

# Interim Remedial Measures Work Plan

NYSDEC-1996 Clean Water/Clean Air Bond Act Environmental Restoration Program Project

> Pan American Tannery 312 West Fulton Street City of Gloversville Fulton County, New York

Prepared for:

#### CITY OF GLOVERSVILLE

3 Frontage Road Gloversville, New York 12078

Prepared by:

C.T. MALE ASSOCIATES, P.C. 50 Century Hill Drive P.O. Box 727 Latham, New York 12110 (518) 786-7400 FAX (518) 786-7299

C.T. Male Project No: 04.9109

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# NYSDEC ENVIRONMENTAL RESTORATION PROJECT INTERIM REMEDIAL MEASURES WORK PLAN PAN AMERICAN TANNERY CITY OF GLOVERSVILLE, FULTON COUNTY, NEW YORK

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#### 1.0 INTRODUCTION

## 1.1 Background

The City of Gloversville has been approved for funding by the New York State Department of Environmental Conservation (NYSDEC) under the Clean Water/Clean Air Bond Act of 1996 for performing an Environmental Restoration "Site Investigation" Project, more commonly referred to as Brownfield Program, at the Pan American While Gloversville, New York. preparing the Remedial Tannery in Investigation/Alternatives Analysis (RI/AA) Work Plan and working with NYSDEC for approval to implement the associated work, it was evident that aspects of the remedial investigation field activities will be impeded by the dilapidated condition of the Main Tannery Building.

Accordingly, NYSDEC has approved the performance of Interim Remedial Measures (IRM) to facilitate the required remedial investigation activities described in the RI/AA Work Plan currently being reviewed by the Department. The approved RI/AA Work Plan will be made available through the project repositories. In the interim, this IRM Work Plan describes the activities that will be completed as part of the IRM subsequent to the approval by NYSDEC and placement in the project repositories.

### 1.2 IRM Objectives and Goal

The objective of this IRM is to identify and properly dispose petroleum and chemical wastes, properly abate asbestos containing materials prior to and/or during building demolition, and demolish one of the largest site buildings that is currently dilapidated. In May 2005, the City Engineer visited the site, and on the basis of a detailed inspection, indicated that the main building is deteriorated/settling and approaching collapse.

The short term goal of the IRM will be to remove petroleum and chemical wastes from the building and demolish it before weather conditions cause failure of the existing structure which could potentially cause and uncontrolled release of contaminants into the environment. The long term goal of the IRM is to allow investigation of the subsurface conditions beneath the buildings in accordance with the RI/AA Work Plan after review and approval by NYSDEC.

## 1.3 IRM Work Plan Requirements

To meet the IRM objectives and goals, this work plan is required to be developed, reviewed and approved by NYSDEC prior to the initiation of IRM. The objective of the IRM Work Plan is to provide a description of the general methods and procedures to be followed by the City of Gloversville during implementation of IRM. Information obtained from the IRM will also be beneficial to the overall characterization of the site and conditions encountered will be used in conjunction with decision making for successful completion of the remedial investigation/alternatives analysis of the entire site.

#### 2.0 SITE DESCRIPTION AND HISTORY

## 2.1 Site Description

The site is located on the north side of West Fulton Street in the City of Gloversville, Fulton County, New York, as shown on Figure 1 (Site Location Map). The site is approximately 4.8 acres of land bordered by vacant undeveloped land (formerly West Mill Pond, now Mill Creek) to the north, residential and vacant undeveloped land to the west, residential land to the south (beyond West Fulton Street), and commercial use and vacant undeveloped land to the east. The site is identified on the City of Gloversville tax maps as tax map ID 148.08, Block 2, Lot 17.5. The site and its surrounding area are shown in Figure 2, a circa 2001 aerial map. A Boundary Survey of the site is presented as Figure 3.

The site generally includes five abandoned and partially dilapidated tannery buildings of various sizes and configurations. A sixth building houses the waste water pretreatment plant. For the purpose of the remedial investigation each building is designated as Bldg#1 through Bldg#6, as shown on Figure 4 (Site Plan).

## 2.2 Site History

The site is an abandoned tannery complex and is located on the north side of West Fulton Street in the City of Gloversville, Fulton County, New York. The site is primarily situated in a residential setting with limited surrounding commercial use. There has been no previous investigations or remedial activities performed at the Pan American Tannery prior to the City's involvement with the ERP.

## 3.0 PROJECT SCOPE

#### 3.1 General

The primary focus of the IRM activities will be to demolish Bldg#1 and remove waste materials required to facilitate demolition of this building. The following IRM work tasks are planned for the Pan American Tannery site:

- Install chain-link fence to secure the site;
- Evaluate building materials for disposal;
- Design and implement asbestos abatement;
- Clean and close petroleum storage tanks;
- Remove and dispose waste materials in the building;
- Dispose residual bulk tanning materials and wastes in the building.
- Remove and dispose PCB transformers;
- Clean the floor drains and trenches in the building;
- Clean the waste water treatment plant; and
- Demolish the Main Tannery Building (Bldg#1).

## 3.2 Fencing of the Project Site

The current fencing at the site does not encompass the entire work area associated with the IRM. In order to control access and to deter unauthorized persons from entering the site during the demolition and related activities it will be necessary to augment the existing fence and install new fence along the balance of the site boundaries. The new fence will consist of chain link fence generally six feet tall. The fence will be installed close to the property lines at the direction of the City prior to demolition activities are initiated. Temporary fencing may be used along West Fulton Street until such time the

building or the portions of the building are demolished that will allow for the fence's permanent installation.

### 3.3 Evaluation of Building Materials for Disposal

There are building materials and tannery equipment that have the potential to be defined as hazardous waste based on their exposure to various tannery chemicals. Sampling and analysis of suspected contaminated material and equipment, mainly wood and concrete materials, will be performed. Some of the building materials, depending on the location within the building, may not be able to be cleaned or removed prior to demolition. The intent of this task is to control the overall cost for the building demolition work by identifying and labeling hazardous materials so that they can be segregated from the other non-hazardous C&D materials.

Where possible, building material samples will be collected from representative groupings of materials in lieu of sampling individual building components on the basis of visual observation of similar materials and considering the potential historical use of tannery operations on those materials. The samples will be analyzed for Toxicity Characteristics Leaching Procedure and RCRA characteristics to determine if building materials are a hazardous waste or a non-hazardous waste.

#### 3.4 Asbestos Abatement

An asbestos survey of the site buildings has been completed to identify the type and quantities of the various forms of asbestos containing materials (ACM). The data will be used to develop design plans and specifications for the abatement of the materials. Based on preliminary findings, it appears that the ACM in the Main Tannery Building include thermal pipe insulation, caulking around window units and built-up roofing materials. The office area of the Main Tannery Building also has asbestos containing plaster walls and asbestos containing flooring.

Asbestos containing materials will be removed from the building prior to its demolition per regulatory requirements of the National Emissions Standards for Hazardous Air Pollutants (40 CFR 61). In addition, disturbance of asbestos containing materials will be performed in accordance with New York State's Industrial Code Rule 56 (12 NYCRR Part 56). The removal of the asbestos containing materials will be conducted by trained

individuals with valid asbestos certification, and in accordance with Federal, State and Local regulations.

Friable ACM materials will be abated prior to building demolition by a New York State Licensed Asbestos Abatement Contractor; in accordance with applicable sections of 12 NYCRR Part 56 (Code Rule 56), OSHA 29 CFR 1926.58 and EPA 40 CFR Part 61, Subpart M (NESHAPS). The remaining non-friable ACM, if any, will be handled and disposed by a Licensed Contractor together with the building demolition in accordance with the applicable sections of the New York State approved Department of Labor (NYSDOL) approved site-specific variance. A petition for a site specific variance will be prepared by C.T. Male and submitted to NYSDOL, if deemed necessary, during the preparation of the technical plans and specifications for the project completion. During asbestos abatement, air samples will be collected and analyzed in accordance with applicable regulations.

## 3.5 Cleaning and Closure of Petroleum Storage Tanks

There is a 20,000 gallon above ground No. 6 fuel oil storage tank and a 500 gallon underground gasoline storage tank located at the site. The fuel oil storage tank is housed within a wooden addition to Main Tannery Building #1 and the underground gasoline storage tank is buried along the access drive to the site west of Main Tannery Building #1. The tanks will be accessed and the tank contents will be characterized for disposal purposes. Based on the results of the characterization, the tank contents will be removed via a vacuum tank truck and transported to a disposal facility permitted by NYSDEC to accept that type of waste. The interior of the tanks will be cleaned by appropriate methods depending on the content and quantity of sludge that remains in them. The tank carcasses will be removed with the steel being sent to a recycling yard. If petroleum impacts are observed on the ground surface beneath the above ground storage tank or within the subgrade soils around the underground storage tank, they will be temporarily left in-place and the extent of those impacts with be delineated as part of the subsequent remedial investigation.

# 3.6 Removal and Disposal of Waste Materials in the Building

A limited number of drums and other containers remain in the building and potentially contain chemicals and/or petroleum products. These containers will be removed from

the building prior to demolition by manual means to mitigate the potential for leakage from these containers during demolition. Due to the condition of the building, removing the containers by mechanical means will not be performed so the condition of the building is not jeopardized. The containers that can not be removed will be assessed for liquids and drained as appropriate prior to demolition activities. If waste materials can't be removed prior to demolition, NYSDEC will be notified and consulted as to the proper handling of these materials during demolition.

An inventory of the various waste materials within and surrounding the site buildings will be completed prior to demolition activities. This will include drums, containers, tanks, vats, vessels, pits, piles, boxes, transformers, capacitors, etc. This inventory will include logging of the physical nature of the material and recording any telltale markings on the various containers. Laboratory analyses of the materials will not be completed at this time as it will ultimately be profiled by the subcontractor for the purpose of proper shipping and disposal. The inventory will be used to obtain quotes from, and ultimately the selection of, a subcontractor to complete the work as an IRM activity.

## 3.7 Disposal of the Tanning Residuals in the Building

Loose material from past tannery production (sprayline) is present on the floor of the concrete building. If the loose materials are not removed, they have the potential to become airborne during the demolition activity, or mix with the water sprayed on the building materials to suppress dust. If the water mixes with the materials, they have the potential to spread to other portions of the building and possibly discharge to the environment. The materials on the floor will be characterized, removed and properly disposed prior to demolition of the building.

