

178 Nursery Avenue Geneva, New York 14456 Phone: (315) 781-2705

Cellular: (315) 277-0162 Email: gedding1@yahoo.com

Dear Mr. MacLean,

This letter presents a Remedial Action Work Plan Addendum for the Market Basket Environmental Restoration Program site in Geneva, New York. As you know, this site includes two parcels that are located north and south of Gates Avenue and east of Lehigh Street. The parcels are owned by the City of Geneva. Both parcels formerly contained industrial buildings that were associated with the Market Basket chain of grocery stores. While clearing overgrown vegetation on the south block, what appears to be the top of a subsurface hydraulic cylinder was encountered. Historical fire insurance maps indicate that a freight elevator was formerly near this location, and may have been associated with the apparent reservoir.

The suspected cylinder is not near the areas that were identified as being impacted from historical operations and that were remediated through the ERP program, and available information does not indicate that any releases have occurred from the cylinder. However, the City desires to remove the structure to facilitate potential future use of the property. Therefore, the following actions are proposed:

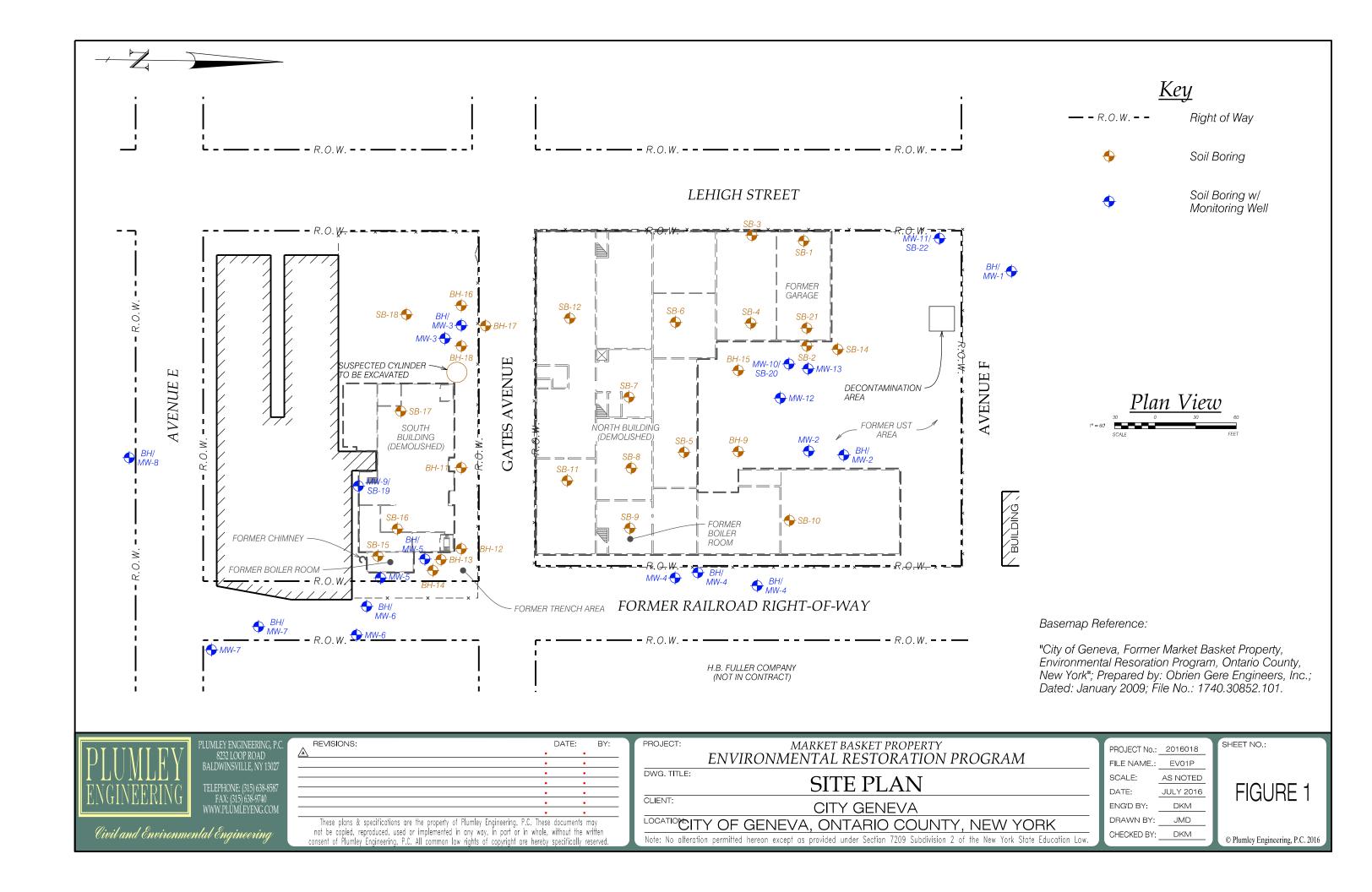
- 1. The top of the structure will be uncovered by carefully removing the overlying soil
- 2. Excavated soil will be staged on polyethylene sheeting in a dedicated pile and will be carefully screened throughout the excavation process for indications of potential releases. Screening will consist of visual and olfactory monitoring and the use of a photoionization detector (PID) to screen for volatile organic compounds (VOCs). If evidence of a release is suspected, a separate soil pile will be started (also placed on polyethylene sheeting).
- 3. Once the top of the cylinder is fully exposed, the sides will be exposed by carefully extending the excavation around the cylinder. Particular attention will be paid to uncovering, but not breaking, any hydraulic line connections that may be present. If line connections are encountered, they will be followed to assess the current or former location of a hydraulic reservoir.
- 4. After fully exposing the cylinder and attached components, the exposed equipment will be inspected for any potential releases, and also to assess the best method to remove the equipment.
- 5. The equipment will be removed and placed on and covered with polyethylene sheeting until appropriate off-site disposal is arranged. Free liquids will be drained and containerized for appropriate off-site disposal.
- 6. The resulting excavation will be inspected for potential releases. If impacted soil is suspected of being present, it will be excavated and placed on polyethylene sheeting. At the completion of each workday, all soil piles will be covered with polyethylene sheeting.

