

**AMHERST CENTRAL PARK – ERIE COUNTY PARCEL
PRE-INTERM REMEDIAL MEASURE (IRM) EXCAVATION WORK PLAN (EWP)**

This Excavation Work Plan will be utilized for the Pre-Interim Remedial Measure (IRM) activities discussed with the NYSDEC. The list of Pre-IRM activities can be seen in **Appendix A**.

1 NOTIFICATION

At least 5 days prior to the start of any activity that is anticipated to encounter remaining contamination or breach or alter the site’s cover system, the site owner or their representative will notify the NYSDEC contacts listed in the table below. Table [1] includes contact information for the above notification. The information on this table will be updated as necessary to provide accurate contact information.

Table [1]: Notifications*

NYSDEC Project Manager: Andrew Zwack	716-851-7220 Andrew.zwack@dec.ny.gov
NYSDEC Project Manager’s Supervisor: Benjamin Mcpherson	716-851-7220 Benjamin.mcpherson@dec.ny.gov
NYSDOH Project Manager: Megan Rivera	518-402-7877 Megan.Rivera@health.ny.gov

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

This notification will include:

- A detailed description of the work to be performed, including the location and areal extent of excavation, plans/drawings for site re-grading, intrusive elements or utilities to be installed below the soil cover, estimated volumes of contaminated soil to be excavated, any modifications of truck routes, and any work that may impact an

engineering control. A 5-day notification will be given to the NYSDEC project manager prior to the start of any work in this Pre-IRMEWP;

- 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 provided in Appendix [C] of this Pre-IRM EWP;
- 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. The alteration, restoration and modification of engineering controls must conform with Article 145 Section 7209 of the Education Law regarding the application professional seals and alterations. All work completed in this Pre-IRM EWP will be performed in compliance with 29 CFR 1910.120 and 29 CFR 1926 Subpart P.

2 SOIL SCREENING METHODS

Visual, olfactory and instrument-based (e.g. photoionization detector) soil screening will be performed during all excavations into known or potentially contaminated material (remaining contamination) or a breach of the cover system. A qualified environmental professional as defined in 6 NYCRR Part 375, 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 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, after issuance of the COC. Contaminants of concern expected to be encountered include metals, such as arsenic, cadmium, and mercury. Concentrations in some sampling results exceed the applicable Commercial Use Soil Cleanup Objectives (SCOs), and are generally the highest in the first 0-12” below the ground surface. Greens and tee boxes had substantially higher concentrations than fairways and rough areas where only 3 out of the 18 holes showed minor commercial use exceedances.

Soil removed from its source of excavation will be segregated based on previous environmental data and screening results into material that requires off-site disposal and material that requires testing to determine if the material can be reused on-site as soil beneath a cover or if the material can be used as cover soil. Further discussion of off-site disposal of materials and on-site reuse is provided in Sections 5 and 6 of this Plan.

3 SOIL STAGING METHODS

Soil imported to the site will be stockpiled in predetermined areas approved by the NYSDEC and can be seen on **Figure 1**.

Soil excavated during the Pre-IRM activities will be stockpiled on site and segregated based on assumed levels of contamination delineated in the draft IRM WP submitted to the NYSDEC in July 2025. Soil excavated from fairways and rough areas will be stockpiled separately in 50 cubic yard (CY) piles and resampled for Total Analyte List (TAL) Metals prior to reuse on site. Soils excavated from greens and tee boxes will be stockpiled separately for disposal during the IRM process. Soils will be stockpiled on an impervious surface or 6-millimeter polyethylene sheeting. Locations can be seen on **Figure 1**.

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 daily after the conclusion of construction activities. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by the NYSDEC.

4 MATERIALS EXCAVATION AND LOAD-OUT

A qualified environmental professional as defined in 6 NYCRR Part 375, 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. Excavated materials will immediately be placed in dump trucks and transported to the stockpile areas to minimize the potential for the release of contaminated material to uncontaminated areas.

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 the Pre-IRM 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.

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.

5 MATERIALS TRANSPORT OFF-SITE

During the Pre-IRM activities, excavated materials are not expected to be removed from the Site. Should there be an instance where material is removed from the Site, the following will be applied:

- 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.
- All trucks loaded with site materials will exit the vicinity of the site using only these approved truck routes. This is the most appropriate route and takes into account: (a) limiting transport through residential areas and past sensitive sites; (b) use of city mapped truck routes; (c) prohibiting off-site queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; and (f) overall safety in transport.
- Trucks will be prohibited from stopping and idling in the neighborhood outside the project site.
- Egress points for truck and equipment transport from the site will be kept clean of dirt and other materials during site remediation and development.
- Queuing of trucks will be performed on-site in order to minimize off-site disturbance. Off-site queuing will be prohibited.

6 MATERIALS DISPOSAL OFF-SITE

During the Pre-IRM activities, excavated materials are not expected to be disposed of from the Site. Should there be an instance where material needs to be disposed of, the following will be applied:

- 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. 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 in the Periodic Review Report. 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 361-5 registered or permitted facility).

