HALEY ALDRICH

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CORRECTIVE ACTION WORK PLAN
FORMER CARTER SPRAY FINISHING CORP.
65 ECKFORD STREET
BLOCK 2698 LOT 26
BROOKLYN, NEW YORK

by Haley & Aldrich of New York
New York, New York

for 65-73 Eckford Realty LLC
266 Broadway, Suite 301
Brooklyn, New York 11211

File No. 0202156-002
August 2021

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27 August 2021
File No. 0201891-001

New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway, 12th Floor
Albany, New York 12233

Attention: Ms. Caroline Jalanti

Subject: Corrective Action Work Plan
NYSDEC BCP Site C224218 – Former Carter Spray Finishing Corp.
65 Eckford Street
Brooklyn, New York

Dear Ms. Jalanti

On behalf of 65-73 Eckford Realty LLC, Haley & Aldrich of New York is submitting for the review and approval of the New York State Department of Environmental Conservation (NYSDEC) this Corrective Action Work Plan (CAWP) for the Former Carter Spray Finishing Corp. Site (Brownfield Cleanup Program Site C224218) located at 65 Eckford Street, in the Greenpoint neighborhood of Brooklyn, NY (Site). This CAWP has been developed based on the NYSDEC's "Technical Guidance for Site Investigation and Remediation" (DER-10, dated May 2010).

Please do not hesitate to contact us if there are any questions regarding this submittal or any other aspects of the project.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK

James M. Bellew
Senior Associate

Mari C. Conlon, P.G.
Project Manager

Scott A. Underhill, P.E.
Remedial Engineer

Cc:
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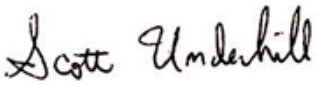
Scarlett McLaughlin (NYSDOH) Email: scarlett.mclaughlin@health.ny.gov

Certification

I, Scott A. Underhill, certify that I am currently a NYS registered Professional Engineer and that this Remedial Action Work Plan was prepared in accordance with the applicable statues and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).



27 August 2021

Scott A. Underhill *Date*
NYS Professional Engineer # 075332

I, James M. Bellew, certify that I am currently a Qualified Environmental Professional as defined in 6 NYCRR Part 375 and that that this Remedial Action Work Plan was prepared in accordance with the applicable statues and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

27 August 2021

James M. Bellew *Date*

List of Appendices

List of Figures

1. Introduction

On behalf of 65-73 Eckford Realty LLC, Haley & Aldrich of New York (Haley & Aldrich) has prepared this Corrective Action Work Plan (CAWP) for the Former Carter Spray Finishing Corp Site located at 65 Eckford Street (see Figure 1) in the Greenpoint neighborhood of Brooklyn NY (Site). This CAWP was prepared in accordance with the regulations and guidance applicable to the Brownfield Cleanup Program (BCP), including DER-10 which is entitled "Technical Guidance for Site Investigation and Remediation" and dated May 2010.

The Site, identified as Section 3, Block 2698, Lot 26 on the New York City tax map, is approximately 10,200-square feet and is bounded a four-story residential building to the north, Eckford Street to the east, a residential apartment building currently in construction (enrolled in the New York State Department of Environmental Conservation (NYSDEC) BCP Program as Site Number C224168) to the south, and a four-story residential and one-story industrial building to the west. The Site location is shown on Figure 1 and existing site features on Figure 2.

The lot is within a MX-8 Special Mixed-Use District (MX) and currently zoned M1-2/R6A. The MX was established in 1997 to encourage investment in, and enhance the vitality of, existing neighborhoods with mixed residential and industrial uses in close proximity and create expanded opportunities for new mixed-use communities. New residential and nonresidential uses (commercial, community facility and light industrial) can be developed as-of right and be located side by-side or within the same building. Pairing an M1 district with an R3 through R10 district (e.g., M1-2/R6) ensures a balanced variety of uses.

2. Background

2.1 CURRENT LAND USE

The Site is currently an undeveloped lot and is enrolled in the NYSDEC Brownfield Cleanup Program as NYSBCP Site Number C224218. Historically, the Site was utilized by several industrial operations including the former Carter Spray Finishing Corporation, which occupied the Site from approximately 1960 to 2008.

2.2 SITE HISTORY

The Site was developed between 1905 and 1916 and improved with several one-story manufacturing buildings occupied by the Meisel Danowitz & Co. woodworking operation. The Site was redeveloped by 1916 with a 1-2 story building and had been utilized by several industrial operations including a machine shop, wood box manufacturing facility, automobile parking garage, and metal finishing facility. Records indicate that former operations utilized underground gasoline storage tanks that were located in the northeast portion of the Site. The Site was occupied by the Carter Spray Finishing Corporation from 1960 to 2008 which used the building for metal finishing and spraying. The building was razed in 2015. The Site was subject to multiple subsurface investigations and construction of a five story hotel on the site began in 2018. Construction included excavation, transportation of soil for off-site disposal, and the installation of a secant pile wall along the perimeter of the Site. Construction of the hotel was not completed. Currently, the Site is excavated to approximately 5 to 6 feet below grade site and remains vacant.

2.3 SURROUNDING LAND USE

The Site is located in a mixed-use residential, commercial, and industrial area. The Site is bounded by a four-story residential building to the north, Eckford Street followed by residential apartment buildings to the east, a residential apartment building currently in construction (enrolled in the NYSDEC BC Program as Site Number C224168) to the south, and a four-story residential and one-story industrial building to the west. The properties adjacent to the Site to the north, west and south are zoned M1-2/R6B and the properties to the east of the Site across Eckford Street are zoned R6B. The closest public park, McCarren Park, is approximately 300 feet west of the site. No other sensitive receptors were identified down gradient of the Site.

2.4 SURROUNDING LAND USE HISTORY

The area surrounding the Site was historically used for dwellings and manufacturing/industrial purposes from the late 1800s through 1980s. The area to the west of the Site was historically characterized by heavy industry and manufacturing. The area was subject to a steady decline of industrial operations and manufacturing from the late 1960s through the 1980s and is now predominantly commercial and residential.

2.5 PREVIOUS INVESTIGATIONS AND REMEDIAL MEASURES

To date the following investigations and remedial measures have been performed at the subject Site:

- Phase I Environmental Site Assessment (Environmental Business Solutions [EBC], May 2015)
- Phase II Site Assessment (EBC, February and April 2015)
- Remedial Investigation (EBC, December 2015)
- Summary of Construction Activities and Remedial Measures (May to December 2018)

May 2015 – Phase I Environmental Site Assessment (EBC)

The Phase I Environmental Site Assessment (ESA) identified the following Recognized Environmental Conditions (RECs) for the Site:

- The 1916 and 1942 Sanborn maps show a parking garage building with an underground gasoline storage tank in the northeast portion of the building. A Site inspection performed in 2015 noted a fill port indicative of an underground gasoline storage tank within the same area of the gasoline tank drawn on the Sanborn maps indicating the tank(s) has not been removed. No information regarding the current status of this tank and/or soil quality in its vicinity was available for review. As such, there is a potential for spills or release from gasoline underground storage tank to have impacted the subsurface.

- New York City Department of Building records indicated fuel oil was used for heating the building. Based on the age and size of the building, it is assumed that an underground storage tank of at least 550 gallons was used. No information/records were obtained indicating proper removal/abandonment of a No. 2 fuel oil underground storage tank has occurred. As such, there is potential for spills or release from the No. 2 fuel oil underground storage tank to have impacted the subsurface.

- City Directory Listings, Sanborn maps and internet search results indicate the building has been historically utilized for industrial purposes, including a machine shop, parking garage, wood box manufacturing and metal finishing. From approximately 1959 to 1998, Carter Spray Finishing Corporation utilized two 275-gallon aboveground storage tanks contained trichloroethene (TCE) and the Toxic Chemical Release Inventory System (TRIS) database indicates Carter Spray Finishing Corporation emitted greater than 8,000 pound per year of TCE into the air. As such, there is a potential for historic site operations to have impacted soil, groundwater, and/or soil vapor quality beneath the Site.

Based on its findings, EBC recommended a Phase II Investigation be conducted to document subsurface conditions and determine the nature and extent of contamination, if any.

February and April 2015 – Limited Phase II Environmental Site Assessment (EBC)

An initial Limited Phase II Environmental Site Assessment performed by EBC in February 2015 included the following scope of work:

1. Installed two soil borings and collected soil samples for chemical analysis from the soil borings to evaluate soil quality; and,

2. Collected one groundwater sample for chemical analysis to evaluate groundwater quality.

Additional sampling was performed by EBC in April 2015 and included the following scope of work:

1. Installed three soil borings and collected soil samples for chemical analysis from the soil borings to evaluate soil quality; and,

2. Collected three groundwater samples for chemical analysis to evaluate groundwater quality.

Shallow soil samples representing the depth interval 0 to 2 feet below grade were collected from the historic fill layer and was analyzed for polychlorinated biphenyls (PCBs) and Target Analyte List (TAL) metals. Soil samples representing the depth interval 11 to 13 feet below grade were collected from the water table interface and analyzed for volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs). The laboratory results identified petroleum related VOCs above Unrestricted Use SCOs and Protection of Groundwater SCOs within the samples collected from the water table interface, including n-Propylbenzene, sec-Butylbenzene, tert-Butylbenzene, and Toluene. Trichloroethene (TCE) (1,100 ug/kg) was detected within one of the samples at the water table interface.

Petroleum-related VOCs were detected in the groundwater samples above groundwater quality standards (GQS). Petroleum-related VOCs detected above GQS includes 2-Isopropyltoluene, Isopropylbenzene, n-Butylbenzene, n-Propyl-benzene, sec-Butylbenzene, and tert-Butylbenzene.

SVOCs including Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Chrysene, and Indeno(1,2,3-cd)pyrene were reported above Restricted Residential Use SCOs within the soil sample from soil boring B2 (11-13 ft).

December 2015 – Remedial Investigation (EBC)

A Remedial Investigation (RI) performed by EBC included the following scope of work:

1. Installed ten soil borings (15SB1 – 15SB10) and collected 31 soil samples for chemical analysis to evaluate soil quality;

2. Installed eight groundwater monitoring wells (15MW1 – 15MW8) and collected eight groundwater samples for chemical analysis to evaluate groundwater quality; and,

3. Installed seven soil vapor probes and collected 7 samples for chemical analysis to evaluate the potential for vapor intrusion.

Soil samples collected at both 0 to 2 and 2 to 4 feet below grade and analyzed for VOCs, SVOCs, pesticides, PCBs, and TAL metals. Soil samples collected at 11 to 13 feet below grade (groundwater interface) were analyzed for VOCs and SVOCs. Soil samples collected at 18 to 20 feet below grade (native soil layer) were analyzed for VOCs, SVOCs, pesticides, PCBs, and TAL metals. Groundwater samples were analyzed for VOCs, SVOCs, pesticides, PCBs and TAL metals and dissolved metals. Soil vapor samples were analyzed for VOCs by EPA Method TO-15.

A summary of the environmental findings of the Remedial Investigation includes the following:

1. A 5- to 6-foot thick zone of petroleum VOC contamination was identified at the groundwater interface across the Site.

2. TCE impacted soil with the highest concentrations was detected in the shallow soil samples collected from the western portion of the Site.

3. A historic fill material layer extending to depths as deep as 13 feet below grade contained SVOCs and metals exceeding the commercial SCOs.

4. A native soil layer approximately 18 to 20 feet below grade contained elevated concentrations of both arsenic and mercury.

5. Petroleum related VOCs were detected above GQS in six of the eight groundwater samples.

6. Low levels of petroleum related VOCs were detected in soil vapor samples in addition to elevated concentrations of chlorinated VOCs TCE and PCE.

May to December 2018 – Summary of Construction Activities

Construction activities and remedial measures took place on the Site from May to December 2018. Construction work was completed under the final Interim Remedial Measures Work Plan (IRMWP) submitted to NYSDEC in January 2016 by AMC Engineering. According to available records, intrusive work began on the Site in late May 2018 and commenced with the excavation and offsite disposal of soil from 0 to 5 feet below grade site wide. This interval was documented as the historic fill layer. Executed manifests and logs indicated a total of 6,458.53 tons of soil were excavated and transported offsite to Bayshore Soil Management Facility (Bayshore) located in Keasbey, NJ. Soil excavation and offsite disposal was temporarily concluded on 13 December 2018.

Beginning on 12 June 2018, a secant pile wall was installed on the perimeter of the Site as part of the support-of-excavation (SOE) design and was overseen by Mueser Rutledge Consulting Engineers (Mueser). A review of daily field reports prepared by Mueser revealed that a total of 292 secant piles (each grouted) were installed. An unknown number of tiebacks were also installed as part of the SOE.

On 20 June 2018, a 550-gallon underground storage tank located in the southeast corner of the Site was removed according to a tank removal affidavit provided by Eastern Environmental Solutions, Inc.,. The affidavit indicates that the tank was purged, cut open, cleaned of all contents, and disposed of at a permitted disposal facility. The associated piping was also removed and disposed of at a permitted scrap metal facility.

Dewatering efforts were required on-site to during excavation. Dewatering permits were authorized by the NYC Department of Environmental Protection on 9 December 2018, to discharge up to 20,000 gallons per day (gpd) of groundwater during construction. Although the permits were authorized, no records indicate that a dewatering system was implemented. The permits have since expired.

Construction and IRM activities have left an open excavation area approximately 5 to 6 feet below grade. The excavation is heavy vegetated and contains approximately 1- to 2-ft of standing water. Garbage, debris and construction materials are scattered throughout excavation depression.

3. Corrective Action Work Plan

3.1 CAWP OBJECTIVES AND RATIONALE

The objective of the Corrective Action is to address the current deficiencies in Site progression through the BCP and remedy non-compliant conditions at the Site. Corrective Action activities will require equipment mobilization, dewatering, installation of a demarcation layer, backfilling and documentation sampling. The Site will be locked and inaccessible to the public during implementation of the Corrective Action and will remain locked and inaccessible until implementation of an approved Remedial Action Work Plan (RAWP) is complete, and a DER-10 compliant final cover replaces the temporary CAWP cover. The forthcoming RAWP will be submitted to and approved by the NYSDEC prior to implementation.

3.2 GENERAL PROJECT INFORMATION

3.2.1 Remedial Engineer

The Remedial Engineer (RE) will review plans and submittals for this remedial project, contractor and subcontractor document submittals, and will confirm that plans and submittals are in compliance with this CAWP. Remedial documents, including contractor and subcontractor document submittals, will be submitted to the NYSDEC and New York State Department of Health (NYSDOH) in a timely manner and prior to the start of work associated with the CAWP.

The RE for this project will be Scott Underhill. The RE is a registered professional engineer licensed by the State of New York. The RE will have primary direct responsibility for implementation of the remedial program at the Site. The RE will certify in the Construction Completion Report (CCR), which will detail the CAWP activities that will be were observed by qualified environmental professionals under his supervision and that the remediation requirements set forth in this CAWP and other relevant provisions of ECL 27-1419 have been achieved in substantial conformance with the CAWP.

Under direction of the RE, the work of other contractors and subcontractors involved in aspects of the CAWP will be documented, including dewatering, confirmation sample collection, air monitoring, emergency spill response services, import of backfill, and management of waste transport and disposal.

The RE will review the work plans submitted by contractors and subcontractors for substantial conformance with this CAWP and will provide a certification in the CCR.

3.3 SUMMARY OF PROPOSED CORRECTIVE ACTION

The proposed Corrective Action consists of the following elements:

1. Establish soil erosion, pollution, and sediment control measures in compliance with applicable laws and regulations.
2. Screen for indications of contamination (by visual means, odor, and monitoring with photoionization detectors [PIDs]) of excavated material during intrusive Site work.

3. Dewater, characterization, and treatment of water accumulated in excavations prior to discharge to a NYSDEC approved sewer/sanitary line (pending permits), or localized dewatering with containerization, classification, and disposal at an approved receiving facility.
4. Install a demarcation barrier, such as orange snow fence, along the excavation sidewalls and bottom of excavation prior to backfilling.
5. Import of clean backfill compliant with 6NYCRR Part 375 6.7(d).
6. Collection of documentation endpoint samples within the Corrective Action area, assuming Site conditions allow safety for collection.
7. Submission of a CCR at the completion of the Corrective Action.

A Corrective Action Plan is included as Figure 3.

3.3.1 Site Preparation

Prior to commencing Corrective Action activities, the Remediation Contractor will mobilize to the Site and prepare for remedial activities. Mobilization and site preparation activities may include the following:

- Identify the location of aboveground and underground utilities (e.g., power, gas, water, sewer, and telephone), equipment, and structures as necessary to implement remediation;
- Mobilize necessary remediation personnel, equipment, and materials to the Site;
- Install soil erosion, pollution, and sediment control measures; and
- Mark out proposed dewatering and backfill area.

3.3.2 Temporary Stabilized Construction Entrances

Temporary stabilized construction entrances will be installed at the existing curb cuts along Eckford Street. The entrances will be covered with gravel or recycled concrete aggregate (RCA), information for which will be supplied to NYSDEC prior to import for approval, and graded so that runoff water will be directed on site. Vehicles exiting construction areas will be cleaned using clean water or dry brushing, as needed, to remove site soil from the tires and undercarriages. The Remedial Contractor will protect and maintain the existing sidewalks and roadways at both site access points.

3.3.3 Utility Mark out and Easement Layouts

The Volunteer and its Contractors are solely responsible for the identification of utilities and/or easements that might be affected by work under this Corrective Action and implementation of the required, appropriate, or necessary health and safety measures during performance of the work under this Corrective Action. The Contractor will place a Dig Safely New York call out for public utilities to be confirmed complete prior to commencing work.

3.4 CORRECTIVE ACTION ACTIVTY

3.4.1 Site Fencing

The Site will be fenced during working hours and securely locked by gates during off hours and with appropriate signage maintained by the Contractor. As the work will be completed indoors this will limit access to authorized personnel and protect pedestrians from Site activities.

3.4.2 Documentation Sampling

Documentation soil samples will be collected from the base of the backfill area prior to demarcation placement in accordance with NYSDEC DER-10 to document remedial performance and will be analyzed for the Part 375 list of VOCs, SVOCs, pesticides and metals. Samples will be collected into laboratory-provided bottle ware. VOCs will be collected into Terracore or Encore samplers. Samples will be transported under chain of custody protocol to an ELAP certified laboratory. Sample frequency will be at a minimum rate of 1 base sample per 900 SF. It is noted that sample collection will be dependent on the overall safety of the excavation area pending access with an excavator. Due to the longevity of the excavation being filled with rain and surface water runoff, the excavation area itself may be unsafe to sample.

An estimated 12 endpoint samples, plus QA/QC samples, will be collected at the locations shown in Figure 4. If results of an endpoint sample does not comply with the 6 NYCRR Part 375-6.7(d) Unrestricted Use Soil Cleanup Objectives (UUSCOs), over-excavation may be completed as practical and additional endpoint samples will be collected.

3.4.3 Import of Backfill

Imported soil for backfill must meet the requirements of 6 NYCRR Part 375-6.7(d) and NYSDEC DER-10 Section 5.4(e), Table 5.4(e)10. Material from industrial sites, spill sites, other environmental remediation sites, or other potentially contaminated sites will not be imported to the Site. Solid waste will not be imported onto the Site.

Backfill material will consist of clean fill (as described in the following paragraph) or other acceptable fill material such as virgin stone from a quarry or RCA. Imported material will be approved by NYSDEC prior to import. If RCA is imported to the site, it will be from a NYSDEC-registered facility in compliance with 6 NYCRR Part 360 registration and permitting requirements for the period of acquisition of RCA. RCA imported from compliant facilities will not require chemical testing, unless required by the NYSDEC under the terms for operation of the facility. RCA imported to the site must be derived from recognizable and uncontaminated concrete, with no more than 10% by weight passing through a No. 80 sieve. RCA is not acceptable for and will not be used as cover or drainage material.

Imported soil will meet the UUSCOs. Non-compliant soils will not be imported to the Site. Imported soil will be segregated at a source/facility that is free of environmental contaminants. Qualified environmental personnel will collect representative samples at a frequency consistent with NYSDEC CP-51. The samples will be analyzed for Part 375 VOCs, SVOCs, pesticides/herbicides, PCBs, cyanide, metals including trivalent and hexavalent chromium, 1,4-dioxane, and PFAS by a NYSDOH ELAP-certified laboratory. Upon meeting these criteria, the certified-imported soil will be transported to the Site and segregated from impacted material, as necessary, on plastic sheeting until used as backfill. Trucks entering the Site with imported soils will be secured with tight fitting covers.

Soils that meet “exempt” fill requirements under 6 NYCRR Part 360, but do not meet backfill or cover soil objectives for this Site, will not be imported onto the site without prior approval by the NYSDEC. The

contents of this CAWP and NYSDEC approval of this CAWP should not be considered an approval for this purpose.

3.4.4 Fluids Management

Liquids removed from the Site, including dewatering fluids, will be handled, transported, and disposed of in accordance with applicable local, state, and federal regulations. Liquids discharged into the New York City sewer system will be addressed through approval by the New York City Department of Environmental Protection (NYCDEP).

A dewatering and treatment system will be designed by the Remediation Contractor's NYS-licensed Professional Engineer. During excavation and installation of the foundation, water management will be required to facilitate construction. Groundwater is encountered between 8 to 10 feet below grade across the Site. The excavation will extend below the water table; therefore, the Contractor will implement appropriate measures to assure that dewatering activities do not result in settling that may damage adjacent structures. The on-Site dewatering system will be installed to collect the groundwater infiltration during the excavation. Groundwater will be collected from within the active work area using sumps or trenches. Pumps will be used to convey collected groundwater from the collection point(s) to a temporary on-Site treatment and/or collection system. Groundwater discharge/disposal will be evaluated further and will be conducted via discharge to a NYSDEC approved sewer/sanitary line (pending permits), or disposal at an approved receiving facility.

4. Quality Assurance and Quality Control

Quality Assurance/Quality Control (QA/QC) procedures will be used to provide performance information with regard to accuracy, precision, sensitivity, representation, completeness, and comparability associated with the sampling and analysis for this investigation. Field QA/QC procedures will be used (1) to document that samples are representative of actual conditions at the Site and (2) identify possible cross-contamination from field activities or sample transit. Laboratory QA/QC procedures and analyses will be used to demonstrate whether analytical results have been biased either by interfering compounds in the sample matrix, or by laboratory techniques that may have introduced systematic or random errors to the analytical process.

QA/QC procedures are defined in the QAPP included in Appendix A.

5. Data Use

5.1 DATA SUBMITTAL

Analytical data will be supplied in ASP Category B Data Packages. If more stringent than those suggested by the United States Environmental Protection Agency, the laboratory's in house QA/QC limits will be utilized.

5.2 DATA VALIDATION

Data packages will be sent to a qualified data validation specialist for evaluation of accuracy and precision of the analytical results. A Data Usability Summary Report (DUSR) will be created to confirm the compliance of methods with the protocols described in the NYSDEC Analytical service Protocol (ASP). DUSRs will summarize and confirm usability of the data for project-related decisions. Data validation will be completed in accordance with the DUSR guidelines from NYSDEC Division of Environmental Remediation. The DUSR will be included with the submittal of a Construction Completion Report (CCR), further discussed in Section 8.

6. Project Organization

A project team for the Site has been created, based on qualifications and experience, with personnel suited for successful completion of the project. Project resumes are included in Appendix C.

The NYSDEC Case Manager will be Caroline Jalanti. The Case Manager will be responsible for overseeing the successful completion of the project work and adherence to the work plan on behalf of NYSDEC.

The NYSDOH Case Manager will be Scarlett McLaughlin. The Case Manager will be responsible for overseeing the successful completion of the project work and adherence to the work plan on behalf of NYSDEC.

Scott Underhill P.E. will be the Remedial Engineer for this work. Mr. Underhill is a professional engineer licensed by the State of New York. The RE will have primary direct responsibility for implementation of the overall remedial program for the Site. The Remedial Engineer will certify that the remedial activities were observed by a qualified environmental professional(s) under his supervision and that the remediation requirements set forth in the IRMWP and any other relevant provisions of ECL 27-1419 have been achieved in conformance with the plan.