- 7. If no evidence of a release is encountered, it is expected that the excavation will be relatively small and one grab soil sample will be collected from the bottom of the excavation for confirmation purposes. The sample will be submitted to an ELAP-certified environmental laboratory for analysis of semi-volatile organic compounds (SVOCs) via EPA Method 8270.
- 8. If impacted soils are removed, one additional confirmation sample will be collected from each side of the excavation, for a total of five confirmation samples.
- 9. The south block is currently fenced and the excavation will be left open pending receipt of the laboratory results of the confirmation samples. Stakes and plastic fencing will be placed around the excavation as an added precaution.
- 10. Any excavated soil suspected of being contaminated will be disposed off-site. Characterization samples will be collected as required by the disposal facility. Following approval from the disposal site, an appropriately permitted hauler will transport the material to the disposal site.
- 11. The results of the confirmation samples will be forwarded to you. If the results of the confirmation samples meet the soil cleanup objectives for restricted commercial use, it is anticipated that the excavation will be back-filled with clean fill that meets the requirements of Appendix 5 of DER-10.
- 12. The previous removal tasks will be documented in the Site Management Plan and the Final Engineering Report that are presently being prepared.
- 13. Following approval from the Department of the completed removal action described above, a one-foot cover of clean fill that meets the requirements of Appendix 5 of DER-10 will be placed over the south block. This material will be placed and graded in a similar manner as was used on the north block, and a grass cover will established.

Thank you for your assistance on this matter. Please contact me if you have any questions or comments.

Sincerely,

Gordon P-Eddiylon Gordon P. Eddington



HEALTH AND SAFETY PLAN for

EXCAVATION ACTIVITIES

at the

FORMER MARKET BASKET SITE Gates Avenue City of Geneva, Ontario County, New York ERP Site No. B00018-8

Prepared for:

CITY OF GENEVA 47 Castle Street Geneva, New York 14456

Prepared by:



8232 Loop Road Baldwinsville, New York 13027 (315) 638-8587 Project No. 2016018

July 2016

TABLE OF CONTENTS

	<u>1</u>	PAGE
1.0	PURPOSE AND APPLICABILITY	1
2.0	SITE DESCRIPTION	1
3.0	SCOPE OF WORK	1
4.0	HEALTH AND SAFETY PERSONNEL	3
5.0	GENERAL INFORMATION	5
6.0	SITE CONTAMINANT CHARACTERISTICS	6
7.0	HAZARD EVALUATION AND REDUCTION	6
8.0	SITE SAFETY WORK PLAN	10
9.0	ENVIRONMENTAL MONITORING PLAN	15
10.0	INVESTIGATION WASTE DISPOSAL PLAN	18
11.0	EMERGENCY RESPONSE PLAN	20

FIGURE

FIGURE 1 - SITE PLAN

TABLE

TABLE 1 – HEALTH AND SAFETY DATA FOR SELECTED CONTAMINANTS OF CONCERN

ATTACHMENTS

ATTACHMENT A - AUTHORIZED PERSONNEL

ATTACHMENT B - DAILY WORK ZONE AND PERIMETER AIR MONITORING LOG SHEET

1.0 PURPOSE AND APPLICABILITY

This Health and Safety Plan (HASP) outlines precautions and protective measures that employees and subcontractors ("Workers") of Plumley Engineering and Eddington Environmental must take to minimize the risk to health and safety while performing field tasks for on-site activities to be conducted at the former Market Basket site, located on Gates Avenue in the City of Geneva, Ontario County, New York. The site consists of two parcels and has been investigated and remediated under the Environmental Restoration Program (ERP). While clearing overgrown vegetation on the southern block, what appears to be a subsurface hydraulic cylinder was encountered. A Remedial Action Work Plan Addendum detailing the proposed actions to remove the cylinder was submitted to the New York State Department of Environmental Conservation (DEC) on April 20, 2016. Each worker shall review the HASP prior to working on the site and sign an acknowledgement indicating the worker agrees to comply with the HASP requirements. If activities require parties other than the engineer or its subcontractors to be at the site, these parties are solely responsible for maintaining compliance with all applicable regulations and for their own health and safety procedures. All on-site workers must have received the appropriate level of training for their specific duties in accordance with Occupational Safety and Health Administration (OSHA) 29 CFR 1910.120 (e).