## 3.8 Removal and Disposal of PCB Transformers

There are a several transformers within the building which may contain PCB-laden oils. Other transformers are present around the perimeter of the Main Tannery Building #1. Prior to the demolition of the building, the transformers will be removed and properly transported off site to mitigate a potential release of oil if disturbed during demolition activities.

If transformers are located outside site buildings where the potential exists for transformer oil leakage to impact surrounding soils, at least one soil sample will be collected from the base of each transformer and will be analyzed for TCL PCBs. The analytical results will be used to determine if remedial action is warranted for the soil beneath the transformer.

## 3.9 Cleaning of the Floor Drains and Trenches in the Building

The floor drains and trenches within the building contain sediments and sludge which may be contaminated from former tannery operations. The floor drain/trench sediments and sludge are capable of migrating from the drains to other portions of the site and possibly the environment. As the building may be demolished as an asbestos project, copious amounts of water may be used to control dust during the demolition phase of work. The drains/trenches will be cleaned before the demolition activity to reduce, if not eliminate, the potential for sediments becoming intermixed with the construction and demolition (C&D) materials which accumulate on the floor slab of the building or migrate to the on-site waste water treatment plant.

## 3.10 Cleaning of the Waste Water Treatment Plant (WWTP)

The on-site waste water treatment plant contains both water and sludge which have remained since the tannery was abandoned. It is has not yet been determined if the sludge is a defined hazardous waste and there is insufficient data for the local sewer authority to determine if they can accept the waste water and sludge. The waste water tanks represent a physical hazard to trespassers, and could be a potential source of significant contamination if they were to be damaged. Since the floor drains / trenches are reportedly tied into the waste water treatment plant, the waste water treatment plant below ground tanks may be used to capture waters generated during cleaning and demolition of the building. The water and sludge in the waste water treatment plant will be removed and the interior walls and floor of the compartments will be cleaned to mitigate the potential release or mixture with demolition dust control runoff.

According to the NYSDEC M2P2 inspections for other tanneries in the area, the major contaminant of concern relating to the pretreatment wastewater treatment system is chromium. The on-site treatment system currently contains an undetermined volume of both water and sludge. The wastewater plant will be evaluated on the basis of visual

site inspections and review of available drawings and specifications for the configuration as provided by the City or Gloversville-Johnstown Joint Sewer District for the purpose of determining how to decontaminate the plant.

The evaluation will also include the collection and laboratory analysis of sludge and liquid samples from the system for waste characterization. This data will be coordinated with and provided to the Gloversville-Johnstown Joint Sewer District and the Fulton County Landfill for determining if they can accept the material at the time the waste water treatment plant compartments are cleaned, or it will need to be handled in an alternative manner. A formal assessment will be made at the time of sample collection to determine the actual number of compartments present, the size of the compartments and the estimated volume of sludge/liquid present. Since the buildings are currently unheated, frozen conditions may postpone sample collection and compartment evaluation until such a time they can be sampled and evaluated.

The evaluation of the waste water pretreatment plant will include an assessment of the floor drain systems within the buildings to determine the connection to the waste water pretreatment plant or other outfall points, and the need for additional sample collection.

# 3.11 Demolition of the Main Tannery Building (Bldg#1)

Demolition of the Main Tannery Building will be publicly bid in order to receive competitive pricing from any prospective demolition, asbestos abatement and/or remedial contractors. The City of Gloversville will prepare technical specifications and bidding documents to facilitate the bidding process and solicit price quotes in a timely manner. Due to the presence of asbestos containing materials, abatement of friable materials will likely occur prior to demolition and demolition of non-friable materials may be part of demolition as allowed by governing agencies.

The Main Tannery Building is situated close to the edge of West Fulton Street, approximately 10 to 30 feet from the edge of pavement. In order to inhibit the potential for uncontrolled failure of the existing building during demolition, a portion of West Fulton Street may be temporarily closed. The closure of the street would be primarily during the demolition of the southern portion of the Main Tannery Building and not during the entire demolition activities. The goal of the road closure would be to provide an appropriate buffer from work activities and reduce the potential for

demolition debris from entering the road. During periods of road closure, flagmen will be present to direct local traffic to the residences adjacent to the project site. To assist in uninterrupted traffic flow, a detour would be established around the West Fulton Street Closure via State Route 29A, County Route 101, and County Route 122.

Prior to selection, the low bid will be reviewed, and if it is responsive and complete, will be contracted with the City of Gloversville. C.T. Male will be the overseeing Engineer on the project, which will include full-time oversight of field activities for conformance to project plans and also to complete project air monitoring for particulates, organic vapors and asbestos, as necessary.

## 4.0 PROJECT PLANS AND SPECIFICATIONS

#### 4.1 General

The project plans and specifications will be prepared to describe the details for completing the IRM that are required to facilitate the upcoming remedial investigation. The following sections describe the additional criteria to be implemented and followed during IRM completion.

## 4.2 Community Air Monitoring Plan

A Community Air Monitoring Plan (CAMP) will be followed during demolition of the Main Tannery Building #1. The intent of CAMP 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 IRM work activities. The CAMP is not intended for use in establishing action levels for worker respiratory protection. The CAMP will monitor the air for dust (particulate air monitoring, see Section 4.2.1) and volatile organic compound (VOC) vapors (VOC air monitoring, see Section 4.2.2) at the downwind perimeter of each designated work area. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown.

## 4.2.1 Particulate Air Monitoring

C.T. Male will utilize two or three real-time particulate monitors capable of continuously measuring concentrations of particulate matter less than 10 micrometers in size (PM-10). The instruments will be placed at temporary monitoring stations based on the prevailing wind direction each day, at least one upwind and one downwind of the work area. The available particulate monitoring instruments may not be capable of displaying the short term exposure limit (STEL) or 15 minute averaging period, but in the absence of that ability, continuous direct readings will be field checked and recorded for comparison to the NYSDOH Generic Community Air Monitoring Plan action levels for particulates, as listed below. The particulate readings will be manually monitored, but the instruments are programmed to alarm at preset action levels.

Instantaneous readings will be recorded periodically throughout the work day. At the end of each day, the readings for each instrument will be downloaded to a PC and retained for future reference and reporting.

- 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, 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.

In the event of poor weather such as heavy snow or rain, particulate monitoring will not be performed for protection of instrumentation. These weather conditions would limit the effectiveness of the sensitive monitoring equipment and likely suppress particulate generation. Work activities will be halted if fugitive dust migration is visually observed for a sustained period of time.

## 4.2.2 VOC Air Monitoring

The presence of VOCs within building materials is not expected and therefore VOC air monitoring will not be performed during building demolition. The potential for a release of volatile and semi-volatile organic compounds would be during the cleaning and closure of petroleum storage tanks, cleaning of the waste water treatment plant, and to a remote degree during handling of PCB transformers and VOC monitoring will be performed during these tasks. VOC monitoring will be performed at the downwind perimeter of the immediate work area on a periodic basis. Upwind concentrations will also be measured at the start of the work day and periodically thereafter to evaluate the site's background conditions. A MiniRAE 2000 handheld VOC monitor or equal will used to perform the VOC monitoring. This unit is capable of displaying the STEL (15 minute averaging period) which will be field checked and recorded for comparison to the NYSDOH Generic Community Air Monitoring Plan action levels for VOCs, as listed

below. The VOC readings (STEL) will be manually recorded for future reference and reporting. Instantaneous readings will be recorded periodically throughout the work day.

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

## 4.3 Health and Safety Plans

It will be the requirement of the contractor completing the IRM to prepare a site specific Health and Safety Plan (HASP) for the work they are responsible for performing. For publicly bid work, the HASP should be provided to NYSDEC and the Engineer after the Notice to Award and prior to completion of work. The contractor's employees will be required to have read and understood their HASP prior to completing the work. A copy of the health and safety plan will be made available at the site during the performance of remedial activities to which they are applicable.

Health and safety procedures to be followed by C.T. Male personnel will be in accordance with the site specific HASP provided as Appendix A of this report.

#### 4.4 Dust Control

Dust suppression techniques will be employed as necessary to control fugitive dust to the extent practical during remediation. Such techniques must be employed, at a minimum, if the community air monitoring results indicate that particulate levels are above action levels. All reasonable attempts will be made to inhibit visible and/or fugitive dusts. Techniques to be utilized may include one or more of the following:

- Applying water to haul roads.
- Wetting equipment and demolition activities/debris.
- Hauling materials in properly tarped containers or vehicles.
- Restricting vehicle speeds on-site.

#### 5.0 IRM REPORT AND SCHEDULE

## 5.1 Reporting

Upon completion of the field activities and receipt of the validated analytical laboratory data, if any, an IRM Report will be prepared. The IRM report will summarize IRM activities completed, describe deviations for the approved work plan, and present other conditions that provide information relative to the environmental characterization of the site.