James Bellew will be the Qualified Environmental Professional and Principal in Charge for this work. Mr. Bellew will be the Qualified Environmental Professional (QEP) for this work. Mr. Bellew has 15 years of experience in investigation and remediation in New York and throughout the eastern United States. In this role, Mr. Bellew will be responsible for the overall completion of each task as per requirements outlined in this work plan and in accordance with the DER-10 guidance.

Mari Conlon P.G. will be the Project Manager for this work. In this role, Ms. Conlon will manage the day-to-day tasks including coordination and supervision of field engineers and scientists, adherence to the work plan and oversight of project schedule. As the Project Manager, Ms. Conlon will also be responsible for communications with the NYSDEC Case Manager regarding project status, schedule, issues, and updates for project work. Ms. Conlon will also act as the Quality Assurance Officer (QAO). The QAO will assure the application and effectiveness of the QAPP by the analytical laboratory and the project staff, provide input to field team as to corrective actions that may be required as a result of the above-mentioned evaluations and prepare and/or review data validation and audit reports.

Sarah Commisso will be the field geologist responsible for implementing the field effort for this work. Ms. Commisso's responsibilities will include implementing the work plan activities and directing the subcontractors to ensure successful completion of all field activities.

The analytical laboratory will be Alpha Analytical of Westborough, MA, a New York Environmental Laboratory Approval Program (ELAP) certified laboratory. Alpha Analytical will be responsible for analyzing samples as per the analyses and methods identified in Section 2.

7. Health and Safety

7.1 HEALTH AND SAFETY PLAN

A Site-specific Health and Safety Plan (HASP) has been prepared in accordance with NYSDEC and NYSDOH guidelines and is provided as Appendix C of this work plan. The HASP includes a description of health and safety protocols to be followed by Haley & Aldrich field staff during implementation of the remedy, including monitoring within the work area, along with response actions should impacts be observed. The HASP has been developed in accordance with Occupational Health and Safety Administration (OSHA) 40 CFR Part 1910.120 regulatory requirements for use by Haley & Aldrich field staff that will work at the Site during planned activities. Contractors or other personnel who perform work at the Site are required to develop their own health and safety plan and procedures of comparable or higher content for their respective personnel in accordance with relevant OSHA regulatory requirements for work at hazardous waste sites as well as general industry as applicable based on the nature of work being performed.

7.2 COMMUNITY AIR MONITORING PLAN

The proposed investigation/remediation work will be completed both indoors at the Site. Where intrusive operations are planned, community air monitoring will be implemented to protect the downwind receptors. A Haley & Aldrich representative will continually monitor the breathing air in the vicinity of the immediate work area using a PID to measure total VOCs in air at concentrations as low as 1 part per million (ppm). The air in the work zone also will be monitored for visible dust generation.

The Community Air Monitoring Plan will require continuous real-time monitoring for particulate matter less than 10 micrometers in size (PM-10) and VOCs at the downwind perimeters when ground intrusive activities, including soil/waste excavation, soil handling, test pit excavation and/or trenching, are in progress at the Site. Upwind background concentrations will be determined each day prior to commencement of intrusive work. The CAMP aims to provide protection for residents in the designated work area and residents of the downwind community from potential airborne releases that directly result from the remedial construction activities conducted at the Site. Adherence to the monitoring action levels specified in the CAMP requires monitoring and, when necessary, corrective actions to abate emissions, and/or shutdown work. The CAMP also helps to confirm that work activities do not spread contamination off-Site through the air. In addition, visual and olfactory observations will be made to keep dust and odors at a minimum around the work areas. VOCs will be monitored using a PID, and particulates will be monitored using TSI DustTrak Environmental Monitor (DustTrak) equipment. Readings will be recorded every 15-minutes at the Site by field personnel.

The following actions will be taken based on monitoring of particulate concentrations:

- If the downwind PM-10 particulate level is 100 µg/m^3 greater than background for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques will be employed. Work will continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 µg/m^3 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 µg/m^3 above the background level, work will be stopped, and a re-evaluation of activities initiated. Work will resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 µg/m^3 of the upwind level and in preventing visible dust migration.

The following actions will be taken based on VOC monitoring:

- 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 will be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities will 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 will be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities will 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 will be shut down.

7.3 ODOR, DUST AND NUISANCE CONTROL PLAN

Dust, odor, and nuisance controls will be accomplished by the remediation contractor as described in this section.

Odor Control

This odor control plan is capable of controlling emissions of nuisance odors off-Site. Specific odor control methods to be used if needed will include application of foam suppressants or tarps over the odor or VOC source areas. If nuisance odors are identified, work will be halted, and the source of odors will be identified and corrected. Work will not resume until nuisance odors have been abated. The NYSDEC and NYSDOH will be notified of odor events and of other complaints about the project. Implementation of odor controls is the responsibility of the Contractor. Monitoring odor emission, including the halt of work, will be the responsibility of the RE or his/her designated representative.

Necessary means will be employed to prevent on- and off-Site nuisances. At a minimum, procedures will include: (a) limiting the area of open excavations; (b) shrouding open excavations with tarps and other covers; and (c) using foams to cover exposed odorous soils. If odors develop and cannot be otherwise controlled, additional means to eliminate odor nuisances will include: (a) direct load-out of soils to trucks for off-Site disposal; (b) use of chemical odorants in spray or misting systems; and (c) use of staff to monitor odors in surrounding neighborhoods.

Where odor nuisances have developed during remedial work and cannot be corrected, or where the release of nuisance odors cannot otherwise be avoided due to on-Site conditions or close proximity to sensitive receptors, odor control will be achieved by sheltering excavation and handling areas under tented containment structures equipped with appropriate air venting/filtering systems.

Dust Control

A dust suppression plan that addresses dust management during ground-intrusive on-Site work will include, at a minimum: (a) use of a dedicated water distribution system, on-Site water truck for road wetting, or an alternate source with suitable supply and pressure for use in dust control; (b) gravel used for on-Site roads to provide a clean and dust-free road surface; and (c) on-Site roads will be limited in total area to minimize the area required for water spraying.

Other Nuisances

A plan for rodent control will be developed and used by the remediation contractor during Site preparation (including clearing and grubbing) and during remedial work. A plan for noise control will be developed and used by the remediation contractor during Site preparation and remedial work and will conform, at a minimum, to the NYCDEP noise control standards.

8. Reporting

8.1 DAILY REPORTING

Daily reports will be submitted to NYSDEC and NYSDOH summarizing the Site activities completed during the corrective action. Daily reports will include a Site figure, a description of Site activities, a photo log and CAMP data. Daily reports will be submitted to the NYSDEC and NYSDOH case managers the following morning after Site work is completed.

8.2 SUMMARY REPORTING

Following completion of Corrective Action, a CCR will be prepared to document all of the aspects of the dewatering, installation of the demarcation barrier, and backfilling. This CCR will be summarized in the RAWP and included in the subsequent Final Engineering Report (FER). The CCR will be prepared in accordance with DER-10 guidelines and will include:

- A summary of the removal action including a detailed description of the extent and volume of soil excavated.
- Scaled site plan showing the location of all confirmation samples.
- Results of all analyses, including summary tables, laboratory data sheets and the required laboratory data deliverables.
- Photographic documentation of the Corrective Action activities.
- Information on backfill imported onto the Site including amount, type and origin and copies of transport tickets from the supplier.
- Certification of the Report by a QEP or P.E. as required.

9. Schedule

The Site owner plans to implement this Corrective promptly upon approval of the CAWP and renewal of the onsite permits.

Anticipated Corrective Action Schedule	
Corrective Action Work Plan and 30-Day Public Comment Period	August-September 2021
Receive Permit Approval (NYCDEP and NYCDOB)	September-October 2021
Implementation of Corrective Action	September-October 2021
Submission of Construction Completion Report	November 2021

References

1. Phase I Environmental Site Assessment. 65 Eckford Street, Brooklyn, New York. prepared by Environmental Business Consultants. May 2015

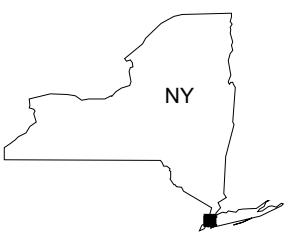
2. Phase II Site Assessment. Prepared by Environmental Business Consultants, LLC (ASR). May 2015

3. Remedial Investigation Report. Prepared for Z65 Realty LLC by Environmental Business Consultants. June 2016

4. Interim Remedial Measure Work Plan. . Prepared for Z65 Realty LLC by AMC Engineering, PLLC. January 2016.

\\haleyaldrich.com\share\CF\Projects\0202157\Deliverables\2. Site Logistics Plan

FIGURES



MAP SOURCE: ESRI
SITE COORDINATES: 40°43'19"N, 73°56'54"W

HALEY ALDRICH

65 ECKFORD STREET
BROOKLYN, NEW YORK

PROJECT LOCUS

APPROXIMATE SCALE: 1 IN = 2000 FT
AUGUST 2021

FIGURE 1

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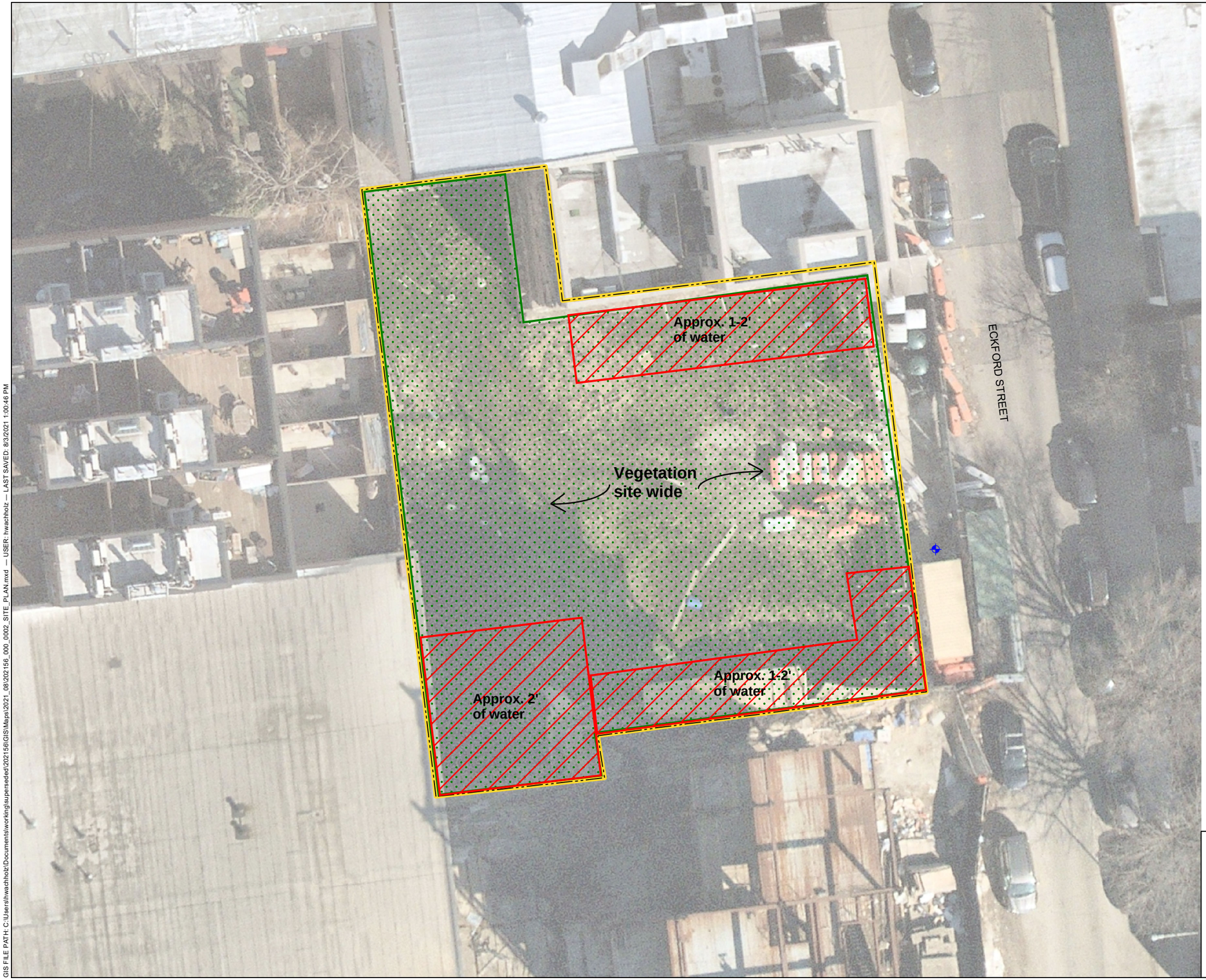

LEGEND

SITE BOUNDARY

Field Notes:

1. 95% of site is covered in thick vegetation (i.e. reeds and weeds).
1. Excavation depth site wide is approx. 6' bgs (potential to be deeper as site gently slopes to the west).
3. Existing construction ramp located in the central portion of the site and contains gravel.
4. Debris and garbage located within the excavation and entrance area.
5. One permanent groundwater monitoring well observed in the southwestern corner of the site (i.e. in sidewalk within construction fence).

NOTES

1. ALL LOCATIONS ARE APPROXIMATE.
2. AERIAL IMAGERY SOURCE: NEARMAP, 12 MARCH 2021

N

0 20 40
SCALE IN FEET

HALEY ALDRICH

65 ECKFORD STREET
BROOKLYN, NEW YORK

SITE PLAN

AUGUST 2021

FIGURE 2

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LEGEND

SITE BOUNDARY

VEGETATION TO BE REMOVED

AREAS WITH VISIBLE STANDING WATER APPROX. 1-2 FT

NOTES

1. ALL LOCATIONS ARE APPROXIMATE.
2. AERIAL IMAGERY SOURCE: NEARMAP, 12 MARCH 2021

N

0 20 40

SCALE IN FEET

HALEY ALDRICH

65 ECKFORD STREET
BROOKLYN, NEW YORK

CORRECTIVE ACTION MAP

AUGUST 2021

FIGURE 3

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LEGEND

SITE BOUNDARY

PROPOSED SOIL ENDPOINT SAMPLE LOCATIONS

NOTES

1. ALL LOCATIONS ARE APPROXIMATE.
2. AERIAL IMAGERY SOURCE: NEARMAP, 12 MARCH 2021

N

0 20 40

SCALE IN FEET

HALEY ALDRICH

65 ECKFORD STREET
BROOKLYN, NEW YORK

ENDPOINT SAMPLE MAP

AUGUST 2021

FIGURE 4

GIS FILE PATH: C:\Users\hwachholz\Documents\working\superseded\202156\GIS\Maps\2021_08\202156_000_0002_SITE_PLAN.mxd — USER: hwachholz — LAST SAVED: 8/3/2021 1:00:46 PM

APPENDIX A

Quality Assurance Project Plan

HALEY ALDRICH

www.haleyaldrich.com

QUALITY ASSURANCE PROJECT PLAN
65 ECKFORD STREET
BROOKLYN, NEW YORK

by
Haley & Aldrich of New York
New York, New York

for
65-73 Eckford Realty LLC
266 Broadway, Suite 301
Brooklyn, New York 11211

File No. 0202156-002
August 2021

Executive Summary

This Quality Assurance Project Plan (QAPP) outlines the scope of the quality assurance and quality control (QA/QC) activities associated with the site monitoring activities associated with the Corrective Action Work Plan (CAWP) for 65 Eckford Street (Site) in Brooklyn, New York.

Protocols for sample collection, sample handling and storage, chain-of-custody procedures, and laboratory and field analyses are described herein or specifically referenced to related project documents.

Table of Contents

Table of Contents

Table of Contents

1. Project Description

This Quality Assurance Project Plan (QAPP) has been prepared as a component of the CAWP for the 65 Eckford Street Site in Brooklyn, New York.

1.1 PROJECT OBJECTIVES

The primary objective for data collection activities is to collect sufficient data necessary to monitor the nature of any remaining impacts.

1.2 SITE DESCRIPTION AND HISTORY

The general Site description and Site history is provided in the CAWP.

1.3 LABORATORY PARAMETERS

The laboratory parameters for soil include:

- Target Compound List volatile organic compounds (VOCs) using EPA method 8260B
- Target Compound List semi-volatile organic compounds (SVOCs) using EPA method 8270C
- Total Analyte List (TAL) Metals using EPA method 6010
- TCL Pesticides using EPA 8081B

Laboratory parameters for disposal samples will be determined by the disposal facility after an approved facility has been determined.

1.4 SAMPLING LOCATIONS

The CAWP provides the locations of soil samples that will be sampled.

2. Project Organization and Responsibilities

This section defines the roles and responsibilities of the individuals who will perform the CAWP monitoring activities. A NYSDOH certified analytical laboratory will perform the analyses of environmental samples collected at the Site.

2.1 MANAGEMENT RESPONSIBILITIES

The Project Manager is responsible for managing the implementation of the CAWP and monitoring and coordinating the collection of data. The Project Manager is responsible for technical quality control and project oversight. The Project Manager responsibilities include the following:

- Acquire and apply technical and corporate resources as needed to ensure performance within budget and schedule restraints;
- Review work performed to ensure quality, responsiveness, and timeliness;
- Communicate with the client point of contact concerning the progress of the monitoring activities;
- Assure corrective actions are taken for deficiencies cited during audits of CAWP monitoring activities; and
- Overall Site health and safety plan compliance.

2.2 QUALITY ASSURANCE RESPONSIBILITIES

The Quality Assurance team will consist of a Quality Assurance Officer and the Data Validation staff. Quality Assurance responsibilities are described as follows:

2.2.1 Quality Assurance (QA) Officer

The QA Officer reports directly to the Project Manager and will be responsible for overseeing the review of field and laboratory data. Additional responsibilities include the following:

- Assure the application and effectiveness of the QAPP by the analytical laboratory and the project staff;
- Provide input to the Project Manager as to corrective actions that may be required as a result of the above-mentioned evaluations;
- Prepare and/or review data validation and audit reports.

The QA Officer will be assisted by the data validation staff in the evaluation and validation of field and laboratory generated data.

2.2.2 Data Validation Staff

The data validation staff will be independent of the laboratory and familiar with the analytical procedures performed. The validation will include a review of each validation criterion as prescribed by the guidelines presented in Section 9.2 of this document and be presented in a Data Usability Summary Report (DUSR) for submittal to the QA Officer.

2.3 LABORATORY RESPONSIBILITIES

Laboratory services in support of the CAWP monitoring include the following personnel:

2.3.1 Laboratory Project Manager

The Laboratory Project Manager will report directly to the QA Officer and Project Manager and will be responsible for ensuring all resources of the laboratory are available on an as-required basis. The Laboratory Project Manager will also be responsible for the approval of the final analytical reports.

2.3.2 Laboratory Operations Manager

The Laboratory Operations Manager will report to the Laboratory Project Manager and will be responsible for coordinating laboratory analysis, supervising in-house chain-of-custody reports, scheduling sample analyses, overseeing data review and overseeing preparation of analytical reports.

2.3.3 Laboratory QA Officer

The Laboratory QA Officer will have sole responsibility for review and validation of the analytical laboratory data. The Laboratory QA Officer will provide Case Narrative descriptions of any data quality issues encountered during the analyses conducted by the laboratory. The QA Officer will also define appropriate QA procedures, overseeing QA/QC documentation.

2.3.4 Laboratory Sample Custodian

The Laboratory Sample Custodian will report to the Laboratory Operations Manager and will be responsible for the following:

- Receive and inspect the incoming sample containers;
- Record the condition of the incoming sample containers;
- Sign appropriate documents;
- Verify chain-of-custody and its correctness;
- Notify the Project Manager and Operations Manager of sample receipt and inspection;
- Assign a unique identification number and enter each into the sample receiving log;
- Initiate transfer of samples to laboratory analytical sections; and
- Control and monitor access/storage of samples and extracts.

2.3.5 Laboratory Technical Personnel

The laboratory technical staff will have the primary responsibility in the performance of sample analysis and the execution of the QA procedures developed to determine the data quality. These activities will include the proper preparation and analysis of the project samples in accordance with the laboratory's Quality Assurance Manual (QAM) and associated Standard Operating Procedures (SOP).

2.4 FIELD RESPONSIBILITIES

2.4.1 Field Coordinator

The Field Coordinator is responsible for the overall operation of the field team and reports directly to the Project Manager. The Field Coordinator works with the project Health & Safety Officer (HSO) to conduct operations in compliance with the project Health & Safety Plan (HASP). The Field Coordinator will facilitate communication and coordinate efforts between the Project Manager and the field team members.

Other responsibilities include the following:

- Develop and implement field-related work plans, ensuring schedule compliance, and adhering to management-developed project requirements;
- Coordinate and manage field staff;
- Perform field system audits;
- Oversee quality control for technical data provided by the field staff;
- Prepare and approve text and graphics required for field team efforts;
- Coordinate and oversee technical efforts of subcontractors assisting the field team;
- Identify problems in the field; resolve difficulties in consultation with the Project QAO, and Project Manager; implement and document corrective action procedures; and,
- Participate in preparation of the final reports.

2.4.2 Field Team Personnel

Field Team Personnel will be responsible for the following:

- Perform field activities as detailed in the CAWP and in compliance and QAPP.
- Immediately report any accidents and/or unsafe conditions to the Site Health & Safety Officer and take reasonable precautions to prevent injury.

3. Sampling Procedures

Sampling will be conducted in general accordance with the New York State Department of Conservation (NYSDEC) Technical Guidance for Site Investigation and Remediation (DER-10).

3.1 SAMPLE CONTAINERS

Sample containers for each sampling task will be provided by the laboratory performing the analysis. The containers will be cleaned by the manufacturer to meet or exceed the analyte specifications established in the U.S. EPA, "Specifications and Guidance for Obtaining Contaminant-Free Sample Containers", April 1992, OSWER Directive #9240.0-0.5A. Certificates of analysis for each lot of sample containers used will be maintained by the laboratory.

The appropriate sample containers, preservation method, maximum holding times, and handling requirements for each sampling task are provided in Table I.

3.2 SAMPLE LABELING

Each sample will be labeled with a unique sample identifier that will facilitate tracking and cross-referencing of sample information. Equipment rinse blank and field duplicate samples also will be numbered with a unique sample identifier to prevent analytical bias of field QC samples.

4. Custody Procedures

Sample custody is addressed in three parts: field sample collection, laboratory analysis and final project files. Custody of a sample begins when it is collected by or transferred to an individual and ends when that individual relinquishes or disposes of the sample.

A sample is under custody if:

1. The item is in actual possession of a person;
2. The item is in the view of the person after being in actual possession of the person;
3. The item was in actual possession and subsequently stored to prevent tampering; or
4. The item is in a designated and identified secure area.

4.1 FIELD CUSTODY PROCEDURES

Field personnel will keep written records of field activities on applicable preprinted field forms or in a bound field notebook to record data collecting activities. These records will be written legibly in ink and will contain pertinent field data and observations. Entry errors or changes will be crossed out with a single line, dated, and initialed by the person making the correction. Field forms and notebooks will be periodically reviewed by the Field Coordinator.

The beginning of each entry in the logbook or preprinted field form will contain the following information:

- Date
- Start time
- Weather
- Names of field personnel (including subcontractors)
- Level of personal protection used at the Site
- Names of all visitors and the purpose of their visit.

For each measurement and sample collected, the following information will be recorded:

- Detailed description of sample location,
- Equipment used to collect sample or make measurement and the date equipment was calibrated,
- Time sample was collected,
- Description of the sample conditions,
- Depth sample was collected (if applicable),
- Volume and number of containers filled with the sample; and,
- Sampler's identification.

4.1.1 Field Procedures

The following procedure describes the process to maintain the integrity of the samples:

- Upon collection samples are placed in the proper containers. In general, samples collected for organic analysis will be placed in pre-cleaned glass containers and samples collected for inorganic analysis will be placed in pre-cleaned plastic (polyethylene) bottles.
- Samples will be assigned a unique sample number and will be affixed to a sample label.
- Samples will be properly and appropriately preserved by field personnel in order to minimize loss of the constituent(s) of interest due to physical, chemical or biological mechanisms.
- Appropriate volumes will be collected to ensure that the appropriate reporting limits can be successfully achieved and that the required QC sample analyses can be performed.