2.0 SITE DESCRIPTION

The site is located in a mixed residential-industrial area in the City of Geneva, New York and consists of two parcels, one north of Gates Avenue and one south of Gates Avenue. The buildings that formerly occupied the site were demolished and both parcels are now vacant properties. Refer to Figure 1 for additional information.

3.0 SCOPE OF WORK

The following tasks are proposed to address the apparent cylinder:

- The top of the cylinder structure will be uncovered by carefully removing the overlying soil.
- Excavated soil will be staged on polyethylene sheeting in a dedicated pile and carefully screened throughout the excavation process for indications of potential releases. Screening will consist of visual and olfactory monitoring and the use of a photoionization detection (PID) meter to screen for volatile organic compounds (VOCs). If evidence of a release is suspected, a separate soil pile will be started (also placed on polyethylene sheeting).
- Once the top of the cylinder is fully exposed, the sides will be exposed by carefully extending the excavation around the cylinder. Particular attention will be paid to uncovering, but not breaking, any hydraulic line connections that may be present. If line connections are encountered, they will be followed to assess the current or former location of a hydraulic reservoir.
- After fully exposing the cylinder and attached components, it will be inspected for any potential releases and to assess the best method of removal.
- The equipment will be removed and placed on and covered with polyethylene sheeting until off-site disposal is arranged. Free liquids will be drained and containerized for proper off-site disposal.
- The resulting excavation will be inspected for potential releases. Any soil showing evidence of impact will be excavated and placed on polyethylene sheeting. All soil piles will be covered with polyethylene sheeting at the completion of each workday.
- It is anticipated that the excavation will be relatively small. If no evidence of a release is encountered, one grab soil sample will be collected from the excavation bottom and submitted to an ELAP-certified environmental laboratory for analysis of semi-volatile organic compounds (SVOCs) via EPA Method 8270 for confirmation purposes.

- If impacted soils are removed, one grab soil sample will be collected from the bottom and each side wall of the excavation, for a total of five confirmation samples.
- The south block is currently fenced and the excavation will be left open pending, receipt of the laboratory results of the confirmation samples. Stakes and plastic fencing will be placed around the excavation as an added precaution.
- Any excavated soil suspected of being contaminated will be disposed off-site.
 Characterization samples will be collected as required by the disposal facility. Following approval from the disposal site, an appropriately permitted hauler will transport the material to the disposal site.
- If the results of the confirmation samples meet the soil cleanup objectives for restricted commercial use, the excavation will be backfilled with clean fill that meets the requirements of Appendix 5 of DER-10.
- The removal tasks will be documented in the Site Management Plan and the Final Engineering Report that are currently being prepared.
- A 1-foot cover of clean fill meeting the requirements of Appendix 5 of DER-10 will be placed over the south block following DEC approval of the completed removal tasks. This material will be placed and graded in a manner similar to that used on the north block, and a grass cover will be established.

These field activities are anticipated to take place during the 2016 calendar year.

4.0 HEALTH AND SAFETY PERSONNEL

The following personnel are responsible for the development, implementation and maintenance of this HASP:

Although responsibility for implementing this HASP is with the Site Safety Officer, the primary responsibility for health and safety lies with the individual workers. Each worker must be familiar with and conform to the safety procedures outlined in this HASP. The Site Safety Officer is responsible for all decisions regarding health and safety policies, procedures and protective measures. It is the responsibility of the Site Safety Officer to provide the resources required to allow the work to be conducted in conformance with this HASP.

The Site Safety Officer will also be responsible for:

- Maintaining a complete copy of the HASP at the site during all field activities.
- Assuring that all workers at the site are familiar with the procedures outlined in the HASP.
- Assuring that all workers have undergone the required OSHA training program.
- Assuring that workers have, and properly use and maintain, all specified personal protective and other health and safety equipment.
- Assuring that proper decontamination procedures are followed.
- Initiating immediate response actions, if necessary, and coordinating these actions with all workers at the site, any other individuals at the site, any involved agencies or medical facilities.
- Recommending improvements to this HASP, if needed.

The Site Safety Officer has the authority to:

• Direct any worker to alter or suspend any work practice they deem is not sufficient to

protect human health.

• Deny access to the site to any individual or organization who does not have a complete

copy of the HASP and/or the appropriate training and personal protective equipment

(PPE) for the potential health and safety hazards at the site.

The presence or absence of the Site Safety Officer shall in no way relieve any individual or

organization of their obligation to comply with the HASP or any applicable Federal, State and

local laws and regulations.

5.0 GENERAL INFORMATION

Plan Prepared By / Date:

Plumley Engineering / July 2016

Plan Approved By / Date:

David K. Meixell, P.E. / July 2016

Proposed Date(s) of Work:

Initial activities will be in July 2016. Follow-up activities may

occur at various times throughout 2016.