7 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 Pre-IRM EWP are followed and that unacceptable material (i.e. contaminated) does not remain on-site. Contaminated on-site material, including historic fill and contaminated soil, that is acceptable for reuse on-site will be placed below the demarcation layer or impervious surface. Contaminated on-site material may only be used beneath the site cover as backfill for subsurface utility lines with prior approval from the DEC project manager.

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 5-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.

8 FLUIDS MANAGEMENT

During the Pre-IRM activities, excavation derived fluids are not expected to be generated from the Site. Should there be an instance where fluids need to be managed, the following will be applied:

- 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 SPDES permit.

9 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 Pre-IRM EWP prior to receipt at the site. A Request to Import/Reuse Fill or Soil form, which can be found at <http://www.dec.ny.gov/regulations/67386.html>, will be prepared and submitted to the NYSDEC project manager allowing a minimum of 5 business days for review.

Material from industrial sites, spill sites, 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 6 NYCRR 375-6.7(d) and DER-10 Appendix 5 for commercial use. Based on an evaluation of the land use, protection of groundwater and protection of ecological resources criteria, the resulting soil quality standards are listed in the Site Characterization. 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.

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 daily after the conclusion of construction activities. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by the NYSDEC.

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.

10 STORMWATER POLLUTION PREVENTION

Remediation and restoration work associated with Pre-IRM activities is expected to involve excavations of approximately 0.5 acres. Due to the volume of this work, a Storm Water Pollution Prevention Plan (SWPPP) will not be required prior to activities involving excavation.

11 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 project manager will be promptly notified of the discovery.

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 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 during invasive site work will be promptly communicated by phone within two hours to NYSDEC's Project Manager. Reportable quantities of petroleum product will also be reported to the NYSDEC spills hotline.

12 COMMUNITY AIR MONITORING PLAN

Continuous air monitoring will be conducted at upwind and downwind locations during all ground intrusive activities. These locations will be adjusted on a daily or more frequent basis based on actual wind directions to provide an upwind and a downwind monitoring station. Daily work reports will include figures showing the work zone for that day, locations of monitoring stations, wind direction, and the upwind and downwind CAMP data and can be seen in **Appendix D**.

Exceedances of action levels listed in the CAMP will be reported to NYSDEC and NYSDOH Project Managers within 1-day of exceedance.

13 ODOR CONTROL PLAN

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

All necessary means will be employed to prevent on- and off-site nuisances. At a minimum, these measures will include: (a) limiting the area of open excavations and size of soil stockpiles; (b) shrouding open excavations with tarps and other covers; and (c) using foams to cover exposed

odorous soils. If odors develop and cannot be otherwise controlled, additional means to eliminate odor nuisances will include: (d) direct load-out of soils to trucks for off-site disposal; (e) use of chemical odorants in spray or misting systems; and, (f) use of staff to monitor odors in surrounding neighborhoods.

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

14 DUST CONTROL PLAN

Particulate monitoring must be conducted according to the Community Air Monitoring Plan (CAMP) provided in **Appendix B**. If particulate levels at the site exceed the thresholds listed in the CAMP or if airborne dust is observed on the site or leaving the site, the dust suppression techniques listed below will be employed. 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 using 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.

15 OTHER NUISANCES

A plan for rodent control will be developed and utilized by the contractor prior to and during site clearing and site grubbing, and during all Pre-IRM activities.

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

Pre-IRM Activities Schedule

Task	Date Accomplished
Pre-IRM EWP Submitted to NYSDEC and NYSDOH	November 2025
Pre-IRM EWP Approved	Fall 2025
Pre IRM activities begin: A, C, D	Fall / Winter 2025
Excavating and Repaving for Cart Path	Winter 2025 / Spring 2026
Completion of Pre-IRM Activities	Spring / Summer 2026

Figure 1

Legend

- Passive Recreation Area
- Town Park
- Golf Course
- Proposed Berm
- Proposed Imported Soil Stockpile Area
- Clubhouse
- Pro Shop
- Excavated Soil Stockpile Area
- Golf Cart Path



1 inch equals 400 feet
When printed at 11 in. by 17 in.



Former Westwood Country Club

Sources: . Created by C&S Engineers, Inc.

Appendix A

ACTIVITIES TO BE UNDERTAKEN TO DEVELOP, OPERATE AND MAINTAIN A PUBLIC PARK ON PARCELA

1. Pre-IRM Activities may include

- a. Stockpiling of pre-tested soil meeting 6 NYCRR Part 375, and Fill Type 1 (F 1) under 6 NYCRR Part 360.13(f) standards for Commercial Use to be used as cover with implementation of anticipated Interim Remedial Measures.
- b. Repaving cart path for use on golf course, and trails along existing routes. Repaving will include widening the current cart path by 1-foot and adding a new layer of asphalt to the already established cart path. The widened the cart path will require excavating 4 inches down by 1 foot wide removing a total of approximately 150 cubic yards of soil.
- c. Inspect, test, and repair irrigation on fairways. Inspection and repair of the irrigation system, if damaged, could require an excavation of 1 foot by 4 feet to the water line.
- d. Reestablishment of fairways holes 10-18 by (brush hogging, clearing fallen trees above ground surface, tree trimming).