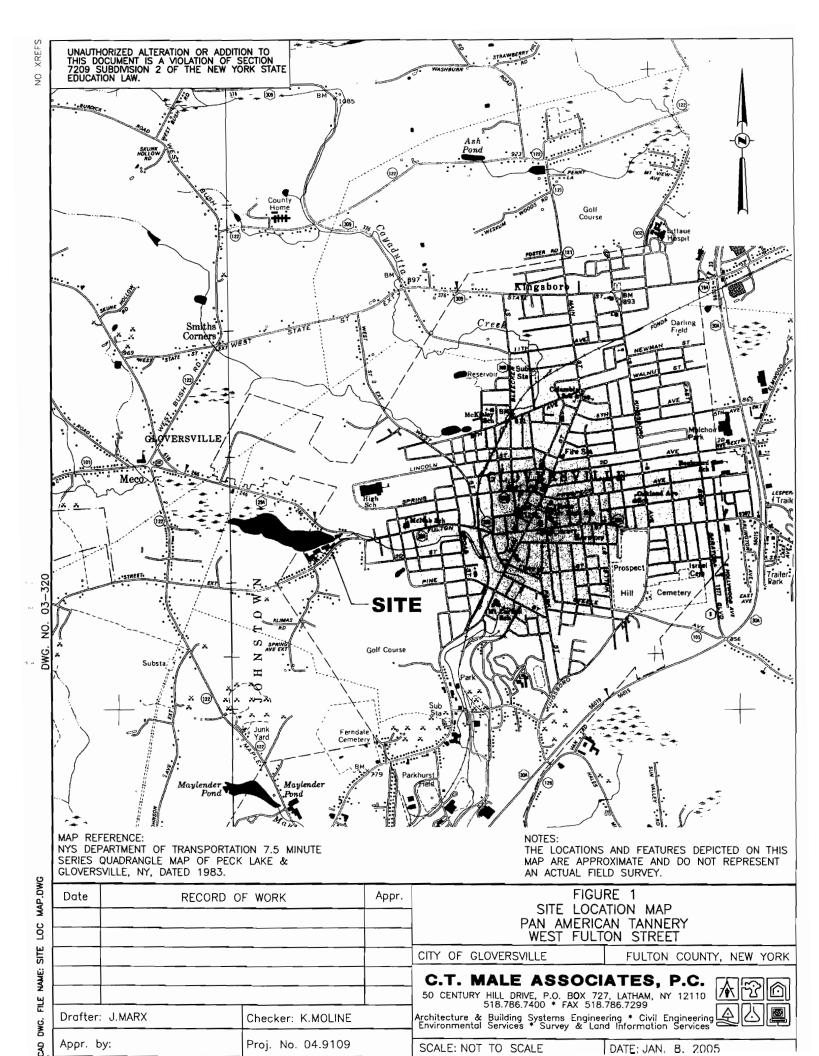
If analytical sampling is required as part of the IRM activities, a New York State Department of Health (NYSDOH) ELAP certified analytical laboratory would perform the analysis. The analysis will be performed in accordance with NYSDEC ASP Category B protocols. The data deliverables will be subjected to data validation in accordance with NYSDEC Data Usability Summary Reports (DUSR) to document the data is valid and usable.

Waste characterization samples may be necessary for off-site disposal of wastes generated from the IRM activities. Analysis of characterization samples will not require NYSDEC ASP Category B data deliverables, nor will the analytical results be subjected to DUSR data validation.

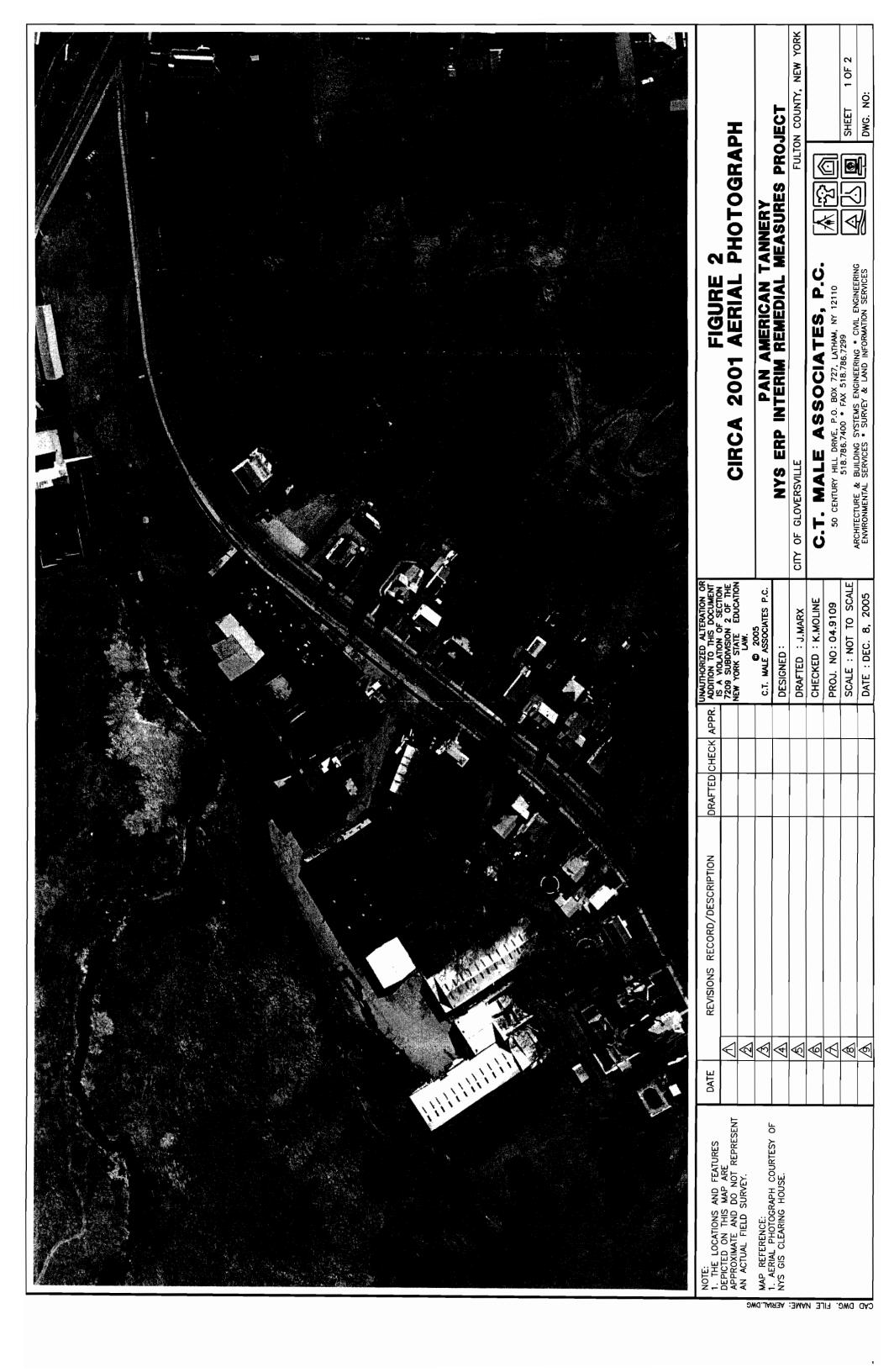
# 5.2 Proposed Project Schedule

It is anticipated that the field work would be initiated immediately upon receipt of NYSDEC work plan approval to obtain necessary information for preparation of project plans and technical specifications for bidding the project. If IRM work plan approval was granted by the end of December 2005, project plans and specifications would be prepared and complete before the end of January 2006. Public bidding for the IRM activities would occur during the month of February 2006 and a 30 day bid period will be allowed. Depending on the weather conditions, environmental preparation (i.e., disposal of wastes, cleaning tanks, etc.) would be initiated in the beginning of March with the demolition to subsequently follow. The demolition of the select buildings would be completed by April 2006.