Background Review:

Preliminary

Complete

X

A review of prior site investigation and environmental site assessment reports has been

completed sufficiently to support the preparation of the site HASP. As more detailed

information is obtained or if new information is obtained that requires a modification to the

HASP, an addendum will be issued.

5

6.0 SITE CONTAMINANT CHARACTERISTICS

Definition of Site Contaminants of Concern

The site was a former food storage facility and tool rental company. The northern block had also been used as a do-it-yourself auto body repair business. Remedial activities at the site were completed in 2008 and 2009. Contaminants of concern (COCs) that were addressed in the remedial activities included:

- VOCs, including chlorobenzene, trichloroethene and xylenes.
- SVOCs, including acenaphthene, fluorene, phenanthrene, anthracene, chrysene, benzo(a) pyrene, naphthalene and 2-methylnaphthalene.
- Several metals.

Potential Hazardous Material(s)

The suspected hydraulic cylinder is not located in an area identified during the Remedial Investigation as containing hazardous constituents. A representative of Plumley Engineering will monitor the work for visual or olfactory evidence of contamination as the cylinder is exposed and removed, and will screen the excavation with a PID meter.

7.0 HAZARD EVALUATION AND REDUCTION

VOCs can present an inhalation hazard from breathing air contaminated with these materials resulting from exposures to contaminated equipment, site soils or groundwater disturbed by site activities. Although less volatile than the VOCs, SVOCs may also be present in the breathing zone.

Chemical constituents could occur in soil and groundwater at the site, and thus pose a potential dermal exposure risk that can result from handling site soil and groundwater or equipment that has come into contact with impacted soil or groundwater.

The current OSHA permissible exposure limits (PEL) standards are provided in Table 1. Workers are not expected to be exposed to conditions exceeding the PEL.

Based on the nature of the contaminant and the type of work being performed, the most significant hazards at this site are:

- Potential direct contact with VOCs and SVOCs during excavation activities. The PPE requirements for the project are designed to eliminate this risk to the extent practical.
- Physical hazards related to operating and working with excavation equipment. All equipment operators and inspectors shall be familiar with the associated physical hazards and shall have had at least five years of related experience. Environmental contractors shall provide copies of their current HASP to the project engineer for review. The PPE requirements for the project are designed to eliminate this risk to the extent practical.

There are three primary pathways by which site workers can be exposed to chemical hazards: inhalation, ingestion and dermal contact. The chemical exposures across these pathways can cause two types of effects: acute and chronic. Acute effects occur during or shortly after exposure to a sufficiently high concentration of a chemical. Chronic effects occur after repeated or constant exposures for a long period of time. Regulatory exposure limits, such as PELs, are related to both acute effects (such as respiratory irritation) and chronic effects (such as cancer). Symptoms of chemical exposure may include behavioral changes, breathing difficulties, skin color changes, coordination difficulties, coughing, dizziness, weakness, irritability, skin irritation, eye irritation, respiratory tract irritation, headache, nausea, lightheadedness, sneezing, etc.

The primary pathway exposures associated with site VOCs is inhalation and dermal contact with affected media or tools that have come into contact with the affected media. SVOCs may also be present in the breathing space, although typically at concentrations less than VOCs. Real-time ambient air monitoring, appropriate engineering controls, PPE and good hygiene practices will be employed to minimize exposure to VOCs. Exposures to SVOCs, metals, pesticides and polychlorinated biphenyls (PCBs) is primarily by dermal contact with affected media or tools that have come into contact with the affected media.

Another potential pathway for exposure to COCs is through inhalation and dermal contact with airborne dust derived from contaminated soil. However, there are no site activities proposed at this time that will expose large areas of unstabilized soil, and vegetation is well developed at the site. The cylinder excavation pit will be backfilled upon completion and is not expected to be a source of dust.

The following precautions will be taken to reduce the potential exposure to site COCs during site investigation and remediation activities:

- Field personnel will conduct air monitoring with a PID meter during excavation activities to measure total concentrations of VOCs in the work zone breathing space.
- Engineering controls and/or appropriate respiratory protection will be used if visible dust does become present in the breathing space.
- The work procedures shall be modified if VOCs in the breathing space rise above action levels.
- Site investigation activities will be conducted in Level D PPE to minimize dermal exposure to potentially affected media (i.e., specifying the use of disposable protective gloves when handling site materials during field sampling activities) and reduce the risk of physical hazards (by requiring hard hats and safety glasses when inspecting drilling or test pits), as detailed in Section 8. The PPE will be upgraded, as necessary, for organic vapor, dermal and dust inhalation hazards.

- Any non-disposable PPE that comes in contact with potentially affected facility media will be decontaminated prior to leaving the work area.
- Soap, clean water and paper towels for washing hands will be provided at the site during all field activities. Hands will be washed thoroughly prior to eating, drinking and leaving the site.

The Site Safety Officer will have the NIOSH *Pocket Guide to Chemical Hazards* available for reference at the site. This reference identifies exposure routes, exposure symptoms, physical properties, chemical incompatibilities, first aid treatment and other information for many chemical compounds.