Appendix B

Community Air Monitoring Plan

for

**Amherst Central Park – Erie County Parcel
772 North Forest Road
Town of Amherst, Erie County, New York
“P Order” (Index No. R9-20240227-28)**

Site No. 915291

November 2025

Community Air Monitoring Plan

Overview

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

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.

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.

Particulate Monitoring, Response Levels, and Actions

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

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m³) 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 mcg/m³ 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 mcg/m³ 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 mcg/m³ 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.

Fugitive Dust and Particulate Monitoring

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

1. Reasonable fugitive dust suppression techniques must be employed during all site activities which may generate fugitive dust.

2. Particulate monitoring must be employed during the handling of waste or contaminated soil or when activities on site may generate fugitive dust from exposed waste or contaminated soil. Remedial activities may also include the excavation, grading, or placement of clean fill. These control measures should not be considered necessary for these activities.

3. Particulate monitoring must be performed using real-time particulate monitors and shall monitor particulate matter less than ten microns (PM10) with the following minimum performance standards:

- (a) Objects to be measured: Dust, mists or aerosols;
- (b) Measurement Ranges: 0.001 to 400 mg/m³ (1 to 400,000 :ug/m³);
- (c) Precision (2-sigma) at constant temperature: +/- 10 :g/m³ for one second averaging; and +/- 1.5 g/m³ for sixty second averaging;
- (d) Accuracy: +/- 5% of reading +/- precision (Referred to gravimetric calibration with SAE fine test dust (mmd= 2 to 3 :m, g= 2.5, as aerosolized);
- (e) Resolution: 0.1% of reading or 1g/m³, whichever is larger;
- (f) Particle Size Range of Maximum Response: 0.1-10;
- (g) Total Number of Data Points in Memory: 10,000;
- (h) Logged Data: Each data point with average concentration, time/date and data point number;
- (i) Run Summary: overall average, maximum concentrations, time/date of maximum, total number of logged points, start time/date, total elapsed time (run duration), STEL concentration and time/date occurrence, averaging (logging) period, calibration factor, and tag number;
- (j) Alarm Averaging Time (user selectable): real-time (1-60 seconds) or STEL (15 minutes), alarms required;

- (k) Operating Time: 48 hours (fully charged NiCd battery); continuously with charger;
- (l) Operating Temperature: -10 to 50°C (14 to 122°F); 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 ug/m³ (15 minutes average). While conservative, this short-term interval will provide a real-time assessment of on-site air quality to assure both health and safety. If particulate levels are detected in excess of 150 ug/m³, the upwind background level must be confirmed immediately. If the working site particulate measurement is greater than 100 ug/m³ above the background level, additional dust suppression techniques must be implemented to reduce the generation of fugitive dust and corrective action taken to protect site personnel and reduce the potential for contaminant migration. Corrective measures may include increasing the level of personal protection for on-site personnel and implementing additional dust suppression techniques (see paragraph 7). Should the action level of 150 ug/m³ continue to be exceeded work must stop and DER must be notified as provided in the site design or remedial work plan. The notification shall include a description of the control measures implemented to prevent further exceedances.

6. It must be recognized that the generation of dust from waste or contaminated soil that migrates off-site, has the potential for transporting contaminants off-site. There may be situations when dust is being generated and leaving the site and the monitoring equipment does not measure 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 mph;
- (f) Covering excavated areas and material after excavation activity ceases; and
- (g) Reducing the excavation size and/or number of excavations.

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

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

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 mcg/m³, work activities will be suspended until controls are implemented and are successful in reducing the total particulate concentration to 150 mcg/m³ or less at the monitoring point.

- Depending upon the nature of contamination and remedial activities, other parameters (e.g., explosivity, oxygen, hydrogen sulfide, carbon monoxide) may also need to be monitored. Response levels and actions should be pre-determined, as necessary, for each site.

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 C
Health and Safety Plan
for
Amherst Central Park – Erie County Parcel

