in work areas will be removed.
Wild animals pose a hazard of rabies infection secondary to a bite. Raccoons, skunks, bats and rats are potential vectors.	Possible throughout the Site.	Site workers instructed to avoid confrontation and notify the HSO immediately.
Aggressive dogs and other pets.	Residential yards and throughout the work area.	Site workers instructed to avoid confrontation and notify the HSO immediately.
Excavation Activities.	Across the Site	Level D Protection
Working in the vicinity of above and below ground utilities.	Across the Site	Call UDIG NY before beginning invasive activities.
Heavy Machinery	Across the Site	Level D Protection

Care must be taken when loading and unloading equipment or supplies from elevated platforms, such as rack trucks and shipping containers. Workers must also exercise appropriate caution in moving drums or other equipment or supplies. The Site Supervisor is responsible for ensuring that an adequate number of workers are assigned to each lifting task.

Employees will not be required to lift any object over 50 pounds unassisted, or lighter objects under circumstances that they believe would be potentially injurious, such as a physical restriction, the object's weight, dimensions, or ability of a container to retain contents during the lifting process.

7.2 CHEMICAL HAZARDS

Chemical hazards may potentially be encountered during the investigation activities described. Chemicals that may be encountered are listed in Section 3.0.

7.2.1 FIRE / EXPLOSION

Although the threat of brush fire is particularly high during the warm, dry months, it can occur as soon as the ground is free of snow and ice. Ignition sources can include vehicles, discarded smoking material, uncontrolled burning on an adjacent property, etc.

The following engineering and administrative controls and procedures will be taken:

- Smoking is prohibited in all work areas.
- All drill rigs and sub-contractor support vehicles in the work area will be equipped with fire extinguishers with a minimum rating of 3A:40B:C.
- All portable fuel containers will meet OSHA 29 CFR 1910.106, NFPA 30, UL listing, and be Fire Marshall approval.
- The Site Supervisor or Site HSO will be equipped with cellular telephones to ensure prompt notification to Municipal Emergency Services.

7.3 ENVIRONMENTAL HAZARDS

7.3.1 Heat Stress

Conditions in the work area during the summer months can be expected to occasionally exceed 90°F during the day, accompanied by high humidity. Discomfort caused by these ambient conditions is greatly exacerbated by the protective equipment such as hard hats and gloves worn by the workers.

These dangerous environmental conditions can have rapid deleterious effects on a worker's ability to safely perform basic tasks and avoid obvious hazards. It is essential that proper precautions, outlined below be consistently followed.

Heat related problems include heat cramps, heat exhaustion, and heat stroke. Preventive measures, when conditions warrant, require establishing a designated rest area near each work area. This refuge area should offer a cooler environment with water, isotonic drinks, or similar available at all times. The Site Supervisor is responsible for providing these environments. Workers are permitted to cease work activities and rest in a cooler refuge area any time that they deem necessary due to the effects of heat stress.

The Site Supervisor will institute rest/work cycles of as high as 20 work /40 rest minutes if the conditions warrant.

7.3.2 NOISE

Site workers exposed to noise at or above 85 dB on an 8-hour time-weighted average are to wear hearing protection (ear plugs or muffs) and hearing protection is strongly encouraged whenever the

noise levels exceed 85 decibels, even for a short period of time. If needed, ear plugs are available from the HSO. Engineering controls to limit high noise exposure, such as varying personnel assignments, should be instituted when feasible.

7.3.3 HAZARDOUS ENERGY SOURCES

Temporary electrical wiring used in areas on or near water accumulation poses a serious electrical hazard. Electrical appliances and portable Site lighting must use ground fault circuit interrupters (GFCI), in addition to other National Electrical Code and local requirements for electrical equipment grounding.

Prior to maintenance or repair work on equipment, all electrical, hydraulic, pneumatic, or steam pressurized sources of energy must be OFF or fully disconnected in accordance with standard lockout/tagout procedures.

7.3.4 COLD STRESS

Site workers may be required to work in cold environments, and sometimes for extended periods. Cold stress is a common problem encountered in these types of situations.