4.1.2 Transfer of Custody and Shipment Procedures

- A chain-of-custody (COC) record will be completed at the time of sample collection and will accompany each shipment of project samples to the laboratory. The field personnel collecting the samples will be responsible for the custody of the samples until the samples are relinquished to the laboratory. Sample transfer will require the individuals relinquishing and receiving the samples to sign, date and note the time of sample transfer on the COC record.
- Samples will be shipped or delivered in a timely fashion to the laboratory so that holding times and/or analysis times as prescribed by the methodology can be met.
- Samples will be transported in containers (coolers) which will maintain the refrigeration temperature for those parameters for which refrigeration is required in the prescribed preservation protocols.
- Samples will be placed in an upright position and limited to one layer of samples per cooler. Additional bubble wrap or packaging material will be added to fill the cooler. Shipping containers will be secured with strapping tape and custody tape for shipment to the laboratory.
- When samples are split with the NYSDEC representatives, a separate chain-of-custody will be prepared and marked to indicate with whom the samples are shared. The person relinquishing the samples will require the representative's signature acknowledging sample receipt.
- If samples are sent by a commercial carrier, a bill of lading will be used. A copy of the bill of lading will be retained as part of the permanent record. Commercial carriers will not sign the custody record as long as the custody record is sealed inside the sample cooler and the custody tape remains intact.
- Samples will be picked up by a laboratory courier or transported to the laboratory the same day they are collected unless collected on a weekend or holiday. In these cases, the samples will be stored in a secure location until delivery to the laboratory. Additional ice will be added to the cooler as needed to maintain proper preservation temperatures.

4.2 LABORATORY CHAIN-OF-CUSTODY PROCEDURES

A sample custodian will be designated by the laboratory and will have the responsibility to receive all incoming samples. Once received, the custodian will document if the sample is received in good condition (i.e., unbroken, cooled, etc.) and that the associated paperwork, such as chain-of-custody forms have been completed. The custodian will sign the chain-of-custody forms.

The custodian will also document if sufficient sample volume has been received to complete the analytical program. The sample custodian will then place the samples into secure, limited access storage (refrigerated storage, if required). The sample custodian will assign a unique number to each incoming sample for use in the laboratory. The unique number will then be entered into the sample-receiving log with the verified time and date of receipt also noted.

Consistent with the analyses requested on the chain-of-custody form, analyses by the laboratory's analysts will begin in accordance with the appropriate methodologies. Samples will be removed from secure storage with internal chain-of-custody sign-out procedures followed.

4.3 STORAGE OF SAMPLES

Empty sample bottles will be returned to secure and limited access storage after the available volume has been consumed by the analysis. Upon completion of the entire analytical work effort, samples will be disposed of by the sample custodian. The length of time that samples are held will be at least thirty (30) days after reports have been submitted. Disposal of remaining samples will be completed in compliance with all Federal, State and local requirements.

4.4 FINAL PROJECT FILES CUSTODY PROCEDURES

The final project files will be the central repository for all documents with information relevant to sampling and analysis activities as described in this QAPP. The Haley & Aldrich Project Manager will be the custodian of the project file. The project files including all relevant records, reports, logs, field notebooks, pictures, subcontractor reports and data reviews will be maintained in a secured, limited access area and under custody of the Project Director or his designee.

The final project file will include the following:

- Project plans and drawings
- Field data records
- Sample identification documents and soil boring/monitoring well logs
- All chain-of-custody documentation
- Correspondence
- References, literature
- Laboratory data deliverables
- Data validation and assessment reports
- Progress reports, QA reports
- Final report

The laboratory will be responsible for maintaining analytical logbooks, laboratory data and sample chain of custody documents. Raw laboratory data files and copies of hard copy reports will be inventoried and

maintained by the laboratory for a period of six (6) years at which time the laboratory will contact the Haley & Aldrich Project Manager regarding the disposition of the project related files.

5. Calibration Procedures and Frequency

5.1 FIELD INSTRUMENT CALIBRATION PROCEDURES

Several field instruments will be used for both on-site screening of samples and for health and safety monitoring, as described in the Health and Safety Plan (HASP). On-site air monitoring for health and safety purposes may be accomplished using a vapor detection device, such as a Photo-ionization Detector (PID).

Field instruments will be calibrated at the beginning of each day and checked during field activities to verify performance. Instrument specific calibration procedures will be performed in accordance with the instrument manufacturer's requirements.

5.2 LABORATORY INSTRUMENT CALIBRATION PROCEDURES

Reference materials of known purity and quality will be utilized for the analysis of environmental samples. The laboratory will carefully monitor the preparation and use of reference materials including solutions, standards, and reagents through well-documented procedures.

All solid chemicals and acids/bases used by the laboratory will be rated as "reagent grade" or better. All gases will be "high" purity or better. All Standard Reference Materials (SRMs) or Performance Evaluation (PE) materials will be obtained from approved vendors of the National Institute of Standards and Technology (formerly National Bureau of Standards), the U.S. EPA Environmental Monitoring Support Laboratories (EMSL), or reliable Cooperative Research and Development Agreement (CRADA) certified commercial sources.

6. Analytical Procedures

Analytical procedures to be utilized for analysis of environmental samples will be based on referenced USEPA analytical protocols and/or project specific SOP.

6.1 LABORATORY ANALYTICAL PROCEDURES

Laboratory analyses will be based on the U.S. EPA methodology requirements promulgated in:

- "Test Methods for Evaluating Solid Waste," SW-846 EPA, Office of Solid Waste, and promulgated updates, 1986.

6.1.1 List of Project Target Compounds and Laboratory Detection Limits

The laboratory reporting limits (RLs) and associated method detection limits (MDLs) for the target analytes and compounds for the environmental media to be analyzed are presented in Table I. MDLs have been experimentally determined by the project laboratory using the method provided in 40 CFR, Part 136 Appendix B.

Laboratory parameters for soil samples are listed in the CAWP. Laboratory parameters for disposal samples will be determined by the disposal facility after an approved facility has been determined.

6.1.2 List of Method Specific Quality Control (QC) Criteria

The laboratory SOPs include a section that presents the minimum QC requirements for the project analyses. Section 7.0 references the frequency of the associated QC samples for each sampling effort and matrix.

7. Internal Quality Control Checks

This section presents the internal quality control checks that will be employed for field and laboratory measurements.

7.1 FIELD QUALITY CONTROL

7.1.1 Field Blanks

Internal quality control checks will include analysis of field blanks to validate equipment cleanliness. Whenever possible, dedicated equipment will be employed to reduce the possibility of cross-contamination of samples.

7.1.2 Trip Blanks

Trip blanks samples will be prepared by the project laboratory using ASTM Type II or equivalent water placed within pre-cleaned 40 milliliter (ml) VOC vials equipped with Teflon septa. Trip blanks will accompany each sample delivery group (SDG) of environmental samples collected for analysis of VOCs.

Trip blank samples will be placed in each cooler that stores and transports project samples that are to be analyzed for VOCs.

7.2 LABORATORY PROCEDURES

Procedures which contribute to maintenance of overall laboratory quality assurance and control include appropriately cleaned sample containers, proper sample identification and logging, applicable sample preservation, storage, and analysis within prescribed holding times, and use of controlled materials.

7.2.1 Field Duplicate Samples

The precision or reproducibility of the data generated will be monitored through the use of field duplicate samples. Field duplicate analysis will be performed at a frequency of 1 in 20 project samples.

Precision will be measured in terms of the absolute value of the relative percent difference (RPD) as expressed by the following equation:

$$RPD = [|R1-R2|/[(R1+R2)/2]] \; X \; 100\%$$

Acceptance criteria for duplicate analyses performed on solid matrices will be 100% and aqueous matrices will be 35%. RPD values outside these limits will require an evaluation of the sampling and/or analysis procedures by the project QA Officer and/or laboratory QA Director. Corrective actions may include re-analysis of additional sample aliquots and/or qualification of the data for use.

7.2.2 Matrix Spike Samples

Ten percent of each project sample matrix for each analytical method performed will be spiked with known concentrations of the specific target compounds/analytes.

The amount of the compound recovered from the sample compared to the amount added will be expressed as a percent recovery. The percent recovery of an analyte is an indication of the accuracy of an analysis within the site-specific sample matrix. Percent recovery will be calculated for MS/MSD using the following equation.

$$\%\ Recovery = \frac{Spiked\ Sample - Background}{Known\ Value\ of\ Spike} x\,100\%$$

If the quality control value falls outside the control limits (UCL or LCL) due to sample matrix effects, the results will be reported with appropriate data qualifiers. To determine the effect a non-compliant MS recovery has on the reported results, the recovery data will be evaluated as part of the validation process.

7.2.3 Laboratory Control Sample (LCS) Analyses

The laboratory will perform LCS analyses prepared from Standard Reference Materials (SRMs). The SRMs will be supplied from an independent manufacturer and traceable to NIST materials with known concentrations of each target analyte to be determined by the analytical methods performed. In cases where an independently supplied SRM is not available, the LCS may be prepared by the laboratory from a reagent lot other than that used for instrument calibration.

The laboratory will evaluate LCS analyses in terms of percent recovery using the most recent laboratory generated control limits.

LCS recoveries that do not meet acceptance criteria will be deemed invalid. Analysis of project samples will cease until an acceptable LCS analysis has been performed. If sample analysis is performed in association with an out-of-control LCS sample analysis, the data will be deemed invalid.

Corrective actions will be initiated by the Haley & Aldrich QA Officer and/or Laboratory QA Officer to investigate the problem. After the problem has been identified and corrected, the solution will be noted in the instrument run logbook and re-analysis of project samples will be performed, if possible.

The analytical anomaly will be noted in the sample delivery group (SDG) Case Narrative and reviewed by the data validator. The data validator will confirm that appropriate corrective actions were implemented and recommend the applicable use of the affected data.

7.2.4 Surrogate Compound/Internal Standard Recoveries

For VOCs, surrogates will be added to each sample prior to analysis to establish purge and trap efficiency. Quantitation will be accomplished via internal standardization techniques.

The recovery of surrogate compounds and internal standards will be monitored by laboratory personnel to assess possible site-specific matrix effects on instrument performance.

For semi-volatile organics analyses, surrogates will be added to the raw sample to assess extraction efficiency. Internal standards will be added to all sample extracts and instrument calibration standard immediately before analysis for quantitation via internal standardization techniques.

Method specific quality control (QC) limits are provided in the attached laboratory method SOPs. Surrogate compound/internal standard recoveries that do not fall within accepted QC limits for the analytical methodology performed will have the analytical results flagged with data qualifiers as appropriate by the laboratory and will not be noted in the laboratory report Case Narrative.

To ascertain the effect non-compliant surrogate compound/internal standard recoveries may have on the reported results, the recovery data will be evaluated as part of the validation process. The data validator will provide recommendations for corrective actions including but not limited to additional data qualification.

7.2.5 Calibration Verification Standards

Calibration verification (CV) standards will be utilized to confirm instrument calibrations and performance throughout the analytical process. CV standards will be prepared as prescribed by the respective analytical protocols. Continuing calibration will be verified by compliance with method-specific criteria prior to additional analysis of project samples.

Non-compliant analysis of CV standards will require immediate corrective action by the project laboratory QA officer and/or designated personnel. Corrective action may include re-analysis of each affected project sample, a detailed description of the problem, the corrective action undertaken, the person who performed the action, and the resolution of the problem.

7.2.6 Laboratory Method Blank Analyses

Method blank sample analysis will be performed as part of each analytical batch for each methodology performed. If target compounds are detected in the method blank samples, the reported results will be flagged by the laboratory in accordance with standard operating procedures. The data validator will provide recommendations for corrective actions including but not limited to additional data qualification.

8. Data Quality Objectives

Sampling that will be performed as described in the CAWP is designed to produce data of the quality necessary to achieve the minimum standard requirements of the field and laboratory analytical objectives described below. These data are being obtained with the primary objective to assess levels of contaminants of concern associated with the Site.

The overall project data quality objective (DQO) is to implement procedures for field data collection, sample collection, handling, and laboratory analysis and reporting that achieve the project objectives. The following section is a general discussion of the criteria that will be used to measure achievement of the project DQO.

8.1 PRECISION

8.1.1 Definition

Precision is defined as a quantitative measure of the degree to which two or more measurements are in agreement. Precision will be determined by collecting and analyzing field duplicate samples and by creating and analyzing laboratory duplicates from one or more of the field samples. The overall precision of measurement data is a mixture of sampling and analytical factors. The analytical results from the field duplicate samples will provide data on sampling precision. The results from duplicate samples created by the laboratory will provide data on analytical precision. The measurement of precision will be stated in terms of relative percent difference (RPD).

8.1.2 Field Precision Sample Objectives

Field precision will be assessed through collection and measurement of field duplicate samples at a rate of 1 duplicate per 20 investigative samples. The RPD criteria for the project field duplicate samples will be +/- 100% for soil for parameters of analysis detected at concentrations greater than 5 times (5X) the laboratory reporting limit (RL).

8.1.3 Laboratory Precision Sample Objectives

Laboratory precision will be assessed through the analysis of laboratory control and laboratory control duplicate samples (LCS/LCSD) and matrix spike and matrix spike duplicate (MS/MSD) samples for groundwater and soil samples and the analysis of laboratory duplicate samples for air and soil vapor samples. Air and soil vapor laboratory duplicate sample analyses will be performed by analyzing the same SUMMA canister twice. The RPD criteria for the air/soil vapor laboratory duplicate samples will be +/- 35 % for parameters of analysis detected at concentrations greater than 5 times (5X) the laboratory reporting limit (RL).

8.2 ACCURACY

8.2.1 Definition

Accuracy relates to the bias in a measurement system. Bias is the difference between the observed and the "true" value. Sources of error are the sampling process, field contamination, preservation techniques, sample handling, sample matrix, sample preparation and analytical procedure limitations.

8.2.2 Field Accuracy Objectives

Sampling bias will be assessed by evaluating the results of field equipment rinse and trip blanks. Equipment rinse and trip blanks will be collected as appropriate based on sampling and analytical methods for each sampling effort.

If non-dedicated sampling equipment is used, equipment rinse blanks will be collected by passing ASTM Type II water over and/or through the respective sampling equipment utilized during each sampling effort. One equipment rinse blank will be collected for each type of non-dedicated sampling equipment used for the sampling effort. Equipment rinse blanks will be analyzed for each target parameter for the respective sampling effort for which environmental media have been collected. (Note: If dedicated or disposable sampling equipment is used, equipment rinse samples will not be collected as part of that field effort.)

8.3 LABORATORY ACCURACY OBJECTIVES

Analytical bias will be assessed through the use of laboratory control samples (LCS) and Site-specific matrix spike (MS) sample analyses. LCS analyses will be performed with each analytical batch of project samples to determine the accuracy of the analytical system.

One (1) set of MS/MSD analyses will be performed with each batch of 20 project samples collected for analysis to assess the accuracy of the identification and quantification of analytes within the Site-specific sample matrices. Additional sample volume will be collected at sample locations selected for the preparation of MS/MSD samples so that the standard laboratory reporting limits (RLs) are achieved.

The accuracy of analyses that include a sample extraction procedure will be evaluated through the use of system monitoring or surrogate compounds. Surrogate compounds will be added to each sample, standard, blank, and QC sample prior to sample preparation and analysis. Surrogate compound percent recoveries will provide information on the effect of the sample matrix on the accuracy of the analyses.

8.4 REPRESENTATIVENESS

8.4.1 Definition

Representativeness expresses the degree to which sample data represent a characteristic of a population, a parameter variation at a sampling point or an environmental condition. Representativeness is a qualitative parameter that is dependent upon the design of the sampling program. The representativeness criterion is satisfied through the proper selection of sampling locations, the quantity of samples and the use of appropriate procedures to collect and analyze the samples.

8.4.2 Measures to Ensure Representativeness of Field Data

Representativeness will be addressed by prescribing sampling techniques and the rationale used to select sampling locations. Sampling locations may be biased (based on existing data, instrument surveys, observations, etc.) or unbiased (completely random or stratified-random approaches).

8.5 COMPLETENESS

8.5.1 Definition

Completeness is a measure of the amount of valid (usable) data obtained from a measuring system compared to the total amount of the anticipated to be obtained. The completeness goal for all data uses is that a sufficient amount of valid data be generated so that determinations can be made related to the intended data use with a sufficient degree of confidence.

8.5.2 Field Completeness Objectives

Completeness is a measure of the amount of valid measurements obtained from measurements taken in this project versus the number planned. Field completeness objective for this project will be greater than (>) 90%.

8.5.3 Laboratory Completeness Objectives

Laboratory data completeness objective is a measure of the amount of valid data obtained from laboratory measurements. The evaluation of the data completeness will be performed at the conclusion of each sampling and analysis effort.

The completeness of the data generated will be determined by comparing the amount of valid data, based on independent validation, with the total laboratory data set. The completeness goal will be >90%.

8.6 COMPARABILITY

8.6.1 Definition

Comparability is a qualitative parameter expressing the confidence with which one data set can be compared to another.

8.6.2 Measures to Ensure Comparability of Laboratory Data

Comparability of laboratory data will be measured from the analysis of Standard Reference Materials (SRM) obtained from either EPA Cooperative Research and Development Agreement (CRADA) suppliers or the National Institute of Standards and Technology (NIST). The reported analytical data will also be presented in standard units of mass of contaminant within a known volume of environmental media. The standard units for various sample matrices are as follows:

- Solid Matrices – mg/kg of media (Dry Weight).

8.7 LEVEL OF QUALITY CONTROL EFFORT

If non-dedicated sampling equipment is used, equipment rinse blanks will be prepared by field personnel and submitted for analysis of target parameters. Equipment rinse blank samples will be analyzed to check for potential cross-contamination between sampling locations that may be introduced during the investigation. One (1) equipment rinse blank will be collected per sampling event to the extent that non-dedicated sampling equipment is used.

Trip blanks will be used to assess the potential for contamination during sample storage and shipment. Trip blanks will be provided with the sample containers to be used for the collection of groundwater samples for the analysis of VOC. Trip blanks will be preserved and handled in the same manner as the project samples. One (1) trip blank will be included along with each shipping container containing project samples to be analyzed for VOC.

Method blank samples will be prepared by the laboratory and analyzed concurrently with all project samples to assess potential contamination introduced during the analytical process.

Field duplicate samples will be collected and analyzed to determine sampling and analytical reproducibility. One (1) field duplicate will be collected for every 20 or fewer investigative samples collected for off-Site laboratory analysis.

Matrix spikes will provide information to assess the precision and accuracy of the analysis of the target parameters within the environmental media collected. One (1) matrix spike/matrix spike duplicate (MS/MSD) will be collected for every 20 or fewer investigative samples per sample matrix.

(Note: Soil MS/MSD samples require triple sample volume for VOC only. Aqueous MS/MSD samples require triple the normal sample volume for VOC analysis and double the volume for the remaining parameters.)

9. Data Reduction, Validation and Reporting

Data generated by the laboratory operation will be reduced and validated prior to reporting in accordance with the following procedures:

9.1 DATA REDUCTION

9.1.1 Field Data Reduction Procedures

Field data reduction procedures will be minimal in scope compared to those implemented in the laboratory setting. The pH, conductivity, temperature, turbidity, DO, ORP and breathing zone VOC readings collected in the field will be generated from direct read instruments. The data will be written into field logbooks immediately after measurements are taken. If errors are made, data will be legibly crossed out, initialed and dated by the field member, and corrected in a space adjacent to the original entry.

9.1.2 Laboratory Data Reduction Procedures

Laboratory data reduction procedures are provided by the appropriate chapter of USEPA, “Test Methods for Evaluating Solid Waste”, SW-846, Third Edition. Errors will be noted; corrections made with the original notations crossed out legibly. Analytical results for soil samples will be calculated and reported on a dry weight basis.

9.1.3 Quality Control Data

Quality control data (e.g., laboratory duplicates, surrogates, matrix spikes, and matrix spike duplicates) will be compared to the method acceptance criteria. Data determined to be acceptable will be entered into the laboratory information management system.

Unacceptable data will be appropriately qualified in the project report. Case narratives will be prepared which will include information concerning data that fell outside acceptance limits and any other anomalous conditions encountered during sample analysis.

9.2 DATA VALIDATION

Data validation procedures of the analytical data will be performed by the Haley & Aldrich QA Officer or designee using the following documents as guidance for the review process:

- "U.S. EPA National Functional Guidelines for Organic Data Review”, and the "U.S. EPA National Functional Guidelines for Inorganic Data Review".

- The specific data qualifiers used will be applied to the reported results as presented and defined in the EPA National Functional Guidelines. Validation will be performed by qualified personnel at the direction of the Haley & Aldrich QAO.

- The completeness of each data package will be evaluated by the Data Validator. Completeness checks will be administered on all data to determine that the deliverables are consistent with the NYSDEC Analytical Services Protocol (ASP) Category A and Category B data package requirements. The validator will determine whether the required items are present and request copies of missing deliverables (if necessary) from the laboratory.

9.3 DATA REPORTING

Data reporting procedures will be carried out for field and laboratory operations as indicated below:

- Field Data Reporting: Field data reporting will be conducted principally through the transmission of report sheets containing tabulated results of measurements made in the field and documentation of field calibration activities.

- Laboratory Data Reporting: The laboratory data reporting package will enable data validation based on the protocols described above. The final laboratory data report format will include the QA/QC sample analysis deliverables to enable the development of a data usability summary report (DUSR) based on Department DER-10 Appendix 2B.

10. Performance and System Audits

A performance audit is an independent quantitative comparison with data routinely obtained in the field or the laboratory. Performance audits include two separate, independent parts: internal and external audits.

10.1 FIELD PERFORMANCE AND SYSTEM AUDITS

10.1.1 Internal Field Audit Responsibilities

Internal audits of field activities will be initiated at the discretion of the Project Manager and will include the review of sampling and field measurements. The audits will verify that all procedures are being followed. Internal field audits will be conducted periodically during the project. The audits will include examination of the following:

- Field sampling records, screening results, instrument operating records
- Sample collection
- Handling and packaging in compliance with procedures
- Maintenance of QA procedures
- Chain-of-custody reports

10.1.2 External Field Audit Responsibilities

External audits may be conducted by the Project Coordinator at any time during the field operations. These audits may or may not be announced and are at the discretion of the NYSDEC. The external field audits can include (but are not limited to) the following:

- Sampling equipment decontamination procedures
- Sample bottle preparation procedures
- Sampling procedures
- Examination of health and safety plans
- Procedures for verification of field duplicates
- Field screening practices

10.2 LABORATORY PERFORMANCE AND SYSTEM AUDITS

10.2.1 Internal Laboratory Audit Responsibilities

The laboratory system audits are typically conducted by the laboratory QA Officer or designee on an annual basis. The system audit will include an examination of laboratory documentation including sample receiving logs, sample storage, chain-of-custody procedures, sample preparation and analysis and instrument operating records.

At the conclusion of internal system audits, reports will be provided to the laboratory's operating divisions for appropriate comment and remedial/corrective action where necessary. Records of audits and corrective actions will be maintained by the Laboratory QA Officer.