Amherst Central Park-South
772 North Forest Road
Amherst, Erie County, New York

Prepared by



C&S Engineers, Inc.
141 Elm Street, Suite 100
Buffalo, New York 14203

November 2025

EMERGENCY PHONE NUMBERS

Emergency Medical Service911

Police Department.....911

Fire Department.....911

Millard Fillmore Suburban Hospital.....(716) 568-3600

National Response Center(800) 424-8802

Poison Control Center(800) 222-1222

Center for Disease Control(800) 311-3435

NYSDEC Region 9 (Buffalo, New York).....(716) 851-7201

C&S Engineers.....(315) 455-2000

TABLE OF CONTENTS

	<u>Page</u>
Emergency Phone Numbers	<i>i</i>
Section 1 – General Information	1
1.1 Responsibilities	1
Section 2 - Health And Safety Personnel.....	2
2.1 Project Manager (PM)	2
2.2 Health and Safety Manager	2
2.3 Health and Safety Officer (HSO)	2
2.4 Emergency Coordinator	3
2.5 Site Workers	3
Section 3 - Pertinent Site Information	4
3.1 Site Location and General History	4
Section 4 – Training.....	5
4.1 Site-Specific Training	5
4.2 Safety Briefings.....	5
Section 5 - Personal Protective Equipment.....	6
5.1 General	6
5.2 Personal Protective Equipment – Site Specific	7
Section 6 - Monitoring Procedures	8
6.1 Monitoring During Site Operations.....	8
6.1.1 Drilling Operations (Monitoring Well Installation and Subsurface Borings).....	8
6.2 Action Levels.....	8
6.3 Personal Monitoring Procedures	8
Section 7 – Communications	9
Section 8 - Safety Considerations For Site Operations.....	10
8.1 General	10
8.2 Field Operations	11
Section 9 - Decontamination Procedures	12
Section 10 – Disposal Procedures	13
Section 11 - Emergency Response Procedures.....	14
11.1 Emergency Coordinator.....	14
11.2 Evacuation.....	14
11.3 Potential or Actual Fire or Explosion.....	14
11.4 Environmental Incident (spread or release of contamination)	14
11.5 Personnel Injury	14
11.6 Personnel Exposure	14
11.7 Adverse Weather Conditions.....	15
11.8 Incident Investigation and Reporting.....	15
Section 12 – Community Relations	16
13.1 Community Health and Safety Plan	16
13.1.1 Community Health and Safety Monitoring.....	16
13.1.2 Community Air Monitoring Plan.....	16
Section 13 - Authorizations	17

FIGURES

Figure 1 Site Location

Figure 2 Site Detail

Attachment A – Map and Directions to Hospital

Appendix A – Guidance on Incident Investigation and Reporting



SECTION 1 – GENERAL INFORMATION

This Health and Safety Plan (HASP) addresses health and safety considerations for the activities that personnel employed by C&S Engineers, Inc., (C&S) may be engaged in during site investigation at the Amherst Central Park- South located in Amherst, New York (Site). **Figure 1** and **Figure 2** shows the location and layout of the Site. This HASP will be implemented by the Health and Safety Officer (HSO) during site work.

Compliance with this HASP is required of C&S personnel who enter this Site. The content of the HASP may change or undergo revision based upon additional information made available to the health, safety, and training (H&S) committee, monitoring results or changes in the technical scope of work. Any changes proposed must be reviewed by the H&S committee.

1.1 Responsibilities

Project Manager.....	Dan Riker Phone: (716) 847-1630
Health and Safety Manager.....	Michael Sherlock Phone: (315) 703-4210 Cell: (707) 420-3455
Site Health and Safety Officer.....	Cody Martin Phone: (716) 955-3021
Emergency Coordinator.....	Cody Martin Phone: (716) 955-3021

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 40-Hour training course for the Hazardous Waste Operations Worker that meets OSHA 29 CFR 1910, as well as 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

- ◆ Will at a minimum, have the 40-Hour training course for the Hazardous Waste Operations Worker that meets OSHA 29 CFR 1910, as well as the OSHA 10-Hour Construction Safety Training.
- ◆ The Emergency Coordinator or his on-site designee will, in coordination with Town of Amherst, 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 C&S 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 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 - PERTINENT SITE INFORMATION

3.1 Site Location and General History

The Site is located at 772 North Forest Road, Amherst, New York (Tax Parcel ID# 68.01-1-1.2). The Site is 18 acres in size and sits on the southern portion of the former Westwood Country Club.

The previous owner completed preliminary sampling of surface soils to determine if long-term, historic use of golf-course-related pesticides impacted the property. Contamination was identified and the owner entered into the New York State Brownfield Cleanup Program (BCP) in 2015 (NYSDEC Site No. C915291). After several long negotiations between the owner and the Town of Amherst, the property was sold to the Town and the 2015 Brownfield Cleanup Agreement was terminated.

Previous investigations revealed the contamination present on the Site:

- Metals historically commonly used in pesticides with concentrations above Restricted Residential Use SCOs throughout the site
- Surface water samples with exceedances for PFOs and Benzo(k)fluoranthene

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

C&S 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.

SECTION 5 - PERSONAL PROTECTIVE EQUIPMENT

5.1 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.

5.2 Personal Protective Equipment – Site Specific

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

SECTION 6 - MONITORING PROCEDURES

6.1 Monitoring During Site Operations

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

6.1.1 Drilling Operations (Monitoring Well Installation and Subsurface Borings)

Monitoring will be performed by the HSO or drilling observer during the conduct of work. A photoionization detector (PID) equipped with an appropriate map (e.g. 10.6 or 11.7 eV) will be utilized to monitor for the presence of volatile organic vapors within the breathing zone, the borehole, and subsurface samples upon their retrieval. Drill cuttings and 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 the borehole for the presence of combustible gases. Similar monitoring of fluids produced during well development will also be conducted.