Physical hazards expected during the investigation and remediation activities are related to working with heavy construction equipment (backhoe), potential utility conflicts for the excavation work, and slip, trip and fall hazards. Additional physical hazards may include heat or cold stress. These hazards will be evaluated by the Site Safety Officer prior to beginning work in a new area and as conditions change in the work area. The following precautions will be taken to reduce the physical hazards:

- A utility clearance program shall be completed prior to initiating the project, to include contacting Dig Safely New York and researching private utilities. No subsurface borings or test pits will be started at any location prior to utility clearance.
- "Tailgate" safety briefings will be conducted by the Site Safety Officer to identify additional safety protocols, as needed.
- The specified PPE shall be worn by all workers in the project exclusion zone.

• No confined space entries will take place under this HASP. If a confined space entry becomes necessary, appropriate confined space entry procedures will be detailed in an addendum to this plan.

• A warming space will be provided during cold weather, if needed.

• Good housekeeping in the work area will be maintained.

If VOCs in the breathing space are detected above action levels (or as determined by the monitoring plan), work will cease until a determination is made as to whether further controls are required.

If necessary, engineering controls will be developed to minimize dust generation at the sampling location. For example, water may be sprayed on the surface soils to reduce breathing space dust concentrations.

Encountering unknown or unexpected substances or containers of a hazardous nature is possible, though not expected based on the degree of prior investigation and remedial activities undertaken at the site. Work will be discontinued if field measurements or observations indicate there is a potential exposure to a hazard that was not anticipated, is not adequately characterized and controlled, or may exceed the protection provided by the PPE specified for the task.

8.0 SITE SAFETY WORK PLAN

Site Map

Figure 1 shows the main features on and adjacent to the site, and the locations of prior environmental sampling points.

Site Security

A security fence with a locked gate encloses the southern portion of the site where the cylinder is to be excavated. The gate is kept locked at all times except during times when investigation activities are underway. The gate will be closed when personnel are on-site working to limit incoming traffic to authorized personnel only.

Training

All authorized workers will receive a HASP briefing and will be required to read and sign the HASP at the beginning of the field work. The following main items shall be covered:

- The tasks the workers will be required to perform, as detailed in the Work Plan.
- Site ingress, egress and decontamination procedures.
- Site hazards, accident prevention and overexposure symptoms.
- The required PPE plan and exclusion zone requirements.
- Emergency response procedures.

Attachment A is a record of all authorized workers who have either attended the startup training session or received a similar briefing from the Site Safety Officer, to include any visitors. This shall be kept up-to-date throughout the project.

Should unexpected site conditions be encountered requiring utilization of Level C or higher protection and/or other specialized operations (e.g., a confined space entry), the work shall not be carried out until a Response Team comprised of personnel with proper training in accordance 29 CFR Part 1910.120 (e) (f) (g) is formed to complete such work.

Any new personnel assigned to this project shall receive the HASP briefing and be required to read and sign the HASP before being allowed to perform work. The briefing will be given by the Site Safety Officer or a delegated safety representative who has previously completed this training.

The Site Safety Officer will be responsible for insuring that visitors receive the necessary site-specific visitor training applicable to the visitors' anticipated activities. Site visitors shall not be allowed access to the project exclusion zone unless they receive a site-specific training brief, can demonstrate they have received the appropriate training per 29 CFR Part 1910.120 (e) and have received the required project PPE equipment.

Zone(s) of Contamination Identified

Workers are to assume that COCs may occur anywhere on the site in the surface soils, subsurface soil and groundwater.

Medical Surveillance

If used, subcontractors shall be current with medical surveillance requirements in accordance with 29 CFR Part 1910.120 (f).

Exclusion Zone

Temporary exclusion zones will be established around all subsurface drilling and sampling locations while such operations are being conducted. No unauthorized personnel will be allowed to approach the location, as monitored by the Site Safety Officer. Traffic cones will be used to designate the area, set at a safe distance from the associated hazard, as determined by the Site Safety Officer. Any worker in the exclusion zone shall comply with all aspects of the HASP.

Decontamination Area

A central decontamination area where decontamination materials shall be placed and stored, and procedures conducted, will be designated at the outset of the project. Portable decontamination equipment will also be used to expedite the work.

Personal Protection Equipment

- Level of protection in the exclusion zone shall be Level D Modified.
- Level D PPE in the exclusion zone shall consist of the use of hard hats, rubber (nitrile) gloves, steel-toed boots if inspecting drilling or test pits operations, ear plugs and safety glasses. Latex gloves will be used by inspectors for handling soil samples.
- Drillers and any other site worker who is in close contact with soils during ground intrusive activities shall wear coveralls or other appropriate clothing to safeguard against debris and skin contact.
- A cellular telephone in proper working order shall be available at the work site at all times.
- Eating, drinking, smoking and carrying food or tobacco products are prohibited in the exclusion zone.

Decontamination Procedures

- *Personnel:* Workers shall remove coveralls and wash face and hands with soap and water prior to eating, drinking, using restroom facilities or leaving the site.
- *Protective Equipment:* A detergent wash and clean water rinse will be used for rubber boots, hard hats, safety glasses and hand sampling tools.