When the body is unable to warm itself, cold related stress may result. This may include tissue damage and possibly death. Four factors contribute to cold stress: cold air temperatures, high velocity air movement, dampness of the air, and contact with cold water or surfaces. A cold environment forces the body to work harder to maintain its temperature. Cold air, water, and snow all draw heat from the body. Wind chill is the combination of air temperature and wind speed. For example, when the air temperature is 40°F, and the wind speed is 35 mph, your exposed skin receives conditions equivalent to an air temperature of 11° F. While it is obvious that below freezing conditions combined with inadequate clothing could bring about cold stress, it is also important to understand that it can also be brought about by temperatures in the 50's coupled with some rain and wind.

When in a cold environment, most of your body's energy is used to keep your internal temperature warm. Over time, your body will begin to shift blood flow from your extremities (hands, feet, arms, and legs) and outer skin to the core (chest and abdomen). This allows exposed skin and the extremities to cool rapidly and increases the risk of frostbite and hypothermia.

8.0 PERSONAL PROTECTION EQUIPMENT

For all work activities, Site workers must maintain the minimum of level “D” protective equipment, as defined by EPA. Depending on Site specific conditions the HSO may require upgrading of the PPE to a higher level. Site workers are always given the option to upgrade personal protective equipment (PPE). Downgrading of PPE is permissible only under the expressed direction of the Site HSO. Specific personal protective equipment for each level of protection is as follows.

All Site tasks in work plan need to be assigned a specific level of protection.

EPA PPE LEVEL	PROTECTIVE EQUIPMENT
A	Not applicable
B	Not applicable
C	All Level D PPE and: Tyvek coveralls Latex or nitrile gloves (under leather work gloves) Rubber over-boots or neoprene steel toe boots Full face air purifying respirator (APR) with P100/ filter cartridge, at a minimum.
D	Hard Hat required for specified activities with heavy equipment Leather work gloves with latex or nitrile gloves for soil contact. Safety boots (Neoprene steel toe boots or latex over-boots in specified areas) Safety glasses at a minimum for all Site work/ goggles for sampling tasks Full-body harness and fall protection system for specified activities Splash protection required for specified activities United States Coast Guard approved life preserver for specified activities Face shield with hard hat for specified tasks Integral hearing protectors with hard hat for specified tasks Radio communication with field office (as appropriate)
Not Permitted	Tank Tops, Shorts (unless under Tyvek coveralls)

9.0 ENVIRONMENTAL MONITORING

The proposed investigation activities will involve invasive excavation of soils using heavy equipment that could potentially produce airborne dust and particulates. Therefore, UMC has developed a Site-specific Community Air Monitoring Work Plan (CAMP) as an attachment to the site investigation workplan, requiring that continuous real-time monitoring for volatile organic compounds (VOCs) and particulates be conducted at the upwind and downwind perimeter of the designated work area during these activities.

UMC prepared the CAMP in general accordance with the requirements established by the New York State Department of Health (NYSDOH) as presented in the NYSDEC DER-10, Appendix 1A and 1B. Accordingly, VOC monitoring will be performed using a photoionization detector (PID) capable of continuous data logging of airborne VOC concentrations. Particulate monitoring equipment capable of real-time data logging of particulates less than 10 microns in diameter will be used to generate 15 minute (or less) running average concentrations for comparison to the regulatory response levels. The air monitoring equipment will be utilized to assess the VOC and particulate concentrations in ambient air within the exclusion zone proximate to Site workers' breathing space. These measurements will be utilized to assess the correct breathing protection consistent with OSHA's workplace permissible exposure limits. The monitoring equipment will have an audible alarm to indicate exceedance of the regulatory response

levels. The Site Supervisor and designated UMC personnel will be trained in the use of the air monitoring equipment and will be responsible for the regular documentation of collected air monitoring data.

If exceedances of regulatory response levels occur, response actions will be implemented consistent with requirements of the NYSDOH and detailed in UMCs' Site-specific CAMP. These actions may include: If VOC and/or particulate levels exceed acceptable standards, work activities may be (1) temporary work stoppage with continued monitoring; (2) temporary work stoppage until the source is identified, corrective actions are taken to abate emissions, and continued monitoring; or (3) work shutdown.