6.2 Action Levels

The action threshold for VOCs established in the CAMP is 5ppm above background. If this value is exceeded for the 15-minute average work will be halted and work may resume once instantaneous readings will also be conducted.

The action level for dust is 100 ($\mu\text{g}/\text{m}^3$) over background during a 15-minute average. If this limit is exceeded, dust suppression techniques will be employed, including using water to wet the area.

The NYSDEC will be notified of any exceedances in CAMP monitoring which persist for the 15-minute average within 24-hours. CAMP monitoring and reporting will be submitted to the DEC following sampling.

6.3 Personal Monitoring Procedures

Personal monitoring shall be performed as a contingency measure in the event that VOC concentrations are consistently above the 10 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 7 – COMMUNICATIONS

Cell phones will be the primary means of communicating with emergency support services/facilities.

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 enter the work zone alone.
- ◆ Practice contamination avoidance, on and off-site.
- ◆ Plan activities ahead of time, use caution when conducting concurrently running activities.
- ◆ No eating, drinking, chewing or smoking is permitted in work zones.
- ◆ Due to the unknown nature of waste placement at the Site, extreme caution should be practiced during excavation activities.
- ◆ 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 health and safety officer.
- ◆ 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 investigations, including:
 - ◆ 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., drilling operations, excavations, trenching) and will provide monitoring to oversee that appropriate levels of protection and safety procedures are utilized by C&S 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

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 from the work zone.
- ◆ Avoid exposing unprotected personnel outside of the work zone to contaminants.

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.
- ◆ Do not enter a contaminated area unless it is necessary to carry out a specific objective.
- ◆ When in a contaminated area, avoid touching anything unnecessarily.
- ◆ Walk around pools of liquids, discolored areas, or any area that shows evidence of possible contamination.
- ◆ Walk upwind of contamination, if possible.
- ◆ Do not sit or lean against anything in a contaminated area. If you must kneel (e.g., to take samples), use a plastic ground sheet.
- ◆ If at all possible, do not set sampling equipment directly on contaminated areas. Place equipment on a protective cover such as a ground cloth.
- ◆ Use the proper tools necessary to safely conduct the work.

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 grapplers.
- ◆ Watering down dusty areas.

Equipment which will need to be decontaminated includes tools, 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. Monitoring instruments may be wrapped in plastic bags prior to entering the field in order to reduce the potential for contamination. 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 drillers or 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. Investigation Derived Waste (IDW) will be managed and characterized. Characterization of IDW may require TCLP sampling and analysis consistent with the work plan for the Site and DER-10 Technical Guidance for Site Investigation and Remediation.

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

Emergency Coordinator:..... Cody Martin Work Phone: (716) 955-3021

The Emergency Coordinator or his on-site designee will, in concert with the Town of Amherst, 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 C&S personnel 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 or 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

Health and Safety Plan

- ◆ *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 A** of this HASP, shall be followed.

SECTION 12 – COMMUNITY RELATIONS

13.1 Community Health and Safety Plan

13.1.1 Community Health and Safety Monitoring

As part of the site work, three general types of efforts are scheduled, *update as necessary*: including, non-intrusive reconnaissance tasks, sampling or monitoring tasks (monitoring point sampling), and intrusive tasks (test trenching, subsurface borings, monitoring well installation). During completion of general reconnaissance and sampling or monitoring tasks, potential for health and safety risks to off-site landowners or the local community are not anticipated.

During completion of intrusive efforts at or adjacent to the Site; health and safety monitoring efforts will be concentrated on the area or areas in which intrusive efforts are being completed. Since the air pathway is the most available and likely avenue for the release of potential contaminants to the atmosphere at or near the Site, in addition to limiting public or community access to the areas in which intrusive efforts are completed, health and safety measures will primarily consist of monitoring the air pathway for worker exposure.

13.1.2 Community Air Monitoring Plan

Efforts will be taken to complete field work in a manner which will minimize the creation of airborne dust or particulates. Under dry conditions, work areas may be wetted to control dust. During periods of extreme wind, intrusive field work may be halted until such time as the potential for creating airborne dust or particulate matter as a result of investigation activities is limited. Periodic monitoring following the guidelines of the site's Community Air Monitoring Plan (CAMP) will be implemented during all non-intrusive Site investigation activities, including surface soil and sediment sampling, and collection of groundwater samples from groundwater monitoring wells.

During completion of Site investigation, a CAMP will be implemented for the duration of intrusive activities. These additional air monitoring activities will include establishment of background conditions, continuous monitoring for volatile organic compounds and/or particulates at the downwind work area (exclusion zone) perimeter, recording of monitoring data, and institution and documentation of response levels and appropriate actions consistent with NYSDOH guidance.

SECTION 13 - AUTHORIZATIONS

Personnel authorized to enter the Site while operations are being conducted must be approved by the HSO. Authorization will involve completion of appropriate training courses, medical examination requirements, and review and sign-off of this HASP. No C&S personnel should enter the work zone alone. Each site visitor should check in with the HSO or Project Manager prior to entering the work zones.