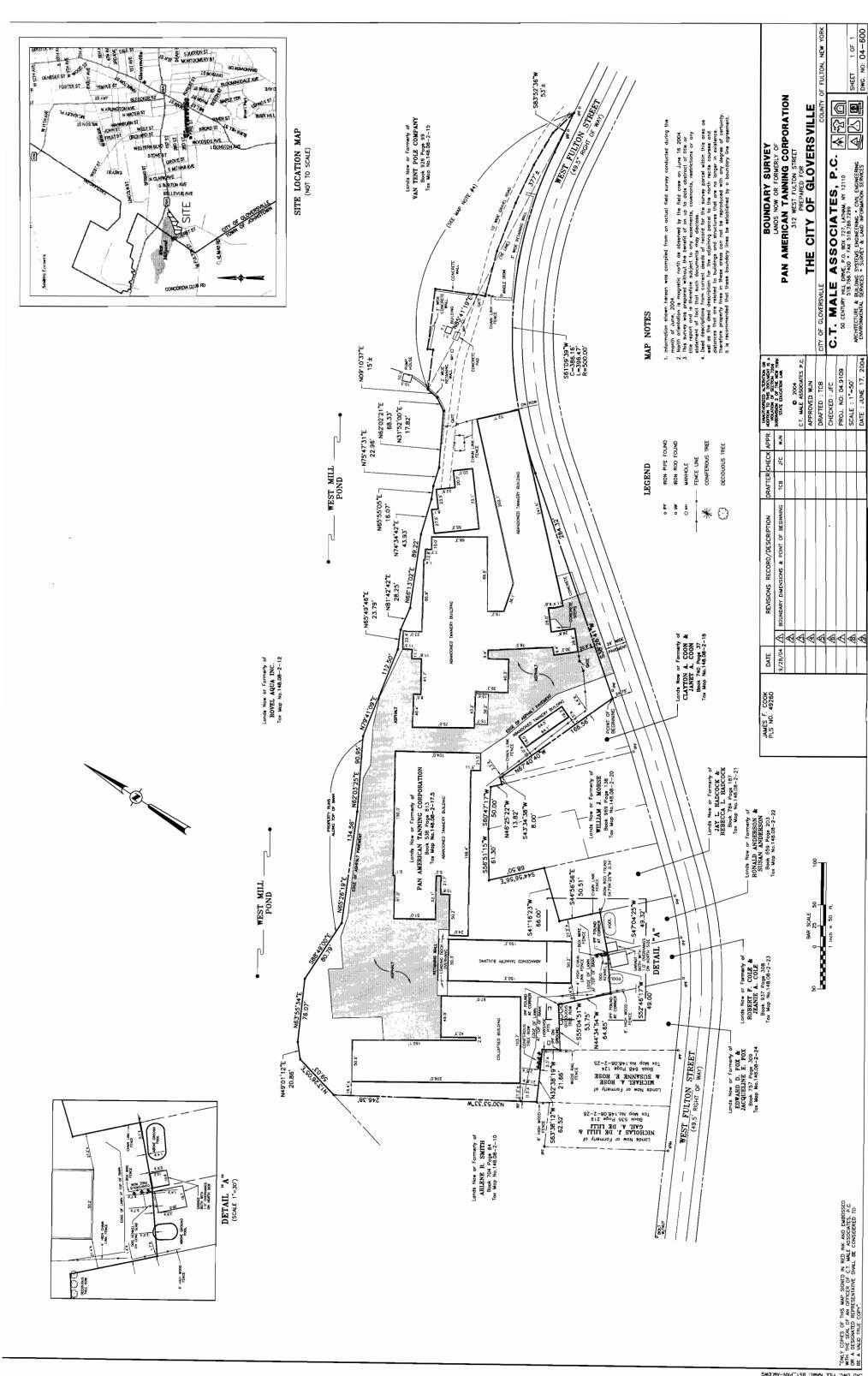
# FIGURE 1 SITE LOCATION MAP



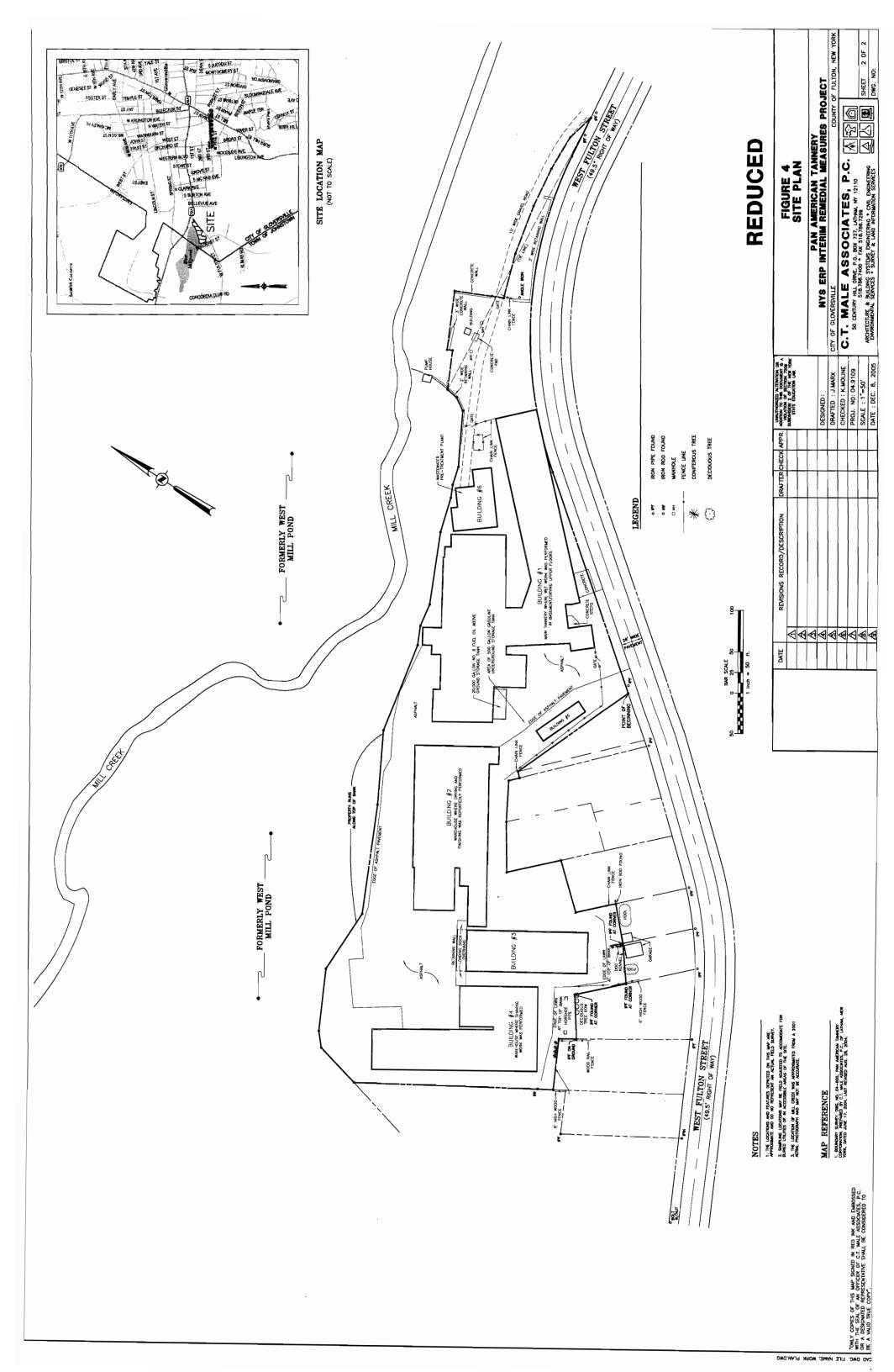
C.T. MALE ASSOCIATES, P.C.		
FIGURE 2		
2001 AERIAL PHOTOGRAPH		



C.T. MALE ASSOCIATES, P.C.	
FIGURE 3	
BOUNDARY SURVEY	



# FIGURE 4 SITE PLAN



# **APPENDIX A**

SITE SPECIFIC HEALTH AND SAFETY PLAN
INTERIM REMEDIAL MEASURES ACTIVITIES
PAN AMERICAN TANNERY
312 WEST FULTON STREET
CITY OF GLOVERSVILLE
FULTON COUNTY, NEW YORK

# SITE SPECIFIC HEALTH AND SAFETY PLAN PAN AMERICAN TANNERY IRM CITY OF GLOVERSVILLE FULTON COUNTY, NEW YORK

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#### 1.0 GENERAL

#### 1.1 Overview

This Health and Safety Plan (HASP) has been prepared for use during implementation of Interim Remedial Measure (IRM) activities at the Pan American Tannery ("the Site") generally located on the north side of West Fulton Street, east of this street's confluence with Rose Street, in the City of Gloversville, Fulton County, New York. This HASP has been developed by C.T. Male Associates, P.C. (C.T. Male) as an integral part of the Interim Remedial Measures (IRM) Work Plan under the NYSDEC's 1996 Clean Water/Clean Air Bond Act Environmental Restoration Project (Brownfield's) Program. The IRM is being performed to mitigate the potential for a release of petroleum or chemical release to the environment from an uncontrolled failure of the dilapidated site building, and to facilitate the planned remedial investigation of the site.

A designated Health and Safety Officer (HSO) will be responsible for implementing this HASP during the completion of the field work. C.T. Male persons or parties who enter C.T. Male's work area (support, decontamination, and exclusion zone) must review, sign and comply with this HASP. A list of individuals authorized to enter the exclusion zone at the Site is presented in Section 13.0 of this HASP. A copy of this HASP will be maintained at the work area throughout the duration of the project. A complete description of the IRM work is presented in the IRM Work Plan. A brief description of the proposed scope of work is outlined below:

- Install chain-link fence to secure the site;
- Evaluate building materials for disposal;
- Design and implement asbestos abatement;
- Clean and close petroleum storage tanks;
- Remove and dispose waste materials in the building;
- Dispose residual bulk tanning materials and wastes in the building.
- Remove and dispose PCB transformers;
- Clean the floor drains and trenches in the building;
- Clean the waste water treatment plant; and
- Demolish the Main Tannery Building (Bldg#1).

#### 1.2 Contact Names & Numbers

For this project, the following New York State Department of Environmental Conservation (NYSDEC), New York State Department of Health (NYSDOH), City of Gloversville, C.T. Male, and Emergency Response names and telephone numbers are presented below as Site contacts.

## **NYSDEC CONTACTS:**

Project Manager	Alicia Thorne	(518) 623-1238
	Bureau of Spill Prevention and Response	
}	232 Hudson Street, PO Box 220	
	Warrensburg, New York 12885	
Regional Engineer	Russell Huyck, PE	(518) 897-1242
	Region 5, Division of Env. Remediation	
	Route 86, P.O. Box 296	
	Ray Brook, New York 12977-0296	

# **CITY OF GLOVERSVILLE CONTACT:**

Municipal Project	Ronald Ellis	(518) 773-4557
Manager	Director of Public Works	
	3 Frontage Road	
	Gloversville, New York 12078	

## **NYSDOH CONTACT:**

Regional Project	Jacquelyn Nealon	(518) 402-7850
Manager	(Richard Fedigan as Section Chief)	
	NYS State Department of Health	
	Flanigan Square	
	547 River Street	
	Troy, New York 12180-2216	

# **CONSULTANT CONTACTS:**

Multiple Contacts	C.T. Male Associates, P.C. 50 Century Hill Drive Latham, New York 12110		(518) 786-7400 (Main Number)
Project Principal	David Roecker, PE		(518) 786-7491
		Cell:	(518) 265-2117
Project Manager	Kirk Moline		(518) 786-7502
		Cell:	(518) 265-1708
Project Engineer and	Jeffrey Marx, PE		(518) 786-7548
Health & Safety		Numeric Pager:	(518) 437-2459
Officer			
Quality Assurance	Elizabeth Rovers, PE		(518) 786-7492
Officer			

# **EMERGENCY PHONE NUMBERS:**

Emergency		911 (1)
Non-emergency	Nathan Littauer Hospital	(518) 725-8621
	99 East State Street Gloversville, New York 12078	
Fire Department	Emergency	911 (1)
	Gloversville Fire Department	(518) 725-3124
Police	Emergency	911 (1)
	Gloversville Police Department	(518) 773-7514
	3 Frontage Road	
	Gloversville, New York 12078	

# **EMERGENCY PHONE NUMBERS (CON'T):**

Central New York Poison Control Center	Central New York Poison Control Center 750 East Adams Street Syracuse, New York 13210	(800) 222-1222 (315) 464-7078
National Response Center	c/o United States Coast Guard (G-OPF) 2100 2nd Street, Southwest - Room 2611 Washington, DC 20593-0001	(800) 424-8802

<sup>1. 911</sup> should be the first call made, especially if there is uncertainty on the severity of the emergency situation.

#### 2.0 HEALTH AND SAFETY PERSONNEL

## 2.1 Responsibility

The Health and Safety Officer (HSO) will be responsible for implementation of the HASP and the delegation of health and safety duties. The HSO will coordinate the resolution of safety issues, which arise during Site work. When field operations are routine and do not require personal protective equipment above Level D (as explained in Section 9.1) it will not be necessary for the HSO to be present on-Site at all times. When the HSO is not present on-site, a designee will be authorized to perform the duties of the HSO. The designee will be responsible for implementation of the HASP.

The HSO or designee has stop work authorization which the HSO or designee will execute upon the HSO or designee's determination of an eminent safety hazard, emergency situation or other potentially dangerous situations (e.g. weather conditions), when this action is deemed appropriate. Authorization to resume work will be issued by the HSO.

#### 3.0 SITE LOCATION AND DESCRIPTION

#### 3.1 General

The Site is located at the Pan American Tannery located on West Fulton Street, near this street's confluence with Rose Street, in the City of Gloversville, Fulton County, New York. The site is approximately 4.8 acres in size and consists of several vacant buildings historically used for tanning activities from the late 1800's to as late as the 1990's. The site is located in a residentially developed area of Gloversville. Development contiguous to the site consists primarily of residential dwellings and undeveloped land. Mill Creek, which at one time was dammed to create West Mill Pond, is located adjacent north of the Site.