10.2.2 External Laboratory Audit Responsibilities

External audits will be conducted as required, by the NYSDOH or designee. External audits may include any of the following:

- Review of laboratory analytical procedures
- Laboratory on-site visits
- Submission of performance evaluation samples for analysis

Failure of any of the above audit procedures can lead to laboratory de-certification. An audit may consist of but not limited to:

- Sample receipt procedures
- Custody, sample security and log-in procedures
- Review of instrument calibration logs
- Review of QA procedures
- Review of log books
- Review of analytical SOPs
- Personnel interviews

A review of a data package from samples recently analyzed by the laboratory can include (but not be limited to) the following:

- Comparison of resulting data to the SOP or method
- Verification of initial and continuing calibrations within control limits
- Verification of surrogate recoveries and instrument timing results
- Review of extended quantitation reports for comparisons of library spectra to instrument spectra, where applicable
- Assurance that samples are run within holding times

11. Preventive Maintenance

11.1 FIELD INSTRUMENT PREVENTIVE MAINTENANCE

The field equipment preventive maintenance program is designed to ensure the effective completion of the sampling effort and to minimize equipment down time. Program implementation is concentrated in three areas:

- Maintenance responsibilities
- Maintenance schedules
- Inventory of critical spare parts and equipment

The maintenance responsibilities for field equipment will be assigned to the task leaders in charge of specific field operations. Field personnel will be responsible for daily field checks and calibrations and for reporting any problems with the equipment. The maintenance schedule will follow the manufacturer's recommendations. In addition, the field personnel will be responsible for determining that an inventory of spare parts will be maintained with the field equipment. The inventory will primarily contain parts that are subject to frequent failure, have limited useful lifetimes and/or cannot be obtained in a timely manner.

11.2 LABORATORY INSTRUMENT PREVENTIVE MAINTENANCE

Analytical instruments at the laboratory will undergo routine and/or preventive maintenance. The extent of the preventive maintenance will be a function of the complexity of the equipment.

Generally, annual preventive maintenance service will involve cleaning, adjusting, inspecting and testing procedures designed to deduce instrument failure and/or extend useful instrument life. Between visits, routine operator maintenance and cleaning will be performed according to manufacturer's specifications by laboratory personnel.

12. Specific Routine Procedures Used to Assess Data Precision, Accuracy, and Completeness

12.1 FIELD MEASUREMENTS

Field generated information will be reviewed by the Field Coordinator and typically include evaluation of bound logbooks/forms, data entry and calculation checks. Field data will be assessed by the Project Coordinator who will review the field results for compliance with the established QC criteria that are specified in Section 7.0 of this QAPP. The accuracy of pH and specific conductance will be assessed using daily instrument calibration, calibration check, and blank data. Accuracy will be measured by determining the percent recovery (% R) of calibration check standards. Precision of the pH and specific conductance measurements will be assessed on the basis of the reproducibility of duplicate readings of a field sample and will be measured by determining the relative percent difference (RPD). Accuracy and precision of the soil VOC screening will be determined using duplicate readings of calibration checks. Field data completeness will be calculated using the following equation:

$$\text{Completeness} = \frac{\text{Valid (usable) Data Obtained}}{\text{Total Data Planned}} \text{ X } 100$$

12.2 LABORATORY DATA

Surrogate, internal standard and matrix spike recoveries will be used to evaluate data quality. The laboratory quality assurance/quality control program will include the following elements:

- Precision, in terms of relative percent difference (RPD), will be determined by relative sample analysis at a frequency of one duplicate analysis for each batch of ten project samples or a frequency of 10 percent (10%). RPD is defined as the absolute difference of duplicate measurements divided by the mean of these analyses normalized to percentage.

- Accuracy, in terms of percent recovery (recovery of known constituent additions or surrogate recoveries), will be determined by the analysis of spiked and unspiked samples. MS/MSD will be used to determine analytical accuracy. The frequency of MS/MSD analyses will be one project sample MS/MSD per set of 20 project samples.

- One method blank will be prepared and analyzed with each batch of project samples. The total number of method blank sample analyses will be determined by the laboratory analytical batch size.

- Standard Reference Materials (SRMs) will be used for each analysis. Sources of SRM's include the U.S. EPA, commercially available material from CRADA certified vendors and/or laboratory produced solutions. SRMs, when available and appropriate, will be processed and analyzed on a frequency of one per set of samples.

- Completeness is the evaluation of the amount of valid data generated versus the total set of data produced from a particular sampling and analysis event. Valid data is determined by independent confirmation of compliance with method-specific and project-specific data quality

objectives. The calculation of data set completeness will be performed by the following equation.

$$\frac{Number\ of\ Valid\ Sample\ Results}{Total\ Number\ of\ Samples\ Planned}\ X\ 100 = \%\ Complete$$

13. Quality Assurance (QA) Reports

Critically important to the successful implementation of the QA Plan is a reporting system that provides the means by which the program can be reviewed, problems identified, and programmatic changes made to improve the plan.

QA reports to management can include:

- Audit reports, internal and external audits with responses
- Performance evaluation sample results; internal and external sources
- Daily QA/QC exception reports/corrective actions

QA/QC corrective action reports will be prepared by the Haley & Aldrich QA Officer when appropriate and presented to the project and/or laboratory management personnel so that performance criteria can be monitored for all analyses from each analytical department. The updated trend/QA charts prepared by the laboratory QA personnel will be distributed and reviewed by various levels of the laboratory management.

References

1. United States Environmental Protection Agency, (1999). EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations. EPA QA/R-5 Interim Final, November 1999.

2. United States Environmental Protection Agency (1991). Preparation Aids for the Development of Category I Quality Assurance Project Plans. U.S. EPA/600/8-91/003, Risk Reduction Engineering Laboratory, Office of Research and Development, Cincinnati, Ohio, February 1991.

3. United States Environmental Protection Agency, (1993). Data Quality Objectives Process for Superfund Interim Final Guidance. U.S. EPA/540/R-93-071, Office of Solid Waste and Emergency Response (OSWER), September 1993.

4. United States Environmental Protection Agency, (1992). Specifications and Guidance for Contaminant-Free Sample Containers. OSWER Directive 9240.0-05A, April 1992.

5. United States Environmental Protection Agency. U.S. EPA National Functional Guidelines for Organic Data Review. U.S. EPA 540/R-2017-002.

6. United States Environmental Protection Agency. U.S. EPA National Functional Guidelines for Organic Data Review. U.S. EPA 540/R-2017-001.

7. United States Environmental Protection Agency. Test Methods for Evaluating Solid Waste, Office of Solid Waste, U.S. EPA, SW-846, November 1986, with updates.

8. New York State Department of Environmental Conservation, NYSDEC Analytical Services Protocol (ASP), Bureau of Environmental Investigation, 1991 with updates.

9. New York State Department of Environmental Conservation, NYSDEC, Division of Environmental Remediation, Technical Guidance for Site Investigation and Remediation, DER-10, May 2010.

APPENDIX B

Project Resumes

HALEY ALDRICH

SCOTT A. UNDERHILL, P.E.

Senior Environmental Remediation Engineer

EDUCATION

M.S., Environmental Engineering, State University of New York
B.S., Civil Engineering, State University of New York

PROFESSIONAL REGISTRATIONS

1998/ NY: Professional Engineer (Reg. No. 075332)

SPECIAL STUDIES AND COURSES

40-Hour OSHA Hazardous Waste Operations and Emergency Response Training (29 CFR 1910.120)
8-Hour Hazardous Waste Operations and Emergency Response Supervisor Training
Project Management Training
8-Hour Hazardous Waste Operations and Emergency Response Refresher

Scott has 25 years of experience as an environmental engineer. His diverse background includes the investigation, design, installation, and operation of remediation systems for soil, water, and air; design of water and wastewater treatment facilities; energy studies; and numerical modeling of environmental media. Scott has worked for federal, state and industrial clients throughout the United States, most recently working on the remediation of contaminated sites, such as manufactured gas plant (MGP) and chlorinated solvent, in the Northeast and Midwest.

RELEVANT PROJECT EXPERIENCE

New Jersey Natural Gas, Former MGP Remediation, Toms River, New Jersey. Construction project manager for the construction inspection oversight of a former MGP that consists of the removal and off-site disposal of 6,800 cubic yards of impacted soils, dewatering during excavation that produced over 12,000,000 gallons of water to handle, treat and dispose, and in situ solidification (ISS) of 85,000 cubic yards of soil to depths of 45 feet. Engineering oversight services provided during construction included attending weekly meetings, reviewing contractor submittals, issuing field orders and work change directives, reviewing and responding to change order requests, developing change orders, responding to request for information, and documenting remediation activities in a remedial action report.

Duke Energy, Former MGP Remediation, Cincinnati, Ohio. Lead design engineer for a design/build remediation project at a former MGP that consists of the removal and off-site disposal of 75,000 cubic yards of impacted soils, dewatering during excavations, and ISS of over 150,000 cubic yards of soil to depths of 60 feet below ground surface. Engineering services provided during construction included weekly engineering calls, working with contractor to develop engineering solutions to changes in field conditions, reviewing contractor submittals, issuing field orders, developing change orders, and documenting remediation activities in a construction completion report.

AEP, Former MGP Remediation, Three Rivers, Michigan. Lead design engineer for a design/build remediation project at a former manufactured gas plant (MGP) that consists of the installation of a four-cell sheeting system, installation and operation of a dewatering system that removed and discharged 420,000 gallons of water, and removal and off-site disposal of 5,400 cubic yards of impacted soils. Engineering services included developing full set of design drawings and specifications and provided engineering oversight during construction included weekly engineering calls, working to develop engineering solutions to changes in field conditions, and documenting remediation activities in a construction completion report.

American Electric Power, Former MGP Remediation, Dowagiac, Michigan. Lead design engineer for a design/build remediation project at a former manufactured gas plant (MGP) that consists of the removal and off-site disposal of 1,000 tons of impacted soils. Engineering services included developing full set of design drawings and specifications

and provided engineering oversight during construction included weekly engineering calls, working to develop engineering solutions to changes in field conditions, and documenting remediation activities in a construction completion report.

New York State Energy and Gas, Former MGP Remediation, Lockport, New York. Project manager for the remedial design of a former MGP that consists of the removal of 4,000 cubic yards of impacted soils, overburden non-aqueous phase liquid (NAPL) collection trench, 600 linear feet of bedrock grout wall, bedrock NAPL collection wells and the removal of 1,200 cubic yards of impacted sediment from the NYS Barge Canal. Design required submission of work plan, pilot test for grout wall implementation, and New York State Department of Environmental Conservation (NYSDEC) approval of final design drawing, report and specifications. Program director for the engineering oversight services provided during construction which included attending weekly meetings, reviewing contractor submittals, reviewing and approving change orders, responding to request for information, and certifying the construction completion report.

New York State Energy and Gas, Former MGP Remediation, Norwich, New York. Project manager for design and construction management, including design of an ISS system of 52,000 cubic yards of soil and NAPL recovery, in situ chemical oxidation (ISCO) and enhanced in situ bioremediation systems for the off-site groundwater plume. Scott managed preparation of work plans for submission to the NYSDEC and on-site construction management services during remediation of the on-site ISS services. Scott managed the operation and maintenance of the NAPL recovery system from 2009-2016 which resulted in the recovery of almost 100,000 gallons of total fluids or 40,000 gallons of NAPL. Due to the large quantities of NAPL encountered off-site, initiated and obtained NYSDEC approval in 2015 for a modification to the Record of Decision to all for ISS of the off-site soils rather than NAPL recovery and ISCO. Program director for the design package for the ISS treatment of 11,500 cubic yards of soil and NAPL.

New York State Energy and Gas, Former MGP Remediation, Ithaca, New York. Project manager for remedial design of a former MGP plant that consisted of the removal of 11,000 tons of impacted soils within sheet piling down to a depth of 18 feet, temporary relocation of a sewer main, and three injection events for in situ chemical oxidation (ISCO) treatment of coal tar stringers. Design requires submission of work plan, pilot test for ISCO implementation, and NYSDEC approval of final design drawing, report and specifications. Program director for the engineering oversight services provided during construction which included attending weekly meetings, reviewing contractor submittals, reviewing and approving change orders, responding to request for information, and certifying the construction completion report.

New York State Department of Environmental Conservation, New York. Program manager of three standby engineering services contracts issued by the NYSDEC for the investigation, design, construction oversight, and site management of inactive hazardous waste sites within New York. Responsible for overall program management, including budgeting, schedule and quality deliverable to the NYSDEC for over 100 individual work assignments valued at over $35,000,000, which was managed by a team of over 12 project managers. As required, acted as engineer-of-record for many sites, which required approval of feasibility studies, remedial designs, construction completion reports, and periodic review reports.

United States Army Corps of Engineers, Former Scotia Naval Depot, Scotia, New York. Project manager for the design and installation of a 900-foot-long, 45-foot-high and 0.25-foot-thick permeable reactive barrier (PRB) wall containing zero valent iron. The PRB was installed to treat a chlorinated solvent groundwater plume. In addition, four large commercial buildings (80,000 square feet) over a portion of the groundwater plume were fitted with sub-slab depressurization systems to mitigate indoor air concerns. As project manager, Scott was responsible for project deliverables, costs, schedule and quality for the $10MM remediation project.

New York State Department of Environmental Conservation, Scotia New York. Remedial design lead and engineer of record for the development and issuance of two feasibility studies (on-site and off-site) for a large, complex inactive hazardous waste site. An estimated 7,000 gallons of tetrachloroethylene (PCE) released to the environment created a groundwater plume almost ¾ mile in length and impacting numerous residential supply wells. The on-site feasibility

study evaluated remedial technologies selecting excavation and in situ thermal treatment for a present worth cost of $14,000,000. The off-site feasibility study selected ISCO/bioremediation and downgradient permeable reactive barrier wall to treat the plume with concentrations greater than 100 μg/L with a present worth cost of $13,000,000. Also designed an aeration system as an interim remedial measure to treat PCE impacts to local surface water detention pond and stream.

New York State Department of Environmental Conservation, Scotia New York. Project manager for the design and construction oversight of the installation of water line to a residential neighborhood affected by a PCE plume. The design consisted of engineering calculations, basis of design, drawings, and specifications for the installation of 8,800 linear feet of water main and 100 residential connections. Construction services included reviewing contractor submittals and invoices, overseeing contractor work, responding to request for information and attending weekly construction meetings.

New York State Energy and Gas, Former MGP Remediation, Homer, New York. Project manager for design and construction management, including design of a permanent watertight barrier wall system, in situ stabilization system within the utility corridor and a temporary water treatment plant as part of the remediation of 25,000 cubic yards of soil. Scott managed preparation of work plans for submission to the NYSDEC and on-site construction management services during remediation. Scott managed air monitoring, scheduling of trucks for off-site disposal of impacted soil, and preparation of daily reports and a final closure report.

New York State Energy and Gas, Former MGP Remediation, Mechanicville, New York. Project manager for design and construction management, including the design of a temporary watertight barrier wall system and temporary water treatment system as part of a remediation of 10,000 cubic yards of soil. The project also included the evaluation and development of alternatives for the recovery of coal tar contamination in the fractured bedrock underlying the site, which included performing multiple long-term NAPL recovery pump tests. Project manager for the engineering oversight services provided during construction which included attending weekly meetings, reviewing contractor submittals, reviewing and approving change orders, responding to request for information, and certifying the construction completion report.

New York State Department of Environmental Conservation, Poughkeepsie, New York. Engineer of record for the design and construction oversight of the thermal treatment of soil and groundwater at an inactive hazardous waste site impacted with chlorinated solvents. The design consisted of engineering calculations, basis of design, drawings, and specifications for the installation 100 electrodes to treat the 0.5-acre plume. Construction services included reviewing contractor submittals and invoices, overseeing contractor work, responding to request for information and attending regular construction meetings.

New York State Department of Environmental Conservation, Poughkeepsie, New York. Project engineer for the design and implementation of a full-scale pilot test of in situ enhanced bioremediation to treatment of soil and groundwater at an inactive hazardous waste site impacted with chlorinated solvents. The pilot study consisted of direct injection of approximately 4,150 gallons of 60% edible vegetable oil (EVO) and 7,825 pounds zero-valent iron (ZVI) at 75 points. Scott managed development of design and bid package, selected and oversaw injection contractor, and reviewed follow-on sampling reports.

United States Army Corps of Engineers, Griffiss Air Force Base, Rome, New York. Project engineer for land farming treatment of over 50,000 cubic yards of petroleum impacted soils. Activities included design of a land farming approach in a performance based contract to successfully remediate the soils within a three-year contract period. Due to an aggressive remediation approach, all soils were remediated within two years.

New York State Electric and Gas, Cortland Homer Manufactured Gas Plant Demolition Procurement, Homer, New York. Project manager for procuring a contractor to demolish the southern portion of the MGP building as defined by the demolition drawings. Work included developing a request for proposal with final demolition drawings, specifications, and bid schedule and overseeing successful completion of the building demolition.

New York State Energy and Gas, Former MGP Remediation, Oneonta, New York. Project engineer for the design of temporary water treatment system as part of the remediation of a former MGP site.

US Air National Guard, Site Management and Project Close-Out for Site 2 – Pesticide Burial Pit, Stewart ANGB, Newburg, New York. Project manager for preparation of a site management plan (SMP) and periodic review report (PRR) for Site 2 - Pesticide Burial Pit Area at the 105th Airlift Wing (AW), New York Air National Guard (ANG), and Stewart International Airport. Due to negotiations with the NYSDEC, Site 2 was delisted.

US Air National Guard, Remedial Design and Remedial Action, Site 15, Hancock ANGB, New York. Project engineer for the bioremediation of a petroleum groundwater plume. The project included the design, installation and operation of a 15 well biosparing system for the on-site source area and the injection of calcium peroxide for the downgradient plume. Responsible for the remedial action work plan, construction completion report and annual periodic review reports.

US Air National Guard, Interim Remedial Action and Focused Feasibility Study, Sites 3 and 6, Stratton ANGB, New York. Project manager for an interim remedial measure and focused feasibility study at Site 3 contaminated with chlorinated solvents, and Site 6 contaminated with petroleum hydrocarbons. At Site 6, managed removal of 6,200 tons of contaminated soil, installation of a horizontal well network below the water table, and injection of a substrate into the groundwater to enhance biodegradation of the contaminants. At Site 3, managing removal of 600 tons of contaminated soils from four hot spots, delineation of the nature and extent of groundwater contamination by installing and sampling new wells.

BP, Pilot-Scale Soil Thermal Treatment, Rumaila, Iraq. Primary author of a pilot scale work plan for the treatment of heavily-impacted soils at the Rumaila Well Field. Work plan included the evaluation of several thermal desorption units capable of being shipped to the location, transportation logistics, compound design for placement of the unit and utility requirements to operate the TDU.

Confidential Client, Lagoon Biocell Design, Maybrook, New York. Project engineer for the design of a membrane lined biocell for the treatment of 25,000 cubic yards of soils impacted with petroleum and pyridine compounds associated with former waste lagoons. Design also included the use of enhanced bioremediation for the contaminants of concern in groundwater. Scott managed development of a design in accordance with the remedial design and remedial action framework developed by the United States Environmental Protection Agency (USEPA).

Chevron, Malabalay Remediation Project, Philippines. Project engineer for remedial design sub-slab depressurization system and vapor barrier for the redevelopment of a gasoline station for a Jolibee Store in Malabalay. Project was completed within budget and on-time given challenging field conditions.

Confidential Client, Solid Waste Disposal Area, Kisladag, Turkey. Project engineer responsible for the development of a feasibility study to evaluate 1,250 cubic meters of petroleum impacted soil as a waste storage area at an active mining facility in Turkey. Remedial alternatives evaluated included land farming, windrow composting, bioremediation in piles, in situ solidification, and capping.

Chevron, Remedial Design and construction Oversight, Service Station/Residential House, Manila, Philippines. Project engineer for the design and implementation of a sub-slab barrier system and vapor collection system at a residential home downgradient from a gas station. Travelled to site to oversee installation and quality control of the first sub-slab barrier system to be installed in the Philippines. Project was recognized by Chevron for being completed with zero accidents.

BEM Systems, Remedial Design and Remedial Action, Site 6, Schenectady ANGB, New York. Project manager for the design and implementation of the in situ chemical oxidation of chlorinated hydrocarbon impacted groundwater at Site 6. Project included supporting the development and issuance of the Record of Decision (ROD), submission and approval of the remedial design and implementation of the injection of sodium permanganate to treat the residual groundwater plume at Site 6.

Navy, Light Non-Aqueous Phase Liquid (LNAPL) Modeling Effort, Pearl Harbor, HI. Provided technical support for investigation and modeling of several large LNAPL plumes at the Shipyard GSA at Pearl Harbor. The modeling effort included applying the van Genuchten method to properly estimating the LNAPL plume size, volume, distribution, transport, and potential release to the harbor.

New York State Department of Environmental Conservation, Remediation System Installation, National Heatset Printing, East Farmingdale, New York. Project engineer supporting the installation and evaluation of a pilot study evaluating the use of an innovative technology - density driven convection (DDC) and in-well stripping – for the treatment of a large chlorinated solvent plume in a sandy aquifer on Long Island.

NYSDEC, Remedial Design and Construction Oversight, North East Alloy and Metals Site, Utica, New York. Project engineer for the design of a sub-slab depressurization system (SSDS) at a residential house above a chlorinated solvent plume. The design utilized two fans and six vacuum points installed over a concrete slab. Oversaw contractor's installation of the system including sealing of the concrete floor cracks and documented installed system met the performance requirements of the design.

Confidential Client, Remediation System Pilot Study and Evaluation, Schenectady, New York. Project engineer responsible for technical evaluation and comparison of a traditional and an innovative thermal enhanced soil vapor extraction system below a concrete slab. The innovative thermal enhanced soil vapor extraction (TESVE) system removed over 99.99% of the volatile compounds and over 96% of the semi volatile compounds in the unsaturated zone and outperformed the traditional TESVE system.

NYSDEC, Remedial Design and Construction Oversight, Utility Manufacturing Site, New Hampstead, New York. Project engineer for the design of nine SSDSs at three industrial buildings above a chlorinated solvent plume. The design utilized 30 fans and 30 vacuum points installed over a concrete slab. Oversaw contractor's installation of the system and documented that the installed system met the performance requirements of the design.

NYSDEC, Remediation System Optimization, Multiple Sites, New York. Provided technical support for the optimization and improvements of a number of remediation systems currently operated under the NYSDEC contract (D004445). System evaluations and improvements included the Becker Electronic pump-and treat system; NOW Corporation pump-and-treat system; SMS Industries biosparge (PhoSTER) system; Kingsbury Landfill pump and treat system, Fort Edward phytoremediation system; and Korkay soil vapor extraction/air sparging system.

NYSDEC, Site Management, Multiple Sites, New York. Provided technical support, final review and engineering certification for periodic reviews on the following sites: Armonk; Becker Electronics; Dzus Fasteners; Fort Edward Landfill; Kingsbury Landfill; Korkay; Liberty Industries; Now Corporation; Old Agway; ServeAll; and SMS Industries.

NYSDEC, Remedial Design, BB&S Treated Lumber Site, Southampton, New York. Project engineer reviewing preliminary design concepts of the groundwater remedy selected in the ROD for this former wood pressure treating site. The site was contaminated primarily with chromium, which was associated with the former wood preservative chromated copper arsenate (CCA). Using results from the pre-design investigations, prepared a Supplemental Feasibility Study (FS) that formed the basis for NYSDEC to amend the ROD for the site. The Amended ROD revised the groundwater remedy for the site from groundwater pump and treat to providing an alternative water-supply to authorized homes and businesses, and ongoing monitoring of plume attenuation.

New York State Department of Environmental Conservation, Construction Oversight, Freeman's Bridge Site, Scotia, New York. Quality assurance/quality control (QA/QC) manager for the certification report of completion for the remediation of contaminated soils using low-temperature thermal desorption at the 34 Freeman's Bridge Road site.

New York State Office of General Services (NYSOGS), Remediation System Optimization, Multiple Sites, New York. Provided technical support for optimization and improvements of a number of remediation systems operated under the NYSOGS contract. System evaluations and improvements included the Bedford Hills pump-and-treat system and the Highland Residential pump-and-treat system.

Bank of New York, Brownfield Remediation Monthly Site Visits, Flushing, New York. Project manager for periodic site visits to review progress of work performed by Creamer Environmental, Inc., the remedial contractor working on behalf of Muss Development. Scott managed the review of the remedial progress in relation to the proposed schedule, budget, and New York State Department of Environmental Conservation approved work plans. Scott managed preparation of a site observation report with information pertaining to construction status; permits, tests, and certifications; subcontracts; change orders; and contractor's completion schedule.