• Sampling Equipment: A detergent wash and clean water rinse shall be used to clean

sampling equipment before exiting the work site. Decontamination of tools shall be

performed at the designated decontamination pad facility. Sampling tools will be dry

brushed, as appropriate, prior to detergent cleaning.

• Disposal: Gloves, coveralls, etc., used at the site will be collected at a central location

for disposal in accordance with all applicable laws of the State of New York or, where

applicable, properly cleaned and disinfected for reuse. All water generated from

decontamination shall be collected and containerized for proper testing and disposal in

accordance with all applicable laws of the State of New York.

Equipment Checklist

Level D Modified

Hardhat

Steel toed work boots

Safety glasses

Safety goggles or shield, if necessary

Tyvek coveralls, if necessary

Rubber and latex gloves

Hearing Protection

Ear Plugs

Decontamination Materials

Alconox

Brushes

Buckets

Potable water source and portable containers

Low pressure sprayer

Decontamination pad materials, including water containment

Plastic drop cloth material

Garbage can and plastic liners

Field Instruments

PID / Calibrated HNU, 10.6 eV

Other

Disposal dust masks

Glove and helmet liners for cold weather

9.0 ENVIRONMENTAL MONITORING PLAN

Work Zone Monitoring

Air monitoring in the exclusion zone near the point of operation will be periodically tested by the Site Safety Officer using a PID meter as a general precaution at a frequency of once every 60 minutes, or whenever a fugitive odor suggestive of possible VOCs is encountered. Should readings exceeding 5 parts per million (ppm) be recorded, additional readings in the operator

breathing zone will be obtained. Should these levels continue to exceed 5 ppm over a sustained period of one minute, work will be discontinued until appropriate engineering controls (e.g. fan ventilation, vapor suppression) and a Community Air Monitoring Program (CAMP) are employed. The Site Safety Officer will continue to evaluate the situation and, if necessary, upgrade the PPE requirements to include air purifying respirators. Should Level C respirator PPE be required, all workers shall have had the proper training for their use and have had a fitness test performed current within the previous one-year period in accordance with 29 CFR 1910.120.134, Appendix A. Readings will be documented on the form provided in Attachment C.

Community Air Monitoring Program

A CAMP requires real-time monitoring for VOCs and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at the site. 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.

Continuous CAMP monitoring for VOCs and particulates will be required for ground excavation activities.

Periodic monitoring for VOCs will be required during **non-excavation** activities, such as collection of surface soil and sediment samples, collection of groundwater samples from existing monitoring wells, direct-push soil borings, installation of small diameter monitoring wells and test pits. "Periodic" monitoring during these activities will consist of taking a PID meter reading upon arrival at a test location and periodically during the work, as described above in "Work Zone Monitoring".

VOC CAMP Monitoring, Response Levels and Actions

VOCs must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone). Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the COCs or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

- If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 ppm above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.
- If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions and monitoring continued. After these steps, work activities can resume, provided the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less (but in no case less than 20 feet), is below 5 ppm over background for the 15-minute average.
- If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shut down.

Particulate CAMP 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.

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. If downwind PM-10 particulate levels are greater than 150 mcg/m³ above the upwind level after implementation of dust suppression techniques, 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.

All 15-minute readings must be recorded and be available for review by DEC and New York State Department of Health (DOH) personnel. Instantaneous readings, if any, used for decision purposes should also be recorded.

10.0 INVESTIGATION WASTE DISPOSAL PLAN

Investigation derived wastes (IDW) generated during the completion of the remedial investigation shall be handled as follows:

- Drill cuttings may be disposed of back within the borehole, provided the cuttings are not grossly contaminated (containing sheen or free product) and the borehole does not penetrate an aquitard or bedrock, nor creates a significant avenue for vertical migration of contamination. Such backfilling shall be completed to within 12 inches of grade, followed by the placement of 6 inches of bentonite, followed by 6 inches of clean soil (drilling sand) when in outdoor, unpaved areas. Patch with asphalt if in a paved area and with concrete if inside the building.
- Department of Transportation (DOT) approved drums or temporarily stockpiled on and covered with plastic sheeting, and handled in accordance with the off-site disposal requirements discussed below. For test pits, grossly impacted soils shall be containerized in DOT-approved drums or temporarily stockpiled on and covered with plastic sheeting, and disposed of in accordance with the off-site disposal requirements discussed below. Such soils are not to be placed directly on the ground during the excavation procedures. All other soils may be placed back in the pit in the order they were removed and the surface left graded with clean soil to promote runoff.
- Groundwater generated from developing, purging and sampling monitoring wells is to be containerized upon production to allow visual observations and can subsequently be discharged to the ground near the point of on-site generation, provided the groundwater:
 - Is free of visual sheen or oil (no free product). No water is to be discharged at the site if it contains visual product.
 - Has no olfactory indicators.
 - Does not contain a known high concentration of COCs, based on prior site sampling work.

Water containing any of the above characteristics is to be stored in labeled containers in an area affording secondary containment and handled in accordance with the off-site disposal requirements discussed below. Water generated by decontamination procedures is to be handled following the same protocol.