## 3.2 Site Layout & Access

Six separate buildings of various size, shape and condition are located at the subject site. Two of the buildings are centrally located, and were used for the main tannery operations. The other buildings surrounding the main tannery buildings are warehouses to the west, boiler storage building to the south and a waste water pretreatment plant building to the east. The condition of the buildings is generally structurally sound, but portions of the buildings are dilapidated. There is no power to the site and portions of the buildings do not have sufficient outdoor light.

The IRM work will be focused on the Main Tannery Building (Bldg. #1). The access point to the site is from West Fulton Street where a chain link fence exists. The chain link fence is locked and controlled by the City of Gloversville. However, the Contractor performing the IRM work, will be responsible for controlling access to the site.

#### 4.0 POTENTIAL SITE CONTAMINANTS

## 4.1 Tanning Process

The historical manufacturing activity at the Pan American Tannery (formerly the Gloversville Leather Corporation and others) is reported to have been primarily the retanning and finishing of previously tanned leather. Beaming, pickling and initial tanning of skins is not reported to have been conducted at the Site, which lessons the quantity and types of chemicals used as part of the tanning process. The re-tanning, dying and finishing of hides involves many processes, each of which utilizes particular chemicals and generates various liquid and solid waste streams.

Tanning is the final process in turning hides into finished leather after pickling. The two most common methods of tanning are chrome and vegetable tanning. It is believed that chrome tanning was the preferred method utilized by most Gloversville tanneries, but was not believed to be performed at Pan American. After pickling the hides are placed in a bath of trivalent chrome (chromium sulfate). The chrome bonds to the hide fibers and makes the hides resistant to bacterial attack and high temperatures. Once the chrome has soaked through the hide, the chrome is "fixed" by adding to the tanning bath an alkaline chemical such as sodium carbonate or bicarbonate, or magnesium oxide.

Re-tanning gives the tanner an opportunity to combine the desirable properties of more than one tanning agent into leather. There is in effect a second tannage. There are a variety of materials that can be employed for this purpose, the more common ones being the addition of vegetable extracts and sytans (man-made chemicals).

Leather may be considerably enhanced by dying. Dying is accomplished with aniline dyes derived from coal products. The dye combines with skin fibers to form an insoluble compound which becomes part of the skin itself. The dyes were added to the drums along with water and synthetic tanning materials at a select temperature to obtain the desired color. After dying, the hides are fat-liquored to lubricate the leather and increase its tensile strength and pliability. The basic ingredients of fat liquors are animal oil and related fatty substances.

To create an even thickness on the hides, a machine shaved the hides. The shaving process generated dust that was typically high in chromium. The dust was usually captured with large hoods and plumed to the bag house. The bag house would collect the dust and would be emptied, as necessary.

The final step is finishing the leather. The leather receives a light application of a transparent coating, which provides a protective and durable film. The coating may consist of polyurethane, nitrocellulose, wax, vinyl or acrylic. The end use of the leather product determines the type of finish process to be applied and varies widely.

#### 4.2 Potential Contaminants of Concern

Based upon the history of the Site use, preliminary site visits and typical tannery processes, the potential contaminants of concern are categorized as follows:

- · Petroleum compounds from known use of gasoline, fuel oils and possibly kerosene,
- Miscellaneous solvents and possibly degreasers,
- Metals from dyes, pigments, and coloring/tanning agents,
- Pesticides from insect and rodent control, and
- PCBs from transformer use and handling.

#### 5.0 HAZARD ASSESSMENT

#### 5.1 General

The hazard assessment, use of specific protective equipment, and monitoring associated with each field work task of the investigation work to be conducted at the subject Site are presented in following subsections.

C.T. Male will be subcontracting portions of the remedial activities. Each subcontractor will be responsible for developing and implementing a Site specific health and safety plan for their activities, for protection of their employees, and use of personal protective equipment. The subcontractor will also be responsible for developing and following their own Respiratory Protection Program and Confined Space Entry Program, as applicable to this project.

During all aspects of work, the potential exist for deer and wood ticks to be present at the site. Deer ticks can be the carrier of Lyme disease. Deer ticks are most active in spring and fall, and are also present throughout the summer. Lyme disease is a bacterial infection transmitted by the bite of a deer tick, found on all types of vegetation and animals, especially in the woods. Deer ticks are very small and are typically orange-brown with a black spot near their head. Wood ticks are twice as large as deer ticks and have white marks near their head and are unlikely to transmit Lyme disease. Employees should protect themselves (during all site work) with insect repellent, wear long sleeves and pants, and check clothing and exposed skin for ticks after completion of work.

The power is disconnected and lighting within the buildings is not available, so adequate lighting will be necessary for certain interior tasks. Flashlights or temporary lights should be utilized where necessary. If temporary lighting requires use of a generator, the generator should remain outside building structures to prevent an accumulation of exhaust fumes in the building.

#### 5.2 Install Chain-link Fence

The installation of the fence will be performed by a fence contractor. The installation of the fence will require the installation of concrete bases for fence posts, which may require shallow excavations with a mechanical drill. Therefore, exposure to potential site contaminants in soil is possible. The potential hazards to the personnel observing the fence installations may include slip and fall hazards from tools and associated equipment required for work completion, and direct contact with site soils. To protect against these potential hazards, personnel completing this work should wear Level D protection. Hearing protection may also be necessary if mechanical means of installing the fence posts are required.

# 5.3 Inventory of Waste Materials/Containers and Building Materials

The inventory of the waste materials/containers and building materials should be performed by two persons employing the buddy system and the amount of time working in the building should be minimized due to the poor condition of the building. This work task will consist of visual observation of building materials and collecting representative laboratory samples of the appropriate group of building materials (i.e., wood, concrete, etc.) prior to building demolition. The assessment will include logging of the physical nature of the material and recording any telltale markings on the various containers. The waste materials will not be opened for this task and laboratory analyses of the materials will not be completed at this time. Considering that the materials will not be handled, the potential hazards to the personnel performing the inventory of waste materials may include slip and fall hazards from debris within the building, holes within the floor, eye damage from walking into something hanging in the building or from collecting samples, cuts from handling building materials being sampled, and inadequate light within the buildings. To protect against these potential hazards, personnel completing this work should wear Level D protection and utilize handheld flashlights.

# 5.4 Interim Remedial Measure Sampling

For determining certain IRM activities requirements, sampling of the storage tank contents, excess bulk tanning materials and wastes, and floor drain contents may be collected and visually assessed and/or analyzed. The potential hazards to personnel during this work are dermal contact with the material being sampled and potential inhalation of volatile contaminants. The potential hazards from collecting samples from petroleum or other storage tanks will be significantly reduce by collecting the samples from outside the tank with no personnel being allowed to enter a tank or other

questionable potential confined spaced environment. Level D protection should be sufficient to protect against dermal contact during sample collection. If organic vapors are noticed, stop work, and assess the potential for organic vapors with a photo-ionization detector (PID). The results of the PID screening should be discussed with the HSO and upgrades to personal protective equipment may be necessary. Action levels for use of respiratory protection are presented in Section 6.1.

# 5.5 Petroleum Storage Tank Closure

The closure of petroleum storage tanks will be performed by a remediation contractor. Petroleum storage tanks at this site should be considered confined spaces and C.T. Male personnel will not be allowed to enter the interior of the tanks, nor handle the contents of the tanks. If petroleum impacts are observed in the surface or subsurface soils at the time of tank closure work, the conditions will be reported to NYSDEC and delineation of the impacts will be part of the subsequent remedial investigation activities. Therefore, exposure to potential site contaminants in soil and groundwater is considered remote. The potential hazards to the personnel observing the tank closure work may include slip and fall hazards from tools and associated equipment required for work completion. To protect against these potential hazards, personnel completing this work should wear Level D protection and maintain a safe distance from the immediate work area. If organic vapors are present at the action levels described in Section 6.1 on the basis of organic vapor monitoring of the area during the work, it may be necessary to upgrade to Level C respiratory protection. The HSO must be consulted prior to implementing use of respiratory protection. Hearing protection may also be necessary if mechanical means (i.e., hammer drill or reciprocating saw) of accessing or dismantling the tanks is required.

## 5.6 Disposal of Waste Materials/Containers

Disposal of waste materials/containers will include characterization, consolidation, and ultimately disposal of waste off-site. A Contractor experience with this type of work should be utilized to complete this task. While the subcontractor is assessing the contents of each drum/container and collecting appropriate analytical samples, C.T. Male personnel should maintain a safe distance from the immediate work area. By maintaining a safe distance, Level D protection should be sufficient. If C.T. Male personnel are required to enter the contractor's work area, coordination with the

contractor's HSO is required to determine the appropriate level of protection or temporarily halt the work activity.

# 5.7 Cleaning Drains, Trenches and WWTP

The compartments of the waste water treatment plant and associated building drains and trenches will be cleaned. The potential hazards to personnel during this work are dermal contact with the contents or cleaning spray, vapor inhalation of volatile contaminants, and working around open tanks/drains. Level D protection should be sufficient to protect against dermal contact during these activities. If organic vapors are present at the action levels described in Section 6.1 on the basis of organic vapor monitoring of the area during the work, it may be necessary to upgrade to Level C respiratory protection. The HSO must be consulted prior to implementing use of respiratory protection.

# 5.8 Demolition of Building(s)

The demolition of the building(s) will be performed by a demolition contractor and their work will not be ground intrusive as the concrete slab will be left in-place. Therefore, exposure to potential site contaminants in soil and groundwater is considered remote. The potential hazards to C.T. Male personnel during demolition activities may include slip and fall hazards from poor terrain and demolition debris piles and the possibility of skin and eye damage from walking in the work area or from falling debris. To protect against these potential hazards, C.T. Male personnel should not enter the work area during active demolition, and if entering the work area is necessary, should wear Level D protection. It should be noted that the work area may also be limited to asbestos trained personnel depending on the type of asbestos containing materials that may be present at the time of demolition. Only personnel with the proper asbestos training will be allowed to enter an asbestos work area. Hearing protection may also be necessary if mechanical means (i.e., concrete hammer) of dismantling the building is required.