Remediation System Design, Fort Drum Military Reservation, New York. Scott designed a 150-well multiphase extraction and air sparging system for remediation of a 200,000-gallon gasoline-contaminated area and oversaw installation, start-up, and operation of the complex remedial systems.

Solvent Site Remediation, Batavia, New York. Scott designed and implemented injection of whey powder solution for the bioremediation of a chlorinated solvent site.

Railyard, Oneonta, New York. Scott designed, installed, and operated two 8-well soil vapor extraction and air sparging system at an industrial facility.

Railyard Site, North Creek, New York. Scott implemented an innovative application of Fenton's reagent to remediate diesel-contaminated soil at a historic railyard. Was awarded an Engineering Excellence Award by the American Consulting Engineering Council.

Toluene Site, Pittsburgh, Pennsylvania. Scott optimized a 20-well soil vapor extraction and air sparge system at an industrial facility in an urban area.

Town of Windham, Wastewater Treatment Plant, Windham, New York. Scott designed a new 250,000-gpd wastewater treatment plant that used tertiary filtration, microfiltration, and ultraviolet disinfection.

Ski Windham, Wastewater Treatment Plant, Windham, New York. Scott designed tertiary filtration, microfiltration, and ultraviolet disinfection for a treatment plant upgrade.

Wastewater Treatment Plant Upgrade, Endicott, New York. Scott designed solids contact tanks, secondary clarifiers, ultraviolet disinfection system, and pumping station as part of the upgrade of the 10-mgd wastewater treatment plant.

New York State, Gas-to-Energy Studies, New York. Scott evaluated the potential of using landfill gas from Colonie Landfill at Mohawk Paper mills boilers.

New York State, Sludge-to-Energy Study, Glens Falls, New York. Scott evaluated the potential of using dried paper sludge from a paper manufacturer as feed material and energy source at a cement kiln.

Groundwater and Soil Vapor Treatment, Pease AFB, NH, and Loring AFB, Maine. Scott designed, installed, and operated in-situ treatment systems at the former bases, including two groundwater pump-and-treat systems, four soil vapor extraction and air sparging systems, and 16 bioventing systems.

Hydrocarbon Cleanup, Pease AFB, New Hampshire. Scott evaluated and implemented the use of natural attenuation to remediate more than 60 petroleum hydrocarbon plumes.

Remedial Action, Loring AFB, Maine. Field engineer responsible for eight remedial actions including oversight of three subcontractors.

Oak Ridge National Laboratory, RI Report, Oak Ridge, Tennessee. Scott prepared remedial investigation report for a radioactive waste burial.

Radioactive Waste Disposal Sitting Study, Nebraska. Scott provided hydrologic modeling support for the safety analysis and license application permit for siting a low-level radioactive waste disposal site.

PUBLICATIONS

"Subsurface Solution," with C.H. Floess, T. Blazicek, M. Thorpe, S. McDonough and R. Doshi, *American Society of Civil Engineering Magazine*, pp. 76-81,86. September 2012.

"In Situ Chemical Oxidation of Saturated and Unsaturated Petroleum-Containing Soils at a Historic Railroad Site," with A.R. Vitolins, B.R. Nelson, L.M. Thomas, *Contaminated Soil Sediment and Water, International Issue*, pp. 38-40, 2001.

"Development and Application of a Geographically-Based Groundwater Flow and Solute Transport Model," Master's Thesis, State University of New York at Buffalo, 1993.

INVITED LECTURER OR SPEAKER

"Developing a Water Supply System in Rural Haiti," Albany, New York Celebration of Engineer's Week. February 16, 2012.

"Remediation of a Former MGP Site in Norwich, New York: A Case Study," with C. Floess and T. Blazicek, 27th Annual Conference on Contaminated Soils, Amherst, Massachusetts, October 17-20, 2011.

"Developing a Water Supply System in Rural Zimbabwe,". Albany, 7 June 2016, New York Celebration of Engineer's Week. February 15, 2008.

"Remediation of Petroleum-Containing Soil and Groundwater at a Former Rail Yard Locomotive Fueling Area," with S. Compston, B.R. Nelson, L.M. Thomas, 20th Annual Conference on Contaminated Soils, Amherst, Massachusetts, October 18-21, 2004.

"Optimization of an LNAPL Recovery System Based on the Observational Approach," with S. Taylor and A. Ditto, ASCE International Water Resources Engineering Conference in Seattle, Washington, August 8-11, 1999.

"Natural Attenuation of 60 Petroleum Groundwater Plumes at Pease Air Force Base, New Hampshire, USA," with S. Szojka and J. Flagg, 6th FZK/TNO International Conference on Contaminated Soils, Edinburgh, Scotland. May 17-21, 1998.

"Bioremediation of Petroleum Contaminated Soils at Loring Air Force Base, Maine," with P. Forbes and J.A. Mueller, Fourth International Conference on Bioremediation, New Orleans, Louisiana, April 28-May 2, 1997.

"Expedited CERCLA Removal Actions at Loring AFB," with T.R. Wood, D. St. Peter, D.S. Hopkins and J.A. Mueller, Maine. 11th Annual Conference on Contaminated Soils, Amherst, Massachusetts, October 21-24, 1996.

"Innovative Investigative Technique for Characterization of Radioactive Disposal Trenches," with J.B. Cange and S.A. Blair, Superfund XVI Conference, Washington D.C., November 6-8, 1995.

"Development of a Geographically Based Groundwater Flow and Solute Transport Model," with S.W. Taylor and J.V. DePinto, ASCE International Groundwater Symposium, San Antonio, Texas, August 14-18, 1995.

"Modeling Surface Water Flow and Contaminant Flux from a Mixed Waste Burial Ground," with R.A. Lambert and J.B. Cange, 21st Environmental Symposium. San Diego, California, April 18-21, 1995.

"Who's Taking Out the Garbage?", ASCE Environmental Engineering Division Conference. Reno, Nevada, July 6-10, 1991.

JAMES BELLEW

Senior Client Leader

EDUCATION

M.S., Environmental Geology, Queens College
B.S., Geology, Pre-Law, Environmental Science, Binghamton University

PROFESSIONAL SOCIETIES

American Council of Engineering Companies, Member, 2017
Urban Land Institute, Member, 2016
Business Council of New York, Member, 2018

SPECIAL STUDIES AND COURSES

40-Hour OSHA Hazardous Waste Operations and Emergency Response Training (29 CFR 1910.120)
30-Hour OSHA Construction Safety and Heath
8-hour OSHA Site Supervisor Certification
OSHA Confined Space Entry Training Certification
Erosion and Sediment Control, New York, No. 006925
USDOT/IATA Training on the Shipping and/or Transportation of Hazardous Materials

James Bellew is a senior client leader and geologist with experience in bedrock, soil and groundwater investigation and an emphasis on remedial design and implementation and will focus his time at Haley & Aldrich serving the Buildings and Infrastructure markets. His experience also includes completion of numerous Phase I Environmental Site Assessments and Phase II Environmental Site Investigations, development of conceptual site models, site characterization, environmental permitting, environmental compliance reports as well as remedial design and implementation. He has been involved with numerous projects within the New York State Superfund Program, New York State Brownfield Clean-up Program and New York City Office of Environmental Remediation E-Designation Program.

James has designed, estimated and managed large-scale remediation jobs in a variety of settings in the New York/New Jersey metropolitan area. He has performed construction management services on large scale projects requiring abatement of asbestos-containing materials and polychlorinated biphenyls (PCBs). He has direct experience developing and implementing operation, maintenance and monitoring programs for groundwater and soil remediation systems.

James has also worked on large scale remediation projects for Manufactured Gas Product (MGP) in the lower New York Region from former operations associated with National Grid and Con Edison. He has also designed, installed, operated and maintained remedial systems at retail petroleum stations for Hess Amerada, British Petroleum, Sunoco and Shell in addition to providing operation and maintenance programs for chemical injection and petroleum systems for New York State Department of Environmental Conservation (NYSDEC) Superfund and Environmental Protection Agency (EPA) Superfund Sites.

RELEVANT PROJECT EXPERIENCE

Development, Former BP Station, Elmhurst Queens, NY. James was responsible for the preparation of a full environmental impact statement with respect to a mixed-use development proposed in Elmhurst Queens. The work includes a full impact assessment of the proposed construction with respect to the neighborhood, evaluation of green/open spaces for the community and environmental site investigation and remediation services.

New York State Superfund Site, Former Nuhart Plastics Site, New York State Superfund Site, Brooklyn, NY. Senior Project Manager for a feasibility study and remedial planning for a former plasticizer facility with on- and off-site pollutant concerns. Project was a high-profile New York State Superfund Site that required compliance with the

NYSDEC, the New York City Office of Environmental Remediation (NYCOER), and local regulatory agencies. Ongoing work was the operation and maintenance (O&M) activities related to two large groundwater plumes impacted by light non-aqueous liquids (LNAPL) with phthalates and trichloroethene (TCE), which extend downgradient of the Site. Completed the first remedial action design for Lot 57 with is enrolled in the NYCOER E-Designation program. The Site will include two additional developments within the former manufacturing building footprint.

New York State Brownfield Site, Former Delta Metals Site, Brooklyn, NY. Senior Project manager for the remedial investigation and remedial action design for the former Delta Metal Products Company. Project is under the New York State Brownfield Cleanup program as a Participant where TCE and tetrachloroethene (PCE) were encountered in soil and groundwater. James successfully delineated the vertical and lateral extents of the plumes which were identified as an upgradient, on-site and downgradient plume. Investigation results triggered the NYSDEC to utilize its call-out contract to perform a plume trackdown for the immediate area and identify additional Potentially Responsible Parties. The design for an Air Sparge Soil Vapor Extraction system has been accepted and the project is currently in construction.

Manufacturing-Industrial, Hess Amerada, Bogota and Edgewater, NJ. James provided construction management services for the demolition of two waterfront terminals, one each on the Hackensack and Hudson rivers. Demolition included oversight, planning and coordination of activities related to asbestos abatement, demolition of buildings, thirty holding tanks, piping structures, containment structures and storm water structures.

Manufacturing-Industrial, PQ Corporation, Northeastern United States. James designed and implemented a three phased program for handling PCBs containing materials on approximately 100 tank structures at large, active industrial sites, which included coating removal, encapsulation, demolition, and Toxic Substances Control Act (TSCA) remediation. He was responsible for development of the overall program, specifications, drawings, bid packages, construction oversight and project administration until closure. Program also included design and oversight of a new façade and roof upgrades completed concurrently to client operations.

Development, New York State Brownfield Site, Former Cascade Laundry, Brooklyn, NY. James was responsible for environmental and construction management services required to successfully navigate seven-building redevelopment project through the NYSDEC Brownfield Cleanup Program (BCP). Project included site investigation, design, and remediation for development of seven buildings within a 2-acre site in Brooklyn, New York. Remediation included excavation of approximately 40,000 cubic yards of soil, groundwater extraction and treatment, underground storage tank (UST) removal, design and installation of a Sub Slab Depressurization System (SSDS) and ex situ chemical oxidation of groundwater impacted by petroleum.

Development, New York City Brownfield Site - 520-534 West 29th Street, New York, NY. James was responsible for environmental site investigation and remediation activities required to successfully navigate the project through the New York City Office of Environmental Remediation's (NYCOER's) E-Designation and Voluntary Cleanup Programs. Project included demolition of for existing buildings and development of two separate mixed-use buildings.

Development, New York State Brownfield Site, BJ's Wholesale, Brooklyn, NY. James managed construction oversight activities at an 8-acre peninsula in Gravesend Bay being redeveloped by BJ's Wholesale Club (BJ's) into a "big-box" warehouse and parking garage, and a publicly accessible, waterfront open space. Implemented a comprehensive community air monitoring plan (CAMP), managed the design and installation of a passive sub slab depressurization system, and oversaw handling and off-site disposal of impacted material generated by BJ's (the Lessee for the subject site) during their foundation construction activities.

Development, New York State Brownfield Site, Coney Island, Brooklyn, NY. James provided environmental services during the rehabilitation and expansion of a 1970s-era mixed-use complex, which covers an area equivalent to three city block. He facilitated the BCP applications for two adjacent parcels within the complex impacted by historic dry-cleaning uses. Site investigations performed had documented the presence of PCE in soil gas and was delineated over three separate structural slabs in commercial and residential space utilizing a mobile laboratory. He designed and installed two sub-slab depressurization systems and prepared Remedial Investigation Work Plan which outlined work

required to delineate the vertical and horizontal extent of the impacted soils, soil vapor and groundwater at both BCP sites. The system was designed with below slab suction pits, remote sensing vacuum monitoring points, and a variable frequency drive blower tied into the monitoring points for optimization and power savings.

Development, New York City Brownfield Site, Hospitals, Memorial Sloan Kettering Cancer Center (MSKCC), New York, NY. Project Manager for environmental remediation for this MSKCC development project. James was directly responsible for subsurface investigation and remediation activities, large MGP gas holder removal (from former Con Edison Operations), UST removal, daily status updates to the NYCOER, implementation of the CAMP and the management, handling, characterization, and off-site disposal of MGP impacted soil and dewatering fluids.

New York State Spill Remediation, Metropolitan Transportation Agency Bridges and Tunnels, New York, NY. James managed investigation for underground storage tank removal, excavation of 600 cubic yards of petroleum impacted soil, design and installation of a groundwater extraction and treatment system and post remediation samples. Implemented the In Situ Chemical Oxidation program for the injection of 54,000 gallons of 8 percent solution Fenton's Reagent and the O&M of the petroleum spill with respect to the Fenton's performance and the plume migration.

Various Public Schools, New York City School Construction Authority, New York, NY. James oversaw environmental remediation proposed for several school development sites, including PS 312, P.S. 281 and PS 27K. Assisted in the design and implementation of the remediation programs for the sites for petroleum spills, PCB TSCA contamination and hazardous lead hot spots.

Development, i.Park Edgewater, Edgewater, NJ. James designed and oversaw the environmental remediation on-site. Implemented the construction plan for remediation of arsenic, pitch- and PCB-impacted soil for excavation and off-site disposal of 20,000 tons. He managed the air monitoring system on-site which consisted of four permanent stations set upwind and downwind on-site for volatile organic compound (VOC) and particulate migration off-site. Also, James performed redesigns throughout the project to keep within the current schedule and budget.

Development, New York State Brownfield, Queens West, Long Island City, NY. Assistant Project Manager for oversight of the Environmental Remediation on-site. James implemented the construction plan for remediation of 20,000 cubic yards of LNAPL on the Site; he assisted in design and oversight of the In Situ Chemical Oxidation mixing on-site. The project was eventually developed into three large towers and a new school.

Manufactured Gas Plant, National Grid, Rockaway, NY. James aided in the design and implementation of the soil characterization plan for MGP impacted sands. After delineation of the contamination plume, helped draft work plans and site layout of the negative pressure tent. He performed and trained the on-site staff on the use of personal air monitoring equipment and provided assistance with design considerations on the installation of a waterloo barrier to be advanced to minus 80 feet below grade surface. James also helped with the design and permitting for the groundwater treatment system installed on-site.

Manufactured Gas Plant, Con Edison, New York, NY. Environmental engineer for responsible party for all environmental issues associated with this job, including transportation and disposal of 8,000 tons of MGP contaminated soil from former Con Edison operations. James scheduled weekly work for all civil and environmental tasks on the job. He was responsible for the design and installation of the dewatering treatment system with a daily discharge of 25,000 gallons per day of MGP-impacted water.

New York State Superfund Project, NYSDEC, Hicksville, NY. James performed O&M and reporting on the Site's Potassium Permanganate Injection system, which was on a timed system; maintained the system, troubleshooting problems and ensuring that the proper ratios were being injected. He performed the fieldwork for analysis and drafted interim reports for the project manager.

Retail Petroleum, New York State Spills Program, Hess Amerada, Various Locations, NY. James designed installed and maintained groundwater and soil vapor remedial systems at over 30 retail petroleum stations for Hess. Responsible for ensuring that the remedial systems were operating properly and performing repairs as necessary

during operation. He performed groundwater and soil vapor monitoring and drafted O&M reports for the NYSDEC. Plume size ranged from within the retail station property with monitoring off-site impacts in local neighborhoods greater than a 3-mile radius.

Retail Petroleum, New York State Spills Program, British Petroleum, Various Locations, NY. James designed installed and maintained groundwater and soil vapor remedial systems at over 10 retail petroleum stations for BP. He was responsible for ensuring that the remedial systems were operating properly and performing repairs necessary during operation. He performed groundwater and soil vapor monitoring and drafted O&M reports for the NYSDEC. Plume size ranged from within the retail station property with monitoring off-site impacts in local neighborhoods greater than a 2-mile radius.

Development, 524 West 19th Street, New York, NY (Metal Shutter Homes). Responsible party for all environmental and civil issues associated with this job, including transportation and disposal of 5,000 tons of MGP contaminated soil from former Con Edison operations. James scheduled weekly work for all civil and environmental tasks on the job. He successfully redesigned the grout cutoff wall connections to the installed steel sheeting with a secant wall installed off-site. He provided technical guidance for drilling 4-foot diameter exploratory casings for subsurface anomalies. Additionally, James was responsible for the design and installation of the dewatering treatment system with a daily discharge of 25,000 gallons per day of MGP impacted water.

EPA Superfund Site, Newtown Creek Superfund, Brooklyn, NY. James aided in the design of the pump and treat system installed at Peerless Importers. He also aided in the design and installation of the harbor boom set up. Operated and Maintained groundwater/LNAPL extraction systems on-site and performed monthly site gauging as part of the O&M plan.

MARI C. CONLIN

Project Manager

EDUCATION

M.S., Geology, Boston College
B.S., Geology with a minor in Economics and Business, Lafayette College

PROFESSIONAL REGISTRATIONS

NY: Professional Geologist (License No. 000769)

PROFESSIONAL SOCIETIES

Big Apple Brownfield Awards, Co-Chair, 2018-2019
Big Apple Brownfield Awards Nomination Committee, 2016-2017

SPECIAL STUDIES AND COURSES

40-Hour OSHA Hazardous Waste Operations and Emergency Response Training (29 CFR 1910.120)
10-Hour OSHA Construction Safety
8-Hour OSHA Supervisor of Hazardous Waste (29 CFR 1910.120 & 29 CFR 1926.65)

Mari is a project manager with experience in soil, groundwater and soil vapor investigation and a focus on remedial design and implementation, and will focus her time at Haley & Aldrich serving the environmental and real estate markets. She is also experienced in completion of numerous Phase I Environmental Site Assessments and Phase II Environmental Site Investigations, site characterization, hazardous materials analysis, regulatory closure reports as well as remedial design and implementation.

Mari has experience in composing site closure documentation including Remedial Closure Reports and Noise Installation Reports reviewed by the Office of Environmental Remediation as well as Final Engineering Reports reviewed by the New York State Department of Environmental Conservation. Her background includes developing and complying with approved site management plans overseeing the operation and maintenance of on-site engineering controls and ensuring the protection of human health and the environment.

Mari has also worked on city rezoning proposals by performing work associated with and composing the Hazardous Materials Analysis chapter included in Final Environmental Impact Statements published by New York City Department of Planning. Analysis methods were performed in accordance with the City Environmental Quality Review (CEQR) guidelines for neighborhoods including East New York, Brooklyn, Jerome Avenue, Brooklyn, Inwood, and Manhattan.

RELEVANT PROJECT EXPERIENCE

State and City Agencies

School Construction Authority, Waste Characterization and Excavation Materials Disposal Plan, Brooklyn, New York. Project manager for consulting services for New York Public School 127. Services included composition of an Excavated Materials Disposal Plan, collection of waste characterization samples and preparation of and preparation of a findings and recommendations report.

Department of City Planning, Rezoning Environmental Impact Statement, Bronx, New York. Project lead for analysis and composing the Hazardous Materials Chapter as per City Environmental Quality Review (CEQR) Technical Manual guidelines included in the Final Environmental Impact Statement (FEIS) for an approximately 92-block area primarily along Jerome Avenue and its east-west commercial corridors in the Bronx. The review assessed the potential for the presence of hazardous materials in soil and/or groundwater at both the projected and potential development sites identified in the reasonable worst-case development scenario under the proposed East New York Rezoning Proposal. Procedures involved site inspections and review of historic Sanborn fire insurance maps, city directories and city/state regulatory databases. The assessment identified that each of the 146 projected and potential development sites has

some associated concern regarding environmental conditions. As a result, the proposed zoning map actions include (E) designations (E-366) for all privately-held projected and potential development sites.

Department of City Planning, Rezoning Environmental Impact Statement, Brooklyn, New York. Project lead for performance analysis and composing the Hazardous Materials Chapter as per CEQR Technical Manual guidelines included in the FEIS for an approximately 190-block area of East New York, Cypress Hills, and Ocean Hill neighborhoods of Brooklyn, New York. The review assessed the potential for the presence of hazardous materials in soil and/or groundwater at both the projected and potential development sites identified in the reasonable worst-case development scenario under the proposed East New York Rezoning Proposal. Procedures involved site inspections and review of historic Sanborn fire insurance maps, city directories and city/state regulatory databases. The assessment identified that each of the 186 projected and potential development sites has some associated concern regarding environmental conditions. As a result, the proposed zoning map actions include (E) designations (E-366) for all privately-held projected and potential development sites.

Redevelopment and Remediation

Titan Equity Group, Hotel Redevelopment, Bronx, New York. Project manager for a hotel redevelopment in the south Bronx. The site has been assigned New York City Office of Environmental Remediation (NYC OER) E-Designation status for hazardous materials, noise and air quality. Services included completion of a remedial investigation, composition of a Remedial Investigation Report and development of Hazardous Material Remedial Action Work Plan and Air Quality/Noise Remedial Action Plan as per NYC OER requirements.

The Related Companies, Chelsea Mixed-Use Redevelopment, New York, New York. Field geologist for oversight of the remediation of a mixed-use residential and commercial building, the second of a two-building development on 30th Street. Contaminants of concern included volatile and semi-volatile organic compounds associated with historic operations and underground storage tanks (USTs) located on the Site. The Site was given an E-designation (E-142) for hazardous materials and noise as part of the Highline/West Chelsea rezoning proposal. To satisfy the requirements of the E-designation program, soil was excavated to at least 12 feet below grade and bottom endpoint collected showing no contaminants of concern exceeding the New York State Department of Environmental Conservation (NYSDEC) Unrestricted Use Soil Cleanup Objectives (SCO). By achieving Unrestricted Use SCOs, no engineering controls were necessary, although the building slab was included as part of development, and removal of the hazardous materials E-designation was requested.

Tishman Speyer, Long Island City Residential Development, Long Island City, New York. Field geologist for remedial oversight and implementation of a Community Air Monitoring Program during concurrent remediation and development of three Brownfield Cleanup Program (BCP) sites located in Long Island City, New York. The Sites were grossly contaminated with creosote, a carcinogenic chemical formed from the distillation of various tars. Remediation strategies included soil excavation and in-situ soil stabilization. To prevent migration of groundwater off-site, a temporary and later a permanent capture well system was installed on the western boundary of the property. The BCP site located on the western portion of the property left residual contamination in place requiring installation of a sub-slab depressurization system.

Queens West Development Corporation, Queens Waterfront Development, Long Island City, New York. Field geologist for performance of site management post remedial action. Services included annual groundwater monitoring, evaluation of engineering and institutional controls completion and Period Review Reports. In addition to conducting annual site management activities, responsibilities included composing a work plan to evaluate the transition from active sub-slab depressurization systems to passive. Upon NYSDEC approval, active systems were shut down for 30 days prior to a sub-slab vapor sampling event evaluation soil vapor, indoor and outdoor air conditions for potential vapor intrusion risk. As results indicated no evidence of vapor intrusion, continued pressure monitoring was conducted for from the existing monitoring ports for one year assessing whether negative pressure was held by the existing slab by stack-effect or other passive processes.