10.0 DECONTAMINATION

All disposable safety equipment (e.g., Tyvek coveralls, gloves, etc.) will be discarded as unregulated waste after grass, soil, sediment, etc. is removed by brushing. Decontamination rinsate will consist of potable water, Alconox detergent, and alcohol as detailed in UMCs' SOP DCN1-44. Used rinsate will be containerized at a secure location on the Site pending future characterization and off-Site disposal.

Workers will follow the basic level D decontamination procedure that follows:

- 1) All Site workers will wash hands, arms and face thoroughly using a mild liquid soap before taking any breaks and when leaving the Site. UMC notes that potable water and bathroom facilities are not available on the Site. Therefore, UMC will provide potable water and soap for washing and will arrange for the placement of a portable rest room facility on the Site.
- 2) Disposable nitrile gloves will be changed between the collection of each sample to avoid secondary contamination. Used gloves will be disposed of as unregulated waste.
- 3) Tyvek protective coveralls, if worn, will be removed after completion of sampling and disposed of in the industry prescribed manner to avoid secondary contamination. Used chemical protective clothing will be disposed of as unregulated waste.
- 4) Reusable neoprene boots (if used) will be thoroughly washed with detergent and water and rinsed thoroughly before leaving the Site.

11.0 MEDICAL SURVEILLANCE

UMC intends to take all appropriate measures to ensure the Health and Safety of employees during the course of this project. Federal law requires a medical surveillance program. Under OSHA 29 CFR 1910.120(f), the HAZWOPER standard requires that employees participate in a medical surveillance program if they have work assignments that pose risk of exposure to hazardous substances or the potential exposure to harmful substances for more than 30 days in one calendar year.

UMCs' medical surveillance program includes a baseline physical examination provided to all personnel to who meet the above criteria. The examination includes the following:

- **Baseline history**, which consists of an interview to discuss past medical history, relevant family medical history, personal data, and occupational history.
- **Physical examination**, which includes vital signs (pulse, blood pressure, respiration rate), general appearance, height, and weight, and other evaluation components based on the patient's medical history, age, and predispositions.

- **Eye examination** which includes tests that measure refraction, depth perception, and color vision. These tests shall be administered by a qualified technician or the physician. Vision quality is essential to safety, the accurate reading of instruments and labels, and the avoidance of physical hazards.
- **Spirometry examination** is a pulmonary function test. Measurement will include forced expiratory volume in 1 second (FEV₁), forced vital capacity (FVC), and FEV₁ to FVC ratio. Interpretation of the results will account for age, height, and other factors. Other measurements may include FEF (forced expiratory flow), TLC (total lung capacity), and RV (residual volume).

All employee medical information is confidential. The results of the examination conducted under this program are available only to the employee, UMC, the medical advisor, and those authorized by the employee. Records may be made available to OSHA upon written request.

The employee will be apprised of the medical test results and the recommended medical course of action (if needed) within 5 days after receipt of the results. A conference with the Medical Advisor should be offered to the employee. All communication regarding any recommendations and UMC policy shall be documented. Also, a written opinion by the Medical Advisor shall be obtained by UMC and retained in the employee's medical file. Medical requirements for employees with elevated levels are to be determined by the UMC medical advisor.

Medical records are retained for the employee's period of employment plus 30 years (per OSHA 29 CFR 1910.1020). This includes all examination results, exposure history reports, injury reports, etc.

APPENDIX A

**DIRECTIONS TO
MERCY HOSPITAL OF BUFFALO**

Best 15 min 1 hr 19 2 hr 6 34 min

Add destination

Leave now Options

Send directions to your phone

via NY-277 S/Union Rd and Indian Church Rd 15 min
 6.7 miles
 Fastest route now due to traffic conditions

[Details](#)

via Losson Rd 15 min
 6.8 miles

via Cayuga Creek Rd 15 min
 6.5 miles

Explore nearby Mercy Hospital of Buffalo

- Restaurants
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- Gas stations
- Parking Lots
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