## 5.9 Hazard Identification and Control

Table 5.9-1 presents general hazards which may be encountered pursuant to required tasks for the project. Table 5.9-1 also identifies general procedures to follow to prevent or reduce accident, injury or illness. Any worker on-site who identifies a potential

hazard must report the condition to the HSO or designee, and initiate control of the hazardous condition.

		Table 5.9-1
	P	otential Hazards and Control
Potential Hazard		Control
Vehicular Traffic	. Wear	safety vest when vehicular hazards exist.
	. Use c	ones, flags, barricades, and caution tape to define work area.
	. Use v	ehicle to block work area.
	. Conta	act police and use flagmen for high traffic situations.
Slip, Trip, and Fall	. Asses	s work area to determine if there is a potential for falling.
Protection	. Make	sure work area is neat and tools are staged in one general area.
	8. Wear	steel-toe boots with adequate tread and always watch where the
	indiv	idual is walking. Carry flashlight when walking in poorly lighted
	areas.	
Inclement Weather	. Stop	outdoor work during electrical storms and other extreme weather
	condi	tions such as extreme heat or cold temperatures.
	2. Take	cover indoors or in vehicle.
	3. Lister	n to local forecasts for warnings about specific weather hazards
	such	as blizzards, thunder storms, hurricanes, and flash floods.
Utility Lines Contact	l. Conta	act UFPO to have utility lines marked prior to any underground
	excav	ation, trenching or drilling. UFPO must be contact at least 72 hours
	prior	to commencement of work activities.
	2. Refer	to Site drawings for utility locations.
	3. Manu	ally dig 3 to 5 feet below grade and 5 feet on each side of utility
	mark	ed to avoid breaking utility lines.
Noise	l. Wear	hearing protection when equipment such as a drill rig,
	jackh	ammer, or other heavy equipment is operating on-site.
	2. Wear	hearing protection whenever you need to raise your voice above
	norm	al conversational speech due to a loud noise source; this much
	noise	indicates the need for protection.
	3. Heari	ing protection is required when measured sound exceeds 85
	decib	els (dB) where employees stand or conduct work.
Electrical Shock	l. Main	tain appropriate distance between heavy equipment and overhead

	Table 5.9-1
	Potential Hazards and Control
Potential Hazard	Control
	utilities; 20 foot minimum clearance from power lines; and 10 foot
	minimum clearance from shielded power lines.
	2. Contact local underground utility locating service prior to penetrating
	the ground surface.
Physical Injury	Wear hard hats and safety glasses at all times when on-site.
	2. Maintain visual contact with equipment operators and wear orange
	safety vest when heavy equipment is operating on-site.
	3. Avoid loose clothing when working around rotary equipment.
	4. Keep hands and feet away from drilling augers and excavation
	equipment tracks/tires.
	5. Test emergency shut-off switches on drill rigs and excavation equipment
	regularly.
Back Injury	Use a mechanical lifting device or a lifting aid where appropriate.
	2. Make sure the route is free of obstructions.
	3. Bend at the knees and use leg muscles when lifting.
	4. Use the buddy system if lifting heavy or awkward objects.
	5. Do not twist or jerk your body when lifting.
Cold Stress	Increase water intake while working.
	2. Avoid excessive alcohol intake the night before working in cold stress
	situations.
	3. Increase number of rest breaks, as necessary and rest in a warm area.
	4. Watch for signs and symptoms of frostbite and fatigue.
Cold Stress (con't)	5. In the event of cold stress or frostbite, call 911 and bring the victim to a
	warm environment.
Heat Stress	1. Increase water intake while working.
	2. Avoid excessive alcohol intake the night before working in heat stress
	situations.
	3. Increase number of rest breaks, as necessary and rest in a shaded area.
	4. Watch for signs and symptoms of heat exhaustion and fatigue.
	5. In the event of heat stress or heat stroke, bring the victim to a cool
	environment and call 911.

		Table 5.9-1
Potential Hazards and Control		
Potential Hazard		Control
Fire Control	1.	Smoke only in designated areas.
	2.	Keep flammable liquids in closed containers.
	3.	Isolate flammable and combustible materials from ignition sources.
	4.	Keep fire extinguisher nearby and use only if deemed safe.
Media Sampling	1.	Wear appropriate PPE to avoid skin, eye, and inhalation contact with
(soil, water, liquid,		contaminated media.
sludge, sediment,	2.	Stand upwind to minimize possible inhalation exposure, especially
and water)		when opening monitoring wells or closed containers/vessels.
	3.	Conduct air monitoring, whenever necessary to determine level of
		respiratory protection.
	4.	If necessary, employ engineering controls to assist in controlling
		petroleum or chemical vapors.
Cleaning Equipment	1.	Wear appropriate PPE to avoid skin and eye contact with isopropyl
		alcohol, alconox, or other cleaning materials.
	2.	Stand upwind to minimize possible inhalation exposure.
	3.	Proper disposal of spent chemical cleaning solutions and rinse
		accordingly.

Note: A first aid kit and fire extinguisher will be located in the C.T. Male company vehicle.

Response actions to personal exposure from on-site contaminants include skin contact, eye contact, inhalation, ingestion, and puncture or laceration. The recommended response actions are presented in Section 12.3.

#### 6.0 AIR MONITORING

# 6.1 Respiratory Protection Action Levels

The identified contaminants for the subject site are tanning agents, dyes, and miscellaneous solvents and chemicals. Some of these suspect contaminants are volatile and semi-volatile organic compounds that have the potential to release to the environment when disturbed. During the completion of ground intrusive work tasks, the ambient air in the work area will be monitored with a photo-ionization detector (MiniRAE 2000 which reads total volatile compound vapors in parts per million) prior to the start of work and periodically as conditions warrant. If a concentration of 5 ppm (sustained for 5 minutes) of total volatile compounds is detected within the work area on the instrument, relative to an isobutylene standard (used to calibrate the instrument), work will cease immediately and the workers shall leave the area immediately and notify the HSO. The level of personal protective equipment (PPE) protection will be upgraded, as necessary, in accordance with Table 6.1-1. Prior to upgrading, engineering controls will be evaluated by the HSO in an effort to reduce or eliminate the volatile compound vapors.

Table 6.1-1 C.T. Male Action Levels & Required Respiratory Protection			
Action Level (1)	Level of PPE (2)	Type of Respiratory Protection (2)	
0-5 parts per million	Level D	No respiratory protection	
5-15 parts per million	Level C	Negative pressure full face respirator with combination organic vapor/particulate cartridge	
15-50 parts per million	Level C	Evaluate work procedures	
Greater than 100	Cease Work	Evaluate work procedures	

<sup>(1)</sup> PID reading sustained for 5 minutes.

<sup>(2)</sup> Facial hair is not permitted while wearing most respirators. Workers required to wear a respirator must have a minimum of OSHA 40 Hour training with current medical monitoring and fit test documentation.

# 6.2 Community Air Monitoring Plan

A Community Air Monitoring Plan (CAMP) will be followed during ground intrusive field activities. The intent of the CAMP 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 CAMP will monitor the air for potentially contaminated dust (particulate air monitoring, see Section 6.2.1) and volatile organic compound vapors (VOC Air Monitoring, see Section 6.2.2) at the downwind perimeter of each designated work area. 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.

## 6.2.1 Particulate Air Monitoring

C.T. Male will utilize two real-time particulate monitors capable of continuously measuring concentrations of particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less). The instruments will be placed at a temporary monitoring stations based on the prevailing wind direction each day, one upwind and one downwind of the work area. The particulate monitoring instruments will be capable of displaying the short term exposure limit (STEL) or 15 minute averaging period, which will be field checked and recorded for comparison to the NYSDOH Generic Community Air Monitoring Plan action levels for VOCs, as listed below. The particulate readings will be manually monitored, but the instruments are programmed to alarm at preset action levels. Instantaneous readings will be recorded periodically throughout the work day. At the end of each day, the readings for each instrument will be downloaded to a PC and retained for future reference and reporting.

• 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, 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.

In the event of poor weather such as heavy snow or rain, particulate monitoring will not be performed for protection of instrumentation. These weather conditions would limit the effectiveness of the sensitive monitoring equipment and likely suppress particulate generation. Work activities will be halted if fugitive dust migration is visually observed for a sustained period of time.

# 6.2.2 VOC Air Monitoring

The potential contaminants for the subject site include petroleum products, which are volatile and semi-volatile organic compounds that have the potential to release to the environment when disturbed. Volatile organic compounds (VOCs) will be monitored at the downwind perimeter of the immediate work area on a periodic basis. Upwind concentrations will also be measured at the start of the work day and periodically thereafter to evaluate the site's background conditions. A MiniRAE 2000 handheld VOC monitor will used to perform the VOCs monitoring. This unit is capable of displaying the STEL (15 minute averaging period) which will be field checked and recorded for comparison to the NYSDOH Generic Community Air Monitoring Plan action levels for VOCs, as listed below. The VOC readings (STEL) will be manually recorded for future reference and reporting. Instantaneous readings will be recorded periodically throughout the work day.

- If the ambient air concentration of total organic vapors at the downwind perimeter
  of the work area or exclusion zone exceeds 5 parts per million (ppm) above
  background for the 15-minute average, work activities must be temporarily halted
  and monitoring continued. If the total organic vapor level readily decreases (per
  instantaneous readings) below 5 ppm over background, work activities can resume
  with continued monitoring.
- If total organic vapor levels at the downwind perimeter of the work area or
  exclusion zone persist at levels in excess of 5 ppm over background but less than 25
  ppm, work activities must be halted, the source of vapors identified, corrective
  actions taken to abate emissions, and monitoring continued. After these steps, work

activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.

• If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

#### 7.0 TRAINING

#### 7.1 General

Site specific training of workers and personnel will be conducted and provided by the HSO or designee prior to any on-site activity. The training will specifically address the activities, procedures, monitoring and equipment for the Site operations. It will include area and facility layout, hazards, emergency services (police, hospital, fire, etc.), and review of this HASP. Questions by workers, field personnel, etc. will be addressed at this time.

Workers and personnel conducting and/or supervising the project must have attended and successfully completed a 40 Hour Health and Safety Training Course for Hazardous Waste Operations and an annual 8 hour Refresher Course. In addition, the individual must take part in an employer medical surveillance program in accordance with OSHA 1910.120 requirements, specifically, that the workers have had a medical physical within one (1) year prior to the date the work begins and that they are physically able to wear a respirator.