Jim Beam Brands Co., Brownfield Cleanup Program Remediation Site, Long Island City, New York. Field geologist for oversight of the installation of an Electrical Resistive Heating (ERH) system implemented in order to remediate trichloroethylene groundwater plumes in shallow/intermediate and deep groundwater on- and off-site. The Site, a former stapler manufacturing facility, underwent various remedies, including a Soil Vapor Extraction system, air sparging, ozone injection and chemical oxidation using potassium permanganate injections, which resulted in little reduction to contamination levels and rebounding chlorinated solvents. Components of the ERH system installed included electrodes for delivery of steam, vapor recovery wells, and groundwater monitoring wells. The site is currently under remediation in the state BCP program.

Due Diligence and Site Characterization

Manufacturing Plants, Multiple Investors, Environmental and Compliance Assessment Portfolio United States. Project lead for completion of Phase I Environmental Site Assessments (ESAs) and Limited Compliance Reviews for multiple auto parts manufacturing facilities throughout the United States. Services included completion of Phase I ESAs in accordance with the American Society for Testing and Materials E1527-13 requirements and a limited review of each facility's compliance liabilities including issues pertaining to the Resource Conservation and Recovery Act, Greenhouse Gas Emission Standards and Tier II Emergency and Hazardous Chemical Inventory reporting requirements.

ARM Parking, Environmental Site Assessment and Subsurface Investigation, Brooklyn, New York. Project manager for site assessment and subsurface investigation of parking facility in Sunset Park neighborhood, Brooklyn, New York. Services included ground penetrating radar survey for former and current petroleum USTs, completion of a subsurface investigation of soils and composition of Limited Subsurface Investigation Report.

Spill Consulting

The Trump Organization, Spill Consulting Services, New York, New York. Project manager for consulting services provided after incidental release of calcium carbonate ice rink paint to the Central Park Pond from Wollman Rink. Services included liaising with NYSDEC regarding violations, consent order and required corrective action. Corrective action included designing alterations to the existing on-site drainage plans and routing all meltwater containing paint into the combined sewer system. Coordination was required with property owner, operations personnel, New York City Department of Parks and NYSDEC.

Richmond Gardens Apartments, Spill Management and Closure Services, Staten Island, New York. Project lead responsible for spill closure activities and reporting for Spill 1105661 located at the Richmond Gardens Apartment Complex in the Richmond neighborhood of Staten Island, New York. The spill was opened in 2011 when several underground storage tanks were identified adjacent to the apartments at Jersey Street and Hendricks Avenue. The tanks were cleaned and removed and impacted soils surrounding the tank area excavated to the extent possible. Excavation of all impacted material was not feasible due to the proximity of the tanks to the apartment buildings. Residual contamination in soil and groundwater remained and was monitored through 2016. Upon reviewing the groundwater monitoring data from over 12 consecutive quarters, it was apparent monitored natural attenuation was not a feasible option and an in situ chemical oxidation (ISCO) remedy was approved by NYSDEC. Due to success of the pilot test, the ISCO injection event was implemented utilizing pressure pulse technology to deliver the alkaline activated persulfate solution to the subsurface.

APPENDIX C

Health and Safety Plan

HALEY & ALDRICH, INC.
SITE-SPECIFIC SAFETY PLAN

FOR

Former Carter Spray Finishing Corp.

65 Eckford Street, Brooklyn, NY

Project/File No. **0202156**

Gensuite EZ Scan®

BI - Developers

Prepared By: Yanxia Lin	**Date: 8/17/2021**
Project Manager: Mari Cate Conlon	**Date: 8/26/2021**
HASP Valid Through: 3-10-2023	

Table of Contents

Attachments

STOP WORK AUTHORITY

In accordance with Haley & Aldrich (Haley & Aldrich) Stop Work Authority Operating Procedure (OP1035), any individual has the right to refuse to perform work that he or she believes to be unsafe without fear of retaliation. He or she also has the authority, obligation, and responsibility to stop others from working in an unsafe manner.

STOP Work Authority is the stop work policy for all personnel and subcontractors on the Site. When work has been stopped due to an unsafe condition, Haley & Aldrich site management (e.g., Project Manager [PM], Site Health & Safety Officer [SHSO], etc.) and the Haley & Aldrich Senior Project Manager (SPM) will be notified immediately.

Reasons for issuing a stop work order include, but are not limited to:

- The belief/perception that injury to personnel or accident causing significant damage to property or equipment is imminent.
- An Haley & Aldrich subcontractor is in breach of site safety requirements and/or their own site HASP.
- Identifying a substandard condition (e.g., severe weather) or activity that creates an unacceptable safety risk as determined by a qualified person.

Work will not resume until the unsafe act has been stopped OR sufficient safety precautions have been taken to remove or mitigate the risk to an acceptable degree. Stop work orders will be documented as part of an on-site stop work log, on daily field reports to include the activity/activities stopped, the duration, person stopping work, person in-charge of stopped activity/activities, and the corrective action agreed to and/or taken. Once work has been stopped, only the Haley & Aldrich SPM or SHSO can give the order to resume work. Haley & Aldrich senior management is committed to support anyone who exercises his or her “Stop Work” authority.

ISSUANCE AND COMPLIANCE

This HASP has been prepared in accordance with Occupational Safety and Health Administration (OSHA) regulations (CFR 29, Parts 1904, 1910, and 1926) if such are applicable.

The specific requirements of this HASP include precautions for hazards that exist during this project and may be revised as new information is received or as site conditions change.

- This HASP must be signed by all Haley & Aldrich personnel involved in implementation of the SOW (Section 2 of this HASP).
- This HASP, or a current signed copy, must be retained at all times when Haley & Aldrich staff are present.
- Revisions to this HASP must be outlined within the contents of the HASP. If immediate or minor changes are necessary, the Field Safety Manager (FSM), Haley & Aldrich, SSO and/or Project Manager (PM) may use Attachment 1 (HASP Amendment Form), presented at the end of this HASP. Any revision to the HASP requires employees and subcontractors to be informed of the changes so that they understand the requirements of the change.
- Deviations from this HASP are permitted with approval from the Haley & Aldrich FSM, PM, or Senior Health & Safety Manager (SHSM). Unauthorized deviations may constitute a violation of Haley & Aldrich company procedures/policies and may result in disciplinary action.
- This HASP will be relied upon by Haley & Aldrich's subcontractors and visitors to the site. Haley & Aldrich's subcontractors must have their own HASP which will address hazards specific to their trade that is not included in this HASP. This HASP will be made available for review to Haley & Aldrich's subcontractors and other interested parties (e.g. Facility personnel and regulatory agencies) to ensure that Haley & Aldrich has properly informed our subcontractors and others of the potential hazards associated with the implementation of the SOW to the extent that Haley &Aldrich is aware.

This site-specific HASP provides only site-specific descriptions and work procedures. General safety and health compliance programs in support of this HASP (e.g., injury reporting, medical surveillance, personal protective equipment (PPE) selection, etc.) are described in detail in the Haley &Aldrich Corporate Health and Safety Program Manual and within Haley & Aldrich's Standard Operating Procedures Both the manual and SOPs can be located on the Haley & Aldrich's Company Intranet. When appropriate, users of this HASP should always refer to these resources and incorporate to the extent possible. The manual and SOPs are available to clients and regulators upon request.

EMERGENCY EVENT PROCEDURES

1 - ASSESS THE SCENE

- **STOP WORK**
- Review the situation and ascertain if it's safe to enter the area.
- Evacuate the site if the conditions are unsafe.

2 - EVALUATE THE EMERGENCY

- **Call 911, or designated emergency number, if required.**
- **Provide first aid for the victim if qualified and safe to do so.**
  - First aid will be addressed using the onsite first aid kit. *
    - If providing first aid, remember to use proper first aid universal precautions if blood or bodily fluids are present.
- **If exposure to hazardous substance is suspected, immediately vacate the contaminated area.**
  - Remove any contaminated clothing and/or equipment.
  - Wash any affected dermal/ocular area(s) with water for at least 15 minutes.
  - Seek immediate medical assistance if any exposure symptoms are present.

** Note: Haley & Aldrich employees are not required or expected to administer first aid / CPR to any Haley & Aldrich staff member, Contractor, or Civilian personnel at any time; it is Haley & Aldrich´s position that those who do are doing so on their own behalf and not as a function of their job.*

3 - SECURE THE AREA

- **Cordon off the incident area, if possible.**
  - Notify any security personnel, if required.
  - Escort all non-essential personnel out of the area, if able.

4 - REPORT ON-SITE ACCIDENTS / INCIDENTS TO PM / SSO

- **Notify the PM and SSO as soon as it is safe to do so.**
  - Assist PM and SSO in completing any additional tasks, as required.

5 - INVESTIGATE / REPORT THE INCIDENT

- **Record details of the incident for input to the Gensuite.**
  - Complete any additional forms as requested by the PM and SSO.

6 - TAKE CORRECTIVE ACTION

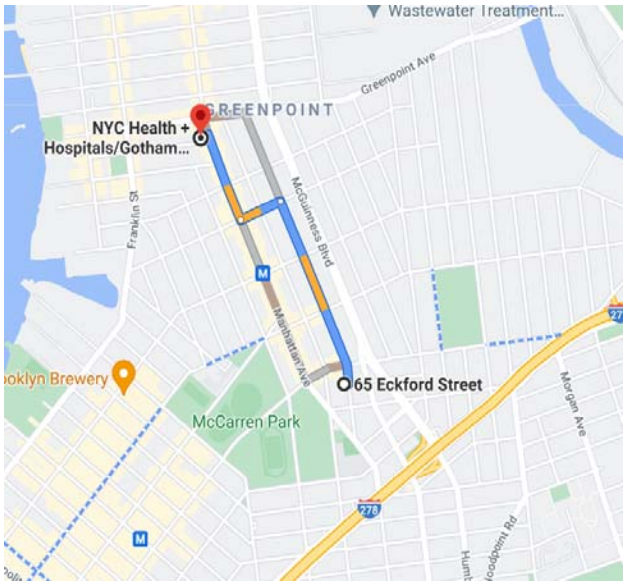
- **Implement corrective actions per the PM following root cause analysis.**
  - Complete Lessons Learned form.

PROJECT INFORMATION AND CONTACTS	
Project Name: Former Carter Spray Finishing Corp.	**Haley & Aldrich File No.:** 0202156
Location: 65 Eckford Street, Brooklyn, NY	
Client/Site Contact: Phone Number:	Z65 Realty LLC Enter Phone Number
Haley & Aldrich Field Representative: Phone Number: Emergency Phone Number:	Zachary Simmel 646.277.5690 646.787.7669
Haley & Aldrich Project Manager: Phone Number: Emergency Phone Number:	Mari Cate Conlon 646.277.5688 347.271.1521
Field Safety Manager: Phone Number: Emergency Phone Number:	Mari Cate Conlon 646.277.5688 347.271.1521
Subcontractor Project Manager: Phone Number:	Marc Morgenstern 631.319.6536
Nearest Hospital: Address: (see map on next page) Phone Number:	NYC Health + Hospitals/Gotham Health, Greenpoint 875 Manhattan Avenue Brooklyn, NY 11222 844.692.4692
Nearest Occ. Health Clinic: http://www.talispoint.com/liberty/ext/ Address: (see map on next page) Phone Number:	Northside Medical Care 66 Nassau Ave, Brooklyn, NY 11222 718.383.4600
Liberty Mutual Claim Policy	**WC6Z11254100030**
Emergency Response Number:	**911**
Other Local Emergency Response Number:	N/A
Other Ambulance, Fire, Police, or Environmental Emergency Resources:	**911**

DIRECTIONS TO THE NEAREST HOSPITAL

Liberty Mutual Medical Location Directory

NYC Health + Hospitals/Gotham Health, Greenpoint
875 Manhattan Avenue
Brooklyn, NY 11222
844.692.4692



Directions to the Nearest Hospital:

5 min (0.7 mile)

via Eckford St and Manhattan Ave

Fastest route, lighter traffic than usual

65 Eckford St
Brooklyn, NY 11222

Head north on Eckford St toward Driggs Ave
0.4 mi

Turn left onto Meserole Ave
0.1 mi

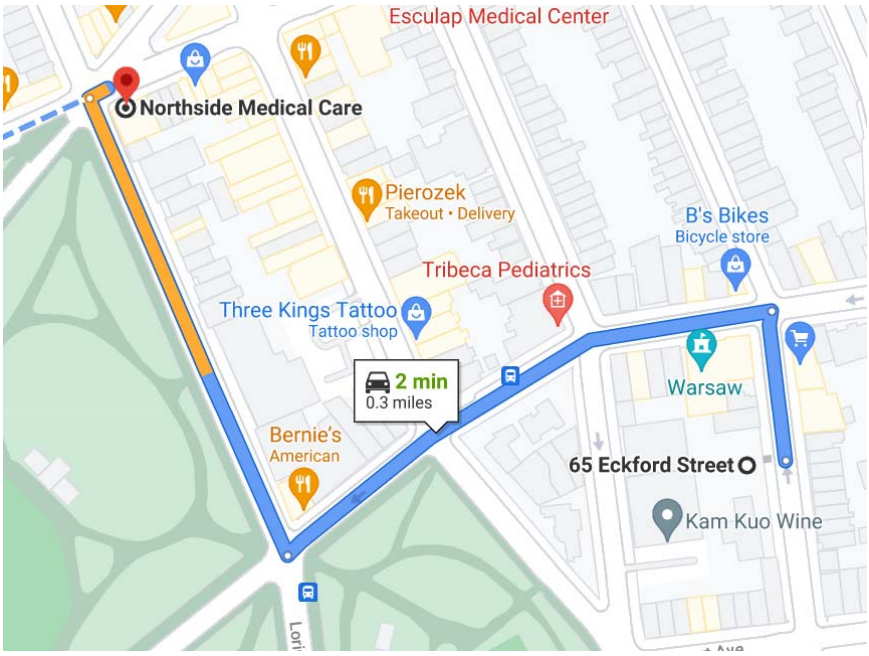
Turn right at the 2nd cross street onto Manhattan Ave
Destination will be on the left
0.2 mi

NYC Health + Hospitals/Gotham Health, Greenpoint
875 Manhattan Ave, Brooklyn, NY 11222

DIRECTIONS TO THE NEAREST URGENT CARE

Liberty Mutual Medical Location Directory

Northside Medical Care
66 Nassau Ave,
Brooklyn, NY 11222
718.383.4600



Directions to the Nearest Urgent Care:

2 min (0.3 mile)

via Driggs Ave and Lorimer St

Fastest route, the usual traffic

65 Eckford St
Brooklyn, NY 11222

Head north on Eckford St toward Driggs Ave
213 ft

Turn left onto Driggs Ave
0.1 mi

Turn right onto Lorimer St
0.1 mi

Turn right onto Nassau Ave
Destination will be on the right
30 ft

Northside Medical Care
66 Nassau Ave, Brooklyn, NY 11222

1. WORK SCOPE

This Site-Specific Health and Safety Plan addresses the health and safety practices and procedures that will be exercised by all Haley & Aldrich employees participating in all work on the Project Site. This plan is based on an assessment of the site-specific health and safety risks available to Haley & Aldrich and Haley & Aldrich's experience with other similar project sites. The scope of work includes the following:

Work tasks will include 1) Site walk and field measurements 2) Corrective action oversight (oversee fluid evacuation and backfilling) 3) Drilling (install soil borings and groundwater wells for an investigation) soil and 4) Groundwater, soil vapor sampling.

Project Task Breakdown

Task No.	Task Description	Employee(s) Assigned	Work Date(s) or Duration
1	Site walk, field measurements	Zachary Simmel	1 day
2	Corrective Action Implementation – Remedial Oversight and Air Monitoring	Zachary Simmel	2-3 months
3	Drilling, install soil borings and groundwater wells for an investigation	Zachary Simmel	2 days
4	Soil sampling/Soil vapor sampling, collect soil samples, soil vapor samples into laboratory provided containers	Zachary Simmel	2 days
5	Groundwater sampling, collect groundwater samples into laboratory provided containers	Zachary Simmel	2 days

Subcontractor(s) Tasks

Firm Name	Work Activity	Work Date(s) or Duration
Eastern Environmental Solutions	Drilling	2 days
Projected Start Date: 11/17/2021		
Projected Completion Date: 12/31/2021		

Firm Name	Work Activity	Work Date(s) or Duration
Prestige NY LLC	Construction Contractor	2-3 months
Projected Start Date: 9/17/2021		
Projected Completion Date: 12/31/2021		

2. SITE OVERVIEW / DESCRIPTION

Site Classification

Commercial

Site Description

The address of the Site is 65 Eckford Street, Brooklyn, NY 11222. It is comprised of a single tax parcels identified as Block 2698, Lot 26. The Site is located on the west side of Eckford Street in the Greenpoint neighborhood of Brooklyn, New York. The Site is an irregular shaped lot consisting of approximately 85 ft of frontage along Eckford Street. The Site is currently a vacant industrial building which was the eastern portion of the former NuHart plastics manufacturing facility. The western portion of the former NuHart facility is listed in the NYSDEC Inactive Hazardous Waste Registry as a Class 2 Site (Site No. 224136). Historically, the former NuHart facility was used for the manufacturing of plastic and vinyl products.

Background and Historic Site Usage

The Site was developed since at least 1887 and was used for metalworking, manufacturing of light fixtures, soaps, and water proofing materials through 1950. From 1950 until 2004, the Site and associated manufacturing buildings to the west were used by the NuHart company for the production, storage, and shipping of plastic and vinyl products. Operations ceased in 2004 and the Site buildings have been vacant since that time.

Site Status

Indicate current activity status and describe operations at the site:

Inactive

Operations ceased in 2004 and the Site buildings have been vacant since that time.

Site Plan

Is a site plan or sketch available? Yes

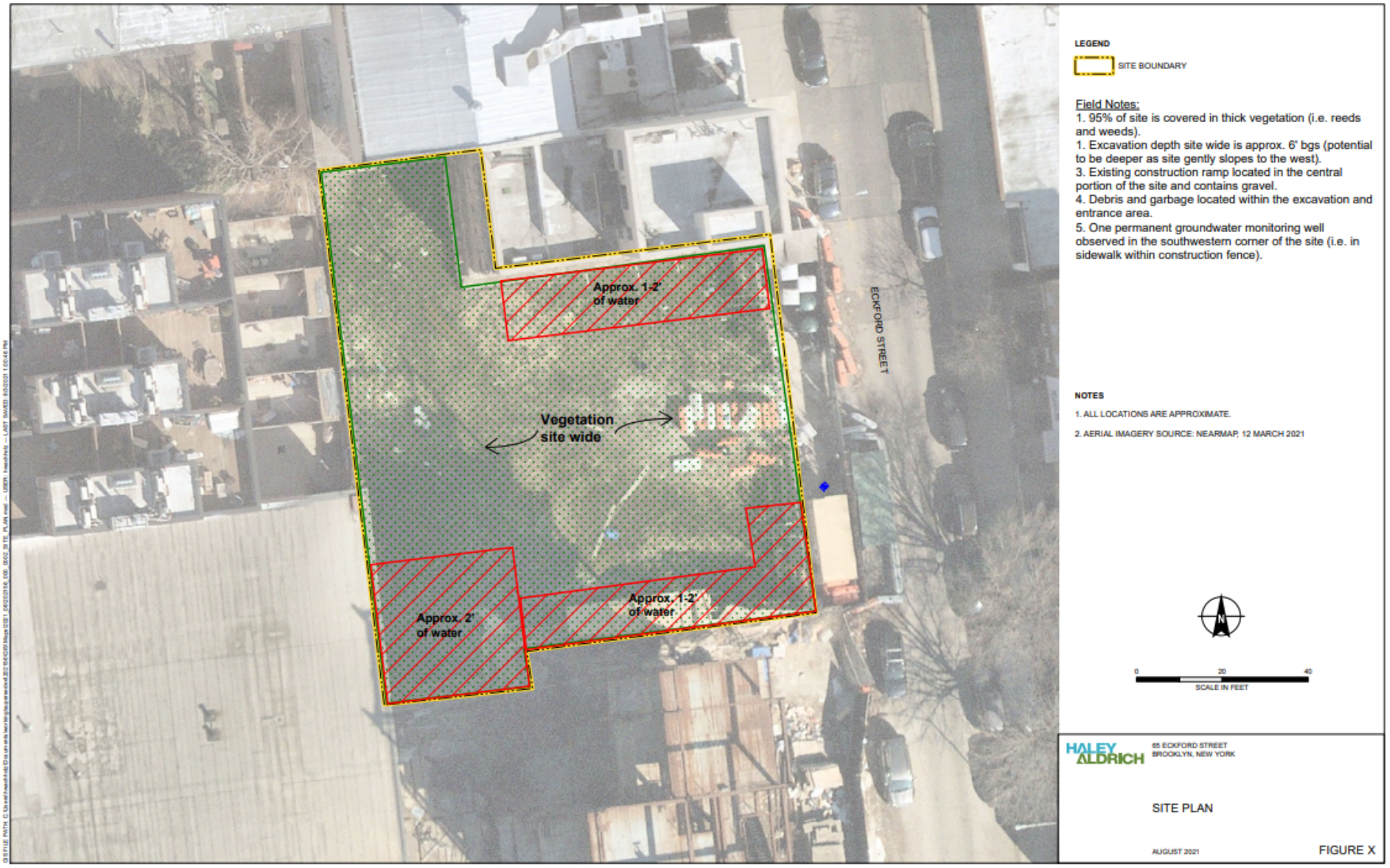
Work Areas

List and identify each specific work areas(s) on the job site and indicate its location(s) on the site plan:

Whole site

Enter work area description
Enter work area description
Enter work area description

Site Plan



3. HAZARD ASSESSMENT

Indicate all hazards that may be present at the site and for each task. If any of these potential hazards are checked, it is the Project Manager's responsibility to determine how to eliminate / minimize the hazard to protect onsite personnel.

Site Chemical Hazards

Is this Site impacted with chemical contamination? Yes

Source of information about contaminants: Owner Knowledge

Contaminant of Concern	Location/Media	Concentration	Units
Volatile Organic Compounds (VOCs)	**Soil**	**102.7**	**mg/kg**
Volatile Organic Compounds (VOCs)	**Groundwater**	**135-457**	**ug/L**
Arsenic	**Soil**	**13.4-31.5**	**mg/kg**
Barium	**Soil**	**743-818**	**mg/kg**
Lead	**Soil**	**103-2790**	**mg/kg**
Mercury	**Soil**	**0.4-14**	**mg/kg**

VOCs: include all organic compounds (substances made up of predominantly carbon and hydrogen) with boiling temperatures in the range of 50-260 degrees C, excluding pesticides. This means that they are likely to be present as a vapor or gas in normal ambient temperatures. Substances which are included in the VOC category include aliphatic hydrocarbons (such as hexane), aldehydes, aromatic hydrocarbons (such as benzene, toluene, and the xylenes or BTEX), and oxygenated compounds (such as acetone and similar ketones). The term VOC often is used in a legal or regulatory context and in such cases the precise definition is a matter of law.

VOCs are released from oil and gasoline refining, storage and combustion as well as from a wide range of industrial processes. Processes involving fuels, solvents, paints or the use of chemicals are the most significant sources. VOCs may also be emitted from cleaning products, degreasing products, fabrics, carpets, plastic products, glues, printed material, varnishes, wax, disinfectants, and cosmetics.

Typically, VOCs are present in gas or vapor and will enter the body by breathing contaminated air. Higher concentrations of VOCs may occur in areas of poor ventilation.

Arsenic: The Occupational Safety and Health Administration has set limits of 10 microgram arsenic per cubic meter of workplace air (10 µg/m3) for 8 hour shifts and 40 hour work weeks. Several studies have shown that inorganic arsenic can increase the risk of lung cancer, skin cancer, bladder cancer, liver cancer, kidney cancer, and prostate cancer. The World Health Organization (WHO), the Department of

Health and Human Services (DHHS), and the EPA have determined that inorganic arsenic is a human carcinogen.

Breathing high levels of inorganic arsenic can give you a sore throat or irritated lungs. Ingesting high levels of inorganic arsenic can result in death. Lower levels of arsenic can cause nausea and vomiting, decreased production of red and white blood cells, abnormal heart rhythm, damage to blood vessels, and a sensation of "pins and needles" in hands and feet.