FIGURE 1

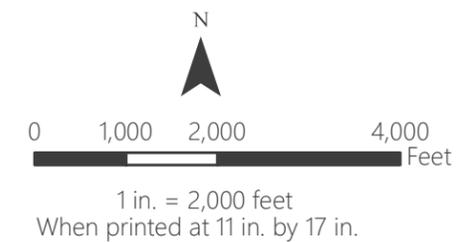
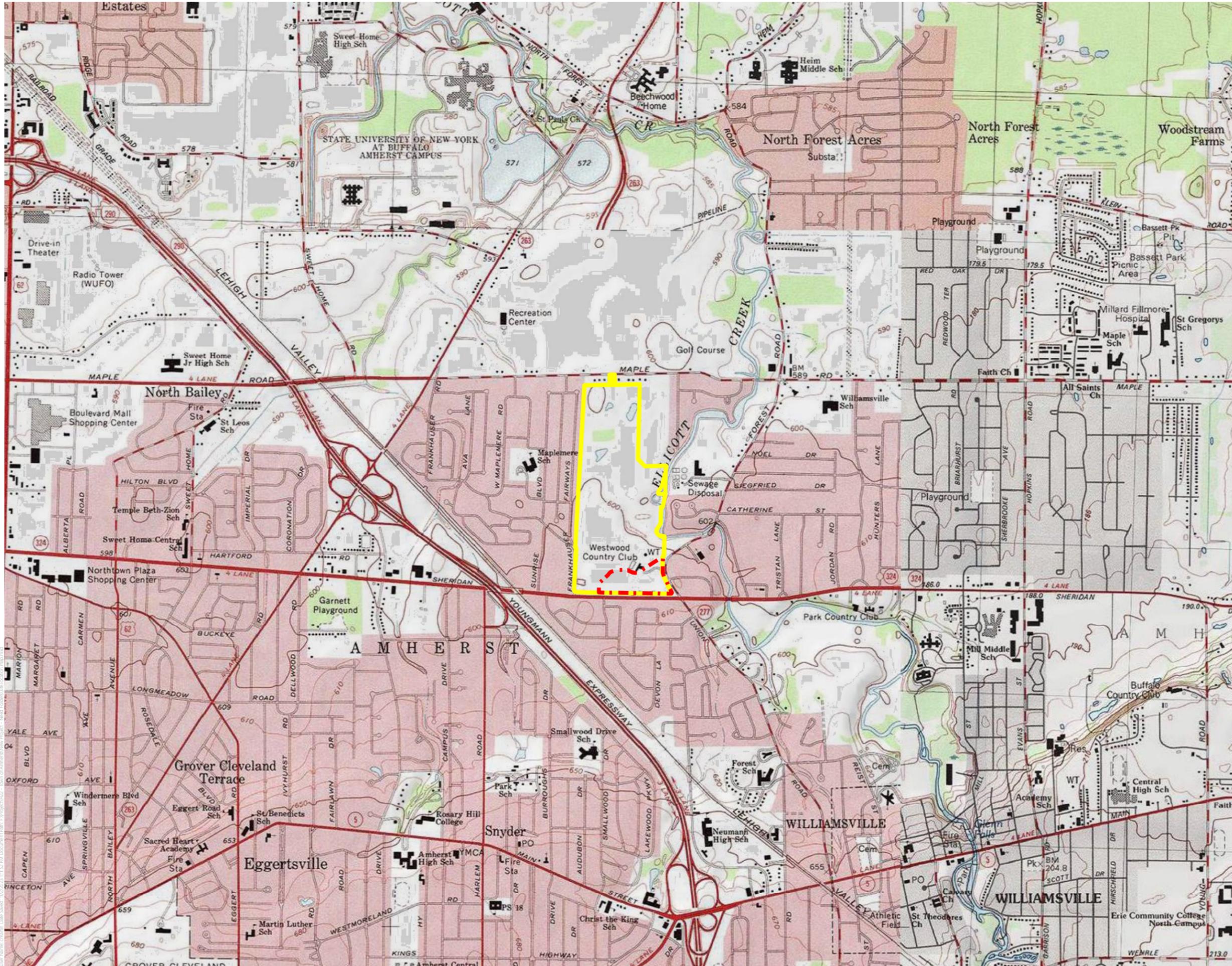
SITE LOCATION MAP