- PPE wastes can be disposed of in a Part 360 permitted solid waste landfill, provided none
 of the materials contain free product staining. These latter materials are to be handled
 similarly to grossly impacted soils, as discussed below.
 - Representative samples of the IDW wastes must be collected and analyzed to properly allow the materials to be classified, treated or disposed of.
 - Any IDW materials determined to be hazardous or solid wastes are to be transported by haulers permitted in accordance with New York Codes, Rules and Regulations, Title 6 (6 NYCRR) Part 364. Waste manifests are to be provided.
 - All IWD materials taken from the site for disposal must be disposed of or treated in DEC-permitted facilities.

11.0 EMERGENCY RESPONSE PLAN

A copy of the HASP and a NIOSH *Pocket Guide of Chemical Hazards* shall be available at the site at all times.

The Site Safety Officer is to be immediately notified of any on-site emergency.

USE THE 911 SYSTEM FOR ANY THREATENING EMERGENCY.

All workers will be alerted upon the occurrence of an emergency involving a potentially ongoing dangerous condition (e.g. a fire, explosion or electrical condition within or adjacent to the site) and the affected area evacuated immediately.

Emergency situations will be evaluated by the Site Safety Officer and initial emergency response measures will be undertaken, if appropriate.

Contact the Project Manager as soon as possible. Emergency telephone numbers are provided.

The following general sequential guidelines are provided for emergency situations:

- 1. If possible, remove the exposed or injured person(s) from immediate danger. Evacuate other personnel on the property to a safe distance until the Site Safety Officer determines it is safe to return to work.
- 2. Obtain paramedic and ambulance service (or fire department response, if needed) immediately by calling 911. Render first aid, as applicable to the rescuers' training.
- 3. If there is any doubt regarding the condition of the area, work shall not commence until all safety issues are resolved.
- 4. The Site Safety Officer shall contact the Project Manager at the earliest time practical and provide details of the incident.
- 5. A written report of the incident shall be forwarded to the Project Manager within 24 hours following the incident.

EMERGENCY TELEPHONE NUMBERS

Plumley Engineering......(315) 638-8587

FOR ALL EMERGENCIES 911 (Fire Department, Police Department, Ambulance)

Other Agencies

Fire Department (non-emergency)	. (315) 789-2121
NYSEG (Gas Emergency)	. (800) 572-1121
NYSEG (Electrical Emergency)	. (800) 572-1131
Geneva General Hospital	. (315) 787-4000
DEC Region 8, Avon Office	. (585) 226-2466
DEC Spill Hotline	. (800) 457-7362

Nearest Hospital:

Name: Geneva General Hospital

Location 196 North Street

Geneva, New York 14456

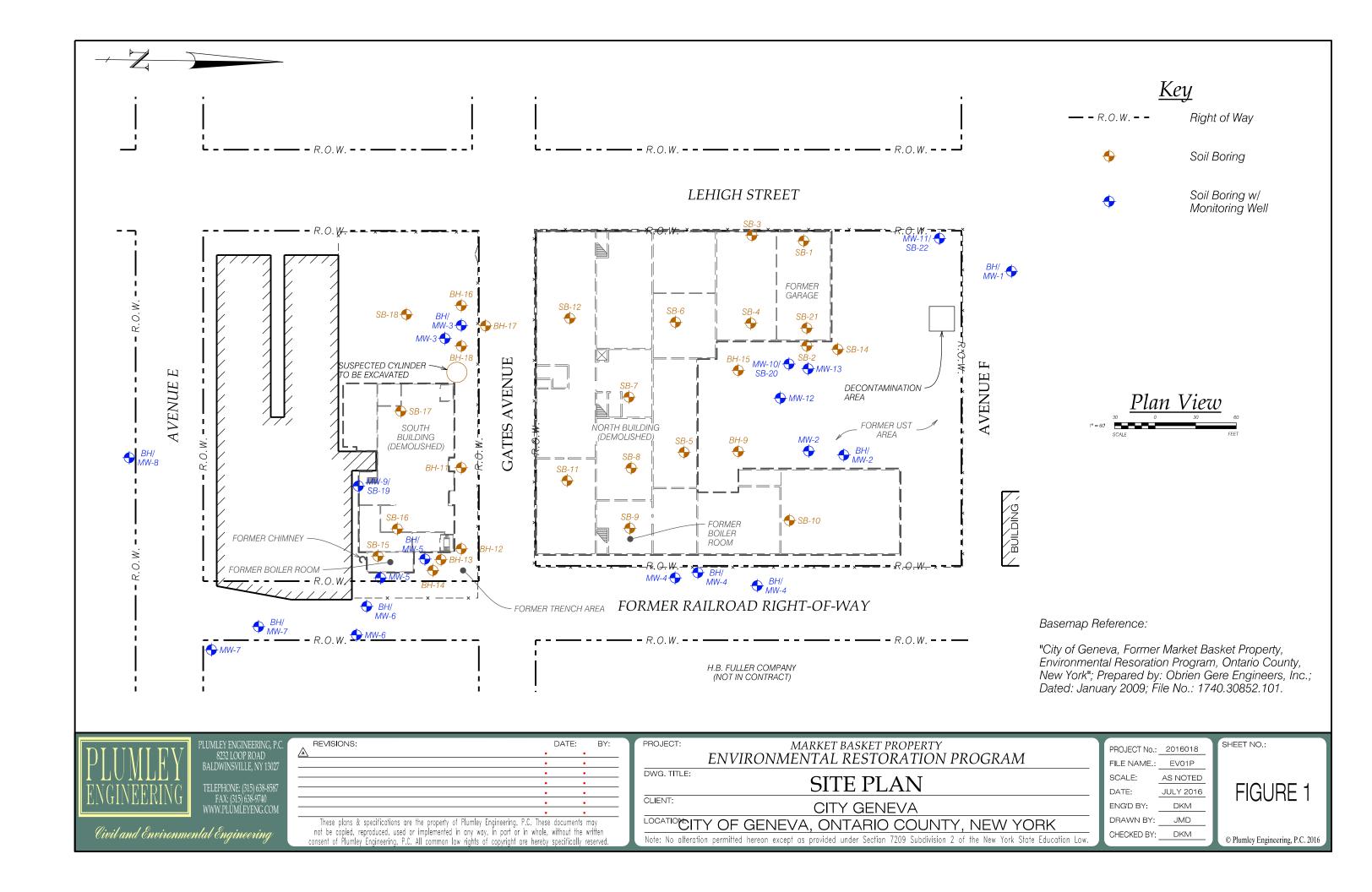
(less than one mile from site)