Barium: is a soft, silvery metal that rapidly tarnishes in air and reacts with water. It is mostly used in drilling fluids for oil and gas wells and used in paint and in glassmaking. All barium compounds are toxic; however, barium sulfate is insoluble and so can be safely swallowed. A suspension of barium sulfate is sometimes given to patients suffering from digestive disorders.

Barium has no known biological role, although barium sulfate has been found in one type of algae. Barium is toxic, as are its water- or acid-soluble compounds. Barium occurs only in combination with other elements. The major ores are barite (barium sulfate) and witherite (barium carbonate). Barium metal can be prepared by electrolysis of molten barium chloride, or by heating barium oxide with aluminum powder.

Lead: The effects of lead are the same whether it enters the body through breathing or swallowing. Lead can affect almost every organ and system in your body. The main target for lead toxicity is the nervous system. Long-term exposure to lead can result in decreased performance in some tests measuring functions of the nervous system in adults. It may also cause weakness in fingers, wrists, or ankles. Lead exposure also causes small increases in blood pressure, particularly in middle-aged and older people and can cause anemia. Exposure to high lead levels can severely damage the brain and kidneys and ultimately cause death.

Mercury: is an odorless, silver metallic liquid. It can be inhaled or absorbed through the skin. Contact may cause irritation to the skin or eyes. Toxic if ingested. Fume inhalation may cause irritation in the nose, throat or lungs. This is a corrosive chemical. Symptoms of poisoning include, muscle tremors, loss of appetite, and nausea. Long-term exposure may have effects on the central nervous system and kidneys. The PEL is 0.1 mg/m^3 averaged over an 8 hour shift.

Site Hazards Checklist			
Weather			
Hot Temperatures	Cold Temperatures	High Winds	Select Hazard

Hot Temperatures

Heat stress may occur at any time work is being performed at elevated ambient temperatures. Because heat stress is one of the most common and potentially serious illnesses associated with

outdoor work during hot seasons, regular monitoring and other preventative measures are vital. Site workers must learn to recognize and treat the various forms of heat stress. The best approach is preventative heat stress management.

H&A employees and their subcontractors should be aware of potential health effects and/or physical hazards of working when there are hot temperatures or a high heat index. Refer OP1015-Heat Stress for a discussion on hot weather hazards.

Cold Temperatures

Cold stress may occur at any time work is being performed at low ambient temperatures and high velocity winds. Because cold stress is common and has potentially serious illnesses associated with outdoor work during cold seasons, regular monitoring and other preventative measures are vital.

Refer to OP1003-Cold Stress for additional information and mitigation controls.

High Winds

While high winds are commonly associated with severe thunderstorms and hurricanes they may also occur as a result of differences in air pressures, such as when a cold front passes across the area. They can cause downed trees and power lines, and flying debris (such as dust or larger debris), which adds additional risks and could lead to power outages, transportation disruptions, damage to buildings and vehicles, and serious injury.

Wind Advisory are issued for sustained winds 25 to 39 mph and/or gusts to 57 mph. High Wind warnings are issued by the National Weather Service when high wind speeds may pose a hazard or is life threatening. The criteria for this warning will varies by state. The Beaufort Wind Scale is a helpful tool to when dealing with high winds.

Biological			
Mosquitoes	Choose an item.	Choose an item.	Choose an item.

Mosquitos

Work outdoors with temperatures above freezing will likely bring staff into contact with mosquitos. There are a variety of mosquito species that can transmit a range of diseases. Birds act as reservoirs for

the viruses that can be collected by the mosquito and transmitted to a person. Majority of mosquitos are mainly a nuisance but staff need to take appropriate precautions to minimize the potential transmission of a virus that can result in one of the following diseases: West Nile, Eastern Equine Encephalitides and Western Encephalitides. Knowing some key steps that can minimize the risk of mosquito bites is, therefore, important in reducing the risks. Workers working outdoors should be aware that the use of PPE techniques is essential to preventing mosquito bites especially when working at sites where mosquitoes may be active and biting.

Use repellents containing DEET, picaridin, IR3535, and some oil of lemon eucalyptus and para-menthane-diol products provide longer-lasting protection. To optimize safety and effectiveness, repellents should be used according to the label instructions. Cover as much of your skin as possible by wearing shirts with long-sleeves, long pants, and socks whenever possible. Avoid use of perfumes and colognes when working outdoors during peak times when mosquitoes may be active; mosquitoes may be more attracted to individuals wearing perfumes and colognes.

Location/Terrain			
Slip/Trip/Falls	Choose an item.	Choose an item.	Choose an item.

Slips, Trips & Falls

Slip and trip injuries are the most frequent injuries to workers. Statistics show most falls happen on the same level resulting from slips and trips. Both slips and trips result from unintended or unexpected change in the contact between the feet and the ground or walking surface. Good housekeeping, quality of walking surfaces (flooring), awareness of surroundings, selection of proper footwear, and appropriate pace of walking are critical for preventing fall accidents.

Site workers will be walking on a variety of irregular surfaces, that may affect their balance. Extra care must be taken to walk cautiously near rivers because the bottom of the riverbed maybe slick and may not be visible. Rocks, gradient changes, sandy bottoms, and debris may be present but not observable.

Take your time and pay attention to where you are going. Adjust your stride to a pace that is suitable for the walking surface and the tasks you are doing. Check the work area to identify hazards - beware of trip hazards such as wet floors, slippery floors, and uneven surfaces or terrain. Establish and utilize a pathway free of slip and trip hazards. Choose a safer walking route. Carry loads you can see over. Keep work areas clean and free of clutter. Communicate hazards to on-site personnel and remove hazards as appropriate.

Miscellaneous			
Extended Shift	Choose an item.	Choose an item.	Choose an item.

Extended Shift

An extended shift can include extending a workday beyond eight hours. Extended or unusual work shifts may be more stressful physically, mentally, and emotionally. Non-traditional shifts and extended work hours may disrupt the body's regular schedule, leading to increased fatigue, stress, and lack of concentration. This leads to an increased risk of operator error, injuries and/or accidents. The degree to which an individual is exposed to fatigue risk factors depends upon the work schedule. As both the duration of the workday and the number of days worked increase so does the fatigue risk factors. Staff Managers need to be aware of the fatigue risk factors and ensure projects are structured to mitigate these factors. Staff Members also have a responsibility to manage the personal fatigue risk factors that they can control outside of work (e.g, duration and quality of sleep, diet, drugs, and alcohol)

Fatigue is a message to the body to rest and can be eliminated with proper rest. However, if rest is not possible, fatigue can increase and becomes distressing and eventually debilitating. Fatigue symptoms, both mental and physical, vary and depend on the person and degree of overexertion. Examples include: weariness, sleepiness, irritability, reduced alertness, lack of memory, concentration and motivation, increased susceptibility to illness, depression, headache, loss of appetite, and digestive problems.

When possible, managers should limit use of extended shifts and increase the number of days worked. Working shifts longer than 8 hours generally result in reduced productivity and alertness. Additional breaks and meals should be provided when working extended shift periods. Tasks requiring heavy physical labor or intense concentration should be performed at the beginning of the shift if possible. This is an important consideration for pre-emergency planning.

Make efforts, when feasible, to ensure that unavoidable extended work shifts and shift changes allow affected employees time for adequate rest and recovery. Project Managers need to plan to have an adequate number of personnel available to enable workers to take breaks, eat meals, relax, and sleep.

Plan for regular and frequent breaks throughout the work shift. If at remote sites, ensure if possible, that there is a quiet, secluded area designated for rest and recuperation. In addition to formal breaks such as lunch or dinner, encourage use of micro breaks to change positions, move about, and shift concentration. Personnel should look to obtain an adequate quantity and quality of sleep.

Task Hazard Summary

Task 1 - Site Walk

General hazards associated with site walk-throughs and site surveys include the following: • Exposure to irritant and toxic plants such as poison ivy and sticker bushes may cause allergic reactions to personnel. • Surfaces covered with heavy vegetation and undergrowth create a tripping hazard. • Back strain due to carrying equipment, tools, and instruments. • Native wildlife such as rodents, ticks, and snakes present the possibility of insect bites and associated diseases such as Lyme disease
Driving vehicles on uneven or unsafe surfaces can result in accidents such as overturned vehicles or flat tires. • Heat stress/cold stress exposure.

HAZARD PREVENTION • Wear long-sleeved clothing and slacks to minimize contact with irritant and toxic plants and to protect against insect bites. Appropriate first aid for individuals' known allergic reactions. • Be alert and observe terrain while walking to minimize slips and falls. • Use proper lifting techniques to prevent back strain. • Avoid wildlife when possible. In case of an animal bite, perform first aid and capture the animal, if possible, for rabies testing. Perform a tick check after leaving a wooded or vegetated area. • Ensure all maintenance is performed on vehicles before going to the field. A site surveillance on foot might be required to choose clear driving paths. • Implement heat stress management techniques such as shifting work hours, fluid intake, and monitoring employees, especially high risk workers.

Task 2 – Remedial oversight and Air Monitoring

Remedial oversight includes community air monitoring, endpoint soil sampling and record keeping, may require working in close proximity to heavy equipment and may be exposed to many of the same hazards as the subcontractor. It is imperative that staff are aware of emergency stops and establish communication protocols with the contractors prior to the start of work.

See OP 1002 Drilling Safety for more information.

Task 3 – Drilling

Drilling is conducted for a range of services that can include but are not limited to: soil characterization, environmental investigation, well installation, and ore exploration. Familiarity with basic drilling safety is an essential component of all drilling projects. Potential hazards related to drilling operations include, but are not limited to encountering underground or overhead utilities, traffic and heavy equipment, hoisting heavy tools, steel impacts, open rotation entanglement, and the planned or unexpected encountering of toxic or hazardous substances. While staff members do not operate drilling equipment, they may work in close proximity to operating drilling equipment and may be exposed to many of the same hazards as the drilling subcontractor. It is imperative that staff are aware of emergency stops and establish communication protocols with the drillers prior to the start of work.

See OP 1002 Drilling Safety for more information.

Task 4 – Soil Sampling

Soil sampling by H&A staff on active construction sites can be conducted in conjunction with a wide range activities such as building construction, earthwork and soil management related activities. These activities can include, but are not limited to: drill spoil characterization and management during building foundation element installation, characterization of excavated soils for management/disposal/reuse during earthwork activities, and as part of environmental remedial activities such as delineation and confirmation sampling. Familiarity with basic heavy construction safety, site conditions (geotechnical and environmental), and potential soil contaminants are essential components of soil sampling performed on active sites. Potential hazards related to soil sampling at construction sites include, but are not limited to: encountering site vehicle traffic and heavy equipment operations, manual lifting, generated waste, contact or exposure to impacted soil, and encountering unknown toxic or hazardous substances. Although soil sampling is commonly performed within active excavations, from stockpiles, or within trench excavations, sampling locations and situations will vary depending on site conditions. Care should be taken while entering and exiting excavations or trenches, and when accessing (climbing up or down) soil stockpiles, ensuring that the sampling area is not being actively accessed by construction equipment. Care should also be taken with handling of potentially environmentally impacted soil during sampling, with appropriate PPE identified and used. At no time during classification activities are personnel to reach for debris near machinery that is in operation, place any samples in their mouth, or come in contact with the soils without the use of gloves. Staff will have to carry and use a variety of sampling tools, equipment, containers, and potentially heavy sample bags. It is imperative that staff are aware of emergency / communication protocols with the Contractor prior to the start of work.

Task 4– Soil Vapor Sampling

Soil gas sampling is employed as an indirect indicator of contamination in soil or groundwater particularly over and around landfill waste sites, or groundwater plumes. Soil gas sampling points can be installed manually using a slam bar or power driven mechanical devices (e.g., demolition hammer or Geoprobe) may be used based on site conditions (i.e., pavement, frozen ground, very dense clays, etc.). Soil gas samples can be drawn through the probe itself, or through Teflon tubing inserted through the probe and attached to the probe point. Samples are collected and analyzed as described below. Other field air monitoring devices, such as the Combustible Gas Indicator (CGI) and the Organic Vapor Analyzer (OVA), can also be used, depending on specific site conditions.

Because the sample is being drawn from underground, and no contamination is introduced into the breathing zone, soil gas sampling usually occurs in Level D. Nevertheless, ambient air should be constantly monitored to obtain background and breathing zone readings during the sampling procedure in the event the seal around the sampling point is breached. As long as the levels in ambient air do not

rise above background, no upgrade of the level of protection is needed. Also, an underground utility search must be performed prior to sampling.

Task 5 – Groundwater Sampling

Environmental water sampling could include activities such as groundwater sampling from permanent or temporary wells, or surface water sampling from streams, rivers, lakes, ponds, lagoons, and surface impoundments.

Sampling tasks could involve uncapping, purging (pumping water out of the well), and sampling, and/or monitoring, new or existing monitoring wells. A mechanical pump may be used to purge the wells and can be hand-, gas-, or electric-operated. Water samples taken from the wells are then placed in containers and shipped to an analytical laboratory for analysis. The physical hazards of these operations are primarily associated with the collection methods and procedures used.

When sampling bodies of water containing known or suspected hazardous substances, adequate precautions must be taken to ensure the safety of sampling personnel. The sampling team member collecting the sample should not get too close to the edge, where ground failure or slips, trips or falls may cause him/her to lose his/her balance. The person performing the sampling should have fall restraint or protection for the task. When conducting sampling from a boat in an impoundment or flowing waters, appropriate vessel safety procedures should be followed. Avoid lifting heavy coolers with back muscles; instead, use ergonomic lifting techniques, team lift or mechanical lifts. Wear proper gloves, such as when handling sample containers to avoid contacting any materials that may have spilled out of the sample containers.

Inhalation and absorption of COCs are the primary routes of entry associated with water sampling, due to the manipulation of sample media and equipment, manual transfer of media into sample containers, and proximity of operations to the breathing zone. During this project, several different groundwater sampling methodologies may be used based on equipment accessibility and the types of materials to be sampled. These sampling methods may include hand or mechanical bailing. The primary hazards associated with these specific sampling procedures are not potentially serious; however, other operations in the area or the conditions under which samples must be collected may present chemical and physical hazards. The hazards directly associated with groundwater sampling procedures are generally limited to strains or sprains from hand bailing, and potential eye hazards. Exposure to water containing COCs is also possible. All tools and equipment that will be used at the site must be intrinsically safe (electronics and electrical equipment) and non-sparking or explosion-proof (hand tools).

Task Physical Hazards Checklist					
Potential Task Hazards	**Task 1** **Site walk, field measurement**	**Task 2** **Remedial oversight and air monitoring**	**Task 3** **Drilling**	**Task 4** **Soil sampling/ soil vapor sampling**	**Task 5** **Groundwater sampling**
Noise	☐	☒	☒	☐	☐
Heavy Equipment	☐	☒	☒	☐	☐
Hot Work	☒	☒	☒	☒	☒
Slippery Surfaces	☒	☒	☒	☒	☒
Ergonomics	☒	☒	☒	☒	☒
Congested Area	☒	☒	☒	☒	☒
Ground Disturbance	☐	☒	☒	☐	☐
Line of Fire	☒	☒	☒	☐	☐
Manual Lifting	☒	☒	☒	☒	☒
Sharp Objects	☒	☒	☒	☒	☒
Underground Utilities	☐	☒	☒	☐	☐

Summary of Physical Hazards & Controls

Noise

Working around heavy equipment (drill rigs, excavators, etc.) often creates excessive noise. The effects of noise include physical damage to the ear, pain, and temporary and/or permanent hearing loss. Workers can also be startled, annoyed, or distracted by noise during critical activities. Noise monitoring data that indicates that working within 25 feet of operating heavy equipment result in exposure to hazardous levels of noise (levels greater than 85 dBA).

See OP 1031 Hearing Conservation for additional information.

Controls

- Personnel are required to use hearing protection (earplugs or earmuffs) within 25 feet of any operating piece of heavy equipment.
- Limit the amount of time spent at a noise source.
- Move to a quiet area to gain relief from hazardous noise sources.
- Increase the distance from the noise source to reduce exposure.

Heavy Equipment

Staff must be careful and alert when working around heavy equipment, failure or breakage and limited visibility can lead to accidents and worker injury. Heavy equipment such as cranes, drills, haul trucks, or other can fail during operation increasing chances of worker injury. Equipment of this nature shall be visually inspected and checked for proper working order prior to commencement of field work. Those operating heavy equipment must meet all requirements to operate the equipment. Haley & Aldrich, Inc. staff that supervise projects or are associated with high risk projects that involve digging or drilling should use due diligence when working with a construction firm.

See OP1052 Heavy Equipment for additional information.

Controls

- Only approach equipment once you have confirmed contact with the operator (e.g., operator places the bucket on the ground).
- Always maintain visual contact with operators and keep out of the strike zone whenever possible.
- Always be alert to the position of the equipment around you.
- Always approach heavy equipment with an awareness of the swing radius and traffic routes of all equipment and never go beneath a hoisted load.
- Avoid fumes created by heavy equipment exhaust.

Hot Work

Hot work is any work that could produce a source of ignition or temperature high enough to cause the ignition of flammable gases and combustible materials. Hot work activities include burning, welding, grinding, braising, soldering, using fire or spark-producing tools. The main hazards associated with hot

work are getting burned directly by the hot work activity or by fires or explosions that result from an accumulation of combustible materials in the work area.

Performing hot work in Classified and Non-Classified areas are considered a hazardous activity, and a Permit to Work may be required. In general, the Hot Work Permit has five purposes:

- To serve as written permission to do the work;
- To provide a minimum checklist prior to the commencement of hot work;
- To outline the steps necessary for making the work site safe for conducting hot work;
- To alert operating personnel to the hot work in progress; and
- To provide a record of safe work practices performed during the permitted activity.

Work shall be conducted in accordance with OP1034 Hot Work.

Controls

- Hot Work Permit must be completed.
- Conduct a risk assessment of the proposed work area to identify combustible or flammable material.
- If potential for flammable gases exists in the work area they must be monitored with a gas detector prior to starting any hot work.
- The hot work equipment shall be in satisfactory operating condition and in good repair.
- All combustible and flammable materials shall be relocated at least 35' in all directions from the work site.

If relocating these materials is impractical, the following precautions shall be taken:

- Materials shall be shielded with fire-retardant covers or metal or fire-retardant guards or curtains.
- The edges of covers at the floor shall be tight to prevent the entrance of sparks, including at the point where several covers overlap when a large pile is being protected.
- A fire watch may be required.
- A fully charged and operable fire extinguisher appropriate for the type of potential fire shall be available for use in the work area (20lbs minimum).
- A nonflammable, impervious material shall seal sewer openings, ducts and drains. Where sealing is insecure or impractical, water spray or stream should be directed across openings.
- The location of the hot work relative to combustible and flammable materials and classified areas shall determine the need for a fire watch
- Personnel within the vicinity of the hot work shall be suitably protected against such dangers as heat, sparks, flash and slag.

Slippery Surfaces

Both slips and trips result from unintended or unexpected change in the contact between the feet and ground or walking surface. Good housekeeping, quality of walking surfaces, selection of proper footwear, and appropriate pace of walking are critical for preventing fall accidents. Slips happen where there is too little friction or traction between the footwear and walking surface.

Common causes of slips are wet or oily surfaces, spills, weather hazards, loose unanchored rugs or mats and flooring or other walking surfaces that do not have same degree of traction in all areas.

Weather-related slips and falls become a serious hazard as winter conditions often make for wet or icy surfaces outdoors. Even wet organic material or mud can create hazardous walking conditions. Spills and leaks can also lead to slips and falls.

Controls

- Evaluate the work area to identify any conditions that may pose a slip hazard.
- Address any spills, drips or leaks immediately.
- Mark areas where slippery conditions exist.
- Select proper footwear or enhance traction with additional PPE.
- Where conditions are uncertain or environmental conditions result in slippery surfaces walk slowly, take small steps, and slide feet on wet or slippery surfaces.

Congested Areas

Working in congested areas can expose both workers and the public to a wide range of hazards depending upon the specific activities taking place. Staff Members need to understand the work scope, work areas, equipment on-site, and internal traffic patterns to minimize or eliminate exposure potential.

Controls

- Provide barricades, fencing, warning signs/signals and adequate lighting to protect people while working in or around congested areas.
- Vehicles and heavy equipment with restricted views to the rear should have functioning back-up alarms that are audible above the surrounding noise levels. Whenever possible, use a signaler to assist heavy equipment operators and/or drivers in backing up or maneuvering in congested areas.
- Lay out traffic control patterns to eliminate excessive congestion.
- Workers in congested areas should always wear high visibility clothing.
- Be aware of Line of Fire hazards when performing work activities in congested areas.
- Hazards associated with SIMOPs should be discussed daily at Tailgate Safety Meetings.

Ground Disturbance

Ground disturbance is defined as any activity disturbing the ground. Ground disturbance activities include, but are not limited to, excavating, trenching, drilling (either mechanically or by hand), digging, plowing, grading, tunneling and pounding posts or stakes.

Because of the potential hazards associated with striking an underground utility or structure, the operating procedure for underground utility clearance shall be followed prior to performing any ground disturbance activities.

See OP1020 Working Near Utilities

Controls

Prior to performing ground disturbance activities, the following requirements should be applied:

- Confirm all approvals and agreements (as applicable) either verbal or written have been obtained.

- Request for line location has been registered with the applicable One-Call or Dial Before You Dig organization, when applicable.
    - Whenever possible, ground disturbance areas should be adequately marked or staked prior to the utility locators site visit.
- Notification to underground facility operator/owner(s) that may not be associated with any known public notification systems such as the One-Call Program regarding the intent to cause ground disturbance within the search zone.
- Notifications to landowners and/or tenant, where deemed reasonable and practicable.
- Proximity and Common Right of Way Agreements shall be checked if the line locator information is inconclusive.

Line of Fire

Line of fire refers to the path an object will travel. Examples of line of fire situations typically observed on project sites include lifting/hoisting, lines under tension, objects that can fall or roll, pressurized objects or lines, springs or stored energy, work overhead, vehicles and heavy equipment.

Controls

- Never walk under a suspended load.
- Be aware and stay clear of tensioned lines such as cable, chain and rope.
- Be cautious of torque stresses that drilling equipment and truck augers can generate. Equipment can rotate unexpectedly long after applied torque force has been stopped.
- Springs and other items can release tremendous energy if compressed and suddenly released
- Items under tension and pressure can release tremendous energy if it is suddenly released.
- Not all objects may be overhead; be especially mindful of top-heavy items and items being transported by forklift or flatbed.
- Secure objects that can roll such as tools, cylinders, and pipes.
- Stay clear of soil cuttings or soil stockpiles generated during drilling operations and excavations, be aware that chunks of soil, rocks, and debris can fall or roll.

Manual Lifting/Moving

Most materials associated with investigation, remedial, or construction-related activities are moved by hand. The human body is subject to damage in the forms of back injury, muscle strains, and hernia if caution is not observed in the handling process.

Controls

- Under no circumstances should any one person lift more than 49 pounds unassisted.
- Always push, not pull, the object when possible.
- Size up the load before lifting. If it is heavy or clumsy, get a mechanical aid or help from a worker.
- Bend the knees; it is the single most important aspect of lifting.
- When performing the lift:
    - Place your feet close to the object and center yourself over the load.
    - Get a good handhold.

- Lift straight up, smoothly and let your legs do the work, not your back!
- Avoid overreaching or stretching to pick up or set down a load.
- Do not twist or turn your body once you have made the lift.
- Make sure beforehand that you have a clear path to carry the load.
- Set the load down properly.

Sharp Objects

Workers who handle sharp edged objects like sheets of steel or glass are at risk of cuts. Workers who handle sharp edged objects are also at risk of cuts. Injuries may occur to hands, fingers, or legs when they are in the way of the blade, when the blade slips, or if an open blade is handled unexpectedly. Other hazards at job sites include stepping on sharp objects (e.g. wooden boards with protruding nails, sharp work-tools, chisels, etc.) and colliding with sharp and/or protruding objects.