#### 7.1 Documentation

Documentation of training and medical surveillance will be submitted to the HSO or designee prior to the start of any on-site work. A copy of the training certificates and medical surveillance documentation shall be inserted into the pocket of this HASP in Appendix A.

#### 8.0 SITE ACCESS

#### 8.1 General

The IRM work will be performed on the Main Tannery Building (Bldg. #1) generally across the entire Site. Access to the site is from West Fulton Street. It may be likely that the public, or curious bystanders, may be present at the time of the work since there are residential dwellings located west and south of the Site along West Fulton Street. Access to the site will be mitigated by the chain link fence to be installed as part of the IRM activities.

#### 8.2 Work Areas

The work area for this project will be considered around the work activity being performed. Only OSHA trained individuals which are qualified to do the work and have read and signed this Site specific HASP will be allowed within the work zone. The work area may be secured by the contractor with chain-link fence, barricades, signs, cones, flagging or other similar method to prevent unauthorized entry. Otherwise, the HSO or designee will be responsible for limiting access to unauthorized individuals.

During completion of the Site investigation and interim remedial activities, the immediate work area will be considered the Exclusion Zone (contaminated area where investigation/remedial work is to be conducted). The Contamination Reduction Zone (decontamination area) and Support Zone (clean area, everywhere else) will be established outside the Exclusion Zone, as necessary. The exclusion, contamination reduction, and support zone during investigation/remediation work have been identified and designated as follows:

<u>Exclusion Zone</u> - The location of the exclusion zone will be determined in the field prior to the start of work and will vary in size shape and location depending on the area(s) the work is being conducted. The outside exclusion zones may be delineated with stakes and yellow caution tape or other similar method. Only authorized persons with proper training and personal protective equipment will be allowed to enter the exclusion zone.

# C.T. MALE ASSOCIATES, P.C.

<u>Contamination Reduction Zone</u> - This zone, if required, will generally be a  $10'\pm x\ 10'\pm$  area, containing the decontamination pad and adequately marked. The location will be determined in the field prior to the start of work and will vary depending on the area(s) the work is being conducted. This zone is where decontamination of personnel and equipment will take place, as necessary, on the basis of the work being performed. It will be located upwind of the Exclusion Zone, if possible.

<u>Support Zone</u> - Area outside of contamination reduction zone and not including the exclusion zone. Unauthorized or untrained individuals must remain in this zone.

#### 9.0 PERSONAL PROTECTION

#### 9.1 Level of Protection

Based on evaluation of the potential hazards, the minimum level of protection to be worn by workers during implementation of the IRM activities is defined as Level D protection, and will be controlled by the HSO or designee.

The minimum level D protective equipment will consist of field clothes, rubber gloves, hard hat, safety glasses, safety boots (steel-toe preferred) and rubber over-boots. As appropriate, this level of protection may be modified to include polylaminated Tyvek suits, coveralls, leg chaps, or face shield for additional protection. A full-face and half-face air purifying respirator should be readily available. The appropriate respirator cartridges that will be available at the Site, to use if necessary with the air purifying respirators, are a combination organic vapor and particulate cartridge filters.

If required, level C protective equipment will consist of the items listed for Level D protection with the added protection of full-face, air purifying (organic vapor and particulate) respirator, chemical resistant clothing, inner and outer chemically resistant gloves (i.e. solvent resistant nitrile, PVC/nitrile), and chemical resistant safety boots/shoes. When Site conditions warrant the need for level C protective equipment, work will cease and the project will be re-evaluated to determine the necessity for employing engineering controls to reduce or eliminate the potential contaminants of concern. Level C protective equipment is not expected to be necessary based on our knowledge of the Site conditions.

If required, level B protective equipment will consist of the items listed for Level D protection except a self-contained breathing apparatus (SCBA) will be worn which is dependent on the level of contaminants present in the work zone and polylaminated Tyvek suits will be required. When Site conditions warrant the need for level B protective equipment, work will cease and the project will be re-evaluated to determine the necessity for employing engineering controls to reduce or eliminate the potential contaminants of concern. Level B protective equipment is not expected to be necessary based on our knowledge of the Site conditions.

# 9.2 Safety Equipment

Basic emergency and first aid equipment will be available at an area within the Support Zone clearly marked and available or within C.T. Male's company vehicle. This shall include a first aid kit, fire extinguisher, supply of potable water, soap and paper towels. The HSO or designee shall be equipped with a cellular phone in case of emergencies. If the cellular phone is not available, or is inoperable, a phone within the nearby businesses, located south of the Site along West Fulton Street, should be used.

#### 10.0 COMMUNICATIONS

#### 10.1 Phone Use

The HSO or designee and site personnel shall be equipped with a cellular phone in case of emergencies. If the cellular phone is not available, or is inoperable, a nearby residence should be contacted for permission to use of their phone. The location of the nearest phone should be determined by field staff prior to start of work. The HSO or designee shall notify the C.T. Male project manager as soon as safely possible in the event of an accident, injury or emergency action.

#### 11.0 DECONTAMINATION PROCEDURES

#### 11.1 Personnel Decontamination Procedures

Decontamination procedures will be carried out by all personnel leaving the Exclusion Zone (except under emergency evacuation). The amount of decontamination performed will be dependent on the level of personal protection currently being worn within the exclusion zone and known level of contaminants present.

- Do not remove respiratory protection until all of steps have been completed.
- 2. Clean outer protective gloves and outer boots, if worn, with water (preferably with a pressurized washer) over designated wash tubs in the exclusion zone to remove the gross amount of contamination.
- 3. Deposit equipment used (tools, sampling devices, and containers) at designated drop stations on plastic drop sheets or in plastic lined containers.
- 4. Rinse outer boots if worn and gloves with clean water in designated rinse tubs. Remove outer boots if worn and gloves and deposit in designated area to be determined in the field for use the next day or when necessary. If disposable outer boots are worn, remove and discard in designated container.
- 5. Remove hard hat & safety glasses, rinse with clean water as necessary and deposit in designated area for use the next day or when necessary.
- 6. Remove Tyvek suit, if worn, and discard in designated container. Remove respirator at this time, if used; wash and rinse with clean water. Organic vapor cartridges, when used, will be replaced daily. Used cartridges will be discarded in the designated waste container. Remove inner gloves and discard in designated container.

# 11.2 Equipment and Sample Containers Decontamination

All decontamination will be completed by personnel in protective gear appropriate for the level of protection determined by the Site HSO or designee. Manual sampling equipment including trowels, hand augers, and shovels which come into contact with the Site's soils other contaminated media, will be cleaned with a tap water/detergent wash and a tap water rinse. The sampling equipment will be washed after each use and the wash and rinse water will be allowed to infiltrate the Site's soils at respective sampling point.

Larger excavation equipment (i.e., rubber-tire backhoe, track excavator, etc.), if utilized, that comes into contact with the site's soils will be decontaminated with a high pressure/water wash. The decontamination procedure will focus on portions of the equipment that has come into contact with the site's soils such as the bucket. The cleaning will be performed at the completion of each task/work area is completed. The cleaning fluids were be containerized for characterization and disposal.

Exterior surfaces of sample containers will be wiped clean with disposable wipes in the decontamination zone and transferred to a clean cooler for transportation or shipment to the analytical laboratory. Sample identities will be noted and checked off against the chain-of-custody record. The disposable wipes will be placed in the designated disposal container and disposed of as solid waste.

#### 12.0 EMERGENCY RESPONSE PROCEDURES

# 12.1 Emergency Coordinator

Site Health and Safety Officer (HSO)

Jeffrey A. Marx, PE

On-site personnel will use the following standard emergency procedures. The Project Manager and HSO shall be notified of any on-site emergencies or accidents, and be responsible for assuring that the appropriate procedures are followed.

# 12.2 Personal Injury

Emergency first aid shall be administered on-site as deemed necessary and only by a trained individual, if available at the Site. If a trained individual is not available on-site, decontaminate, if feasible, and transport individual to nearest medical facility (Nathan Littauer Hospital). The HSO will supply medical data sheets to appropriate medical personnel and be responsible for completing the incident report. If the HSO is injured or controlling the emergency situation, the medical data sheets are available in Appendix B of this Health and Safety Plan.

## 12.3 Personal Exposure

The recommended response to worker exposure from contaminants on-site includes the following:

Skin Contact:

Use generous amounts of soap and water. Wash/rinse affected area

thoroughly, and then provide appropriate medical attention.

Eye Contact:

Wash eyes thoroughly with potable water supply provided on site. Eyes should be rinsed for at least 15 minutes subsequent to chemical

contamination. Provide medical attention, as necessary.

Inhalation:

Move worker to fresh air and outside of the work zone and/or, if necessary, decontaminate and transport to hospital (Nathan Littauer Hospital). If respirator use is implemented at the time of inhalation, worker must not remove respirator until completely away from the work zone.

Ingestion: Decontaminate, if feasible, and transport to hospital (Nathan Littauer

Hospital) and as appropriate, contact Central New York Poison

Control Center.

Puncture Provide first aid at the Site and if wound needs medical attention,

Wound or decontaminate, if feasible, and transport to hospital (Nathan Littauer

Laceration: Hospital).

If the affected worker is exposed to contaminants on-site and the injury or accident prevents decontamination of the individual, the emergency responders must be notified of this condition and the exposure must be kept to a minimum.

# 12.4 Potential or Actual Fire or Explosion

Immediately evacuate area in the event of potential or actual fire or explosion. Notify the local fire and police departments, and other appropriate emergency response groups, as listed in Section 1.2. Perform off-site decontamination and contain wastes for proper disposal. If a fire or explosion occurs, all on-site personnel must meet in the designated area of the Site (established by the HSO or designee) for an accurate head count.

# 12.5 Equipment Failure

Should there be any equipment failure, breakdown, etc. the Project Manager and HSO shall be contacted immediately. The Project Manager or the HSO will make every effort to replace or repair the equipment in a timely manner. If fluids from equipment failure are leaking to the environment, follow spill response procedures described in Section 12.6.

# 12.6 Spill Response

The Site HSO or designee shall initiate a corrective action program with the subcontractors in the event of an accidental release of a hazardous material or suspected hazardous material. The HSO or designee will act as the Emergency Coordinator with the subcontractors for the purposes of: spill prevention; identifying releases; implementing clean up measures; and notification of appropriate personnel.