Figure 1

Site Location

 Former Westwood Country Club Property

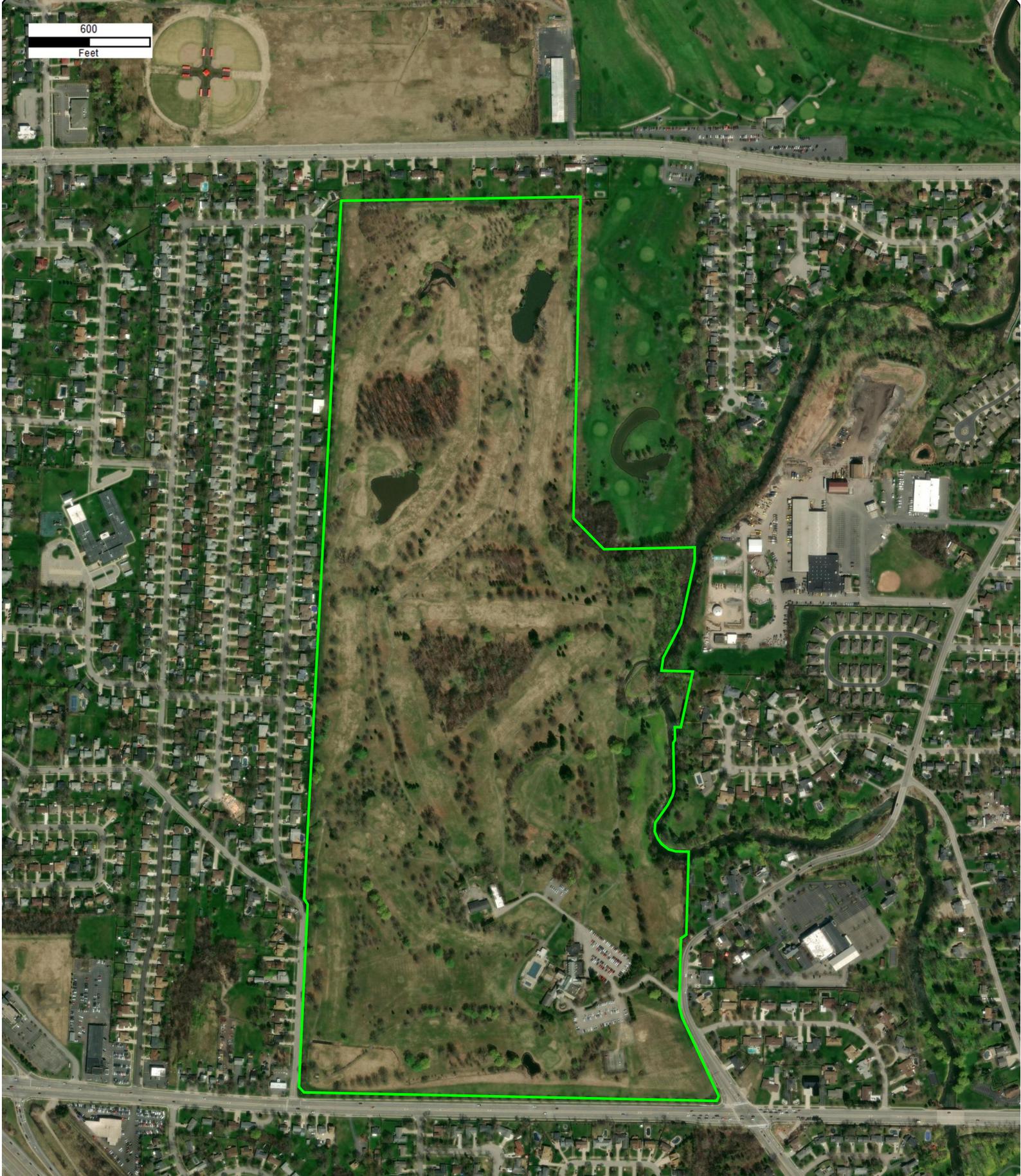


Amherst Central Park South Phase 1
Construction Characterization

Sources: . Created by C&S Engineers, Inc.