Controls

Always be alert when handling sharps. Never look away or become distracted while handling sharp objects. Use caution when working with tools; use right tool for the job. Keep tools sharp, dull blades are a safety hazard, requiring more force to make cuts which can lead to tool slippage. Wear appropriate PPE and do not handle sharp objects (i.e., broken glass) with bare hands. Use mechanical devices, when possible. Stay away from building debris; avoid handling site debris or placing your hand where you cannot see. Watch out for barbed wire and electrical fences; cover with a car mat or equivalent to cross or walk around; use the buddy system to avoid entanglement; wear gloves. Do not leave unprotected sharps unattended. Use protective shields, cases, styrofoam blocks, etc. Pass a sharp by handing it over carefully by the handle with the blade down or retracted. Fixed open blades are prohibited. Always cut away from the body, making several passes when cutting thicker materials. Make sure blades are fitted properly into the knife. Never cut items with a blade or other sharp object on your lap. Never try to catch a blade or cutting tool that is falling.

Underground Utilities

Various forms of underground/overhead utility lines or conveyance pipes may be encountered during site activities. Prior to the start of intrusive operations, utility clearance is mandated, as well as obtaining authorization from all concerned public utility department offices. Should intrusive operations cause equipment to come into contact with utility lines, the SHSO, Project Manager, and Regional H&S Manager shall be notified immediately. Work will be suspended until the client and applicable utility agency is contacted and the appropriate actions for the situation can be addressed.

See OP1020 Work Near Utilities for complete information.

Controls

- Obtain as-built drawings for the areas being investigated from the property owner;
- Visually review each proposed soil boring locations with the property owner or knowledgeable site representative;
- Perform a geophysical survey to locate utilities;
- Hire a private line locating firm to determine location of utility lines that are present at the property;

- Identifying a no-drill or dig zone;
- Hand dig or use vacuum excavation in the proposed ground disturbance locations if insufficient data is unavailable to accurately determine the location of the utility lines.

4. PROTECTIVE MEASURES

The personal protective equipment and safety equipment (if listed) is specific to the associated task. The required PPE and equipment listed must be onsite during the task being performed. Work shall not commence unless the required PPE or Safety Equipment is present.

Required Safety & Personal Protective Equipment

Required Personal Protective Equipment (PPE)	**Task 1**	**Task 2**	**Task 3**	**Task 4&5**
	Site walk, field measurement	Remedial oversight and air monitoring	Drilling	Soil sampling/Soil vapor sampling & Groundwater Sampling
Hard hat	☒	☒	☐	☐
Safety Glasses	☐	☒	☒	☒
Hearing Protection	☐	☒	☐	☐
Safety Toed Shoes	☒	☒	☒	☒
Class 2 Safety Vest	☒	☒	☒	☒
Face Shield	☐	☒	☒	☒
Level of protection required	D	D	D	D
Required Safety Equipment				
First Aid Kit	☒	☒	☒	☒

5. TRAINING REQUIREMENTS

The table below lists the training requirements staff must have respective to their assigned tasks and that are required to access the Site.

Site Specific Training Requirements

HAZWOPER - 40 Hour (Initial); HAZPOWER -8 Hour (Annual Refresher); OSHA - 10 hour Construction; Site Specific Orientation

Task Specific Training Requirements

Required Training Type	**Task 1**	**Task 2**	**Task 3**	**Task 4&5**
	Site walk, field measurement	Remedial oversight and air monitoring	Drilling	Soil sampling/Soil vapor sampling & Groundwater Sampling
HAZWOPER – 40 Hour (Initial); HAZPOWER – 8 Hour (Annual Refresher); and Site – Specific Orientation	☒	☐	☒	☒
DOT HAZMAT Transporter Training	☒	☒	☐	☐
10 hour OSHA Construction	☐	☒	☐	☐

6. AIR MONITORING PLAN AND EQUIPMENT

Exposures to airborne substances shall be fully characterized throughout project operations to ensure that exposure controls are effectively selected and modified as needed.

Is air/exposure monitoring required at this work site for personal protection? No

Is perimeter monitoring required for community protection? No

Air monitoring plan not applicable No

7. DECONTAMINATION & DISPOSAL METHODS

All possible and necessary steps shall be taken to reduce or minimize contact with chemicals and contaminated/impacted materials while performing field activities (e.g., avoid sitting or leaning on, walking through, dragging equipment through or over, tracking, or splashing potential or known contaminated/impacted materials.)

Personal Hygiene Safeguards

The following minimum personal hygiene safeguards shall be adhered to:

1. No smoking or tobacco products in any project work areas.
2. No eating or drinking in the exclusion zone.
3. It is required that personnel present on site wash hands before eating, smoking, taking medication, chewing gum/tobacco, using the restroom, or applying cosmetics and before leaving the site for the day.

It is recommended that personnel present on site shower or bathe at home at the end of each day of working on the site.

Decontamination Supplies

All decontamination should be conducted at the project site in designated zones or as dictated by Client requirements. Decontamination should not be performed on Haley & Aldrich owned or leased premises.

☐ Acetone	☒ Distilled Water	☐ Polyethylene Sheeting
☒ Alconox Soap	☐ Drums	☐ Pressure/Steam Cleaner
☐ Brushes	☐ Hexane	☒ Tap Water
☒ Disposal Bags	☐ Methanol	☐ Wash tubs
☒ 5 Gallon Buckets	☒ Paper Towels	☐ Other: Specify

Location of Decontamination Station

Decontamination will take place prior to leaving the site at the exit.

Standard Personal Decontamination Procedures

Outer gloves and boots should be decontaminated periodically as necessary and at the end of the day. Brush off solids with a hard brush and clean with soap and water or other appropriate cleaner whenever possible. Remove inner gloves carefully by turning them inside out during removal. Wash hands and forearms frequently. It is good practice to wear work-designated clothing while on-site which can be removed as soon as possible. Non-disposable overalls and outer work clothing should be bagged onsite prior to laundering. If gross contamination is encountered on-site contact the Project Manager and Field Safety Manager to discuss proper decontamination procedures.

The steps required for decontamination will depend upon the degree and type of contamination but will generally follow the sequence below.

1. Remove and wipe clean hard hat
2. Rinse boots and gloves of gross contamination
3. Scrub boots and gloves clean
4. Rinse boots and gloves
5. Remove outer boots (if applicable)
6. Remove outer gloves (if applicable)
7. Remove Tyvek coverall (if applicable)
8. Remove respirator, wipe clean and store (if applicable)
9. Remove inner gloves (if outer gloves were used)

PPE that is not grossly contaminated can be bagged and disposed in regular trash receptacles.

Small Equipment Decontamination

Pretreatment of heavily contaminated equipment may be conducted as necessary:

1. Remove gross contamination using a brush or wiping with a paper towel
2. Soak in a solution of Alconox and water (if possible)
3. Wipe off excess contamination with a paper towel

Standard decontamination procedure:

4. Wash using a solution of Alconox and water
5. Rinse with potable water
6. Rinse with methanol (or equivalent)
7. Rinse with distilled/deionized water

Inspect the equipment for any remaining contamination and repeat as necessary.

Disposal Methods

Procedures for disposal of contaminated materials, decontamination waste, and single use personal protective equipment shall meet applicable client, locate, State, and Federal requirements.

Disposal of Single Use Personal Protective Equipment

PPE that is not grossly contaminated can be bagged and disposed in regular trash receptacles. PPE that is grossly contaminated must be bagged (sealed and field personnel should communicate with the Project Manager to determine proper disposal.

Disposal Method for Contaminated Soil

- Contaminated soil cuttings and spoils must be containerized for disposal off-site unless otherwise specifically directed.
- Soil cuttings and spoils determined to be free of contamination through field screening can usually be returned to the boreholes or excavations from which they came.

Any additional requirements that are designated by the workplan or by client specifications should be entered here.

8. SITE CONTROL

The overall purpose of site control is to minimize potential contamination of workers, protect the public from the site's hazards, and prevent vandalism. Site control is especially important in emergency situations. The degree of site control necessary depends on site characteristics, site size, and the surrounding community. The following information identifies the elements used to control the activities and movements of people and equipment at the project site.

Communication

Internal
Haley & Aldrich site personnel will communicate with other Haley & Aldrich staff member and/or subcontractors or contractors with:

Face to Face Communication

External
H&S site personnel will use the following means to communicate with off-site personnel or emergency services.

Cellular Phones

Visitors

Project Site
Will visitors be required to check-in prior to accessing the project site?

Yes

Visitor Access
Authorized visitors that require access to the project site need to be provided with known information with respect to the site operations and hazards as applicable to the purpose of their site visit. Authorized visitors must have the required PPE and appropriate training to access the project site.

Zachary Simmel is responsible for facilitating authorized visitor access.

Zoning

Work Zone
The work zone will be clearly delineated to ensure that the general public or unauthorized worker access is prevented. The following will be used:

Cones

9. SITE SPECIFIC EMERGENCY RESPONSE PLAN

The Emergency Response Plan addresses potential emergencies at this site, procedures for responding to these emergencies, roles, responsibilities during emergency response, and training. This section also describes the provisions this project has made to coordinate its emergency response with other contractors onsite and with offsite emergency response organizations (as applicable).

During the development of this emergency response plan, local, state, and federal agency disaster, fire, and emergency response organizations were consulted (if required) to ensure that this plan is compatible and integrated with plans of those organizations. Documentation of the dates of these consultations are the names of individuals contacted is kept on file and available upon request.

The site has been evaluated for potential emergency occurrences, based on site hazards, and the major categories of emergencies that could occur during project work are:

- Fire(s)/Combustion
- Hazardous Material Event
- Medical Emergency
- Natural Disaster

A detailed list of emergency types and response actions are summarized in Table X below. Prior to the start of work, the SSO will update the table with any additional site-specific information regarding evacuations, muster points, or additional emergency procedures. The SSO will establish evacuation routes and assembly areas for the Site. All personnel entering the Site will be informed of these routes and assembly areas.

Pre-Emergency Planning

Before the start of field activities, the Project Manager will ensure preparation has been made in anticipation of emergencies. Preparatory actions include the following:

Meeting with the subcontractor/and or client concerning the emergency procedures in the event a person is injured. Appropriate actions for specific scenarios will be reviewed. These scenarios will be discussed, and responses determined before the sampling event commences. A form of emergency communication (i.e.; Cell phone, Air horn, etc.) between the Project Manager and subcontractor and/or client will be agreed on before the work commences.

A training session (i.e., “safety meeting”) given by the Project Manager or their designee informing all field personnel of emergency procedures, locations of emergency equipment and their use, and proper evacuation procedures.

Ensuring field personnel are aware of the existence of the emergency response HASP and ensuring a copy of the HASP accompanies the field team(s).

Onsite Emergency Response Equipment

Emergency procedures may require specialized equipment to facilitate work rescue, contamination control and reduction or post-emergency cleanup. Emergency response equipment stocked

Table 9.1 Emergency Equipment and Emergency PPE			
Emergency Equipment	**Specific Type**	**Quantity Stocked**	**Location Stored**
First Aid Kit	General First Aid Kit	1	With H&A personnel

EVACUATION ALARM
Verbal Communication (Site Personnel are adjacent in work zone)
EVACUATION ROUTES
Will be given a map after site specific training
EVACUATION MUSTER POINT(S)/ SHELTER AREA(S)
Will be given a location after site specific training
EVACUTION RESPONSE DRILLS
The Site relies on outside emergency responders and a drill is not required.

Table 9-2 – Emergency Planning

Emergency Type	Notification	Response Action	Evacuation Plan/Route
Chemical Exposure	Report event to SSO immediately	Refer to Safety Data Sheet for required actions	Remove personnel from work zone
Fire - Small	Notify SSO and contact 911	Use fire extinguisher if safe and qualified to do so	Mobilize to *Muster Point*
Fire – Large/Explosion	Notify SSO and contact 911	Evacuate immediately	Mobilize to *Muster Point*
Hazardous Material – Spill/Release	Notify SSO; SSO will contact PM to determine if additional agency notification is	If practicable don PPE and use spill kit and applicable procedures to contain the release	See Evacuation Map for route, move at least 100 ft upwind of spill location
Medical – Bloodborne Pathogen	Notify SSO	If qualified dispose in container or call client or city to notify for further instruction.	None Anticipated
Medical – First Aid	Notify SSO	If qualified perform first aid duties	None Anticipated
Medical – Trauma	If life threatening or transport is required call 911, immediately	Wait at site entrance for ambulance	Noe Anticipated
Security Threat	Notify SSO who will call 911 as warranted	Keep all valuables out of site and work zones delineated.	None Anticipated
Weather – Earthquake/Tsunami's	STOP WORK and evacuate Site upon any earthquake	Turn off equipment and evacuate as soon as is safe to do so	Mobilize to *Shelter Location*
Weather – Lightning Storm	STOP WORK	Work may resume 30 minutes after the last observed lightning.	None Anticipated
Weather – Tornadoes/Hurricanes	Monitor weather conditions STOP WORK and evacuate the site	Evacuate to shelter location or shelter in place immediately	Mobilize to *Shelter Location*
MUSTER POINT Site walk along the Eckdord street		*SHELTER LOCATION* Personal vehicle	
In case of site emergencies, site personnel shall be evacuated per this table and will not participate in emergency response activities. Site emergencies shall be reported to local, state, and federal governmental agencies as required.			

10. HASP ACKNOWLEDGEMENT FORM

All Haley & Aldrich employees onsite must sign this form prior to entering the site.

I hereby acknowledge receipt of, and briefing on, this HASP prior to the start of on-site work. I declare that I understand and agree to follow the provisions, processes, and procedures set forth herein at all times while working on this site.

Printed Name	Signature	Date

ATTACHMENT A
HASP AMENDMENT FORM

HASP AMENDMENT FORM

This form is to be used whenever there is an immediate change in the project scope that will require an amendment to the HASP. For project scope changes associated with "add-on" tasks, the changes must be made in the body of the HASP. Before changes can be made, a review of the potential hazards must be initiated by the Haley & Aldrich Project Manager.

This original form must remain on site with the original HASP. If additional copies of this HASP have been distributed, it is the Project Manager's responsibility to forward a signed copy of this amendment to those who have copies.

Amendment No.	
Site Name	
Work Assignment No.	
Date	
Type of Amendment	
Reason for Amendment	
Alternate Safeguard Procedures	
Required Changes in PPE	

Project Manager Name (Print)	Project Manager Signature	Date

Health & Safety Approver Name (Print)	Health & Safety Approver Signature	Date

ATTACHMENT B
TRAINING REQUIREMENTS

TRAINING REQUIREMENTS

Health and Safety Training Requirements

Personnel will not be permitted to supervise or participate in field activities until they have been trained to a level required by their job function and responsibility. Haley & Aldrich staff members, contractors, subcontractors, and consultants who have the potential to be exposed to contaminated materials or physical hazards must complete the training described in the following sections.

The Haley & Aldrich Project Manager/FSM will be responsible for maintaining and providing to the client/site manager documentation of Haley & Aldrich staff members' compliance with required training as requested. Records shall be maintained per OSHA requirements.

40-Hour Health and Safety Training

The 40-Hour Health and Safety Training course provides instruction on the nature of hazardous waste work, protective measures, proper use of personal protective equipment, recognition of signs and symptoms which might indicate exposure to hazardous substances, and decontamination procedures. It is required for all personnel working on-site, such as equipment operators, general laborers, and supervisors, who may be potentially exposed to hazardous substances, health hazards, or safety hazards consistent with 29 CFR 1910.120.

8-hour Annual Refresher Training

Personnel who complete the 40-hour health and safety training are subsequently required to attend an annual 8-hour refresher course to remain current in their training. When required, site personnel must be able to show proof of completion (i.e., certification) at an 8-hour refresher training course within the past 12 months.

8-Hour Supervisor Training

On-site managers and supervisors directly responsible for, or who supervise staff members engaged in hazardous waste operations, should have eight additional hours of Supervisor training in accordance with 29 CFR 1910.120. Supervisor Training includes, but is not limited to, accident reporting/investigation, regulatory compliance, work practice observations, auditing, and emergency response procedures.

Additional Training for Specific Projects

Haley & Aldrich personnel will ensure their personnel have received additional training on specific instrumentation, equipment, confined space entry, construction hazards, etc., as necessary to perform their duties. This specialized training will be provided to personnel before engaging in the specific work activities including:

- Client specific training or orientation
- Competent person excavations
- Confined space entry (entrant, supervisor, and attendant)
- Heavy equipment including aerial lifts and forklifts
- First aid/ CPR
- Use of fall protection
- Use of nuclear density gauges
- Asbestos awareness

ATTACHMENT C
ROLES AND RESPONSIBILITIES

SITE ROLES AND RESPONSIBILITIES

Haley & Aldrich Personnel

Field Safety Manager (FSM)

The Haley & Aldrich FSM is a full-time Haley & Aldrich staff member, trained as a safety and health professional, who is responsible for the interpretation and approval of this Safety Plan. Modifications to this Safety Plan cannot be undertaken by the PM or the SSO without the approval of the FSM.

Specific duties of the FSM include:

- Approving and amending the Safety Plan for this project
- Advising the PM and SHSOs on matter relating to health and safety
- Recommending appropriate personal protective equipment (PPE) and air monitoring instrumentation
- Maintaining regular contact with the PM and SSO to evaluate the conditions at the property and new information which might require modifications to the HASP and
- Reviewing and approving JSAs developed for the site-specific hazards.

Project Manager (PM)

The Haley & Aldrich PM is responsible for ensuring that the requirements of this HASP are implemented at that project location. Some of the PM´s specific responsibilities include:

- Assuring that all personnel to whom this HASP applies have received a copy of it;
- Providing the FSM with updated information regarding environmental conditions at the site and the scope of site work;
- Providing adequate authority and resources to the on-site SHSO to allow for the successful implementation of all necessary safety procedures;
- Supporting the decisions made by the SHSO;
- Maintaining regular communications with the SHSO and, if necessary, the FSM;
- Coordinating the activities of all subcontractors and ensuring that they are aware of the pertinent health and safety requirements for this project;
- Providing project scheduling and planning activities; and
- Providing guidance to field personnel in the development of appropriate Job Safety Analysis (JSA) relative to the site conditions and hazard assessment.

Site Health & Safety Officer (SHSO)

The SHSO is responsible for field implementation of this HASP and enforcement of safety rules and regulations. SHSO functions may include some or all of the following:

- Act as Haley & Aldrich´s liaison for health and safety issues with client, staff, subcontractors, and agencies.
- Verify that utility clearance has been performed by Haley & Aldrich subcontractors.
- Oversee day-to-day implementation of the Safety Plan by Haley & Aldrich personnel on site.

- Interact with subcontractor project personnel on health and safety matters.
- Verify use of required PPE as outlined in the safety plan.
- Inspect and maintain Haley & Aldrich safety equipment, including calibration of air monitoring instrumentation used by Haley & Aldrich.
- Perform changes to HASP and document in Appendix A of the HASP as needed and notify appropriate persons of changes.
- Investigate and report on-site accidents and incidents involving Haley & Aldrich and its subcontractors.
- Verify that site personnel are familiar with site safety requirements (e.g., the hospital route and emergency contact numbers).
- Report accidents, injuries, and near misses to the Haley & Aldrich PM and FSM as needed.

The SHSO will conduct initial site safety orientations with site personnel (including subcontractors) and conduct toolbox and safety meetings thereafter with Haley & Aldrich employees and Haley & Aldrich subcontractors at regular intervals and in accordance with Haley & Aldrich policy and contractual obligations. The SHSO will track the attendance of site personnel at Haley & Aldrich orientations, toolbox talks, and safety meetings.

Field Personnel

Haley & Aldrich personnel are responsible for following the health and safety procedures specified in this HASP and for performing their work in a safe and responsible manner. Some of the specific responsibilities of the field personnel are as follows:

- Reading the HASP in its entirety prior to the start of on-site work;
- Submitting a completed Safety Plan Acceptance Form and documentation of medical surveillance and training to the SHSO prior to the start of work;
- Attending the pre-entry briefing prior to beginning on-site work;
- Bringing forth any questions or concerns regarding the content of the Safety Plan to the PM or the SHSO prior to the start of work;
- Stopping work when it is not believed it can be performed safely;
- Reporting all accidents, injuries and illnesses, regardless of their severity, to the SHSO;
- Complying with the requirements of this safety plan and the requests of the SHSO; and
- Reviewing the established JSAs for the site-specific hazards on a daily basis and prior to each shift change, if applicable.

Visitors

Authorized visitors (e.g., Client Representatives, Regulators, Haley & Aldrich management staff, etc.) requiring entry to any work location on the site will be briefed by the Site Supervisor on the hazards present at that location. Visitors will be escorted at all times at the work location and will be responsible for compliance with their employer´s health and safety policies. In addition, this safety plan specifies the minimum acceptable qualifications, training and personal protective equipment which are required for entry to any controlled work area; visitors must comply with these

requirements at all times. Unauthorized visitors, and visitors not meeting the specified qualifications, will not be permitted within established controlled work areas.

SUBCONTRACTOR PERSONNEL

Subcontractor Site Representative

Each contractor and subcontractor shall designate a Contractor Site Representative. The Contractor Site Representative will interface directly with Insert Staff Name Here, the Subcontractor Site Safety Manager, with regards to all areas that relate to this safety plan and safety performance of work conducted by the contractor and/or subcontractor workforce. Contractor Site Representatives for this site are listed in the Contact Summary Table at the beginning of the Safety Plan.

Subcontractor Site Safety Manager

Each contractor / subcontractor will provide a qualified representative who will act as their Site Safety Manager (Sub-SSM). This person will be responsible for the planning, coordination, and safe execution of subcontractor tasks, including preparation of job hazard analyses (JHA), performing daily safety planning, and coordinating directly with the Haley & Aldrich SHSO for other site safety activities. This person will play a lead role in safety planning for Subcontractor tasks, and in ensuring that all their employees and lower tier subcontractors are in adherence with applicable local, state, and/or federal regulations, and/or industry and project specific safety standards or best management practices.

General contractors / subcontractors are responsible for preparing a site-specific HASP and/or other task specific safety documents (e.g., JHAs), which are, at a minimum, in compliance with local, state, and/or federal other regulations, and/or industry and project specific safety standards or best management practices. The contractor(s)/subcontractor(s) safety documentation will be at least as stringent as the health and safety requirements of the Haley & Aldrich Project specific HASP.

Safety requirements include, but are not limited to: legal requirements, contractual obligations and industry best practices. Contractors/subcontractors will identify a site safety representative during times when contractor/subcontractor personnel are on the Site. All contractor/subcontractor personnel will undergo a field safety orientation conducted by the Haley & Aldrich SHSO and/or PM prior to commencing site work activities. All contractors / subcontractors will participate in Haley & Aldrich site safety meetings and their personnel will be subject to training and monitoring requirements identified in this Safety Plan. If the contractors / subcontractors means and methods deviate from the scope of work described in Section 1 of this Safety Plan, the alternate means and methods must be submitted, reviewed and approved by the Haley & Aldrich SHSO and/or PM prior to the commencement of the work task. Once approved by the Haley & Aldrich SHSO and/or PM, the alternate means and methods submittal will be attached to this Safety Plan as an Addendum.

ATTACHMENT D
JOB SAFETY ANALYSES

FORMER CARTER SPRAY FINISHING CORP.

KEY TASK ENTER TASK NUMBER.: ENTER TASK NAME.

Subtask Category	Potential Hazards	Controls
Drilling	Slips, Trips, and Falls	• Keep work area clear
Drilling	Utility locators and underground hazards	• Utility markout
Drilling	Noise reduction	• Wear appropriate noise reducing PPE
Drilling	Heavy equipment	• Avoid line of fire, wear PPE
Sampling	Slips, trips, and falls	• Keep work area clear
Sampling	General site hazards	• Wear PPE
Enter subtask information.	Choose category.	• Enter control(s) for each hazard.
Enter subtask information.	Choose category.	• Enter control(s) for each hazard.
Enter subtask information.	Choose category.	• Enter control(s) for each hazard.
Enter subtask information.	Choose category.	• Enter control(s) for each hazard.
Enter subtask information.	Choose category.	• Enter control(s) for each hazard.
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Enter subtask information.	Choose category.	• Enter control(s) for each hazard.