Telephone: (315) 787-4000

Written directions to the hospital from the site:

- Head west on Gates Avenue toward North Genesee Street
- Turn left on North Genesee Street and proceed to North Street (6 blocks)
- Turn right onto North Street and proceed approximately 4 blocks to the hospital.

FIGURE



TABLE

FORMER MARKET BASKET SITE

Gates Avenue

City of Geneva, Ontario County, New York ERP Site B00018-8633077

TABLE 1 - HEALTH AND SAFETY DATA FOR SELECTED CONTAMINANTS OF CONCERN

Contaminant	Synonyms	CAS Number	Ionization Potential (eV)	Odor Threshold (ppm)	PEL 8 hour (ppm)	PEL 15 minute (ppm)	TLV/ TWA (ppm)	STEL (ppm)	Flammable	Explosive Limits	
										LEL	UEL
1,1,1-Trichloroethane	Methyl chloroform	71-55-6	11.00	390	350	NA	350	450	No	NA	NA
1,1-Dichloroethane	Ethylidene chloride	75-34-3	NA	NA	100	NA	100	NA	Yes	NA	NA
Benzene	Benzol	71-43-2	9.24	NA	1	5	0.1	1	Yes	1.2%	7.8%
Chlorobenzene	Benzene chloride	106-90-7	9.07	NA	75	NA	NA	NA	Yes	1.3%	9.6%
cis-1,2-Dichloroethene	1,2- Dichloroethylene	156-59-2	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	Ethylbenzol	100-41-4	8.76	NA	100	NA	100	125	Yes	0.8%	6.7%
m-Xylene	Xylol	108-38-3	8.56	NA	100	NA	100	150	Yes	1.1%	7.0%
o-Xylene	Xylol	95-47-6	8.56	NA	100	NA	100	150	Yes	0.9%	6.7%
p-Xylene	Xylol	106-42-3	8.44	NA	100	NA	100	150	Yes	1.1%	7.0%
Tetrachloroethene	Perchloroethylene	127-18-4	9.32	47	100	200	25	100	No	NA	NA
Toluene	Methyl benzene	108-88-3	NA	2.9	200	300	50	150	Yes	1.3%	7.0%
trans-1,2-Dichloroethene	NA	156-60-5	NA	NA	NA	NA	NA	NA	NA	NA	NA
Trichloroethene	Trichloroethylene	79-01-6	9.45	82-110	100	200	50	100	No	NA	NA
Vinyl Chloride	Chloroethene, Chloroethylene	75-01-4	9.995	NA	1	5	5	NA	Yes	4.0%	22.0%

Notes:

eV electron volts ppm parts per million NA Not applicable

ATTACHMENTS

ATTACHMENT A DEC ERP Site No. B00018-8 AUTHORIZED PERSONNEL

I have read, understand and by signing, agree to comply with the provisions contained in the health and safety plan for this site.

	Name	Representing	Signature	Date
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
13.				
14.				
15.				
16.				
17.				
18.				
19.				
20.				
21.				
22.				
23.				
24.				
25.				

ATTACHMENT B DEC ERP Site No. B00018-8

DAILY WORK ZONE AND PERIMETER AIR MONITORING LOG SHEET

Job:			Date	:		_ Start Time: _			
Monitoring	g Personnel:								
Instrument	s (circle): PID: _		HNU	LEL	Draeger	Tubes Other	r		
	_		- er Cond		_				
Temperatu	re: Sk	xy (circle):	Clear	P. C	loudy	Cloudy	Overcast		
	ed (approx.):								
	1								
TIME	PID/LEL	WORK ZONE OR		COMMENTS (activities, changes in wind direction,					
TINIL	READINGS	PERIMETE	R	temperature, etc.)					
Monitorin	g Performed By	•							
	pirators Worn:	Yes No							
	?	Who?							
Why?									