FIGURE 2

SITE DETAIL PHOTO



600
Feet



Figure 2
Site Map

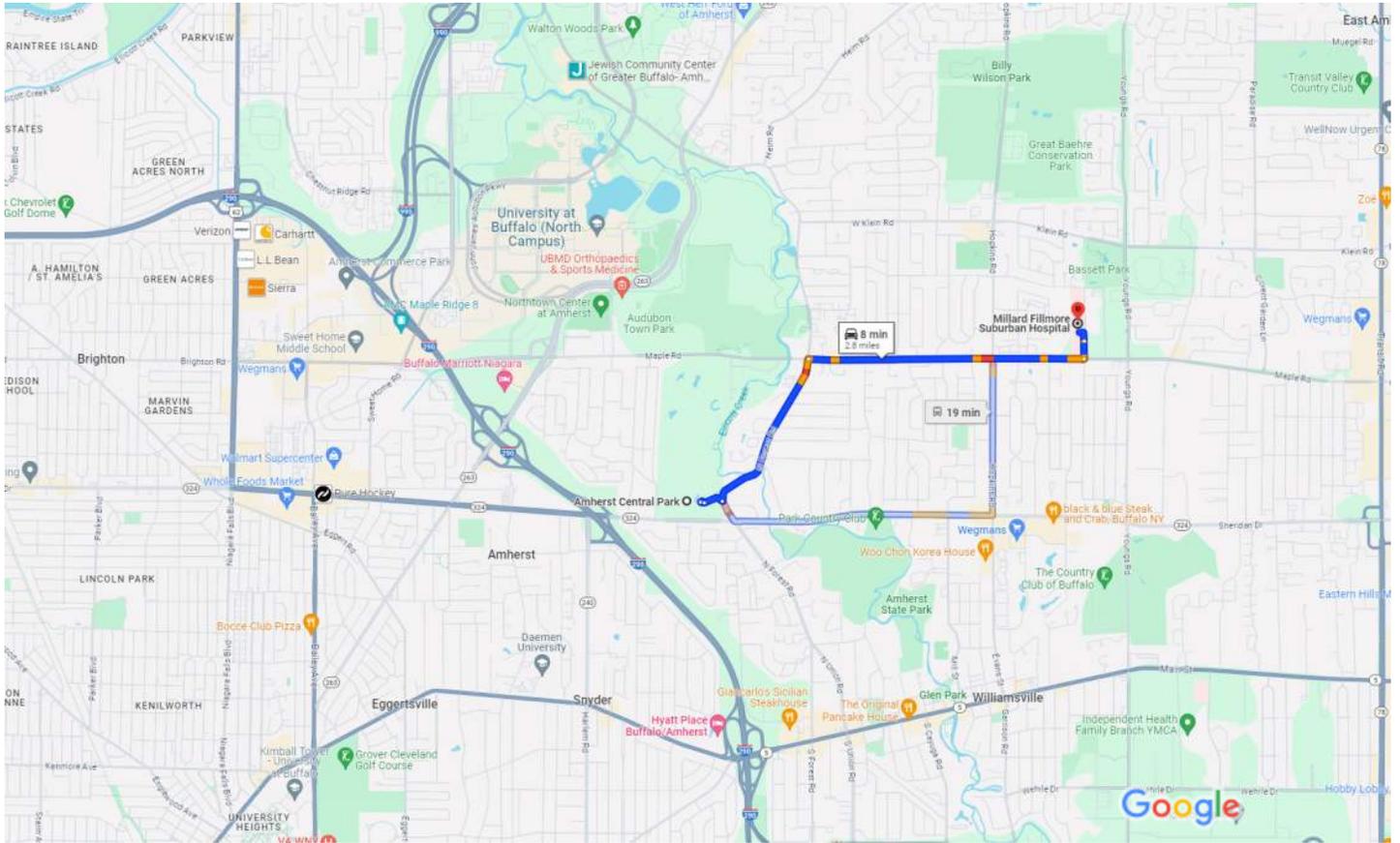
ATTACHMENT A

MAP TO HOSPITAL



Amherst Central Park, Amherst, NY 14221 to Millard Fillmore Suburban Hospital

Drive 2.8 miles, 8 min



Map data ©2023 Google 2000 ft

Amherst Central Park Amherst, NY 14221

- ↑ 1. Head northeast
151 ft
 - ↶ 2. Turn left toward N Forest Rd
0.1 mi
 - ↶ 3. Turn left onto N Forest Rd
1.0 mi
 - ↷ 4. Turn right onto Maple Rd
1.5 mi
 - ↶ 5. Turn left onto MacArthur Dr
0.1 mi
 - ↑ 6. Continue straight
377 ft
- i** Destination will be on the right

Appendix A

GUIDANCE ON INCIDENT INVESTIGATION AND REPORTING

MEDICAL EMERGENCY / INCIDENT

RESPONSE PROTOCOL

1.0 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.

2.0 SCOPE

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

3.0 GUIDELINES

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.

3.1 *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.

3.2 *Project Manager*

1. Upon notification of a personal injury or illness on the job site, will notify C&S Engineers, Inc, President and 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.

3.3 *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 hrs 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.

4.0 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.

5.0 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.

6.0 REFERENCES

29 CFR Part 1904

7.0 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

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.



DAILY WORK REPORT

Project Number:		Project Name:	
Client:		Address:	
Date:		Start / Stop Time:	

CAMP DETAILS

Check box if CAMP monitoring was conducted:	<input type="checkbox"/>		
Start (hh:mm):		Stop (hh:mm):	
Check box if CAMP equipment was calibrated:	<input type="checkbox"/>		
UW C&S SYR #:		DW1 C&S SYR #:	
UW DUST ID:		DW1 DUST ID:	
UW PID ID:		DW1 PID ID:	
Type of soil intrusive work:			
Check box if visible dust was observed leaving the Site:	<input type="checkbox"/>		
Check box if there were exceedances of the CAMP PM-10 action levels:	<input type="checkbox"/>		
Check box if there were exceedances of the CAMP VOC action levels:	<input type="checkbox"/>		

Explain any exceedances and suppression methods implemented:

WORK AREA / CAMP STATION LOCATION SKETCH

Blank area for sketching work area and camp station locations.

Drawing Notes / Sketch Key:

Upwind Station	Downwind Station	Wind Direction	Intrusive Work Area
			



DAILY WORK REPORT

Project Number:		Project Name:	
Client:		Address:	
Date:		Start / Stop Time:	

SITE / CAMP PHOTOLOG

Site conditions before starting work	Site conditions before starting work
Site conditions after completing work	Site conditions after completing work

Photo Notes:

TRUCK EXPORT LOG (SOLIDS)