The corrective action program will be implemented by the HSO and subcontractor to effectively control and minimize any impact accidental releases may have to the environment.

Effective control measures will include:

- · Preliminary assessment of the release
- Control of the release source
- Containment of the released material
- Effective clean-up of the released material

Potential sources of accidental releases may include (but are not expected at the project Site) hydraulic oil spills or petroleum leaks from heavy equipment. The HSO/Emergency Coordinator in conjunction with the subcontractor shall respond to an accidental release in the following manner:

- Identify the character, source, amount and area affected by the release.
- Have subcontractor take all reasonable steps to control the release.
- Notify the NYSDEC Spill Hotline at 1-800-457-7362. Notify Alicia Thorne, NYSDEC Project Manager or Russell Huyck, NYSDEC Regional Engineer, at a minimum, as listed in Section 1.2.
- Contain the release with sorbent material which should include speedidry, spill socks and sorbent pads.
- Prevent the release from entering sensitive receptors (i.e., catch basins and surface water) using the specified sorbent material or sandbags.
- Coordinate cleanup of the release material.
- Oversee proper handling/storage of contaminated material for disposal.

At no time should personal health or safety be compromised or jeopardized in an attempt to control a release. Health and safety measures as outlined in this HASP should be adhered to.

# 12.7 Building Collapse

Notify the local fire department and other appropriate emergency response groups, as listed in Section 1.2. Perform off-site decontamination and contain wastes released from building failure for proper disposal. All on-site personnel must meet in the designated

area of the Site (established by the HSO or designee) for an accurate head count. Maintain safe distance from the portion of the building that has collapse and do not reenter the building. Perform reasonable spill response along the exterior portions of the building, as described in Section 12.6. Contact the City Engineer, C.T. Male Project Manager and/or the HSO for a determining whether or not the building may be reentered.

#### 13.0 ADDITIONAL WORK PRACTICES

Workers will be expected to adhere to the established safety practices. Work on the project will be conducted according to established protocol and guidelines for the safety and health of all involved. The following will be adhered to:

- Employ the buddy system when possible, and for those work tasks which require it. Establish and maintain communications.
- Minimize contact with potentially contaminated soil and water.
- Employ disposable items when possible to minimize risks during decontamination and possible cross-contamination during sample handling.
- Smoking, eating, or drinking after entering the work zone and before decontamination will not be allowed (to prevent oral ingestion of potential onsite contaminants).
- Avoid heat, cold and other work stress related to wearing personal protective equipment. Take breaks as necessary and drink plenty of fluids to prevent dehydration.
- Withdrawal from a suspected or actual hazardous situation to reassess procedures is the preferred course of action.
- The removal of facial hair (except mustaches) prior to working on-site will be required to allow for a proper respiratory face piece fit.
- The Project Manager, the HSO, and sampling personnel shall maintain records recording daily activities, meetings, facts, incidents, data, etc. relating to the project. These records will remain at the project Site during the full duration of the project so that replacement personnel may add information while maintaining continuity. These daily records will become part of the permanent project file.

#### 14.0 AUTHORIZATIONS

Personnel authorized to enter the exclusion zone at the Pan American Tannery in the City of Gloversville, Fulton County, New York while operations are being conducted must be certified by the HSO. Authorization will involve completion of appropriate training courses and review and sign off of this HASP.

Personnel authorized to perform work on-site are as follows:

2.   3.   4.   5.   6.   7.   8.   9.   10.   11.   12.   13.   14.   15.   16.	1	 
3		
4.   5.   6.   7.   8.   9.   10.   11.   12.   13.   14.   15.		
5.         6.         7.         8.         9.         10.         11.         12.         13.         14.         15.		
6		
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14 15		
15		

#### 15.0 MEDICAL DATA SHEET

This medical data sheet will be completed by all on-site personnel and will be kept onsite during the duration of the project. This data sheet will accompany any personnel when medical assistance is needed or if transport to hospital facilities is required.

PROJECT: Interim Remedial Measures to be conducted at the Pan American Tannery
("the Site") located on West Fulton Street in the City of Gloversville,
Fulton County, New York

Name	Home Telephone
Address	
Provide a Checklist of Previous Illnes	ss or Exposure to Hazardous Chemicals
What Medications Are You Presently	Using
Do You Have Any Physical or Medic	ral Restrictions
	or (Provide Fit Test Results)
Date of your last OSHA physical	
Name, Address, and Telephone Num	nber of Personal Physician:

#### 16.0 FIELD TEAM REVIEW

Each field team member shall sign this section after Site specific training is completed and before being permitted to work on-site.

I have read and understood this Site Specific Health and Safety Plan, and I will comply with the provisions contained therein.

PROJECT: Interim Remedial Measures

Pan American Tannery Site

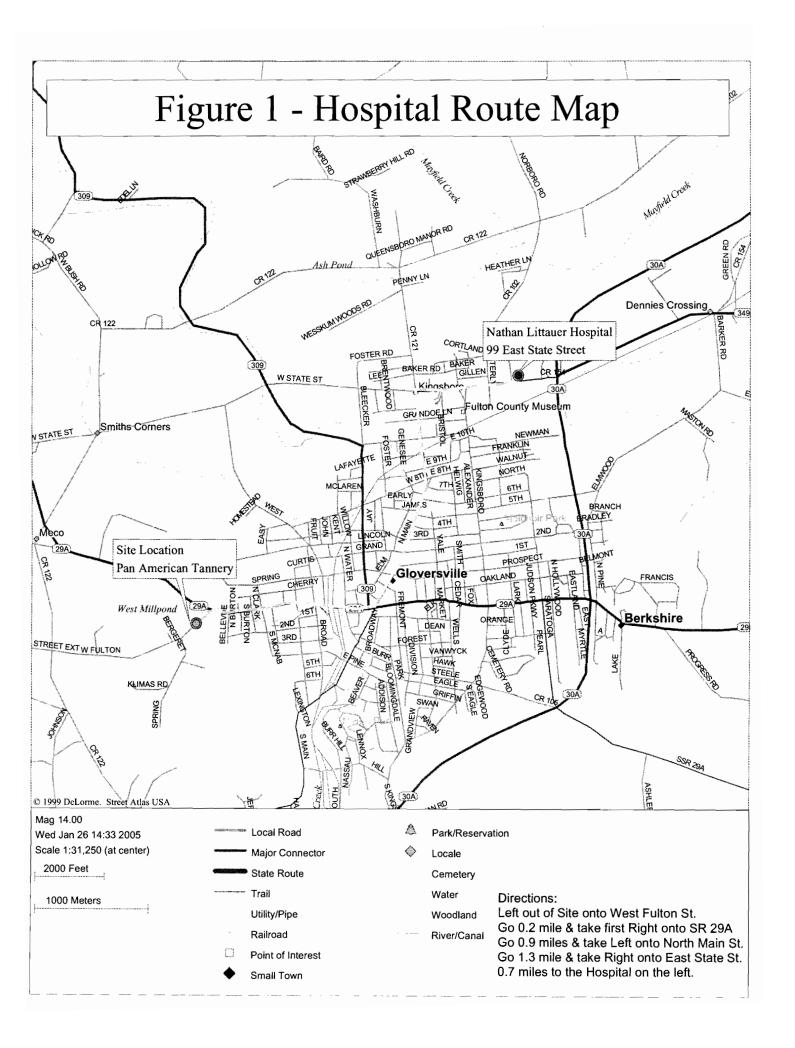
West Fulton Street, City of Gloversville

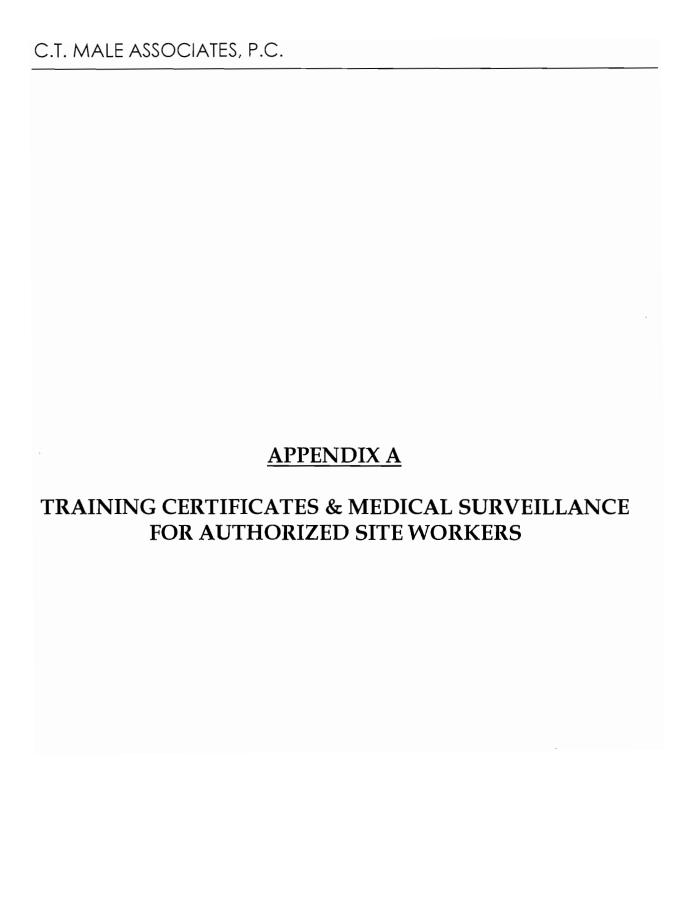
Fulton County, New York

Name: Printed	<u>Signature</u>	<u>Date</u>

# FIGURE 1

MAP SHOWING ROUTE TO NATHAN LITTAUER HOSPITAL





This medical data sheet will be completed by all on-site personnel and will be kept on-site during the duration of the project. This data sheet will accompany any personnel when medical assistance is needed or if transport to hospital facilities is required.

PROJECT: Interim Remedial Measures to be conducted at the Pan American

Tannery ("the Site") located on West Fulton Street in the City of

Gloversville, Fulton County, New York

Name	Home Telephone
Address	
Provide a Checklist of Previous Illness	
What Medications Are You Presently L	Ü
Do You Have Any Physical or Medical	Restrictions
	(Provide Fit Test Results)
Date of your last OSHA physical	
Name, Address, and Telephone Number	er of Personal Physician: