

REMEDIAL INVESTIGATION WORK PLAN
2074-2080 MCDONALD AVENUE
BROOKLYN, NEW YORK
BCP SITE NO. TBD

by
H & A of New York Engineering and Geology, LLP
New York, New York

for
Crystal Residences LLC
Brooklyn, New York

and
New York State Department of Environmental Conservation
Albany, New York

File No. 0214715
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DRAFT





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New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway, 12th Floor
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Subject: Remedial Investigation Work Plan
2074-2080 McDonald Avenue Redevelopment Site
2074-2080 McDonald Avenue
Brooklyn, New York

Ladies and Gentlemen:

On behalf of Crystal Residences LLC, H & A of New York Engineering and Geology, LLP is submitting for the review and approval of the New York State Department of Environmental Conservation (NYSDEC) this Remedial Investigation Work Plan (RIWP) for the property located at 2074-2080 McDonald Avenue in Brooklyn, New York (Site). This document was submitted as part of the Brownfield Cleanup Program Application for the Site. This RIWP has been developed based on NYSDEC's *Technical Guidance for Site Investigation and Remediation* (Division of Environmental 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,
H & A OF NEW YORK ENGINEERING AND GEOLOGY, LLP

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Certification

I, Mari C. Conlon, certify that I am currently a Qualified Environmental Professional as defined in Title 6 of the New York Codes, Rules and Regulations Part 375, and that this Remedial Investigation Work Plan¹ was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the Division of Environmental Remediation Technical Guidance for Site Investigation and Remediation (DER-10).

FINAL WILL BE CERTIFIED

Mari C. Conlon, P.G.

Date

¹ Certification applies to remedial investigation activities conducted after the execution of a Brownfield Cleanup Agreement (BCA).

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List of Acronyms and Abbreviations

Acronym	Definition
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
A	
AOC	Area of Concern
Applicant	Crystal Residences LLC
ASP	Analytical Services Protocol
AWQS	Ambient Water Quality Standards
B	
BCA	Brownfield Cleanup Agreement
BCP	Brownfield Cleanup Program
bgs	below ground surface
BTEX	benzene, toluene, ethylbenzene, and xylenes
C	
CAMP	Community Air Monitoring Plan
CEQR	City Environmental Quality Review
Coastal	Coastal Environmental Solutions, Inc.
CVOC	chlorinated volatile organic compounds
D	
DER-10	Division of Environmental Remediation-10 (<i>specifically "May 2010 NYSDEC Technical Guidance for Site Investigation and Remediation"</i>)
DUSR	Data Usability Summary Report
E	
EAS	Environmental Assessment Statement
ELAP	Environmental Laboratory Approval Program
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
ESI	Environmental Site Investigation
F	
FSP	Field Sampling Plan
ft	feet/foot
FWRIA	Fish and Wildlife Resource Impact Analysis
G	
GPR	ground penetrating radar
GPRS	Ground Penetrating Radar Systems, LLC

List of Acronyms and Abbreviations

Acronym	Definition
H	
Haley & Aldrich of New York	H & A of New York Engineering and Geology, LLP
HASP	Health and Safety Plan
HVAC	heating, ventilation, and air conditioning
L	
Lakewood	Lakewood Environmental Services Corp.
M	
mg/kg	milligrams per kilogram
MTA	Metropolitan Transit Authority
N	
NOVA	NOVA Geophysical Engineering Subsurface Mapping Solutions
NYCDEP	New York City Department of Environmental Protection
NYCOER	New York City Office of Environmental Remediation
NYCRR	New York Codes, Rules and Regulations
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
NYSDOT	New York State Department of Transportation
O	
OSHA	Occupational Safety and Health Administration
P	
Pace	Pace Analytical Laboratories
PAH	Polycyclic aromatic hydrocarbon
PCB	polychlorinated biphenyl
PCE	tetrachloroethene
PFAS	per- and polyfluoroalkyl substances
PID	photoionization detector
PM-10	particulate matter less than 10 micrometers in size
ppm	parts per million
PVC	polyvinyl chloride
Q	
QA/QC	quality assurance/quality control
QAO	Quality Assurance Officer
QAPP	Quality Assurance Project Plan
QHHEA	Qualitative Human Health Exposure Assessment

List of Acronyms and Abbreviations

Acronym	Definition
R	
RAWP	Remedial Action Work Plan
REC	Recognized Environmental Condition
RI	Remedial Investigation
RIR	Remedial Investigation Report
RIWP	Remedial Investigation Work Plan
RRSCOs	Restricted-Residential Soil Cleanup Objectives
S	
SEFA	Spreadsheets for Environmental Footprint Analysis
Site	the property located at 2074-2080 McDonald Avenue, Brooklyn, New York
SVOC	semi-volatile organic compound
T	
TAL	Target Analyte List
TCE	trichloroethene
TCL	Target Compound List
U	
UST	underground storage tank
UUSCOs	Unrestricted Use Soil Cleanup Objectives
V	
VOC	volatile organic compound

1. Introduction

On behalf of the Applicant, Crystal Residences LLC, H & A of New York Engineering and Geology, LLP (Haley & Aldrich of New York) has prepared this Remedial Investigation (RI) Work Plan (RIWP) for the property located at 2074-2080 McDonald Avenue (see Figure 1) in the Gravesend neighborhood of Brooklyn, New York (Site). This RIWP was prepared in accordance with the regulations and guidance applicable to the Brownfield Cleanup Program (BCP).

The Site is identified as Block 6680, Lots 39 and 42 on the New York City tax map. The Site is approximately 31,480 square feet (0.72 acres), where Lot 42 is currently improved with a two-story school building, and Lot 39 is improved with a two-story commercial building occupied by an interior design office/retail space on the ground floor and a recreation/events space utilized by the neighboring school. The Site is bounded by a recycling center and residential buildings to the north; McDonald Avenue and an elevated Metropolitan Transportation Authority (MTA) subway platform, followed by residential and commercial buildings to the east; Avenue S, followed by Brooklyn Union Gas Co. and a public health facility to the south; and Lake Street, followed by an ambulance service and residential buildings to the west. A Site Plan is shown in Figure 2.

The Site is located within a residential (R5B) zoning area with a commercial (C4-4L) overlay. The Site is located in an urban area surrounded by residential and commercial properties served by municipal water. Surrounding land uses are depicted on Figure 3.

The Site has been assigned an environmental E-Designation (E-662) for hazardous materials, noise, and air quality as determined by the 2080 McDonald Avenue Rezoning completed by the City in April 2022 (City Environmental Quality Review [CEQR] No. 21DCP132K). The air quality restrictions associated with new development at this Site include the requirement that the development must exclusively use natural gas as the fuel type for heating, ventilation, air conditioning (HVAC) and hot water systems, ensuring that the stack is located at the building's highest level or at least 118 feet (ft) above grade, and that the stack is located at least 100 ft from the southern lot line facing Avenue S to avoid any potential significant adverse air quality impacts.

Noise restrictions associated with new development at this Site include the requirement that facilities must provide a closed window condition with a minimum of 35 A-weighted decibel (dBA) window/wall attenuation on (i) the facades facing McDonald Avenue for floors below the rail line; (ii) the facades facing Kings Highway within 50 ft of McDonald Avenue for floors below the rail line; (iii) the facades facing Avenue S within 50 ft of McDonald Avenue for floors below the rail line; and (iv) 31 dBA of attenuation on all remaining facades below and above the rail line in order to maintain an interior noise level not greater than 45 dBA for residential and community facility uses, as illustrated in the Environmental Assessment Statement (EAS). In order to maintain a closed window condition, an alternate means of ventilation must also be provided; such means can include, but are not limited to, central air conditioning.

Redevelopment plans are still currently in the design phase; however, the proposed development includes a multi-story mixed-use commercial and residential building with a full cellar extending to approximately 10 to 12 ft below ground surface (bgs).

1.1 PURPOSE

The objective of the RI is to characterize the nature and extent of environmental impacts at the Site and to provide sufficient information to evaluate remedial alternatives, as required. Based on the former use of the Site and previous investigations conducted, petroleum-related volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), chlorinated volatile organic compounds (CVOCs), and heavy metals are the anticipated contaminants of concern.

Previous investigations did not comprehensively characterize the nature and the extent of soil, groundwater, and soil vapor contamination on the Site; specifically, there are vertical and lateral data gaps that require additional sample collection. An RI will be performed upon approval of this RIWP. Results of the additional sample analyses will be used to confirm the results of the previous Site characterization activities, delineate any on-Site source(s), and determine a course for Remedial Action.

Further, upon review of the analytical results of prior reports, the project is seeking entry into the New York State Department of Environmental Conservation (NYSDEC) BCP due to soil impacted with SVOCs and metals, and soil vapor impacted with VOCs, including CVOCs and benzene, toluene, ethylbenzene, and xylenes (BTEX). Specifically, CVOCs were identified in soil vapor samples taken on the upgradient portion of the Site and upgradient from the school, where elevated CVOCs in indoor air were detected. Further evaluation of the source of CVOCs is necessary to ensure protection of human health and the environment.

2. Background

2.1 CURRENT LAND USE

The Site is currently improved with a two-story school building on Lot 42, and a two-story commercial building occupied by an interior design office/retail space on the ground floor and a recreation/events space utilized by the neighboring school on Lot 39.

2.2 SITE HISTORY

Based on a Phase I Environmental Site Assessment (ESA) completed by Haley & Aldrich of New York for the Site in August 2025, the Site was first developed by the late 1800s with two one-story residential buildings and a well house. By the early 1930s, a new one-story structure, identified as a laundry facility, had been constructed in the northern portion of the property. By the 1950s, the laundry facility had been converted to a junk shop, and two one-story buildings for manufacturing use had been constructed, one of which was identified as a clothing manufacturing facility. By the late 1960s, the junk shop was repurposed as a welding space. The former manufacturing buildings were identified as a two-story school and a two-story loft, and a construction storage shed had been developed on the property. By the mid-1970s, two one-story warehouse structures had been constructed on the western portion of the property, while the eastern portion remained in use as a school. These structures remain in place and are currently occupied by a garage, an interior design office/retail space, and YDE Girls High School.

Regulatory review shows the property is an E-Designated site (E-662), which requires hazardous materials Phase I and Phase II testing protocols, restrictions on fuel type (natural gas), exhaust stack location limitations, and minimum window/wall attenuation requirements to be implemented under New York City Department of Environmental Protection (NYCDEP) and New York City Office of Environmental Remediation (NYCOER) oversight before any building permit is issued.

The east-adjacent Prospect & Coney Island Railroad has operated since the late 1800s and may have contributed petroleum products, polycyclic aromatic hydrocarbons (PAHs), or heavy metals associated with historic rail operations. The Flatbush Coal Co., located north and upgradient at 49–57 Lake Street, operated from the early 1930s through at least 2007 and may have released coal-related contaminants such as PAHs and metals. An auto repair facility at 2060 McDonald Avenue, active since at least 1993, may be a source of petroleum- or solvent-related impacts. Additionally, the American Asbestos Manufacturing Co., identified at 2046–2058 McDonald Avenue in the City Directory in 1945 and on the 1950 Sanborn Fire Insurance Map, may have contributed asbestos-containing materials or other hazardous substances.

2.3 SURROUNDING LAND USE

The Site is located within a mixed residential/commercial area of the Gravesend neighborhood of Brooklyn, New York, characterized by low-rise residential buildings, commercial buildings, and educational institutions. There is one sensitive receptor within a 500-ft radius of the Site as listed below:

- Magen David Yeshivah – 2130 McDonald Avenue, Brooklyn, New York 11223, listed as an educational high school.

Properties immediately surrounding the Site are zoned for mixed residential, commercial, and manufacturing use. A surrounding land use map is included as Figure 3.

2.4 SURROUNDING LAND USE HISTORY

The area surrounding the Site has been used primarily for residential, commercial, and manufacturing uses from the late 1800s to the present day. From 1977 to 2007, the east-adjacent property operated as a two-story automobile service station. The east-adjacent Prospect & Coney Island Railroad has operated since the late 1800s, and The Flatbush Coal Co., located north and upgradient at 49–57 Lake Street, operated from the early 1930s through at least 2007. An auto repair facility at 2060 McDonald Avenue has been active since at least 1993, and the American Asbestos Manufacturing Co., identified at 2046–2058 McDonald Avenue, operated from 1945 to 1950.

2.5 PREVIOUS INVESTIGATIONS

The following previous investigations and reports were prepared for the Site and are included in the BCP Application:

- *Phase I Environmental Site Assessment Report*, prepared by Haley & Aldrich of New York, prepared for Emerald Developers LLC, August 5, 2025.
- *Limited Phase II Environmental Site Investigation Report*, prepared by Haley & Aldrich of New York, prepared for Emerald Developers LLC, August 29, 2025.

A summary of the environmental findings of these investigations is provided below.

Phase I Environmental Site Assessment, prepared by Haley & Aldrich of New York, prepared for Emerald Developers LLC, August 5, 2025.

A Phase I ESA was conducted for the Site by Haley & Aldrich of New York in August 2025. At the time of the Phase I ESA Site reconnaissance in August 2025, the Site was owned by Jackson 2064 McDonald LLC (Lot 39) and Jackson Ex 2 Avenue S LLC (Lot 42). Haley & Aldrich of New York indicated the following Recognized Environmental Condition (REC) associated with the Site:

REC #1: Former Uses and Conditions on Subject Property

Sanborn maps identify the following historical uses on the subject property: a junk shop (1950s) and two manufacturing buildings, including a clothing manufacturing facility (1950) and a welding facility (late 1960s through mid-1970s). Manufacturing operations may have involved the use of process chemicals, such as dyes, degreasers, or oils; the former junk shop may have included the handling or storage of discarded materials and equipment potentially containing hazardous substances, such as lubricants, batteries, or electrical components. Due to the nature of these operations and the absence of documentation confirming that environmental impacts are not present, these historical uses of the subject property are considered RECs.

REC #2: Former Uses on Adjacent and Surrounding Properties

Several historical and current uses on adjacent and nearby properties may present a potential for contaminant migration onto the subject property. The east-adjacent Prospect & Coney Island Railroad has operated since the late 1800s and may have contributed petroleum products, polycyclic aromatic hydrocarbons (PAHs), or heavy metals associated with historic rail operations. The Flatbush Coal Co., located north and upgradient at 49–57 Lake Street, operated from the early 1930s through at least 2007 and may have released coal-related contaminants such as PAHs and metals. An auto repair facility at 2060 McDonald Avenue, active since at least 1993, may be a source of petroleum or solvent-related impacts. Additionally, the American Asbestos Manufacturing Co., identified at 2046–2058 McDonald Avenue in the City Directory in 1945 and on the 1950 Sanborn Map and, may have contributed asbestos-containing materials or other hazardous substances. Due to the nature of these operations and their upgradient location, these off-site uses are considered RECs.

Limited Phase II Environmental Site Investigation Report, prepared by Haley & Aldrich of New York, prepared for Emerald Developers LLC, August 29, 2025.

Haley & Aldrich of New York performed a Limited Phase II Environmental Site Investigation (ESI) at the subject property in August, November, and December 2025. The investigation included (i) a Site inspection to identify Areas of Concern (AOCs) and physical obstructions; (ii) the installation of 16 soil borings (B-1 through B-16) across the Site and the collection of 17 soil samples for chemical analysis; (iii) the installation of four groundwater monitoring wells (TWP-1 through TWP-4) across the Site and the collection of four groundwater samples for chemical analysis; (iv) the installation of five soil vapor implants (SSV-2, and SV-1 through SV-4) across the Site and the collection of five soil vapor samples for chemical analysis; and (v) the collection of one indoor air sample from the cellar level of the Site for chemical analysis.

Field observations and laboratory analytical results are summarized below. Analytical results are also presented on Figures 5 and 6.

- The elevation of the Site is approximately 22 ft above mean sea level. Bedrock was not encountered during this investigation, and groundwater was encountered at depths ranging from 19.5 to 20.6 ft bgs. Groundwater flow direction was reported from northeast to southwest. The stratigraphy of the Site, from the surface down, consists of potentially native brown fine to medium sand, with trace amounts of fine gravel and silt to 24 ft below grade.
- Soil analytical results were compared to NYSDEC Title 6 of the New York Codes, Rules, and Regulations (NYCRR) Part 375 Unrestricted Use Soil Cleanup Objectives (UUSCOs) and Restricted-Residential Soil Cleanup Objectives (RRSCOs). Results are summarized as follows:
 - SVOCs, including benzo(a)anthracene (maximum [max.] of 1.7 milligrams per kilogram [mg/kg]), benzo(a)pyrene (max. of 1.5 mg/kg), benzo(b)fluoranthene (max. of 2.3 mg/kg), benzo(k)fluoranthene (max. of 0.82 mg/kg), chrysene (max. of 1.7 mg/kg), and indeno(1,2,3-cd)pyrene (max. of 0.95 mg/kg), were detected above their RRSCOs.
 - Five Target Analyte List (TAL) metals, including copper (max. of 256 mg/kg), lead (max. of 365 mg/kg), mercury (max. of 0.486 mg/kg), nickel (max. of 44 mg/kg), and zinc (max.

of 626 mg/kg), were detected at concentrations exceeding their UUSCOs within one or more soil samples collected across the Site.

- No per- and polyfluoroalkyl substances (PFAS) compounds were detected within the soil samples retained for analysis.
- Soil vapor results collected during the ESI were compared to the compounds listed in Table 3.1 Air Guidance Values derived by the New York State Department of Health (NYSDOH), located in the NYSDOH Final Guidance for Evaluating Soil Vapor Intrusion, dated October 2006, and the revised NYSDOH Decision Matrices dated May 2017 and February 2024.
 - The soil vapor results indicated low levels of BTEX and CVOCs.
 - The total concentration of BTEX ranged from 11.95 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) to 209.3 $\mu\text{g}/\text{m}^3$.
 - The total concentration of CVOCs ranged from 4.3 $\mu\text{g}/\text{m}^3$ to 330.39 $\mu\text{g}/\text{m}^3$.
 - CVOC detections included tetrachloroethene (PCE; ranging from 3 $\mu\text{g}/\text{m}^3$ to 130 $\mu\text{g}/\text{m}^3$), trichloroethene (TCE; ranging from non-detect to 200 $\mu\text{g}/\text{m}^3$), carbon tetrachloride (ranging from 0.39 $\mu\text{g}/\text{m}^3$ to 0.74 $\mu\text{g}/\text{m}^3$), and methylene chloride (ranging from non-detect to 5.5 $\mu\text{g}/\text{m}^3$). 1,1-Dichloroethene, cis-1,2-Dichloroethene, and vinyl chloride were not detected within any of the soil vapor samples.
 - PCE and TCE were detected above the monitoring level range established within the NYSDOH soil vapor guidance matrix.
- Groundwater results were compared to 6 NYCRR Part 703.5 Class GA Ambient Water Quality Standards (AWQS). Results are summarized below:
 - No VOCs were detected above AWQS within any of the groundwater samples collected.

3. Remedial Investigation

This section describes the field activities to be conducted during the RI and provides the sampling scope, objectives, methods, anticipated number of samples, and sample locations. A summary of the sampling and analysis plan is provided in Table 1, and proposed sample locations are shown on Figure 4. The following activities will be conducted to fill data gaps and determine the nature and extent of contamination at the Site.

3.1 UTILITY MARKOUT

A previous ground-penetrating radar (GPR) survey was completed to facilitate access to previous investigation locations; however, another Site-wide GPR survey will be performed prior to the commencement of any ground-intrusive activities. The GPR scan will potentially identify any underground structures, including, but not limited to, utilities and underground storage tanks (USTs), in preparation for the proposed sampling work. It is noted that borings may be adjusted based on the results of the GPR scan, and any adjustments to the locations presented below will be communicated to NYSDEC. Field personnel will mobilize to the Site to mark out (with flagging or paint) the proposed soil sample locations. Prior to mobilization, 811-Dig Safe New York will be contacted to mark public underground utilities. If necessary, the adjacent property owners and/or private vendors will be contacted for assistance with marking out of utilities. Once the utilities are marked, field equipment and personnel will be mobilized to the Site.

3.2 SOIL SAMPLING

To further characterize soil conditions, additional on-Site soil samples will be collected to meet NYSDEC Division of Environmental Remediation (DER)-10 requirements for RIs.

As part of this RI, a total of 13 soil borings will be installed to the groundwater interface. Borings will be installed by a track-mounted direct-push drill rig (Geoprobe®), or other drilling technology as needed, operated by a licensed operator. Soil samples will be collected from dedicated liners using stainless-steel macrocores, casings, or sampling spoons. Samples will be collected using laboratory-provided clean bottle ware. VOC grab samples will be collected using terra cores or encores.

Soils will be logged continuously by a geologist or engineer using the Modified Burmister Soil Classification System. The presence of staining, odors, and photoionization detector (PID) readings will be noted. Sampling methods are described in the Field Sampling Plan (FSP) provided in Appendix A. A Quality Assurance Project Plan (QAPP) is provided in Appendix B. Laboratory data will be reported in Analytical Services Protocols (ASP) Category B deliverable format.

Soil samples representative of Site conditions will be collected at 13 locations widely distributed across the Site, as shown on Figure 4. Up to three grab samples will be collected from each soil boring. One surface sample will be collected from the top 0 to 2 ft immediately beneath the impervious Site cover (i.e., surface soils). A second sample will be collected at an intermediate depth (within the last 2 ft of the fill layer, estimated at 7 to 9 ft bgs, but subject to field observation). A third sample will be collected

from the 2-ft interval above the groundwater interface. If evidence of contamination is observed (staining, odors, or elevated PID readings), additional soil samples will be collected from the contaminated interval. If the contaminated interval is the deepest sample at the soil boring, then a soil sample will be collected at the next interval where there is no evidence of contamination in order to delineate the vertical extent of contamination. The number of samples collected during the RI may vary based on field conditions.

Soil samples will be analyzed for:

- Target Compound List (TCL) VOCs using United States Environmental Protection Agency (EPA) Method 8260B;
- TCL SVOCs using EPA Method 8270C;
- TAL metals using EPA Method 6010;
- Polychlorinated biphenyls (PCBs) using EPA Method 8082;
- TCL pesticides using EPA Method 8081B;
- PFAS using EPA Method 1633A; and
- 1,4-dioxane using EPA Method 8270.

Samples to be analyzed for PFAS will be collected and analyzed in accordance with the NYSDEC-issued April 2023 “Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Under NYSDEC’s Part 375 Remedial Programs.” As needed, additional samples may be collected to satisfy waste characterization analytical needs for facilities located in neighboring states.

3.3 GROUNDWATER SAMPLING

The purpose of the groundwater sampling is to obtain current groundwater data and analyze for additional parameters (i.e., PFAS and 1,4-dioxane) to meet NYSDEC DER-10 requirements for RIs. Groundwater is presumed to flow east to west.

A total of six 2-inch permanent monitoring wells will be installed to approximately 25 ft bgs or to at least 5 ft below the groundwater interface (if encountered at a shallower depth). Monitoring wells will be installed with a solid 2-inch polyvinyl chloride (PVC) riser and PVC with a 20-slot screen for the screened interval. Wells will be screened to straddle the groundwater table. The screen pack will consist of No. 0 certified clean sand filled to a depth of 2 ft above the screen. A bentonite seal will be placed above the sand pack for each monitoring well, and the remainder of the borehole will be filled with bentonite grout. Each monitoring well will be completed using a flush-mount well cover. Monitoring wells will have the appropriate 2-inch annular space and will be installed according to NYSDEC guidelines. Observations will be communicated with NYSDEC daily in field reports, further detailed in Section 9.1.

Monitoring wells will be developed by surging a pump in the well several times to pull fine-grained material from the well. Development will be completed until the water turbidity is 50 nephelometric turbidity units or less, or 10 well volumes are removed, if possible. Groundwater sampling will occur at

a minimum of one week after monitoring well development. The well casings will be surveyed by a New York State-licensed surveyor and gauged during a round of synoptic groundwater depth readings to facilitate the preparation of a groundwater contour map and to determine the direction of groundwater flow.

The sampling and analysis plan is summarized in Table 1. Proposed monitoring well locations are provided on Figure 4. Proposed locations will be dependent on field observation and will be communicated with NYSDEC in daily reporting.

Monitoring wells will be sampled and analyzed for:

- TCL VOCs using EPA Method 8260B;
- TCL SVOCs using EPA Method 8270C;
- Total metals using EPA Methods 6010/7471;
- Dissolved metals using EPA Methods 6010/7471;
- PCBs using EPA Method 8082;
- TCL pesticides using EPA Method 8081B;
- PFAS using EPA Method 1633A; and
- 1,4-dioxane using EPA Method 8270 Selective Ion Monitoring.

Samples to be analyzed for PFAS will be collected and analyzed in accordance with the NYSDEC-issued April 2023 “Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Under NYSDEC’s Part 375 Remedial Programs.”

Groundwater wells will be sampled using low-flow sampling methods as described in the FSP. Following the low-flow purge, samples will be collected from monitoring wells for analysis of the analytes mentioned above. Groundwater sampling will be conducted at least one week after monitoring well development.

The FSP presented in Appendix A details field procedures and protocols that will be followed during field activities. The QAPP presented in Appendix B details the analytical methods and procedures that will be used to analyze samples collected during field activities. Monitoring wells sampled for PFAS will be done following the purge and sampling method detailed in the NYSDEC guidance documents (see Appendix C).

3.4 INVESTIGATION-DERIVED WASTE

Following sample collection, boreholes that are not converted to monitoring wells will be backfilled with soil cuttings and an upper bentonite plug. Boreholes will be restored to grade with the surrounding area. If soil is identified as grossly contaminated, it will be separated and placed into a sealed and labeled New York State Department of Transportation (NYSDOT)-approved 55-gallon drum pending characterization and off-Site disposal. Groundwater purged from the monitoring wells during development and sample collection will be placed into a NYSDOT-approved 55-gallon drum pending off-Site disposal.

3.5 SOIL VAPOR SAMPLING

Samples will be collected in accordance with the NYSDOH Final Guidance for Evaluating Soil Vapor Intrusion in the State of New York (NYSDOH, October 2006). Six soil vapor points will be installed to 2 ft above the groundwater interface, approximately 16 to 17 ft bgs. The vapor implants will be installed with a direct-push drilling rig (e.g., Geoprobe®) to advance a stainless-steel probe to the desired sample depth. Sampling will occur for the duration of two hours.

Soil vapor samples will be collected in appropriately sized SUMMA® canisters that have been certified clean by the laboratory, and samples will be analyzed for VOCs using EPA Method TO-15. Flow rates for both purging and sampling will not exceed 0.2 liters per minute. Sampling methods are described in the FSP provided in Appendix A.

3.6 PROPOSED SAMPLING RATIONALE

Haley & Aldrich of New York has proposed the sampling plan described herein, and as shown on Figure 3, in consideration of observations reported during the August 2025 Phase I ESA and the August 2025 Limited Phase II ESI, as discussed in Section 2.5.

During the previous investigations conducted at the Site, soil, soil vapor, and groundwater samples were collected. The sample map from the previous investigations shows data gaps in both the vertical and lateral profiles. In addition, no soil or groundwater samples were analyzed for the full suite analysis.

Proposed sampling locations will include groundwater, soil, and soil vapor sampling to address data gaps and refine the findings of the previous investigations conducted at the Site. The proposed RI will characterize the nature and extent of contamination while evaluating if there is an on-Site source of contamination or a potential off-Site source migrating onto the Site.

The Proposed Sample Location Map (included as Figure 4) is designed to generate sufficient data to identify the source of contamination, classify subsurface conditions throughout the Site as a whole, with a particular focus on sample locations in areas of the Site that have historically revealed evidence of contamination, and to be the basis for a future remedy design.

4. Green and Sustainable Remediation and Climate Resiliency

The work completed as part of this RIWP will comply with all NYSDEC guidance documents, including DER-31: Green Remediation (NYSDEC, 2011). To ensure compliance with DER-31, the work will be completed using the best practices and techniques described below. Specific reporting methods relative to DER-31 are further described below.

4.1 BEST PRACTICES AND TECHNIQUES

DER-31 provides examples of best practices and techniques that could be applied during all phases of remediation (Attachment 1 of the DER-31 policy). In addition, the techniques identified below will be implemented at sites unless a Site-specific evaluation demonstrates impracticability or favors an alternative green approach:

Practice/Technique	Potential Benefits ¹	Applicable to this Work Plan
Use renewable energy where possible or purchase Renewable Energy Credits	Reduce/supplement purchased energy use	
Use of remediation technologies with an intermittent energy supply (i.e., energy use during peak energy generation only)	Reduce energy use	X
Incorporate green building design	Reduce future use impacts	
Reuse existing buildings and infrastructure to reduce waste	Reduce waste and material use	
Reuse and recycle construction and demolition debris and other materials (i.e., grind waste wood and other organics for on-site use)	Reduce waste and material use	
Design cover systems to be usable (i.e., habitat or recreation)	Reduce construction impacts of future development	
Reduce vehicle idling	Reduce air emissions and fuel use	X
Use of Low-Sulfur Diesel Fuel or alternate fuels (i.e., biodiesel or E85) when possible	Reduce air emissions	
Sequence work to minimize double-handling of materials	Reduce construction impacts	X
Use energy-efficient systems and office equipment in the job trailer	Reduce energy use	X
¹ Potential benefits listed are not comprehensive and will vary depending upon the site and implementation of the practice or technique.		

In order to comply with the requirements of DER-31, the following actions will be taken:

1. All vehicles and fuel-consuming equipment on the Site will be shut off if not in use for more than three minutes;
2. Work will be sequenced, to the extent practicable, to allow the direct loading of waste containers for off-Site disposal;
3. Work will be sequenced, to the extent practicable, to limit unnecessary mobilizations to and throughout the Site; and,
4. To the extent practicable, energy-efficient systems and office equipment will be utilized.

4.2 REPORTING

All green and sustainable practices and techniques employed will be discussed in the forthcoming Remedial Investigation Report (RIR).

4.3 CLIMATE RESILIENCY EVALUATION

The Site is not located within a 100-year flood zone. The development plan is still under design but will incorporate consideration for resiliency to climate change, including the design of a cover system that will mimic, rather than alter, the current setting in the vicinity of the Site and will provide pathways for surface runoff and resiliency against future flooding events. A Climate Screening Checklist is provided in Appendix D.

4.4 ENVIRONMENTAL FOOTPRINT ANALYSIS

While the remedy plan is still under development and is dependent on findings from implementing this investigation, an analysis for completing activities as per this RIWP has been performed using Spreadsheets for Environmental Footprint Analysis (SEFA) Version 3.0. Results of the analysis, available in Appendix E, indicate that the majority of greenhouse gas emissions, potentially exceeding 8 metric tons, would be the product of consumables and transportation associated with the investigation.

5. Quality Assurance and Quality Control

Quality assurance and quality control (QA/QC) procedures will be used to provide performance information with regard to the 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) to 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 B.

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6. Data Use

6.1 DATA SUBMITTAL

Analytical data will be supplied in ASP Category B Data Packages. If more stringent than those suggested by the EPA, the laboratory's in-house QA/QC limits will be utilized. Validated data will be submitted to the NYSDEC EQUIS database in an electronic data deliverable package.

6.2 DATA VALIDATION

Data packages will be sent to a qualified data validation specialist to evaluate the 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 ASP. DUSRs will summarize and confirm the usability of the data for project-related decisions. Data validation will be completed in accordance with the DUSR guidelines from the NYSDEC DER. DUSRs will be included with the submittal of an RIR, further discussed in Section 9.2. Additional details on the DUSRs are provided in the QAPP in Appendix B.

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7. Project Organization

A project team for the Site has been created, based on qualifications and experience, with personnel suited for the successful completion of the project.

The NYSDEC-designated Case Manager, **PENDING**, will be responsible for overseeing the successful completion of the project work and adherence to the work plan on behalf of NYSDEC.

The NYSDOH-designated Case Manager, **PENDING**, will be responsible for overseeing the successful completion of the project work and adherence to the work plan on behalf of NYSDOH.

Mari C. Conlon will be the Qualified Environmental Professional and Principal-in-Charge for this work. In this role, Ms. Conlon will be responsible for the overall completion of each task as per the requirements outlined in this RIWP and in accordance with the DER-10 guidance.

Luke McCartney will be the Project Manager for this work. In this role, Mr. McCartney will manage the day-to-day tasks, including coordination and supervision of field engineers and scientists, adherence to the RIWP, and oversight of the project schedule. As the Project Manager, Mr. McCartney will also be responsible for communications with the NYSDEC Case Manager regarding project status, schedule, issues, and updates for project work.

Sebastian Sotomayor will be the Assistant Project Manager and field team leader for this work and will also act as the Quality Assurance Officer (QAO). The QAO will ensure the application and effectiveness of the QAPP by the analytical laboratory and the project staff, provide input to the 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.

Zavier Richards will be the field person responsible for implementing the field effort for this work. Mr. Richards' responsibilities will include implementing the RIWP activities and directing the subcontractors to ensure the successful completion of all field activities.

The drilling subcontractor will be either Coastal Environmental Solutions, Inc. (Coastal) or Lakewood Environmental Services Corp. (Lakewood). In this role, either Coastal or Lakewood will provide environmental drilling to implement the scope of work outlined in this RIWP.

The geophysical survey contractor will be either NOVA Geophysical & Environmental Services (NOVA) or Ground Penetrating Radar Systems, LLC (GPRS). In this role, either NOVA or GPRS will conduct a geophysical survey throughout all accessible regions of the Site prior to the performance of ground-intrusive work.

The analytical laboratory will be Pace Analytical Laboratories (Pace) of Westborough, Massachusetts, a New York Environmental Laboratory Approval Program (ELAP)-certified laboratory (No. 11148). Pace will be responsible for analyzing samples as per the analyses and methods identified in Section 3.

8. Health and Safety

8.1 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 in Appendix F. The HASP includes a description of health and safety protocols to be followed by Haley & Aldrich of New York field staff during implementation of the RIWP, including monitoring within the work area, along with response actions should impacts be observed. The HASP has been developed in accordance with the Occupational Safety and Health Administration (OSHA) Title 40 Code of Federal Regulations Part 1910.120 regulatory requirements for use by Haley & Aldrich of New York field staff who will work at the Site during planned activities. Contractors or other personnel who perform work at the Site are required to develop their own HASP 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 the general industry requirements as applicable based on the nature of work being performed.

8.2 COMMUNITY AIR MONITORING PLAN

The Community Air Monitoring Plan (CAMP) will require real-time monitoring for particulates (i.e., dust) and VOCs at one location upwind of the work area/exclusion zone and one location downwind of the work area/exclusion zone. The proposed investigation work may be completed both indoors and outdoors. The CAMP will be implemented during all intrusive activities and the handling of contaminated or potentially contaminated media to protect downwind receptors. Background readings will be collected at each station prior to intrusive activities each day. Ground-intrusive activities include, but are not limited to, drilling, excavation, stockpiling, equipment idling, transport, etc.

A Haley & Aldrich of New York representative will continually monitor the breathing air in the vicinity of the immediate work area using a PID to measure total VOCs in the air at concentrations as low as 1 part per million (ppm). CAMP will be performed using appropriate equipment to monitor VOCs and particulate matter less than 10 micrometers in size (PM-10). The equipment will be furnished with an audible alarm activated on all field personnel's mobile devices that notifies them when there is an exceedance of the action level. Particulate monitoring will be performed using real-time equipment capable of measuring PM-10 and integrating over a period of 15 minutes (or less) for comparison to the action level. In addition, fugitive dust migration will be visually assessed during all work activities. The equipment will be calibrated at least daily and will be capable of calculating 15-minute running average concentrations. Upwind background conditions will be evaluated prior to intrusive work and periodically throughout the day. The air in the work zone will also be monitored for visible dust generation.

If downwind VOC measurements above 5 ppm are sustained for 15 minutes, dust particulate is measured at $150 \mu\text{g}/\text{m}^3$ above background levels sustained for 15 minutes, or visual dust generation is observed, the intrusive work will be temporarily halted, and actions will be taken in accordance with the NYSDOH Generic CAMP. CAMP data will be provided to NYSDEC in the daily reports, further detailed in Section 9.1. Exceedances of the action levels for VOCs or particulates will be reported to NYSDEC and NYSDOH within 24 hours of the occurrence, along with the reason for the exceedance and any

mitigation completed to address it as per the CAMP. The NYSDOH CAMP guidance document is included as Appendix G.

8.3 QUALITATIVE HUMAN HEALTH EXPOSURE ASSESSMENT

A comprehensive Qualitative Human Health Exposure Assessment (QHHEA) (on-Site and off-Site) will be performed following the collection of all RI data. The exposure assessment will be performed in accordance with Section 3.3(c)4 of DER-10 and the NYSDOH guidance for performing a Qualitative Exposure Assessment (DER-10; Appendix 3B). The results of the QHHEA will be provided in the RIR.

The Site, which was developed in the late 1800s and most recently operated as a school and retail space, is located in the Gravesend neighborhood of Brooklyn, New York. The Site provides little or no wildlife habitat or food value and/or access to the detected subsurface contamination. Gravesend Bay is located approximately 1.6 miles southwest of the Site. The proposed future use of the Site is anticipated to consist of a new building, anticipated to encompass the entire Site footprint, with a full cellar level. As the Site is not located within a half-mile of a water source, based on the requirements stipulated in Section 3.10 and Appendix 3C of DER-10, a Fish and Wildlife Resource Impact Analysis (FWRIA) will not be necessary at this time.

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9. Reporting

9.1 DAILY REPORTING

Daily reports will be submitted to the NYSDEC and NYSDOH summarizing the Site activities completed during the RI. Daily reports will include a Site figure, a description of Site activities, a photograph log, and a summary of community air monitoring performed. Daily reports will be submitted on the following calendar day after Site work is completed.

9.2 REMEDIAL INVESTIGATION REPORT

Following completion of the work, a summary of the RI will be provided to the NYSDEC in an RIR to support the implementation of the proposed Remedial Action. The report will include:

- A description of existing Site conditions;
- Summary of the RI activities;
- Figure showing sampling locations;
- Tables summarizing laboratory analytical results;
- Laboratory analytical data reports;
- DUSR;
- Field sampling data sheets;
- Community air monitoring data;
- Daily reports;
- Findings regarding the nature and extent of contamination at the Site;
- Qualitative Exposure Assessment of any contamination from an on-Site source that has migrated off the Site; and
- Conclusions and recommendations.

The RIR will include all data collected during the RI and adhere to the technical requirements of DER-10.

10. Schedule

The Site owner plans to implement this RIWP promptly upon execution of a Brownfield Cleanup Agreement (BCA) and after approval of the RIWP. The below anticipated schedule highlights the BCP milestones anticipated for the Site.

Anticipated RI/BCP Schedule	
BCP Application, RIWP, and 30-Day Public Comment Period (Concurrent with BCP Application)	February 2026 to April 2026
Executed BCA	May 2026
NYSDEC Approval of RIWP and Citizen Participation Plan	June 2026
RI Implementation	July to August 2026
RIR/Remedial Action Work Plan (RAWP) Submittal, NYSDEC Review, and 45-Day Public Comment Period	September to November 2026
NYSDEC Approval of RIR/RAWP and Issuance of Decision Document	January 2027

References

1. Haley & Aldrich of New York, 2025a. Limited Phase II Environmental Site Investigation Report. Proposed 2074-2080 McDonald Avenue Development 2074-2080 McDonald Ave, Brooklyn, NY. August.
2. Haley & Aldrich of New York, 2025b. Phase I Environmental Site Assessment. Proposed 2074-2080 McDonald Avenue Development. 2074-2080 McDonald Avenue, Brooklyn, New York. August.
3. Haley & Aldrich of New York, 2026. Brownfield Cleanup Program Application. 2074-2080 McDonald Avenue, Brooklyn, New York. February.
4. New York State Department of Environmental Conservation, 2006. Part 375 of Title 6 of the New York Compilation of Codes, Rules, and Regulations. December 14.
5. New York State Department of Environmental Conservation, 2010. Program Policy DER-10, "Technical Guidance for Site Investigation and Remediation." May.
6. New York State Department of Environmental Conservation, 2023. Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Under NYSDEC's Part 375 Remedial Programs. April.
7. New York State Department of Health, 2006. Final Guidance for Evaluating Soil Vapor Intrusion in the State of New York. October.
8. New York State Division of Water, 1998. Technical and Operational Guidance Series (1.1.1). June 1998.
9. United States Environmental Protection Agency, 2017. Low Flow Purging and Sampling Procedure for the Collection of Groundwater Samples from Monitoring Wells, EQASOP-GW 001. September 19.

https://haleyaldrich.sharepoint.com/sites/EmeraldDevelopersLLC/Shared Documents/0213688.2074-2080 McDonald Avenue/Deliverables/6. RIWP/Text/2026-0217_HANY 2074-2080 McDonald Avenue_RIWP_DRAFT.docx

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TABLE

Boring Number	Sample Depth	Units	Sample Rationale	Target Compound List VOCs (8260D/5035)	Target Compound List SVOCs (8270E)/(8270)	Total Analyte List Metals (6020D)/(6010)	PCBs (8082A)	Pesticides (8081B)	PFAS (1633A)	1,4-Dioxane (8270)/(8270E-SIM)	Dissolved Target Analyte List Metals (6020)	VOCs (TO-15)
SOIL												
SB-01	0-2 in.	bgs	2-in interval immediately below impervious cover	X	X	X	X	X	X	X		
	3-5'	bgs	Intermediate depth (Bottom 2 ft of fill material)	X	X	X	X	X	X	X		
	18-20'	bgs	Groundwater interface	X	X	X	X	X	X	X		
SB-02	0-2 in.	bgs	2-in interval immediately below impervious cover	X	X	X	X	X	X	X		
	3-5'	bgs	Intermediate depth (Bottom 2 ft of fill material)	X	X	X	X	X	X	X		
	18-20'	bgs	Groundwater interface	X	X	X	X	X	X	X		
SB-03	0-2 in.	bgs	2-in interval immediately below impervious cover	X	X	X	X	X	X	X		
	3-5'	bgs	Intermediate depth (Bottom 2 ft of fill material)	X	X	X	X	X	X	X		
	18-20'	bgs	Groundwater interface	X	X	X	X	X	X	X		
SB-04	0-2 in.	bgs	2-in interval immediately below impervious cover	X	X	X	X	X	X	X		
	3-5'	bgs	Intermediate depth (Bottom 2 ft of fill material)	X	X	X	X	X	X	X		
	18-20'	bgs	Groundwater interface	X	X	X	X	X	X	X		
SB-05	0-2 in.	bgs	2-in interval immediately below impervious cover	X	X	X	X	X	X	X		
	3-5'	bgs	Intermediate depth (Bottom 2 ft of fill material)	X	X	X	X	X	X	X		
	18-20'	bgs	Groundwater interface	X	X	X	X	X	X	X		
SB-06	0-2 in.	bgs	2-in interval immediately below impervious cover	X	X	X	X	X	X	X		
	3-5'	bgs	Intermediate depth (Bottom 2 ft of fill material)	X	X	X	X	X	X	X		
	18-20'	bgs	Groundwater interface	X	X	X	X	X	X	X		
SB-07	0-2 in.	bgs	2-in interval immediately below impervious cover	X	X	X	X	X	X	X		
	3-5'	bgs	Intermediate depth (Bottom 2 ft of fill material)	X	X	X	X	X	X	X		
	18-20'	bgs	Groundwater interface	X	X	X	X	X	X	X		
SB-08	0-2 in.	bgs	2-in interval immediately below impervious cover	X	X	X	X	X	X	X		
	3-5'	bgs	Intermediate depth (Bottom 2 ft of fill material)	X	X	X	X	X	X	X		
	18-20'	bgs	Groundwater interface	X	X	X	X	X	X	X		
SB-09	0-2 in.	bgs	2-in interval immediately below impervious cover	X	X	X	X	X	X	X		
	3-5'	bgs	Intermediate depth (Bottom 2 ft of fill material)	X	X	X	X	X	X	X		
	18-20'	bgs	Groundwater interface	X	X	X	X	X	X	X		
SB-10	0-2 in.	bgs	2-in interval immediately below impervious cover	X	X	X	X	X	X	X		
	3-5'	bgs	Intermediate depth (Bottom 2 ft of fill material)	X	X	X	X	X	X	X		
	18-20'	bgs	Groundwater interface	X	X	X	X	X	X	X		
SB-11	0-2 in.	bgs	2-in interval immediately below impervious cover	X	X	X	X	X	X	X		
	3-5'	bgs	Intermediate depth (Bottom 2 ft of fill material)	X	X	X	X	X	X	X		
	18-20'	bgs	Groundwater interface	X	X	X	X	X	X	X		
SB-12	0-2 in.	bgs	2-in interval immediately below impervious cover	X	X	X	X	X	X	X		
	3-5'	bgs	Intermediate depth (Bottom 2 ft of fill material)	X	X	X	X	X	X	X		
	18-20'	bgs	Groundwater interface	X	X	X	X	X	X	X		
SB-13	0-2 in.	bgs	2-in interval immediately below impervious cover	X	X	X	X	X	X	X		
	3-5'	bgs	Intermediate depth (Bottom 2 ft of fill material)	X	X	X	X	X	X	X		
	18-20'	bgs	Groundwater interface	X	X	X	X	X	X	X		

Boring Number	Sample Depth	Units	Sample Rationale	Target Compound List VOCs (8260D/5035)	Target Compound List SVOCs (8270E)/(8270)	Total Analyte List Metals (6020D)/(6010)	PCBs (8082A)	Pesticides (8081B)	PFAS (1633A)	1,4-Dioxane (8270)/(8270E-SIM)	Dissolved Target Analyte List Metals (6020)	VOCs (TO-15)
GROUNDWATER												
MW-01			Straddle water table	X	X	X	X	X	X	X	X	
MW-02			Straddle water table	X	X	X	X	X	X	X	X	
MW-03			Straddle water table	X	X	X	X	X	X	X	X	
MW-04			Straddle water table	X	X	X	X	X	X	X	X	
MW-05			Straddle water table	X	X	X	X					
MW-06			Straddle water table	X	X	X	X	X	X	X	X	
SOIL VAPOR												
SV-01	16-17'	bgs	1-2 ft above groundwater interface									X
SV-02	16-17'	bgs	1-2 ft above groundwater interface									X
SV-03	16-17'	bgs	1-2 ft above groundwater interface									X
SV-04	16-17'	bgs	1-2 ft above groundwater interface									X
SV-05	16-17'	bgs	1-2 ft above groundwater interface									X
SV-06	16-17'	bgs	1-2 ft above groundwater interface									X
SV-07	16-17'	bgs	1-2 ft above groundwater interface									X

Notes:

VOCs - Volatile Organic Compounds
 SVOCs - Semi-volatile Organic Compounds
 PCBs - Polychlorinated biphenyls
 PFAS - Per- and Polyfluoroalkyl Substances

*Only five samples will be collected at the development depth interval to help ascertain the ability to obtain a Track 1 remedy. The locations will be bias toward visual, olfactory, and PID field screening signs of contamination.

Samples to be collected in the 3 to 5 ft bgs range will be determined in the field and collected at base of fill layer as determined by visual logging

Sample depths may be adjusted based on visual, olfactory, and PID field screening

bgs - below grade surface

QA/QC samples include:

MS/MSD - 1 for every 20 samples

Trip Blanks - 1 per cooler per day of samples to be analyzed for VOCs

Field Blanks - 1 for every 20 samples

Duplicates - 1 for every 20 samples

Soil QA/QC Samples:

(2) Duplicates

(2) MS/MSD

(2) Field Blanks

(1) Trip Blank per day

Groundwater QA/QC Samples:

(1) Duplicate

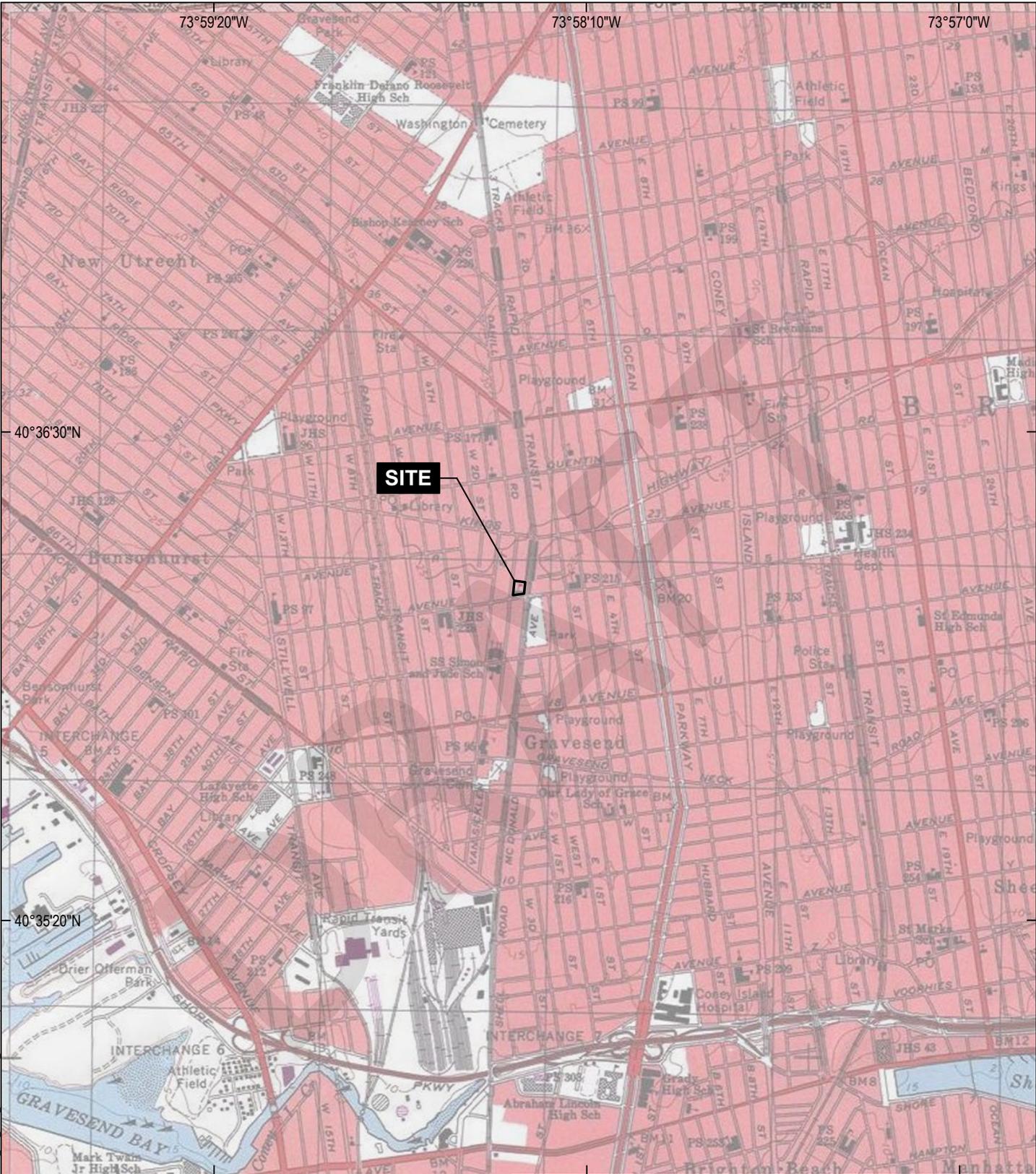
(1) MS/MSD

(1) Field Blank

(1) Trip Blank per day

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FIGURES



GIS: \\haleyaldrich\share\CF\Projects\0213668\GIS\213668.aprx - khansen - 6/6/2025 11:48 AM



MAP SOURCE: USGS
 SITE COORDINATES: 40°36'08\"/>

**HALEY
 ALDRICH**

2074-2080 MCDONALD AVENUE
 BROOKLYN, NEW YORK

PROJECT LOCUS

APPROXIMATE SCALE: 1 IN = 2000 FT
 JUNE 2025

FIGURE 1



LEGEND

-  SITE BOUNDARY
-  PARCEL BOUNDARY

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. ASSESSOR PARCEL DATA SOURCE: NYC DEPARTMENT OF CITY PLANNING, INFORMATION TECHNOLOGY DIVISION
3. AERIAL IMAGERY SOURCE: NEARMAP, APRIL 1, 2025



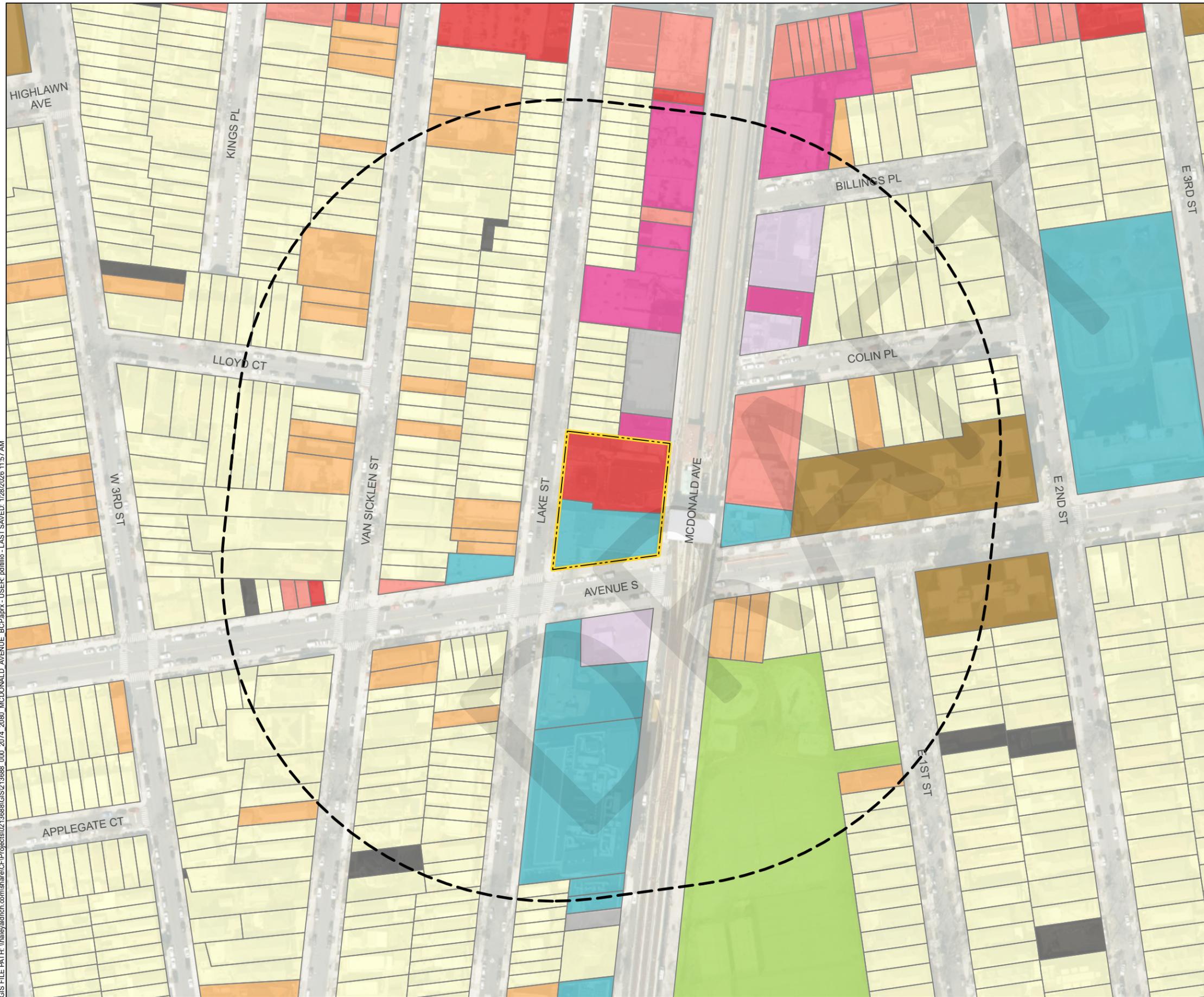
2074-2080 MCDONALD AVENUE
BROOKLYN, NEW YORK

SITE PLAN

JUNE 2025

FIGURE 2

GIS FILE PATH: \\haleyaldrich.com\share\CF\Projects\0213888\GIS\213888_000_2074_2080_MCDONALD_AVENUE_BCP\prx-user\pallilo - LAST SAVED: 1/23/2026 11:57 AM

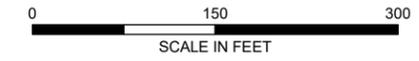


LEGEND

- 500-FT BUFFER OF SITE BOUNDARY
- SITE BOUNDARY
- PARCEL BOUNDARY
- LAND USE CATEGORY**
- ONE AND TWO FAMILY BUILDINGS
- MULTI-FAMILY WALK-UP BUILDINGS
- MULTI-FAMILY ELEVATOR BUILDINGS
- MIXED RESIDENTIAL AND COMMERCIAL BUILDINGS
- INDUSTRIAL AND MANUFACTURING BUILDINGS
- TRANSPORTATION AND UTILITY
- PUBLIC FACILITIES AND INSTITUTIONS
- OPEN SPACE AND OUTDOOR RECREATION
- PARKING FACILITIES
- VACANT LAND

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. ASSESSOR PARCEL DATA SOURCE: NYC DEPARTMENT OF CITY PLANNING, INFORMATION TECHNOLOGY DIVISION
3. LAND USE DATA SOURCE: NYC DEPARTMENT OF CITY PLANNING
4. AERIAL IMAGERY SOURCE: ESRI



2074-2080 MCDONALD AVENUE
BROOKLYN, NEW YORK

SURROUNDING LAND USE

JANUARY 2026

FIGURE 3

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LEGEND

-  SITE BOUNDARY
-  PARCEL BOUNDARY
-  SOIL VAPOR SAMPLE
-  SOIL BORING
-  SOIL BORING AND TEMPORARY MONITORING WELL

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. ASSESSOR PARCEL DATA SOURCE: NYC DEPARTMENT OF CITY PLANNING, INFORMATION TECHNOLOGY DIVISION
3. AERIAL IMAGERY SOURCE: NEARMAP, APRIL 1, 2025

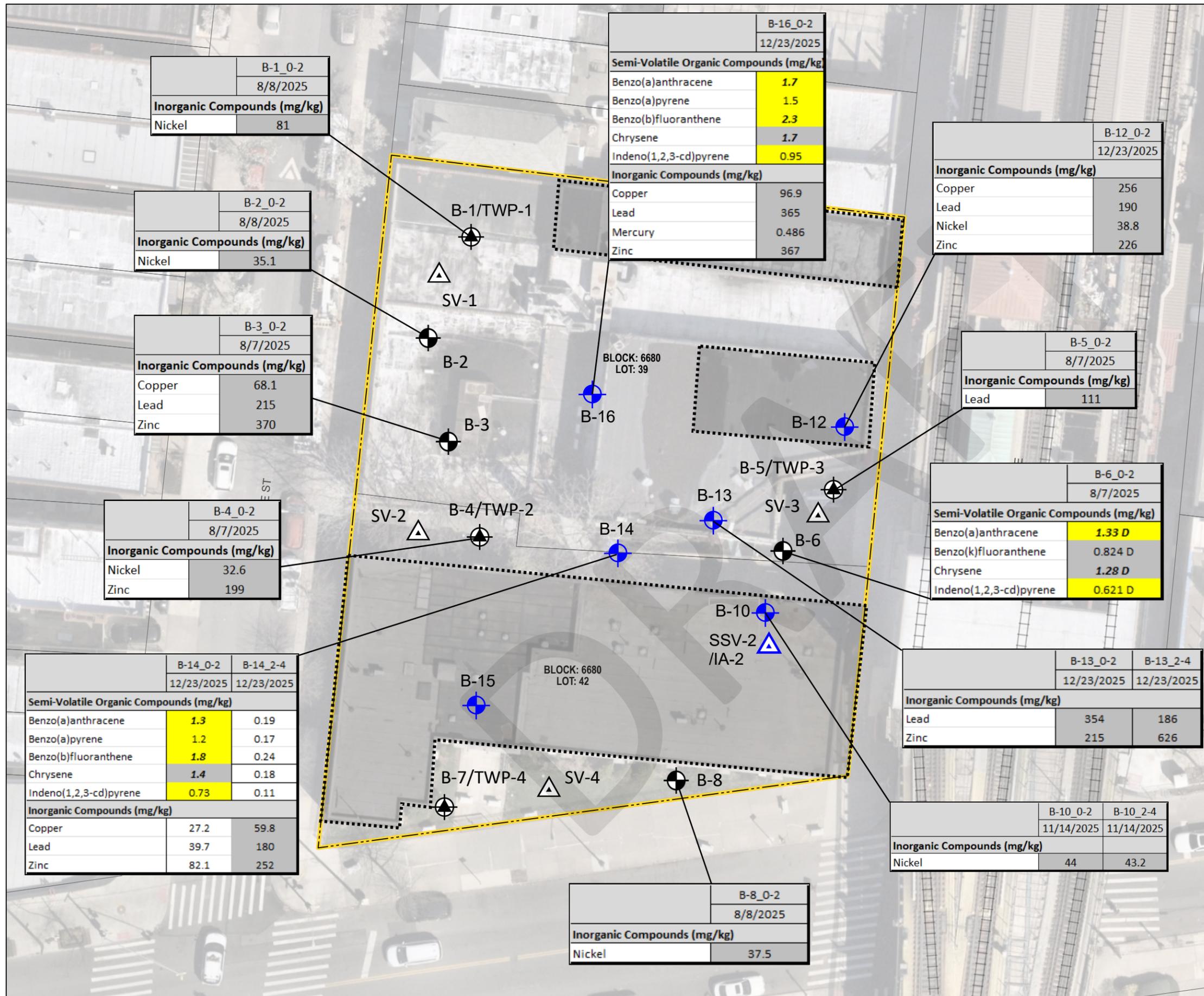


2074-2080 MCDONALD AVENUE
BROOKLYN, NEW YORK

SAMPLE LOCATION PLAN

FEBRUARY 2026

FIGURE 4

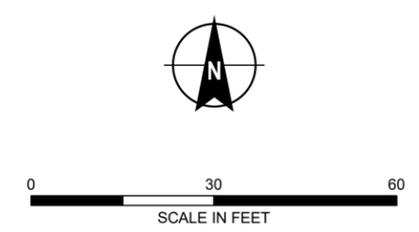


LEGEND

- SITE BOUNDARY
- PARCEL BOUNDARY
- AUGUST 2025 SOIL VAPOR POINT
- AUGUST 2025 SOIL BORING
- AUGUST 2025 TEMPORARY GROUNDWATER MONITORING WELL
- SUPPLEMENTAL SOIL BORING
- SUPPLEMENTAL SOIL VAPOR/INDOOR AIR SAMPLE

NOTES

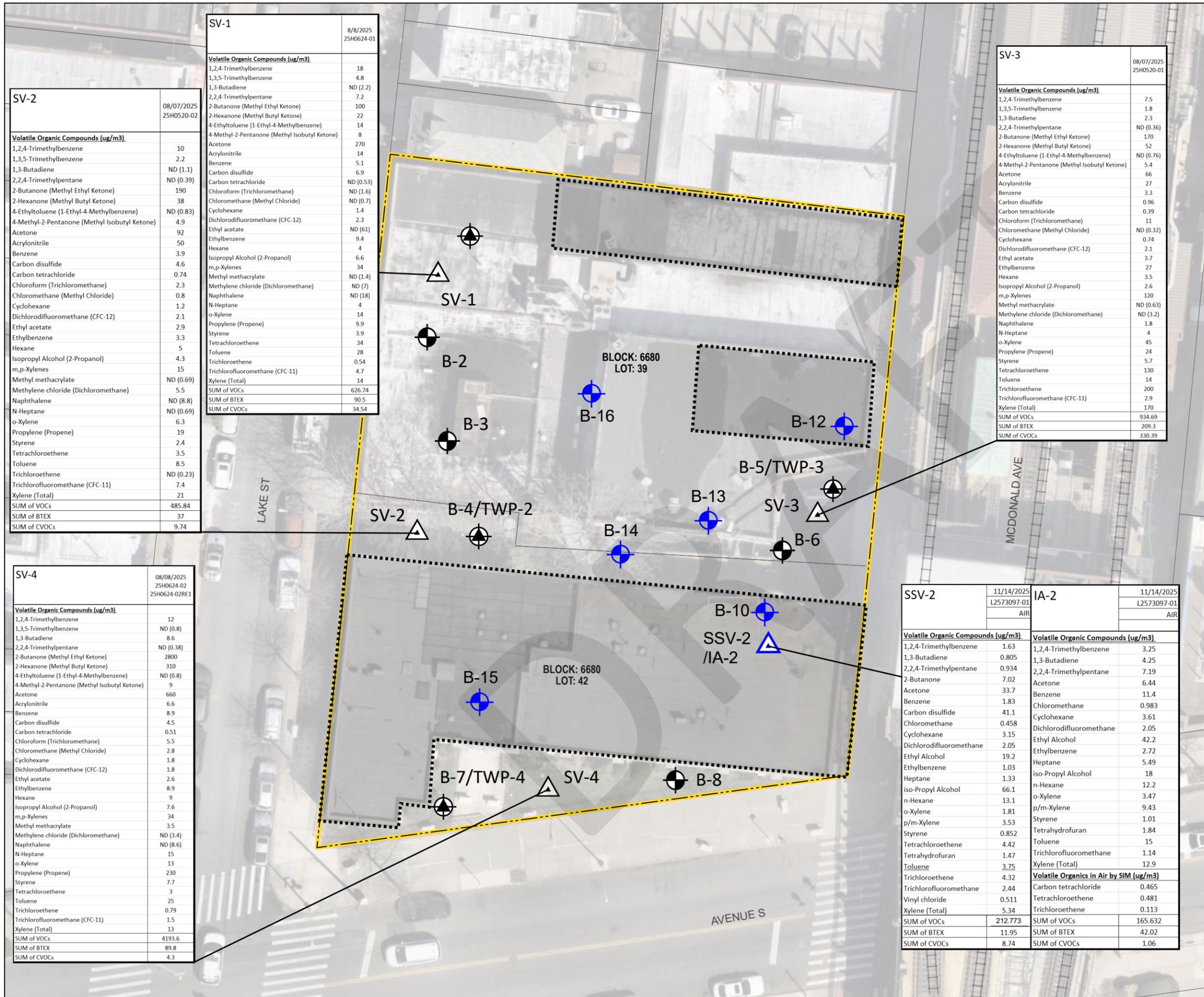
1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. ASSESSOR PARCEL DATA SOURCE: NYC DEPARTMENT OF CITY PLANNING, INFORMATION TECHNOLOGY DIVISION
3. AERIAL IMAGERY SOURCE: NEARMAP, APRIL 1, 2025



HALEY ALDRICH 2074-2080 MCDONALD AVENUE
BROOKLYN, NEW YORK

SOIL ANALYTICAL RESULTS MAP

FIGURE 5

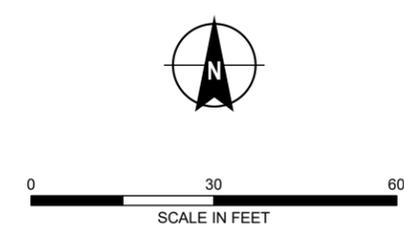


SV-1		8/8/2025 25H0624-01
Volatile Organic Compounds (ug/m3)		
1,2,4-Trimethylbenzene		18
1,3,5-Trimethylbenzene		4.8
1,3-Butadiene		ND (2.2)
2,2,4-Trimethylpentane		7.2
2-Butanone (Methyl Ethyl Ketone)		100
2-Hexanone (Methyl Butyl Ketone)		22
4-Ethyltoluene (1-Ethyl-4-Methylbenzene)		14
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)		8
Acetone		270
Acrylonitrile		14
Benzene		5.1
Carbon disulfide		6.9
Carbon tetrachloride		ND (0.53)
Chloroform (Trichloromethane)		ND (1.6)
Chloromethane (Methyl Chloride)		ND (0.7)
Cyclohexane		1.4
Dichlorodifluoromethane (CFC-12)		2.3
Ethyl acetate		ND (61)
Ethylbenzene		9.4
Hexane		4
Isopropyl Alcohol (2-Propanol)		6.6
m,p-Xylenes		34
Methyl methacrylate		ND (1.4)
Methylene chloride (Dichloromethane)		ND (7)
Naphthalene		ND (18)
N-Heptane		4
o-Xylene		14
Propylene (Propene)		9.9
Styrene		3.9
Tetrachloroethene		34
Toluene		28
Trichloroethene		0.54
Trichlorofluoromethane (CFC-11)		4.7
Xylene (Total)		14
SUM of VOCs		626.74
SUM of BTEX		90.5
SUM of CVOCs		34.54

SV-3		08/07/2025 25H0520-01
Volatile Organic Compounds (ug/m3)		
1,2,4-Trimethylbenzene		7.5
1,3,5-Trimethylbenzene		1.8
1,3-Butadiene		2.3
2,2,4-Trimethylpentane		ND (0.36)
2-Butanone (Methyl Ethyl Ketone)		170
2-Hexanone (Methyl Butyl Ketone)		52
4-Ethyltoluene (1-Ethyl-4-Methylbenzene)		ND (0.76)
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)		5.4
Acetone		66
Acrylonitrile		27
Benzene		3.3
Carbon disulfide		0.96
Carbon tetrachloride		0.39
Chloroform (Trichloromethane)		11
Chloromethane (Methyl Chloride)		ND (0.32)
Cyclohexane		0.74
Dichlorodifluoromethane (CFC-12)		2.1
Ethyl acetate		3.7
Ethylbenzene		27
Hexane		3.5
Isopropyl Alcohol (2-Propanol)		2.6
m,p-Xylenes		120
Methyl methacrylate		ND (0.63)
Methylene chloride (Dichloromethane)		ND (3.2)
Naphthalene		1.8
N-Heptane		4
o-Xylene		45
Propylene (Propene)		24
Styrene		5.7
Tetrachloroethene		130
Toluene		14
Trichloroethene		200
Trichlorofluoromethane (CFC-11)		2.9
Xylene (Total)		170
SUM of VOCs		934.69
SUM of BTEX		209.3
SUM of CVOCs		330.39

- LEGEND**
- SITE BOUNDARY
 - PARCEL BOUNDARY
 - AUGUST 2025 SOIL VAPOR POINT
 - AUGUST 2025 SOIL BORING
 - AUGUST 2025 TEMPORARY GROUNDWATER MONITORING WELL
 - SUPPLEMENTAL SOIL BORING
 - SUPPLEMENTAL SOIL VAPOR/INDOOR AIR POINT

- NOTES**
1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
 2. ASSESSOR PARCEL DATA SOURCE: NYC DEPARTMENT OF CITY PLANNING, INFORMATION TECHNOLOGY DIVISION
 3. AERIAL IMAGERY SOURCE: NEARMAP, APRIL 1, 2025



SV-2		08/07/2025 25H0520-02
Volatile Organic Compounds (ug/m3)		
1,2,4-Trimethylbenzene		10
1,3,5-Trimethylbenzene		2.2
1,3-Butadiene		ND (1.1)
2,2,4-Trimethylpentane		ND (0.39)
2-Butanone (Methyl Ethyl Ketone)		190
2-Hexanone (Methyl Butyl Ketone)		38
4-Ethyltoluene (1-Ethyl-4-Methylbenzene)		ND (0.83)
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)		4.9
Acetone		92
Acrylonitrile		50
Benzene		3.9
Carbon disulfide		4.6
Carbon tetrachloride		0.74
Chloroform (Trichloromethane)		2.3
Chloromethane (Methyl Chloride)		0.8
Cyclohexane		1.2
Dichlorodifluoromethane (CFC-12)		2.1
Ethyl acetate		2.9
Ethylbenzene		3.3
Hexane		5
Isopropyl Alcohol (2-Propanol)		4.3
m,p-Xylenes		15
Methyl methacrylate		ND (0.69)
Methylene chloride (Dichloromethane)		5.5
Naphthalene		ND (8.8)
N-Heptane		ND (0.69)
o-Xylene		6.3
Propylene (Propene)		19
Styrene		2.4
Tetrachloroethene		3.5
Toluene		8.5
Trichloroethene		ND (0.23)
Trichlorofluoromethane (CFC-11)		7.4
Xylene (Total)		21
SUM of VOCs		485.84
SUM of BTEX		37
SUM of CVOCs		9.74

SSV-2		11/14/2025 L2573097-01	IA-2		11/14/2025 L2573097-01
		AIR			AIR
Volatile Organic Compounds (ug/m3)			Volatile Organic Compounds (ug/m3)		
1,2,4-Trimethylbenzene		1.63	1,2,4-Trimethylbenzene		3.25
1,3-Butadiene		0.805	1,3-Butadiene		4.25
2,2,4-Trimethylpentane		0.934	2,2,4-Trimethylpentane		7.19
2-Butanone		7.02	2-Butanone		6.44
Acetone		33.7	Acetone		11.4
Benzene		1.83	Benzene		0.983
Carbon disulfide		41.1	Chloromethane		3.61
Chloromethane		0.458	Cyclohexane		2.05
Cyclohexane		3.15	Dichlorodifluoromethane		42.2
Dichlorodifluoromethane		2.05	Ethyl Alcohol		2.72
Ethyl Alcohol		19.2	Ethylbenzene		5.49
Ethylbenzene		1.03	Heptane		18
Heptane		1.33	iso-Propyl Alcohol		12.2
iso-Propyl Alcohol		66.1	n-Hexane		3.47
n-Hexane		13.1	o-Xylene		9.43
o-Xylene		1.81	p/m-Xylene		1.01
p/m-Xylene		3.53	Styrene		1.84
Styrene		0.852	Tetrahydrofuran		15
Tetrachloroethene		4.42	Toluene		1.14
Tetrahydrofuran		1.47	Trichlorofluoromethane		12.9
Toluene		3.75	Xylene (Total)		0.465
Trichloroethene		4.32	Carbon tetrachloride		0.481
Trichlorofluoromethane		2.44	Tetrachloroethene		0.113
Vinyl chloride		0.511	Trichloroethene		
Xylene (Total)		5.34	SUM of VOCs		212.773
SUM of VOCs		212.773	SUM of VOCs		165.632
SUM of BTEX		11.95	SUM of BTEX		42.02
SUM of CVOCs		8.74	SUM of CVOCs		1.06

HALEY ALDRICH 2074-2080 MCDONALD AVENUE
BROOKLYN, NEW YORK

SOIL VAPOR AND INDOOR AIR QUALITY ANALYTICAL RESULTS MAP

FIGURE 6

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APPENDIX A
Field Sampling Plan

FIELD SAMPLING PLAN
2074-2080 MCDONALD AVENUE
BROOKLYN, NEW YORK

by
H & A of New York Engineering and Geology, LLP
New York, New York

for
Crystal Residences LLC
Brooklyn, New York

File No. 0213688
February 2026

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1. Introduction

This Field Sampling Plan (FSP) has been prepared as a component of the Remedial Investigation Work Plan (RIWP) for the proposed Brownfield Cleanup Program (BCP) site located at 2074-2080 McDonald Avenue, Brooklyn, New York (the “Site”). This document was prepared to establish field procedures for field data collection to be performed in support of the RIWP for the Site.

The RIWP includes this FSP, a Quality Assurance Project Plan (QAPP), a Health and Safety Plan (HASP), and a Community Air Monitoring Plan (CAMP), which are included as part of this plan by reference.

The standard operating procedures (SOPs) included as components of this plan will provide the procedures necessary to meet the project objectives. The SOPs will be used as a reference for the methods to be employed for field sample collection and handling and the management of field data collected in the execution of the approved RIWP. The SOPs include numerous methods to execute the tasks of the RIWP. The Project Manager will select the appropriate method as required by field conditions and/or the objective of the respective project task at the time of sample collection. Field procedures will be conducted in general accordance with the New York State Department of Environmental Conservation (NYSDEC) Technical Guidance for Site Investigation and Remediation (Division of Environmental Remediation [DER]-10) and the “Sampling, Analysis and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) under NYSDEC Part 375 Remedial Program” when applicable.

2. Field Program

This FSP provides the general purpose of sampling as well as procedural information. The RIWP contains the details on sampling and analysis (locations, depths, frequency, analyte lists, etc.).

The field program has been designed to acquire the necessary data to comply with the RIWP, and includes the following tasks:

- Soil sampling;
- Groundwater sampling;
- Soil vapor sampling; and
- Sampling of investigation-derived waste (IDW) as needed for disposal.

A Limited Phase II Environmental Site Investigation (ESI) was performed at the Site in June 2025 to investigate the anticipated contaminants of concern identified based on the Site's current and former uses. While the limited sampling event provided preliminary Site characterization data, it did not fully determine the nature and extent of contamination at the Site. The Site characterization also did not identify a source of contamination on the Site; therefore, additional targeted soil, groundwater, and soil vapor sampling is proposed.

The SOPs presented herein may be changed, as required, dependent on Site conditions or equipment limitations, at the time of sample collection. If the procedures employed differ from the SOP, the deviations will be documented in the associated sampling report.

3. Utility Clearance

Invasive remedial activities, such as excavation or remedial construction activities, require the location of underground utilities prior to initiating work. Such clearance is sound practice in that it minimizes the potential for damage to underground facilities and, more importantly, is protective of the health and safety of personnel. Under no circumstances will invasive activities be allowed to proceed without obtaining proper utility clearance by the appropriate public agencies and/or private entities. This clearance requirement applies to all work on both public and private property, whether located in a dense urban area or a seemingly out-of-the-way rural location.

The drilling contractor performing the work will be responsible for obtaining utility clearance.

Utility clearance is required by law, and obtaining clearance includes contacting a public or private central clearance agency via a “one-call” telephone service and providing the proposed exploration location information. It is important to note that public utility agencies may not, and usually do not, have information regarding utility locations on private property.

Before beginning subsurface work at any proposed exploration locations, it is critical that all readily available information on underground utilities and structures be obtained. This includes publicly available information, as well as information in the possession of private landowners. Any drawings obtained must be reviewed in detail for information pertaining to underground utilities.

Using the information obtained, the Site should be viewed in detail for physical evidence of buried lines or structures, including pavement cuts and patches, variation in or lack of vegetation, variations in grading, etc. Care must also be taken to avoid overhead utilities as well. Presence of surface elements of buried utilities should be documented, such as manholes, gas or water service valves, catch basins, monuments, or other evidence.

Overhead utility lines must be considered when choosing exploration and excavation locations. Most states require a minimum of 10 feet (ft) of clearance between equipment and energized wires. Such separation requirements may also be voltage-based and may vary depending on state or municipality regulations. In evaluating clearance from overhead lines, the same restrictions may apply to “drops,” or wires on a utility pole connecting overhead and underground lines.

Using the information obtained and observations made, proposed exploration or construction locations should be marked in the field. Marking locations can be accomplished using spray paint on the ground, stakes, or other means. All markings of proposed locations should be made in white, in accordance with the generally accepted universal color code for facilities identification (American Public Works Association [APWA] American National Standards Institute [ANSI] Z535.1):

- White: Proposed Excavation or Drilling Location
- Pink: Temporary Survey Markings
- Red: Electrical Power Lines, Cables, Conduit, and Lighting Cables
- Yellow: Gas, Oil, Steam, Petroleum, or Gaseous Materials
- Orange: Communication, Alarm or Signal Lines, Cables, or Conduits

- Blue: Potable Water
- Purple: Reclaimed Water, Irrigation and Slurry Lines
- Green: Sewers and Drain Lines

To effectively evaluate the proposed locations with these entities, detailed, accurate measurements between the proposed locations and existing surface features should be obtained. Such features can be buildings, street intersections, utility poles, guardrails, etc.

Obtaining the utility clearance generally involves the designated “one-call” underground facilities protection organization for the area and the landowner, and one or both following methods:

- A third-party utility locator company will be utilized to locate underground utilities outside of the public right-of-way; and/or
- “Soft dig” excavation techniques to confirm or deny the presence of underground utilities in the area.

The proposed locations should be evaluated in light of the information available for existing underground facilities. The detailed measurement information described above will be required by the “one-call” agency. The owners of the applicable, participating underground utilities are obligated to mark their respective facilities at the Site in the colors described above. Utility stakeout activities will typically not commence for approximately 72 hours after the initial request is made.

The public and private utility entities generally only mark the locations of their respective underground facilities within public rights-of-way. Determination of the locations of these facilities on private property will be the responsibility of the property owner or contractor. If available information does not contain sufficient detail to locate underground facilities with a reasonable amount of confidence, alternate measures may be appropriate, as described below. In some cases, the memory of a long-time employee of a facility on private property may be the best or only source of information. It is incumbent on the consultant or contractor to exercise caution and use good judgement when faced with uncertainty.

Note: It is important to note that not all utilities are participants in the “one-call” agency or process. As such, inquiries must be made with the “one-call” agency to determine which entities do not participate, so they can be contacted independently.

Most utility stakeouts have a limited time period for which they remain valid, typically two to three weeks. It is critical that this time period be considered to prevent expiration of clearance prior to completion of the invasive activities and the need to repeat the stakeout process.

Care must be exercised to document receipt of notice from the involved agencies of the presence or absence of utilities in the vicinity of the proposed locations.

Most agencies will generally provide a telephone or fax communication indicating the lack of facilities in the project area. If contact is not made by all of the agencies identified by the “one-call” process, do not assume that such utilities are not present. Re-contact the “one-call” agency to determine the status.

For complicated sites with multiple proposed locations and multiple utilities, it is advisable to arrange an on-site meeting with utility representatives. This will minimize the potential for miscommunication amongst the involved parties.

Completion of the utility stakeout process is not a guarantee that underground facilities will not be encountered in excavations or boreholes; in fact, most “one-call” agencies and individual utilities do not offer guarantees, nor do they accept liability for damage that might occur. In areas outside the public right-of-way, a utility locating service may be utilized to locate underground utilities. It is advisable that any invasive activities proceed with extreme caution in the upper 4 to 5 ft in the event the clearance has failed to identify an existing facility. This may necessitate hand excavation or probing to confirm the potential presence of shallow utilities. If uncertainty exists for any given utility, extra activities can be initiated to solve utility clearance concerns. These options include:

- Screening the proposed work areas with utility locating devices and/or hiring a utility locating service to perform this task.
- Hand digging, augering, or probing to expose or reveal shallow utilities and confirm presence and location. In northern climates, this may require advancing to below the frost line, typically at least 4 ft.
- Using “soft dig” techniques that utilize specialized tools and compressed air to excavate soils and locate utilities. This technique is effective in locating utilities to a depth of 4 to 5 ft.

Equipment/Materials:

- White spray paint;
- Wooden stakes, painted white or containing white flagging;
- Color-code key; and
- Available drawings.

4. Field Data Recording

This procedure describes the protocol for documenting the investigation activities in the field. Field data serves as the cornerstone for an environmental project, not only for site characterization but for additional phases of investigation or remedial design. Producing defensible data includes proper and appropriate recording of field data as it is obtained in a manner to preserve the information for future use. This procedure provides guidelines for accurate, thorough collection and preservation of written and electronic field data.

Field data to be recorded during the project generally includes, but is not limited to, the following:

- General field observations;
- Numeric field measurements and instrument readings;
- Quantity estimates;
- Sample locations and corresponding sample numbers;
- Relevant comments and details pertaining to the samples collected;
- Documentation of activities, procedures, and progress achieved;
- Contractor pay item quantities;
- Weather conditions;
- A listing of personnel involved in Site-related activities;
- A log of conversations, Site meetings, and other communications; and
- Field decisions and pertinent information associated with the decisions.

4.1 WRITTEN FIELD DATA

Written field data will be collected using a standardized, pre-printed field log form. In general, use of a field log form is preferable as it prompts field personnel to make appropriate observations and record data in a standardized format. This promotes completeness and consistency from one person to the next. Otherwise, electronic data collection using a handheld device produces equal completeness and consistency using a preformatted log form.

In the absence of an appropriate pre-printed form, the data should be recorded in an organized and structured manner in a dedicated project field logbook. Logbooks must be hardcover and bound so that pages cannot be added or removed and should be made from high-grade 50 percent rag paper with a water-resistant surface.

The following are guidelines for use of field log forms and logbooks:

1. Information must be factual and complete.
2. All entries will be made in black indelible ink with a ballpoint pen and will be written legibly. Do not use "rollerball" or felt tip-style pens, since the water-soluble ink can run or smear in the presence of moisture.
3. Field log forms should be consecutively numbered.

4. Each day's work must start a new form/page.
5. At the end of each day, the current logbook page or forms must be signed and dated by the field personnel making the entries.
6. Make data entries immediately upon obtaining the data. Do not make temporary notes in other locations for later transfer; this only increases the potential for error or loss of data.
7. Entry errors are to be crossed out with a single line and initialed by the person making the correction.
8. Do not leave blanks on log forms; if no entry is applicable for a given data field, indicate so with "NA" or a dash ("--").
9. At the earliest practical time, photocopies or typed versions of log forms and logbook pages should be made and placed in the project file as a backup in the event the book or forms are lost or damaged.
10. Logbooks should be dedicated to one project only, i.e., do not record data from multiple projects in one logbook.

4.2 ELECTRONIC DATA

Electronic data recording involves the electronic measurement of field information through the use of monitoring instruments, sensors, gauges, and equipment controls. The following is a list of guidelines for proper recording and management of electronic field data:

1. Field data management should follow the requirements of a project-specific data management plan (DMP), if applicable.
2. Use only instruments that have been calibrated in accordance with manufacturer's recommendations.
3. Usage of instruments, controls, and computers for the purpose of obtaining field data should only be performed by personnel properly trained and experienced in the use of the equipment and software.
4. Use only fully licensed software on personal computers and laptops.
5. Loss of electronic files may mean loss of irreplaceable data. Every effort should be made to back up electronic files obtained in the field as soon as practical. A backup file placed on the file server will minimize the potential for loss.
6. Electronic files, once transferred from field instruments or laptops to office computers, should be protected, if possible, to prevent unwanted or inadvertent manipulation or modification of data. Several levels of protection are usually available for spreadsheets, including making a file "read-only" or assigning a password to access the file.
7. Protect CDs from exposure to moisture, excessive heat or cold, magnetic fields, or other potentially damaging conditions.
8. Remote monitoring is often used to obtain stored electronic data from site environmental systems. A thorough discussion of this type of electronic field data recording is beyond the scope of this Section. Such on-site systems are generally capable of storing a limited amount of data as a comma-delimited or spreadsheet file. Users must remotely access the monitoring equipment files via modem or other access and download the data. In order to minimize the

potential for loss of data, access and downloading of data should be performed frequently enough to ensure the data storage capacity of the remote equipment is not exceeded.

Equipment/Materials:

- Appropriate field log forms, or iPad® or equivalent with preformatted log forms.
- Indelible ballpoint pen (do not use “rollerball” or felt-tip style pens);
- Straight edge;
- Pocket calculator; and
- Laptop computer (if required).

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5. Aquifer Characterization

This procedure describes the measurement of water levels in groundwater monitoring.

A synoptic gauging round will be completed to obtain water levels in monitoring wells. Water levels will be acquired in a manner that provides accurate data that can be used to calculate vertical and horizontal hydraulic gradients and other hydrogeologic parameters. Accuracy in obtaining the measurements is critical to ensure the usability of the data.

5.1 PROCEDURE

In order to provide reliable data, water level monitoring events should be collected over as short a period of time as practical. Barometric pressure can affect groundwater levels; therefore, observation of significant weather changes during the period of water level measurements must be noted. Rainfall events and groundwater pumping can also affect groundwater level measurements. Personnel collecting water level data must note if any of these controls are in effect during the groundwater level collection period. Due to possible changes during the groundwater level collection period, it is imperative that the time of data collection at each station be accurately recorded. Water levels will also be collected prior to any sample collection that day.

The depth to groundwater will be measured with an electronic depth-indicating probe. Prior to obtaining a measurement, a fixed reference point on the well casing will be established for each well to be measured. Unless otherwise established, the reference point is typically established and marked on the north side of the well casing. Do not use protective casings or flush-mounted road boxes as a reference, due to the potential for damage or settlement. The elevation of the reference point shall be obtained by accepted surveying methods, to the nearest 0.01 ft.

The water level probe will be lowered into the well until the meter indicates (via indicator light or tone) that the water has been reached. The probe will be raised above the water level and slowly lowered again until water is indicated. The cable will be held against the side of the inner protective casing at the point designated for water level measurements and a depth reading taken. This procedure will be followed three times or until a consistent value is obtained. The value will be recorded to the nearest 0.01 ft on the Groundwater Level Monitoring Report form.

Upon completion, the probe will be raised to the surface and, together with the amount of cable that entered the well casing, will be decontaminated in accordance with the methods described in Equipment Decontamination Procedure.

Equipment/Materials:

- Battery-operated, non-stretch electronic water level probe with permanent markings at 0.01-ft increments, such as the Solinst Model 101 or equivalent.
- The calibrated cable on the depth indicator will be checked against a surveyor's steel tape once per quarter year. A new cable will be installed if the cable has changed by more than 0.01 percent (0.01 ft for a 100-ft cable). See also the Field Instruments – Use and Calibration Procedure.
- Groundwater Level Monitoring Report form.

6. Sample Collection for Laboratory Analysis

6.1 SOIL SAMPLE COLLECTION FOR LABORATORY ANALYSIS

The following procedure is an introduction to soil sampling techniques and an outline of field staff responsibilities. All samples will be collected with dedicated sampling equipment.

6.1.1 Preparatory Requirements

Prior to the beginning of any remedial investigation or remedial measures activities, staff must attend a project briefing for the purpose of reviewing the project work plan; Site and utility plans; drawings; applicable regulations; sampling location, depth, and criteria; Site contacts; and other related documents. Health and safety concerns will be documented in a Site-specific HASP.

A file folder for the field activities should be created and maintained such that all relevant documents and log forms likely to be useful for the completion of field activities by others are readily available in the event of personnel changes.

6.1.2 Soil Classification

The stratigraphic log is a factual description of the soil at the borehole location and is relied upon to interpret the soil characteristics and their influence and significance in the subsurface environment. The accuracy of the stratigraphic log is to be verified by the person responsible for interpreting subsurface conditions. An accurate description of the soil stratigraphy is essential for a reasonable understanding of the subsurface conditions. Confirmation of the field description by examination of representative soil samples by the project geologist, hydrogeologist, or geotechnical engineer (whenever practicable) is recommended.

The ability to describe and classify soil correctly is a skill that is learned from a person with experience and by systematic training and comparison of laboratory results to field descriptions.

6.1.2.1 Data Recording

Several methods for classifying and describing soils or unconsolidated sediments are in relatively widespread use. The Unified Soil Classification System (USCS) is the most common. With the USCS, a soil is first classified according to whether it is predominantly coarse-grained or fine-grained.

The description of fill soil is similar to that of natural undisturbed soil except that it is identified as fill and not classified by USCS group, relative density, or consistency. Those logging soils must attempt to distinguish between soils that have been placed (i.e., fill) and not naturally present, and soils that have been naturally present but disturbed (i.e., disturbed native).

It is necessary to identify and group soil samples consistently to determine the subsurface pattern or changes and non-conformities in soil stratigraphy in the field at the time of drilling. The stratigraphy in each borehole during drilling is to be compared to the stratigraphy found at the previously completed boreholes to ensure that patterns or changes in soil stratigraphy are noted and that consistent terminology is used.

Visual examination, physical observations, and manual tests (adapted from ASTM International [ASTM] D2488, visual-manual procedures) are used to classify and group soil samples in the field and are summarized in this subsection. ASTM D2488 should be reviewed for detailed explanations of the procedures. Visual-manual procedures used for soil identification and classification include:

- Visual determination of grain size, soil gradation, and percentage fines;
- Dry strength, dilatancy, toughness, and plasticity (thread or ribbon test) tests for identification of inorganic fine-grained soil (e.g., CL, CH, ML, or MH); and
- Soil compressive strength and consistency estimates based on thumb indent and pocket penetrometer (preferred) methods.

Soil characteristics like plasticity, strength, and dilatancy should be determined using the H & A of New York Engineering and Geology, LLP (Haley & Aldrich of New York) Soil Identification Field Form.

6.1.2.2 Field Sample Screening

Upon the collection of soil samples, the soil is screened with a photoionization detector (PID) for the presence of organic vapor. This is accomplished by running the PID across the soil sample. The highest reading and sustained readings are recorded.

Note: The PID measurement must be done upwind of the excavating equipment or any running engines so that exhaust fumes will not affect the measurements.

Another method of field screening is headspace measurements. This consists of placing a portion of the soil sample in a sealable glass jar, placing aluminum foil over the jar top, and tightening the lid. Alternatively, plastic sealable bags may be utilized for field screens in lieu of glass containers. The jar should only be partially filled. Shake the jar and set aside for at least 30 minutes. After the sample has equilibrated, the lid of the jar can be opened; the foil is punctured with the PID probe, and the air (headspace) above the soil sample is monitored. This headspace reading on the field form or in the field book is recorded. All headspace measurements must be completed under similar conditions to allow comparability of results. Soil classification and PID readings will be recorded in the daily field report.

Equipment/Materials:

- Pocket knife or small spatula;
- Small handheld lens;
- Stratigraphic log (Overburden) (Form 2001);
- Tape measure; and
- When sampling for PFAS, acceptable materials for sampling include stainless steel, high-density polyethylene (HDPE), polyvinyl chloride (PVC), silicone, acetate, and polypropylene.

6.1.3 Soil Sampling

Soil samples will be collected from acetate liners installed by a track-mounted direct-push drill rig (Geoprobe®) operated by a licensed operator. Soil samples will be collected using a stainless-steel trowel or sampling spoon into laboratory-provided sample containers. If it is necessary to relocate any

proposed sampling location due to terrain, utilities, access, etc., the Project Manager must be notified, and an alternate location will be selected.

Prior to use and between each sampling location at an environmental site, the sampling equipment must be decontaminated. All decontamination must be conducted in accordance with the project-specific plans or the methods presented in SOP 7.0.

6.1.4 Sampling Techniques

The following procedure describes typical soil sample collection methods for submission of samples to a laboratory for chemical analysis. The primary goal of soil sampling is to collect representative samples for examination and chemical analysis (if required).

Environmental soil samples obtained for chemical analyses are collected with special attention given to the rationale behind determining the precise zone to sample, the specifics of the method of soil extraction, and the requisite decontamination procedures. Preservation, handling, and glassware for environmental soil samples vary considerably depending upon several factors, including the analytical method to be conducted and the analytical laboratory being used.

Soil sampling for PFAS will be performed in accordance with the NYSDEC-issued “Sampling, Analysis and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) under NYSDEC Part 375 Remedial Programs” (April 2023).

6.1.4.1 Grab Versus Composite Samples

A grab sample is collected to identify and quantify conditions at a specific location or interval. The sample is comprised of the minimum amount of soil necessary to make up the volume of the sample dictated by the required sample analyses. Composite samples may be obtained from several locations or along a linear trend (in a test pit or excavation). Sampling may occur within or across stratification.

6.2 GROUNDWATER SAMPLE COLLECTION FOR LABORATORY ANALYSIS

The following section describes two techniques for groundwater sampling: “Low-Stress/Low-Flow Methods” and “Typical Sampling Methods.”

“Low-Stress/Low-Flow” methods will be employed when collecting groundwater samples for the evaluation of volatile constituents (i.e., dissolved oxygen [DO]) or in fine-grained formations where sediment/colloid transport is possible. Analyses typically sensitive to colloidal transport issues include polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), and metals.

The “Typical Sampling Methods” will be employed where parameters less sensitive to turbidity/sediment issues are being collected (general chemistry, pesticides, and other semi-volatile organic compounds [SVOCs]).

NOTE: If non-aqueous phase liquids (NAPL) (light or dense) are detected in a monitoring well, groundwater sample collection will not be conducted, and the Project Manager must be contacted to determine a course of action.

6.2.1 Preparatory Requirements

- Verify well identification and location using borehole log details and location layout figures. Note the condition of the well and record any necessary repair work required.
- Prior to opening the well cap, measure the breathing space above the well casing with a handheld organic vapor analyzer to establish baseline breathing space volatile organic compound (VOC) levels. Repeat this measurement once the well cap is opened. If either of these measurements exceeds the air quality criteria in the HASP, field personnel should adjust their personal protective equipment (PPE) accordingly.
- Prior to commencing the groundwater purging/sampling, a water level must be obtained to determine the well volume for hydraulic purposes. In some settings, it may be necessary to allow the water level time to equilibrate. This condition exists if a water-tight seal exists at the well cap and the water level has fluctuated above the top of screen, creating a vacuum or pressurized area in this air space. Three water level checks will verify that static water level conditions have been achieved.
- Calculate the volume of water in the well. Typically, overburden well volumes consider only the quantity of water standing in the well screen and riser; bedrock well volumes are calculated on the quantity of water within the open core hole and within the overburden casing.

6.2.2 Well Development

Well development is completed to remove fine-grained materials from the well but in such a manner as to not introduce fines from the formation into the sand pack. Well development continues until the well responds to water level changes in the formation (i.e., a good hydraulic connection is established between the well and formation) and the well produces clear, sediment-free water to the extent practical.

- Attach the appropriate pump and lower tubing into the well.
- Gauge well and calculate one well volume. Turn on the pump. If the well runs dry, shut off the pump and allow the well to recover.
- Surging will be performed by raising and lowering the pump several times to pull fine-grained material from the well. Periodically measure the turbidity level using a La Motte turbidity reader.
- The second and third steps will be repeated until turbidity is less than 50 nephelometric turbidity units (NTUs) or when 10 well volumes have been removed.
- All water generated during cleaning and development procedures will be collected and contained on Site in 55-gallon drums for future analysis and appropriate disposal.

Equipment:

- Appropriate health and safety equipment;
- Knife;
- Power source (generator);
- Field book;
- Well Development Form (Form 3006);

- Well keys;
- Graduated pails;
- Pump and tubing;
- Cleaning supplies (including non-phosphate soap, buckets, brushes, laboratory-supplied distilled/deionized water, tap water, cleaning solvent, aluminum foil, plastic sheeting, etc.); and
- Water level meter.

6.2.3 Well Purging and Stabilization Monitoring (Low-Stress/Low-Flow Method)

The preferred method for groundwater sampling will be the low-stress/low-flow method described below.

- Slowly lower the pump, safety cable, tubing, and electrical lines into the well to the depth specified by the project requirements. The pump intake must be at the midpoint of the well screen to prevent disturbance and resuspension of any sediment in the screen base.
- Before starting the pump, measure the water level again with the pump in the well, leaving the water level measuring device in the well when completed.
- Purge the well at 100 to a maximum of 500 milliliters per minute (mL/min). During purging, the water level should be monitored approximately every five minutes, or as appropriate. A steady flow rate should be maintained that results in a drawdown of 0.3 ft or less. The rate of pumping should not exceed the natural flow rate conditions of the well. Care should be taken to maintain pump suction and to avoid entrainment of air in the tubing. Record adjustments made to the pumping rates and water levels immediately after each adjustment.
- During the purging of the well, monitor and record the field indicator parameters (pH, temperature, conductivity, oxidation-reduction [redox] potential [ORP], DO, and turbidity) approximately every five minutes. Stabilization is considered to be achieved when the final groundwater flow rate is achieved, and three consecutive readings for each parameter are within the following limits:
 - pH: 0.1 pH units of the average value of the three readings;
 - Temperature: 3 percent of the average value of the three readings;
 - Conductivity: 0.005 milliSiemens per centimeter (mS/cm) of the average value of the three readings for conductivity less than 1 mS/cm and 0.01 mS/cm of the average value of the three readings for conductivity greater than 1 mS/cm;
 - ORP: 10 millivolts (mV) of the average value of the three readings;
 - DO: 10 percent of the average value of the three readings; and
 - Turbidity: 10 percent of the average value of the three readings, or a final value of less than 50 NTU.
- The pump must not be removed from the well between purging and sampling.

6.2.4 Sampling Techniques

- If an alternate pump is utilized, the first pump discharge volumes should be discarded to allow the equipment a period of acclimation to the groundwater.

- Samples are collected directly from the pump, with the groundwater being discharged directly into the appropriate sample container. Avoid handling the interior of the bottle or bottle cap, and don new gloves for each well sampled to avoid contamination of the sample.
- Order of sample collection:
 - PFAS
 - VOCs
 - 1,4-dioxane
 - SVOCs
 - Total Analyte List (TAL) metals
 - PCBs and pesticides
- No sampling equipment components or sample containers should come in contact with aluminum foil, low-density polyethylene, glass, or polytetrafluoroethylene (PTFE, Teflon™) materials, including plumbers' tape and sample bottle cap liners with a PTFE layer.
- For low-stress/low-flow sampling, samples should be collected at a flow rate between 100 and 500 mL/min and such that the drawdown of the water level within the well does not exceed the maximum allowable drawdown of 0.3 ft.
- The pumping rate used to collect a sample for VOC should not exceed 100 mL/min. Samples should be transferred directly to the final 40-mL glass vials completely full and topped with a Teflon™ cap. Once capped, the vial must be inverted and tapped to check for headspace/air presence (bubbles). If air is present, the sample will be discarded and recollected until free of air.
- Groundwater sampling for PFAS will be performed in accordance with the NYSDEC-issued "Sampling, Analysis and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) under NYSDEC Part 375 Remedial Programs" (April 2023).
- All samples must be labeled with:
 - Unique sample IDs
 - Date and time
 - Parameters to be analyzed
 - Project Reference ID
 - Sampler's initials
- Labels should be written in indelible ink and secured to the bottle with clear tape.

Equipment/Materials:

- pH meter, conductivity meter, DO meter, ORP meter, nephelometer, and temperature gauge;
- Field filtration units (if required);
- Purging/sampling equipment;
- Peristaltic pump;
- Water level probe;
- Sampling materials (containers, logbook/forms, coolers, chain of custody [COC]);
- Work Plan;

- HASP; and
- When sampling for PFAS, acceptable materials for sampling include stainless steel, HDPE, PVC, silicone, acetate, and polypropylene.

Note: Peristaltic pump use for VOC collection is not acceptable on NYSDEC/U.S. Environmental Protection Agency (EPA)/Resource Conservation and Recovery Act (RCRA) sites; this technique has gained acceptance in select areas where it is permissible to collect VOCs using a peristaltic pump at a low flow rate (e.g., Michigan).

Note: 1,4-dioxane and PFAS purge and sample techniques will be conducted following the NYSDEC guidance documents (see Appendix C of the RIWP). Acceptable groundwater pumps include a stainless-steel inertia pump with HDPE tubing, a peristaltic pump equipped with HDPE tubing and silicone tubing, and a stainless-steel bailer with a stainless-steel ball or bladder pump (identified as PFAS-free) with HDPE tubing.

Field Notes:

- Field notes must document all the events, equipment used, and measurements collected during the sampling activities. Section 2.0 describes the data/recording procedure for field activities.
- The logbook should document the following for each well sampled:
 - Identification of well;
 - Well depth;
 - Static water level depth and measurement technique;
 - Sounded well depth;
 - Presence of immiscible layers and detection/collection method;
 - Well yield – high or low;
 - Purge volume and pumping rate;
 - Time well purged;
 - Measured field parameters;
 - Purge/sampling device used;
 - Well sampling sequence;
 - Sampling appearance;
 - Sample odors;
 - Sample volume;
 - Types of sample containers and sample identification;
 - Preservative(s) used;
 - Parameters requested for analysis;
 - Field analysis data and method(s);
 - Sample distribution and transporter;
 - Laboratory shipped to;
 - COC number for shipment to laboratory;
 - Field observations on sampling event;
 - Name collector(s);

- Climatic conditions, including air temperature; and
- Problems encountered and any deviations made from the established sampling protocol.

A standard log form for documentation and reporting groundwater purging and sampling events is presented on the Groundwater Sampling Record, Low-Flow Groundwater Sampling Form, and Low-Flow Monitored Natural Attenuation (MNA) Field Sampling Form. Refer to Appendix A for example field forms.

Groundwater/Decon Fluid Disposal:

- Groundwater disposal methods will vary on a case-by-case basis, but may range from:
 - Off-site treatment at private treatment/disposal facilities or public-owned treatment facilities;
 - On-site treatment at facility-operated facilities; and
 - Direct discharge to the surrounding ground surface, allowing groundwater infiltration to the underlying subsurface regime.
- Decontamination fluids should be segregated and collected separately from wash waters/groundwater containers.

6.3 SOIL VAPOR SAMPLING

The following procedure is an introduction to soil vapor sampling techniques and an outline of field staff responsibilities.

6.3.1 Preparatory Requirements

Prior to collecting the field sample, ensure the stainless-steel soil vapor probe has been installed to the desired depth and sealed completely to the surface using a material such as bentonite. As part of the vapor intrusion evaluation, a tracer gas should be used in accordance with New York State Department of Health (NYSDOH) protocols to serve as a quality assurance/quality control (QA/QC) device to verify the integrity of the soil vapor probe seal. A container (box, plastic pail, etc.) will serve to keep the tracer gas in contact with the probe during testing. A portable monitoring device will be used to analyze a sample of soil vapor for the tracer gas prior to sampling. If the tracer sample results show a significant presence of the tracer, the probe seals will be adjusted to prevent infiltration. At the conclusion of the sampling round, tracer monitoring should be performed a second time to confirm the integrity of the probe seals.

6.3.2 Sampling Techniques

Samples will be collected in appropriately sized Summa canisters that have been certified clean by the laboratory, and samples will be analyzed using EPA Method TO-15. Flow rate for both purging and sampling will not exceed 0.2 liters per minute (L/min). One to three implant volumes shall be purged prior to the collection of any soil gas samples. A sample log sheet will be maintained summarizing sample identification, date and time of sample collection, sampling depth, identity of samplers, sampling methods and devices, soil vapor purge volumes, volume of the soil vapor extracted, vacuum of canisters before and after the samples are collected, apparent moisture content of the sampling zone, and COC protocols.

6.4 SAMPLE HANDLING AND SHIPPING

Sample management is the continuous care given to each sample from the point of collection to receipt at the analytical laboratory. Good sample management ensures that samples are properly recorded, properly labeled, and not lost, broken, or exposed to conditions that may affect the sample's integrity.

All sample submissions must be accompanied by a COC document to record sample collection and submission. Personnel performing sampling tasks must check the sample preparation and preservation requirements to ensure compliance with the QAPP.

The following sections provide the minimum standards for sample management.

6.4.1 Sample Handling

Prior to entering the field area where sampling is to be conducted, especially at sites with defined exclusion zones, the sampler should ensure that all materials necessary to complete the sampling are on hand. If samples must be maintained at a specified temperature after collection, dedicated coolers and ice must be available for use. Conversely, when sampling in cold weather, proper protection of water samples, trip blanks, and field blanks must be considered. Sample preservation will involve pH adjustment, cooling to 4 degrees Celsius (°C), and sample filtration and preservation.

6.4.2 Sample Labeling

Samples must be properly labeled immediately upon collection.

Note that the data shown on the sample label are the minimum data required. The sample label data requirements are listed below for clarity.

- Project name;
- Sample name/number/unique identifier;
- Sampler's initials;
- Date of sample collection;
- Time of sample collection;
- Analysis required; and
- Preservatives.

To ensure that samples are not confused, a clear notation should be made on the container with a permanent marker. If a container is too soiled for marking, the container can be put into a "Zip Lock" bag, which can then be labeled.

All sample names will be as follows:

- Sample unique identifier: Enter the sample name or number. There should be NO slashes, spaces, or periods in the date.
- Date: Enter the six-digit date when the sample was collected. Note that for one-digit days, months, and/or years, add zeros so that the format is MMDDYY (050210). There should be NO slashes, dashes, or periods in the date.

The QA/QC samples will be numbered consecutively as collected with a sample name, date, and number of samples collected throughout the day (i.e., when multiple QA/QC samples are collected in one day). Examples of this naming convention are as follows:

Sample Name:	Comments
TB-050202-0001	TRIP BLANK
TB-050202-0002	TRIP BLANK
FD-050202-0001	FIELD DUPLICATE
FD-050202-0002	FIELD DUPLICATE

NOTE: The QA/QC Sample # resets to 0001 EACH DAY. This will avoid having to look back to the previous day for the correct sequential number.

6.4.3 Field Code

The field code will be written in the “Comments” field on the COC for EVERY sample but will not be a part of the actual sample name. Enter the one/two-character code for the type of sample (must be in CAPITALS):

N	Normal Field Sample
FD	Field Duplicate (note sample number [i.e., 0001] substituted for time)
TB	Trip Blank (note sample number [i.e., 0001] substituted for time)
EB	Equipment Blank (note sample number [i.e., 0001] substituted for time)
FB	Field Blank (note sample number [i.e., 0001] substituted for time)
KD	Known Duplicate
FS	Field Spike Sample
MS	Matrix Spike Sample (note on “Comments” field of COC – laboratory to spike matrix)
MD	Matrix Spike Duplicate Sample (note on “Comments” field of COC – laboratory to spike matrix)
RM	Reference Material

The sample labeling – both chain and sample bottles must be EXACTLY as detailed above. In addition, the Field Sample Key for each sample collected must be filled out.

6.4.4 Packaging

Sample container preparation and packing for shipment should be completed in a well-organized and clean area, free of any potential cross-contamination. The following is a list of standard guidelines that must be followed when packing samples for shipment.

- Double-bag ice in “Zip Lock” bags.

- Double-check to ensure trip and temperature blanks have been included for all shipments containing VOCs, or where otherwise specified in the QAPP.
- Enclose the COC form in a “Zip Lock” bag.
- Ensure custody seals (two, minimum) are placed on each cooler. Coolers with hinged lids should have both seals placed on the opening edge of the lid. Coolers with “free” lids should have seals placed on opposite diagonal corners of the lid. Place clear tape over custody seals.
- Containers should be wiped clean of all debris/water using paper towels (paper towels must be disposed of with other contaminated materials).
- Clear, wide packing tape should be placed over the sample label for protection.
- Do not bulk pack. Each sample must be individually padded.
- Large glass containers (1 liter and up) require much more space between containers.
- Ice is not a packing material due to the reduction in volume when it melts.

Note: Never store sterile sample containers in enclosures containing equipment that uses any form of fuel or volatile petroleum-based product. When conducting sampling in freezing conditions at sites without a heated storage area (free of potential cross-contaminants), unused trip blanks should be isolated from coolers immediately after receipt. Trip blanks should be double-bagged and kept from freezing.

6.4.5 Chain of Custody Records

COC forms will be completed for all samples collected. The form documents the transfer of sample containers. The COC record, completed at the time of sampling, will contain, but not be limited to, the sample number, date and time of sampling, and the name of the sampler. The COC document will be signed and dated by the sampler when transferring the samples.

Each sample cooler being shipped to the laboratory will contain a COC form. The cooler will be sealed properly for shipment. The laboratory will maintain a copy for its records. One copy will be returned with the data deliverables package.

The following list provides guidance for the completion and handling of all COCs:

- COCs used should be a Haley & Aldrich of New York standard form or supplied by the analytical laboratory.
- COCs must be completed in black ballpoint ink only.
- COCs must be completed neatly using printed text.
- If a simple mistake is made, cross out the error with a single line and initial and date the correction.
- Each separate sample entry must be sequentially numbered.
- If numerous repetitive entries must be made in the same column, place a continuous vertical arrow between the first entry and the next different entry.
- When more than one COC form is used for a single shipment, each form must be consecutively numbered using the “Page ___ of ___” format.

- If necessary, place additional instructions directly onto the COC in the Comment section. Do not enclose separate instructions.
- Include a contact name and phone number on the COC in case there is a problem with the shipment.
- Before using an acronym on a COC, clearly define the full interpretation of your designation [i.e., polychlorinated biphenyls (PCBs)].

6.4.6 Shipment

Prior to the start of the field sampling, the carrier should be contacted to determine if pickup will be at the field Site location. If pick-up is not available at the Site, the nearest pick-up or drop-off location should be determined. Sample shipments must not be left at unsecured drop locations.

Copies of all shipment manifests must be maintained in the field file.

DRAFT

7. Field Instruments – Use and Calibration

A significant number of field activities involve the use of electronic instruments to monitor for environmental conditions and health and safety purposes. It is imperative that the instruments are used and maintained properly to optimize their performance and minimize the potential for inaccuracies in the data obtained. This section provides guidance on the usage, maintenance, and calibration of electronic field equipment.

- All monitoring equipment will be in proper working order and operated in accordance with manufacturer's recommendations.
- Field personnel will be responsible for ensuring that the equipment is maintained and calibrated in the field in accordance with manufacturer's recommendations.
- Instruments will be operated only by personnel trained in the proper usage and calibration.
- Personnel must be aware of the range of conditions, such as temperature and humidity, for instrument operation. Usage of instruments in conditions outside these ranges will only proceed with the approval of the Project Manager and/or Health and Safety Officer as appropriate.
- Instruments that contain radioactive source material, such as x-ray fluorescence (XRF) analyzers or moisture-density gauges, require specific transportation, handling, and usage procedures that are generally associated with a license from the Nuclear Regulatory Commission (NRC) or an NRC-Agreement State. Under no circumstances will the operation of such instruments be allowed on Site unless by properly authorized and trained personnel, using the proper personal dosimetry badges or monitoring instruments.

7.1 GENERAL PROCEDURE DISCUSSION

Care must be taken to minimize the potential for transfer of contaminated materials to the ground or onto other materials. Regardless of the size or nature of the equipment being decontaminated, the process will utilize a series of steps that involve removal of gross material (dirt, grease, oil, etc.), washing with a detergent, and multiple rinsing steps. In lieu of a series of washes and rinse steps, steam cleaning with low-volume, high-pressure equipment (i.e., steam cleaner) is acceptable.

Exploration equipment and all monitoring equipment in contact with the sampling media must be decontaminated prior to initiating Site activities, in between exploration locations to minimize cross-contamination, and prior to mobilizing off Site after completion of Site work.

The following specific decontamination procedure is recommended for sampling equipment and tools:

- Brush loose soil off equipment;
- Wash equipment with laboratory-grade detergent (i.e., Alconox or equivalent);
- Rinse with tap water;
- Rinse equipment with distilled water;
- Allow water to evaporate before reusing equipment; and
- Wrap equipment in aluminum foil when not being used.

7.2 DECONTAMINATION OF MONITORING EQUIPMENT

Because monitoring equipment is difficult to decontaminate, care should be exercised to prevent contamination. Sensitive monitoring instruments should be protected when they are at risk of exposure to contaminants. This may include enclosing them in plastic bags, allowing an opening for the sample intake. Ventilation ports should not be covered.

If contamination does occur, decontamination of the equipment will be required; however, immersion in decontamination fluids is not possible. As such, care must be taken to wipe the instruments down with detergent-wetted wipes or sponges, and then with de-ionized water-wetted wipes or sponges.

7.3 DISPOSAL OF WASH SOLUTIONS AND CONTAMINATED EQUIPMENT

All contaminated wash water, rinses, solids, and materials used in the decontamination process that cannot be effectively decontaminated (such as polyethylene sheeting) will be containerized and disposed of in accordance with applicable regulations. All containers will be labeled with an indelible marker as to contents and date of placement in the container, and any appropriate stickers required (such as PCBs). Storage of decontamination wastes on Site will not exceed 90 days under any circumstances.

Equipment/Materials:

Decontamination equipment and solutions are generally selected based on ease of decontamination and disposability.

- Polyethylene sheeting;
- Metal racks to hold equipment;
- Soft-bristle scrub brushes or long-handle brushes for removing gross contamination and scrubbing with wash solutions;
- Large, galvanized wash tubs, stock tanks, or wading pools for wash and rinse solutions;
- Plastic buckets or garden sprayers for rinse solutions;
- Large plastic garbage cans or other similar containers lined with plastic bags can be used to store contaminated clothing; and
- Contaminated liquids and solids should be segregated and containerized in New York State Department of Transportation (NYSDOT)-approved plastic or metal drums, appropriate for off-Site shipping/disposal if necessary.

8. Investigation-Derived Waste Disposal

8.1 RATIONALE/ASSUMPTIONS

This procedure applies to the disposition of IDW, including soils and/or groundwater. IDW is dealt with the following “Best Management Practices” and is not considered a listed waste due to the lack of generator knowledge concerning the chemical source, chemical origin, and timing of chemical introduction to the subsurface.

Consequently, waste sampling and characterization are performed to determine if the wastes exhibit a characteristic of hazardous waste. The disposal of soil cuttings, test pit soils, and/or purged groundwater will be reviewed on a case-by-case basis prior to initiation of field activities. Two scenarios typically exist:

- When no information is available in the area of activity or investigation, and impacted media/soils are identified. Activities such as new construction and /or maintenance below grade may encounter environmental conditions that were unknown.
- Disposal Required/Containerization Required – When sufficient site information regarding the investigative site conditions warrants that all materials handled will be contained and disposed.

If a known listed hazardous and/or characteristically hazardous waste/contaminated environmental media is being handled, then handling must be performed in accordance with RCRA Subtitle C (reference 2, Part V, Section 1(a),(b),(c)).

The following outlines the waste characterization procedures to be employed when IDW disposal is required.

The following procedure describes the techniques for characterization of IDW for disposal purposes. IDW may consist of soil cuttings (augering, boring, well installation soils, test pit soils), rock core or rock flour (from coring, reaming operations), groundwater (from well development, purging, and sampling activities), decontamination fluids, PPE, and disposal equipment (DE).

8.2 PROCEDURE

The procedures for handling and characterization of field activity-generated wastes are:

- A.) Soil Cuttings - Soils removed from boring activities will be contained within an approved container, suitable for transportation and disposal.
 - Once placed into the approved container, any free liquids (i.e., groundwater) will be removed for disposal as waste fluids or solidified within the approved container using a solidification agent such as Speedy Dri (or equivalent).
 - Contained soils will be screened for the presence of VOCs using a PID; this data will be logged for future reference.
 - Once screened, full, and closed, the container will be labeled and placed into the container storage area. At a minimum, the following information will be shown on each container label: date of filling/generation, Site name, source of soils (i.e., borehole or well), and contact.

- Prior to container closure, representative samples from the containers will be collected for waste characterization purposes and submitted to the project laboratory.
 - Typically, at a location where an undetermined Site-specific parameter group exists, sampling and analysis may consist of the full RCRA Waste Characterization (ignitability, corrosivity, reactivity, toxicity), or a subset of the above based upon data collected, historical information, and generator knowledge.
- B.) Groundwater - Purging and sampling groundwater, which requires disposal, will be contained.
- Containment may be performed in 55-gallon drums, tanks suitable for temporary storage (i.e., Nalgene tanks 500 to 1,000 gallons), or, if large volumes of groundwater are anticipated, a tanker trailer (5,000 to 10,000 gallons ±), or drilling “Frac” tank may be utilized (20,000 gallons ±). In all cases, the container/tank used for groundwater storage must be clean before use, such that cross-contamination does not occur.
- C.) Decon Waters/Decon Fluids - Decon waters and/or fluids will be segregated, contained, and disposed of accordingly.
- Decon waters may be disposed of with the containerized groundwater once analytical results have been acquired.
- D.) PPE/DE – A number of disposal options exist for spent PPE/DE generated from investigation tasks. The options typically employed are:
- Immediately disposed of within on-Site dumpster/municipal trash; or
 - If known to be contaminated with RCRA hazardous waste, dispose off Site at an RCRA Subtitle C facility.
 - Spent Solvent/Acid Rinses - The need for sampling must be determined in consultation with the waste management organization handling the materials. If known that only the solvent and/or acids are present, then direct disposal/treatment using media-specific options may be possible without sampling (i.e., incineration).
 - PPE/DE – Typically not sampled and included with the disposal of the solid wastes.

Equipment/Materials:

- Sample spoons, trier, auger;
- Sample mixing bowl;
- Sampling bailer, or pump; and
- Sample glassware.

References

1. American Public Works Association, 1999. Uniform Color Code (<http://www.apwa.net/>). April.
2. ASTM 4750 Test Method for Determining Subsurface Liquid Levels in a Borehole or Monitoring Well (Observation Well)
3. ASTM D2487: Classification of Soils for Engineering Purposes (Unified Soil Classification System).
4. ASTM D4448: Standard Guide for Sampling Groundwater Wells
5. ASTM D4696: Guide for Pore-liquid Sampling from the Vadose Zone
6. ASTM D5088: Practice for Decontamination of Field Equipment Used at Non-Radioactive Waste Sites
7. ASTM D5474: Guide for Selection of Data Elements for Groundwater Investigations
8. ASTM D5903: Guide for Planning and Preparing for a Groundwater Sampling Event
9. ASTM D5979: Guide for Conceptualization and Characterization of Groundwater Systems
10. ASTM D6000 Guide for Presentation of Water Level Information from Ground Water Sites
11. ASTM D6000: Guide for Presentation of Water Level Information from Ground Water Sites
12. ASTM D6001: Standard Guide for Direct Push Water Sampling for Geo-environmental Investigations.
13. ASTM Standards on Environmental Sampling, 1995. Standard D 1586-92, "Test Method for Penetration Test and Split-Barrel Sampling of Soils."
14. ASTM Standards on Environmental Sampling, 1995. Standard D 2488-93, "Standard Practice for Description and Identification of Soils (Visual-Manual Procedure)."
15. ASTM Standards on Environmental Sampling, 1995. Standard D 4700-91, "Guide for Soil Sampling from the Vadose Zone."
16. ASTM, 1991. Standard D1452-80, "Practice for Soil Investigation and Sampling by Auger Borings," Annual Book of ASTM Standard, Section 4, Volume 04.08.
17. Geotechnical Gauge, Manufactured by W.F. McCollough, Beltsville, MD.
18. New York State Code Rule 753
19. New York State Department of Environmental Conservation, 2010. Technical Guidance for Site Investigation and Remediation, DER-10. May 3.

20. New York State Department of Environmental Conservation, 2023. Division of Environmental Remediation, Sampling, Analysis and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) under NYSDEC Part 375 Remedial Program. April.
21. Sand Grading Chart, by Geological Specialty Company, Northport, Alabama.
22. The Occupational Safety and Health Administration's (OSHA) Excavation and Trenching Standard Title 29 of the Code of Federal Regulation (CFR) Part 1926.650.
23. United States Environmental Protection Agency, 1986a. RCRA Ground-Water Monitoring Technical Enforcement Guidance Document, OSWER-9950.1.
24. United States Environmental Protection Agency, 1986b. SEPA Office of Solid Waste- SW846 Chapter 9 Sampling Plan, Chapter 10 Sampling Methods. September.
25. United States Environmental Protection Agency, 1987. A Compendium of Superfund Field Operations Methods, EPA/540/P-87/001.
26. United States Environmental Protection Agency, 1988. Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, OSWER-9950.1.
27. United States Environmental Protection Agency, 1992. USEPA CERCLA Guidance (Options Relevant to RCRA Facilities): Guide to Management of Investigation - Derived Wastes. January.
28. United States Environmental Protection Agency, 1998a. RCRA - Management of Contaminated Media. October.
29. United States Environmental Protection Agency, 1998b. USEPA RCRA - Guidance and Policies: Management of Remediation Waste Under RCRA. October.
30. United States Environmental Protection Agency. Low-flow (Minimal Drawdown) Groundwater Sampling Procedures (EPA/540/S-95/504)
31. United States Environmental Protection Agency. RCRA Groundwater Monitoring: Draft Technical guidance (EPA/530 R 93 001)

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APPENDIX A
Field Forms

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APPENDIX B
Quality Assurance Project Plan

QUALITY ASSURANCE PROJECT PLAN
2074-2080 MCDONALD AVENUE
BROOKLYN, NEW YORK

by
H & A of New York Engineering and Geology,
LLP New York, New York

for
Crystal Residences LLC
Brooklyn, New York

DRAFT

File No. 0213688
February 2026



Executive Summary

This Quality Assurance Project Plan outlines the scope of the quality assurance and quality control activities associated with the site monitoring activities of the Remedial Investigation Work Plan for 2074-2080 McDonald Avenue, Brooklyn, New York (the “Site”).

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

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Attachment	Title
A	PFAS Analyte List
B	Project Team Resumes

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1. Project Description

This Quality Assurance Project Plan (QAPP) presents the organization, objectives, planned activities, and specific quality assurance/quality control (QA/QC) procedures associated with the investigation activity for a Remedial Investigation (RI) at 2074-2080 McDonald Avenue, Brooklyn, New York (Site). Protocols for sample collection, sample handling and storage, chain of custody (COC) procedures, and laboratory and field analyses are specifically described or referenced to related investigation documents.

This QAPP addresses the QA/QC elements in the U.S. Environmental Protection Agency (EPA) QAPP policy and other relevant guidance documents.

1.1 INTRODUCTION

The approximately 31,480-square-foot (sq-ft) Site, addressed 2074-2080 McDonald Avenue and identified as Block 6680, Lots 39 and 42 on the New York City Tax Map, is located in an urban area of the Gravesend neighborhood of Brooklyn, New York, and is improved with a vacant two-story school building on Lot 42 and Lot 39 is improved with a two-story commercial building occupied by an interior design office/retail space on the ground floor and a recreation/events space formerly utilized by the neighboring school. Lot 42 is currently vacant, and Lot 39 is still in use as a retail space.

This QAPP has been prepared on behalf of Emerald Developers LLC. The QAPP is a component of the Remedial Investigation Work Plan (RIWP) that also includes field sampling procedures and the Health and Safety Plan (HASP).

1.1.1 Project Objectives

The primary objectives for data collection activities include:

- Determining the nature and extent of contamination in environmental media (soil, groundwater, and soil vapor) at the Site; and
- Collecting sufficient data for applicable contaminated media to evaluate the risk to human health and the environment, if any, associated with the contamination.

Associated specific objectives for field and laboratory data collection are discussed in Section 1.4 of this plan.

1.2 SITE DESCRIPTION AND SITE HISTORY

The general Site description and Site history are provided in the RIWP appended to the Brownfield Cleanup Program (BCP) Application for the Site and incorporated herein by reference.

1.3 PROJECT OBJECTIVES AND INTENDED DATA USE

1.3.1 Target Parameter List

The investigative program includes the sampling and analysis of environmental media for the presence of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated

biphenyls (PCBs), metals, pesticides, and/or per- and polyfluoroalkyl substances (PFAS) constituents based on historical operations at the Site. The field and laboratory parameters are summarized below.

1.3.1.1 *Field Parameters*

Concurrent with sample collection, several field parameters will be determined by the field sampling personnel. For soils and solid matrices, these field parameters will include visual observations, odor identification, and VOC screening using handheld monitoring equipment.

For aqueous groundwater samples, the following parameters will be determined with field testing equipment, including, but not limited to, pH, specific conductivity, temperature, turbidity, dissolved oxygen (DO), and/or oxidation/reduction potential (ORP). During the collection of groundwater samples, pH, specific conductivity, temperature, DO, and ORP will be measured until stabilized, or if parameters do not stabilize after two hours, a minimum of three times the well volume will be purged prior to sampling.

1.3.1.2 *Laboratory Parameters*

The laboratory parameters for soil include:

- Target Compound List (TCL) VOCs using EPA Method 8260;
- TCL SVOCs using EPA Method 8270;
- Total Analyte List (TAL) metals using EPA Methods 6010/7471;
- TCL pesticides using EPA Method 8081;
- PCBs using EPA Method 8082;
- PFAS using EPA Method 1633A; and
- 1,4-dioxane using EPA Method 8270.

The laboratory parameters for groundwater include:

- TCL VOCs using EPA Method 8260;
- TCL SVOCs using EPA Method 8270;
- Total metals using EPA Methods 6010/7470;
- Dissolved metals using EPA Methods 6010/7470;
- PCBs using EPA Method 8082;
- Pesticides using EPA Method 8081;
- PFAS using EPA Method 1633A; and
- 1,4-dioxane using EPA Method 8270 SIM.

Note: PFAS will be collected in accordance with the New York State Department of Environmental Conservation (NYSDEC), Division of Environmental Remediation (DER), "Sampling, Analysis and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) under NYSDEC Part 375 Remedial Program," April 2023. PFAS analysis in soil and groundwater will be performed for the 40 compounds as referenced

in Attachment A. PFAS analysis will be performed using EPA Method 1633A with a reporting limit of 2 nanograms per liter (ng/L).

The analytical laboratory parameters for soil vapor samples include:

- VOCs using EPA Method TO-15.

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

1.4 SAMPLING LOCATIONS

The RIWP provides a summary and rationale for the sample locations at the Site. It is possible, however, that depending on the nature of the encountered field conditions, sampling locations may change. The person responsible for making such decisions will be the QA Officer, whose responsibilities are described in Section 2 of this QAPP. Any change in the sampling strategy will only be implemented after approval from the Project Manager.

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2. Project Organization and Responsibilities

This section defines the roles and responsibilities of the individuals who will perform the RIWP monitoring activities. A New York State Department of Health (NYSDOH)-certified analytical laboratory will perform the analyses of environmental samples collected at the Site.

2.1 PROJECT TEAM

The following project personnel are anticipated for oversight of the RIWP implementation. Project team resumes are included in Attachment B.

NYSDEC Case Manager	PENDING
NYSDOH Case Manager	PENDING
Qualified Environmental Professional (QEP)	Mari C. Conlon, P.G.
Project Manager	Zachary P. Simmel
Haley & Aldrich of New York* Health and Safety Director	Brian Fitzpatrick, CHMM
Health and Safety Officer (HSO)	Brian Ferguson
QA Officer	Nicole Mooney
Third-Party Validator	Katherine Miller

**H & A of New York Engineering and Geology, LLP (Haley & Aldrich of New York)*

2.2 MANAGEMENT RESPONSIBILITIES

The Project Manager is responsible for managing the implementation of the RIWP and monitoring and coordinating the collection of data. The Project Manager is responsible for technical QC and project oversight. The Project Manager's 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 RIWP monitoring activities; and
- Assure compliance with the Site HASP.

2.3 QA RESPONSIBILITIES

The QA team will consist of a QA Officer and the Data Validation Staff. QA responsibilities are described as follows:

2.3.1 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; and
- 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.

2.3.2 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 will be presented in a Data Usability Summary Report (DUSR) for submittal to the QA Officer.

2.4 LABORATORY RESPONSIBILITIES

The Environmental Laboratory Accreditation Program (ELAP)-approved laboratory to be used will be Pace Analytical (Pace), located in Westborough, Massachusetts. Laboratory services in support of the RIWP monitoring include the following personnel:

2.4.1 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 and adhering to the QAPP.

2.4.2 Laboratory QA Officer

The Laboratory QA Officer will have sole responsibility for the review and validation of the analytical laboratory data generated as part of the investigation. The Laboratory QA Officer will also define appropriate QA procedures, overview QA/QC documentation, and perform audits.

2.4.3 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 COC 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.

2.4.4 Laboratory Technical Personnel

The Laboratory Technical Personnel will have the primary responsibility for 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 (SOPs).

2.5 FIELD RESPONSIBILITIES

2.5.1 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 HSO to conduct operations in compliance with the project 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 QC 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 QA Officer and Project Manager, and implement and document corrective action procedures; and
- Participate in preparation of the final reports.

2.5.2 Field Team Personnel

Field Team Personnel will be responsible for the following:

- Perform field activities as detailed in the RIWP and in compliance with the Field Sampling Plan (FSP; Appendix A of the RIWP) and this QAPP.
- Immediately report any accidents and/or unsafe conditions to the Site HSO and take reasonable precautions to prevent injury.

3. Sampling Procedures

The FSP in Appendix C of the RIWP provides the SOPs for sampling required by the RIWP. Sampling will be conducted in general accordance with the NYSDEC Technical Guidance for Site Investigation and Remediation (DER-10) and the “Sampling, Analysis and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) under NYSDEC Part 375 Remedial Program” (April 2023) when applicable. Proposed sample locations are shown on Figure 4 of the RIWP.

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 EPA’s “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 during the sampling program will be maintained by the laboratory and will be available upon request. The appropriate sample containers, preservation method, maximum holding times, and shipping information for each target parameter and 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. Field blanks and field duplicate samples will also be numbered with a unique sample identifier to prevent analytical bias of field QC samples.

Refer to the FSP (Appendix A of the RIWP) for the sample labeling procedures.

3.3 FIELD QC SAMPLE COLLECTION

3.3.1 Field Duplicate Sample Collection

3.3.1.1 *Water Samples*

Field duplicate samples will be collected by filling the parent sample containers to the proper level and sealing, and then repeating for the duplicate set of sample containers.

- The samples are properly labeled as specified in Section 3.2.
- The samples are collected in order of decreasing analyte volatility as detailed in the FSP provided as Appendix A of the RIWP.
- COC documents are executed.
- The samples will be handled as specified in Table I.

3.3.1.2 Soil Samples

Soil field duplicates will be collected as specified in the following procedure:

- Soils will be sampled directly from acetate liners.
- Soil for VOC analysis will be removed from the sampling device as specified in the FSP provided as Appendix A of the RIWP.
- Soil for non-VOC analysis will be removed from the sampling device and collected into clean laboratory-provided containers.

3.4 GENERAL DECONTAMINATION PROCEDURES

Care must be taken to minimize the potential for transfer of contaminated materials to the ground or onto other materials. Regardless of the size or nature of the equipment being decontaminated, the process will utilize a series of steps that involve removal of gross material (dirt, grease, oil, etc.), washing with a detergent, and multiple rinsing steps. In lieu of a series of washes and rinse steps, steam cleaning with low-volume, high-pressure equipment (i.e., steam cleaner) is acceptable.

Exploration equipment and all monitoring equipment in contact with the sampling media must be decontaminated prior to initiating Site activities, in between exploration locations to minimize cross-contamination, and prior to mobilizing off Site after completion of Site work.

The following specific decontamination procedure is recommended for sampling equipment and tools:

- Brush loose soil off equipment;
- Wash equipment with laboratory-grade detergent (i.e., Alconox or equivalent);
- Rinse with tap water;
- Rinse equipment with distilled water;
- Allow water to evaporate before reusing equipment; and
- Wrap equipment in aluminum foil when not being used.

4. Custody Procedures

Custody is one of several factors necessary for the admissibility of environmental data as evidence in a court of law. Custody procedures help to satisfy the two major requirements for admissibility: relevance and authenticity. Sample custody is addressed in three parts: field sample collection, laboratory analysis, and final project files. Final evidence files, including all originals of laboratory reports, are maintained under document control in a secure area.

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:

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

4.1 FIELD CUSTODY PROCEDURES

Field personnel will be required to keep written records of field activities on applicable pre-printed field forms, in a bound field notebook, or in an electronic format. The records provide the means of recording data collection activities. Non-electronic records will be written legibly in ink and will contain pertinent field data and observations. Written entry errors or changes will be crossed out with a single line, dated, and initialed by the person making the correction. The records will be periodically reviewed by the Field Coordinator.

Each title page will include the field member's name, project name, project start date, project end date, and unique page number.

The beginning of each entry in the record will contain the following information:

- Date;
- Start time;
- Weather;
- Names of field personnel (including subcontractors);
- Level of personal protection used at the Site; and
- 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 the sample or make the 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 data quality can be affected by sample collection activities. If the integrity of collected samples is questionable, the data, regardless of its analytical quality, will also be questionable. 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. Refer to the FSP in Appendix A of the RIWP for sample packaging procedures.
- Samples will be assigned a unique sample number and will be affixed to a sample label affixed to the sample container. Refer to the FSP in Appendix A of the RIWP for sample labeling procedures.
- 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 COC record will be completed at the time of sample collection and will accompany each shipment, identifying the contents of the shipment. The COC record will accompany the 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.
- Soil and groundwater samples will also be transported in containers (coolers) packed with ice. Samples will be packaged for shipment and shipped to the appropriate laboratory for analysis. The samples will be packed to prevent breakage and movement during shipping. The number of coolers must be written on the COC. Samples in polyethylene containers will be placed upright directly in the sample cooler and limited to one layer of samples per cooler. Additional bubble wrap or packaging material will be added to fill the cooler. Shipping containers may be secured with strapping tape and/or custody tape for shipment to the laboratory.
- When samples are split with a regulatory agency and Site representatives, a separate COC will be prepared and marked to indicate with whom the samples are shared. The person relinquishing the samples to the regulatory agency or the Site 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 (and never longer than a one-day delay) 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 COC PROCEDURES

A full-time Sample Custodian will be assigned the responsibility of sample control. It will be the responsibility of the Sample Custodian to receive all incoming samples. Once received, the custodian will document that the custody tape on the coolers is unbroken, that each sample is received in good condition (i.e., unbroken, cooled, etc.), that the associated paperwork, such as COC forms, has been completed, and will sign the COC forms. In special cases, the custodian will document from appropriate sub-samples that the COC with proper preservation has been accomplished. The custodian will also document that 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 COC form, analyses by the laboratory's analysts will begin in accordance with the appropriate methodologies. Samples will be removed from secure storage, with internal COC sign-out procedures followed.

4.3 STORAGE OF SAMPLES

Sample containers with volume remaining will be returned to secure and limited-access storage. Upon completion of all laboratory analyses for each sample submittal and generation of the laboratory report, samples will be stored by the Sample Custodian. The length of time that samples are held will be at least 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 of New York 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 the custody of the Project Director or their 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 COC documentation;
- Correspondence;
- References, literature;
- Laboratory data deliverables;
- Data validation and assessment reports;
- Progress and QA reports; and
- A final report.

The laboratory will be responsible for maintaining analytical logbooks, laboratory data, and sample COC documents, both hard copy and electronic. Raw laboratory data files and copies of hard copy reports will be inventoried and maintained by the laboratory for a period of six years, at which time the laboratory will contact the QA Officer regarding the disposition of the project-related files.

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5. Calibration Procedures and Frequency

This section describes procedures for maintaining the accuracy of all the instruments and measurement equipment, which will be used for conducting field tests and laboratory analyses. These instruments and equipment will be calibrated prior to each use or according to a periodic schedule.

5.1 FIELD INSTRUMENT CALIBRATION PROCEDURES

Field instruments will be used for real-time sample measurement during the sampling of all media and for health and safety monitoring, as described in the HASP. On-Site air monitoring for health and safety purposes may be accomplished using a vapor detection device, such as a photoionization detector (PID).

Field instruments will be calibrated prior to use, and the calibration will be verified, at a minimum, at the beginning of the day and/or the middle of the day.

Satisfactory completion of the pre-operation inspection will be noted on the Field Sampling Record, along with results of each field measurement.

5.2 LABORATORY INSTRUMENT CALIBRATION PROCEDURES

Calibration procedures for a specific laboratory instrument will consist of initial calibration, initial calibration verification, and continuing calibration verification. The Laboratory SOPs present the specific calibration procedures for each method of analysis. The SOP for each analysis performed in the laboratory describes calibration procedures, their frequency, acceptance criteria, and the conditions that will require calibration. In all cases, the initial calibration will be verified using an independently prepared calibration verification solution.

The use of 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 (NIST, formerly National Bureau of Standards), the EPA Environmental Monitoring Support Laboratories (EMSL), or reliable Cooperative Research and Development Agreement (CRADA)-certified commercial sources.

All materials, including standards or standard solutions, will be dated upon receipt and will be identified by material name, lot number, purity or concentration, supplier, receipt/preparation date, recipient/preparer’s name, expiration date, and all other pertinent information.

6. Analytical Procedures

Analytical procedures to be utilized for the analysis of environmental samples will be based on referenced EPA analytical protocols and/or project-specific SOPs.

6.1 FIELD ANALYTICAL PROCEDURES

Field analytical procedures include the measurement of pH, temperature, ORP, DO, and specific conductivity during sampling of groundwater, and the qualitative measurement of VOCs during the collection of soil samples.

6.2 LABORATORY ANALYTICAL PROCEDURES

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

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

6.2.1 List of Project Target Compounds and Laboratory Detection Limits

The method detection limit (MDL) studies are performed by the laboratories in accordance with the procedures established in the Code of Federal Regulations, Title 40, Part 136.

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

6.2.2 List of Method-Specific 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 QC checks that will be employed for field and laboratory measurements.

7.1 FIELD QUALITY CONTROL

Field QC is monitored and enforced by equipment calibration checks, QC samples, a review of QA/QC concerns in the field, and any corrective action(s) required. Haley & Aldrich of New York personnel familiar with the field protocols will perform these tasks. Compliance QC checks will be implemented during the investigations.

Field sampling precision, accuracy, and overall data quality will be evaluated using trip blanks, field blanks, equipment rinse blanks, and potentially field duplicates and matrix spike (MS)/matrix spike duplicates (MSDs), as necessary, as outlined in Table II.

7.1.1 Field Blanks

Internal QC 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 will be prepared by the project laboratory using ASTM International (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.

7.1.3 Equipment Blanks

Equipment blanks are prepared by pouring analyte-free water into, over, or pumped through the sampling device, collected in a sample container, and transported to the laboratory for analysis in the same manner as the environmental samples. Equipment blanks are used to assess the effectiveness of equipment decontamination procedures. One equipment blank sample per type of sampling equipment utilized may be collected at the initiation of each sampling event or when deemed necessary.

7.2 LABORATORY PROCEDURES

Procedures which contribute to maintenance of overall laboratory QA/QC 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 one 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:

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

Acceptance criteria for duplicate analyses performed on solid matrices will be 100 percent, air matrices will be 35 percent, and aqueous matrices will be 35 percent (or the absolute difference rule was satisfied if detects were less than five times the reporting limit [RL] for solid and aqueous matrices only). 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

Five 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 samples using the following equation.

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

If the QC value falls outside the control limits (upper control limit [UCL] or lower control limit [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 Analyses

The laboratory will perform laboratory control sample (LCS) analyses prepared from 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 of New York 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 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 Recoveries

For VOCs, surrogates will be added to each sample prior to analysis to establish purge and trap efficiency.

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

For SVOC analyses, surrogates will be added to the raw sample to assess extraction efficiency.

Method-specific QC limits are provided in the attached laboratory method SOPs. Surrogate compound 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 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 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 SOPs. 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 RIWP 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 of assessing 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 RPD, which is defined as the absolute difference of duplicate measurements divided by the mean of these analyses, normalized to a percentage.

8.1.2 Field Precision Sample Objectives

Field precision will be assessed through the collection and measurement of field duplicate samples at a rate of one duplicate per 20 investigative samples. The RPD criteria for the project field duplicate samples will be +/- 100 percent for soil, +/- 35 percent for groundwater for parameters of analysis detected at concentrations greater than five times the laboratory RL, and +/- 35 percent for air for parameters of analysis detected at any concentration.

8.1.3 Laboratory Precision Sample Objectives

Laboratory precision will be assessed through the analysis of LCS and laboratory control sample duplicates (LCSD) and 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 percent for parameters of analysis detected at any concentration.

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.

Trip blank samples will be prepared by the laboratory and provided with each shipping container, which includes containers for the collection of groundwater samples for the analysis of VOCs. Trip blank samples will be analyzed for each VOC for which groundwater samples have been collected for analysis.

8.3 LABORATORY ACCURACY OBJECTIVES

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

One 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 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 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. Valid data are determined by independent confirmation of compliance with method-specific and project-specific DQOs. The calculation of data set completeness will be performed using the following equation.

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

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. The field completeness objective for this project will be greater than 90 percent.

8.5.3 Laboratory Completeness Objectives

The 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. Corrective actions, such as revised sample handling procedures, will be implemented if problems are noted.

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 greater than 90 percent.

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 SRMs obtained from either EPA CRADA suppliers or the 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 – micrograms per kilogram ($\mu\text{g}/\text{kg}$) for PFAS analyses, milligrams per kilogram (mg/kg) of media (Dry Weight).
- Aqueous Matrices – ng/L for PFAS analyses, micrograms per liter ($\mu\text{g}/\text{L}$) of media for organic analyses, and milligrams per liter (mg/L) for inorganic analyses.
- Air Matrices - micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) for organic analyses.

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 equipment rinse blank will be collected per sampling event to the extent that non-dedicated sampling equipment is used. If necessary, a separate equipment rinse blank sample will be collected for PFAS to assess potential contamination introduced from utilized equipment.

Note: If dedicated or disposable sampling equipment is used, equipment rinse samples will not be collected as part of that field effort.

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 VOCs. Trip blanks will be preserved and handled in the same manner as the project samples. One trip blank will be included along with each shipping container containing project samples to be analyzed for VOCs.

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 field duplicate will be collected for every 20 or fewer investigative samples collected for off-site laboratory analysis.

MS will provide information to assess the precision and accuracy of the analysis of the target parameters within the environmental media collected. One 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 VOCs only. Aqueous MS/MSD samples require triple the normal sample volume for VOC analysis and double the volume for the remaining parameters.

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9. Data Reduction, Validation, and Reporting

All data generated through field activities or by the laboratory operation shall 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. Only direct-read instrumentation will be employed in the field. The pH, conductivity, temperature, turbidity, and PID readings collected in the field will be generated from direct-read instruments following calibration per manufacturer's recommendations. 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. Later, when the results forms required for this study are being filled out, the Project Coordinator will review the forms to determine whether any transcription errors have been made by the field crew.

9.1.2 Laboratory Data Reduction Procedures

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

9.1.3 Quality Control Data

QC data (e.g., laboratory duplicates, surrogates, MS, and MSD) will be compared to the method acceptance criteria or laboratory acceptance criteria when no method criteria are available. Data determined to be acceptable will be entered into the laboratory information management system. Data summaries will be sent to the Laboratory QA Officer for review. If approved, data are logged into the project database format.

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 of New York QA Officer or designee using the following documents as guidance for the review process:

- "U.S. EPA National Functional Guidelines for Organic Data Review," "Analysis of Volatile Organic Compounds in Air Contained in Canisters by Method TO-15," "Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances Under NYSDEC's Part 375 Remedial Programs," 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 of New York QA Officer. Tier 1 data validation (the equivalent of EPA's Stage 2A validation) will be performed to evaluate data quality.
- 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 DUSR based on NYSDEC DER-10, Appendix 2B.

10. Performance and System Audits

A performance audit is an independently obtained 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 an 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; and
- COC reports.

Follow-up audits will be conducted to correct deficiencies and to verify that procedures are maintained throughout the investigation.

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 HASPs;
- Procedures for verification of field duplicates; and
- 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, COC 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 NYSDEC, NYSDOH, or designee. External audits may include any of the following:

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

An audit may consist of, but not be limited to:

- Sample receipt procedures;
- Custody, sample security, and log-in procedures;
- Review of instrument calibration logs;
- Review of QA procedures;
- Review of logbooks;
- Review of analytical SOPs; and
- 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; and
- 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 downtime. Program implementation is concentrated in three areas:

- Maintenance responsibilities;
- Maintenance schedules; and
- 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 reduce 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. Quality Assurance Reports and Corrective Actions

Critically important to the successful implementation of the QAPP 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; and
- QA/QC exception reports/corrective actions.

QA/QC corrective action reports will be prepared by the Haley & Aldrich of New York 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 laboratory management.

Program activities are properly assessed using a review and evaluation process of field QA/QC forms, nonconformance reports (NCR), and subsequent corrective actions, internal peer review, and laboratory oversight. This process ensures this QAPP is adhered to, the quality of the data is adequate, and corrective actions, when needed, are implemented effectively and in a timely manner.

Any project team member can initiate the field corrective action process by identifying a problem, acting to eliminate the problem, documenting the corrective action, monitoring the effectiveness of the corrective action, and verifying the problem has been eliminated. Some examples of corrective actions for field measurements may include the following:

- Repetition of a measurement to check for error;
- Checking all proper adjustments for ambient conditions such as temperature;
- Checking batteries;
- Checking calibrations;
- Recalibration;
- Replacing instruments or measurement devices;
- Stop work (if necessary);
- Revising information submitted on COC forms; and
- Amending of sampling procedures or work plans.

Technical staff and project personnel are responsible for reporting all technical or QA nonconformances or suspected deficiencies of any activity or issued document by reporting the situation to the Haley & Aldrich of New York QA Officer on an NCR. The Haley & Aldrich of New York Project Manager, in coordination with the Haley & Aldrich of New York QA Officer, is responsible for assessing the suspected difficulty and its impact on the data quality in consultation with the Haley & Aldrich of New York

Program Manager. A corrective action decision, if necessary, will be determined by the Haley & Aldrich of New York Project Manager and QA Officer and implemented by the Project Manager. The Haley & Aldrich Project Manager has the authority to initiate stop work orders, if necessary, and is responsible for initiating a corrective action for a nonconformance, which may include the following actions:

- Evaluating all reported nonconformances;
- Determining disposition or action to be taken;
- Maintaining a log of nonconformances; and
- Reviewing nonconformance reports and corrective actions taken.

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References

1. New York State Department of Environmental Conservation, 1991. NYSDEC Analytical Services Protocol (ASP), Bureau of Environmental Investigation, 1991 with updates.
2. New York State Department of Environmental Conservation, 2010. Division of Environmental Remediation, Technical Guidance for Site Investigation and Remediation, DER-10. May.
3. New York State Department of Environmental Conservation, 2023. Division of Environmental Remediation, Sampling, Analysis and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) under NYSDEC Part 375 Remedial Program. April.
4. United States Environmental Protection Agency, 1986. Test Methods for Evaluating Solid Waste, Office of Solid Waste, U.S. EPA, SW-846, November 1986, with updates.
5. 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.
6. United States Environmental Protection Agency, 1992. Specifications and Guidance for Contaminant-Free Sample Containers. OSWER Directive 9240.0-05A. April.
7. 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.
8. United States Environmental Protection Agency, 1999. EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations. EPA QA/R-5 Interim Final. November.
9. United States Environmental Protection Agency, 2014. Analysis of Volatile Organic Compounds in Air Contained in Canisters by Method TO-15, SOP NO. HW-31, Revision 6. June.
10. United States Environmental Protection Agency, 2020a. National Functional Guidelines for Inorganic Superfund Methods Data Review. EPA-542-R-20-006. November.
11. United States Environmental Protection Agency, 2020b. National Functional Guidelines for Organic Superfund Methods Data Review. EPA-540-R-20-005. November.

https://haleyaldrich.sharepoint.com/sites/EmeraldDevelopersLLC/Shared Documents/0213688.2074-2080 McDonald Avenue/Deliverables/6. RIWP/Appendices/Appendix B - QAPP/2026-0217 HANY 2074-2080 McDonald Ave QAPP_DRAFT.docx

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TABLES

TABLE I

SUMMARY OF ANALYSIS METHOD, PRESERVATION METHOD, HOLDING TIME, SAMPLE SIZE REQUIREMENTS, AND SAMPLE CONTAINERS

2074-2080 MCDONALD AVENUE
BROOKLYN, NEW YORK

Analysis/Method ³	Sample Type	Preservation	Holding Time	Volume/Weight	Container ⁴
Volatile Organic Compounds/8260	Soil	1 - 1 Vial MeOH/2 Vial Water, Cool, 4 ± 2 °C	14 days ¹	120 mL	3 - 40ml glass vials
Semivolatile Organic Compounds/8270	Soil	Cool, 4 ± 2 °C	14 days extraction / 40 days analysis	250 mL	1 - 8 oz Glass
Pesticides/8081	Soil	Cool, 4 ± 2 °C	14 days extraction / 40 days analysis	250 mL	1 - 4 oz Glass
Polychlorinated Biphenyls/8082	Soil	Cool, 4 ± 2 °C	14 days extraction / 40 days analysis	250 mL	1 - 4 oz Glass
TAL Metals/6010, 7471	Soil	Cool, 4 ± 2 °C	180 days	60 mL	1 - 4 oz Glass
PFAS/1633A	Soil	Cool, 4 ± 2 °C	28 days extraction / 40 days analysis	To be determined by laboratory	1 - HDPE container
1,4-Dioxane/8270	Soil	Cool, 4 ± 2 °C	14 days extraction / 40 days analysis	250 mL	1 - 8 oz Glass
Volatile Organic Compounds/8260	Groundwater	HCl, Cool, 4 ± 2 °C	14 days	120 mL	3 - 40 mL glass vials
Semivolatile Organic Compounds/8270	Groundwater	Cool, 4 ± 2 °C	7 days extraction / 40 days analysis	500 mL	2 - 250 mL amber glass
Polychlorinated Biphenyls/8082	Groundwater	Cool, 4 ± 2 °C	365 days	2000 mL	2 - 1000 mL amber glass
Pesticides/8081	Groundwater	Cool, 4 ± 2 °C	7 days	3000 mL	2 - 500 mL amber glass
Total and Dissolved Metals/6010, 7470	Groundwater	HNO ₃ ; Cool, 4 ± 2 °C	180 days, except Mercury - 28 days	500 mL	2 - 500 mL plastic bottle
PFAS/1633A	Groundwater	H ₂ O Cool, 4 ± 2 °C	28 days extraction / 28 days analysis	To be determined by laboratory	2 - HDPE container
1,4-Dioxane/8270SIM	Groundwater	Cool, 4 ± 2 °C	7 days extraction / 40 days analysis	500 mL	1 - 500 mL plastic bottle
Volatile Organic Compounds/TO-15	Soil Vapor	N/A	30 days	2.7 - 6 L	1 - 2.7 L Summa Canister

Notes:

1. Terracores and encores must be frozen within 48 hours of collection
2. Refer to text for additional information.
3. Equivalent method can be used.
4. Volume may vary by laboratory and/or equivalent method.

TABLE II
LABORATORY AND FIELD QUALITY CONTROL OBJECTIVES
 2074-2080 MCDONALD AVENUE
 BROOKLYN, NEW YORK

Quality Control Sample/Process Assessed	Measurement Quality Indicator	Frequency	Acceptance Criteria	Corrective Action
LABORATORY QA/QC				
Method Blank	Accuracy and Representativeness	1 per analytical batch of 20 samples	No target analyte above one-tenth the amount in any sample	Reanalyze blank and samples. Qualify as necessary.
LCS or LCS/LCSD	Accuracy or Accuracy and Precision	1 per analytical batch of 20 samples	Method Specific Criteria per lab SOP or NYSDEC's Part 375 Remedial Programs	Re-prepare and reanalyze blank and samples. Qualify as necessary.
MS/MSD	Accuracy and Precision	1 per analytical batch of 20 samples	Method Specific Criteria per lab SOP or NYSDEC's Part 375 Remedial Programs	Qualify as necessary.
Laboratory Duplicate	Precision	1 per analytical batch of 20 samples	RPD <20% (or absolute difference <5x RL)	Qualify as necessary.
Surrogate	Accuracy	Each sample	Method Specific Criteria per lab SOP or NYSDEC's Part 375 Remedial Programs	Re-extract and reanalyze. Qualify as necessary.
FIELD QA/QC				
Trip Blank	Accuracy	1 per cooler when submitting samples for volatile analysis	No target analyte above one-tenth the amount in any sample	Qualify as necessary
Field Blank	Accuracy	As necessary	No target analyte above one-tenth the amount in any sample	Qualify as necessary
Equipment Rinse Blank	Accuracy	As necessary	No target analyte above one-tenth the amount in any sample	Qualify as necessary
Field Duplicate	Accuracy and Precision	1 in 20 project samples	RPD <35% for water (or absolute difference <5x RL) RPD <100% for solid (or absolute difference <5x RL) RPD <35% for air	Qualify as necessary

Notes:

% = percent

LCS/LCSD = Laboratory Control Sample/Laboratory Control Sample Duplicate

MDL = Method Detection Limit

ML = Method Minimum Level

MS/MSD = Matrix Spike/Matrix Spike Duplicate

QA/QC = Quality Assurance/Quality Control

RL = Reporting Limit

RPD = Relative Percent Difference

* QA/QC only analyzed as relevant per method requirements

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**ATTACHMENT A
PFAS Analyte List**

Appendix G – PFAS Analyte List

Group	Chemical Name	Abbreviation	CAS Number
Perfluoroalkyl sulfonic acids	Perfluorobutanesulfonic acid	PFBS	375-73-5
	Perfluoropentanesulfonic acid	PFPeS	2706-91-4
	Perfluorohexanesulfonic acid	PFHxS	355-46-4
	Perfluoroheptanesulfonic acid	PFHpS	375-92-8
	Perfluorooctanesulfonic acid	PFOS	1763-23-1
	Perfluorononanesulfonic acid	PFNS	68259-12-1
	Perfluorodecanesulfonic acid	PFDS	335-77-3
	Perfluorododecanesulfonic acid	PFDoS	79780-39-5
Perfluoroalkyl carboxylic acids	Perfluorobutanoic acid	PFBA	375-22-4
	Perfluoropentanoic acid	PFPeA	2706-90-3
	Perfluorohexanoic acid	PFHxA	307-24-4
	Perfluoroheptanoic acid	PFHpA	375-85-9
	Perfluorooctanoic acid	PFOA	335-67-1
	Perfluorononanoic acid	PFNA	375-95-1
	Perfluorodecanoic acid	PFDA	335-76-2
	Perfluoroundecanoic acid	PFUnA	2058-94-8
	Perfluorododecanoic acid	PFDoA	307-55-1
	Perfluorotridecanoic acid	PFTTrDA	72629-94-8
	Perfluorotetradecanoic acid	PFTeDA	376-06-7
Per- and Polyfluoroether carboxylic acids	Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6
	4,8-Dioxa-3H-perfluorononanoic acid	ADONA	919005-14-4
	Perfluoro-3-methoxypropanoic acid	PFMPA	377-73-1
	Perfluoro-4-methoxybutanoic acid	PFMBA	863090-89-5
	Nonafluoro-3,6-dioxaheptanoic acid	NFDHA	151772-58-6
Fluorotelomer sulfonic acids	4:2 Fluorotelomer sulfonic acid	4:2-FTS	757124-72-4
	6:2 Fluorotelomer sulfonic acid	6:2-FTS	27619-97-2
	8:2 Fluorotelomer sulfonic acid	8:2-FTS	39108-34-4
Fluorotelomer carboxylic acids	3:3 Fluorotelomer carboxylic acid	3:3 FTCA	356-02-5
	5:3 Fluorotelomer carboxylic acid	5:3 FTCA	914637-49-3
	7:3 Fluorotelomer carboxylic acid	7:3 FTCA	812-70-4
Perfluorooctane sulfonamides	Perfluorooctane sulfonamide	PFOSA	754-91-6
	N-methylperfluorooctane sulfonamide	NMeFOSA	31506-32-8
	N-ethylperfluorooctane sulfonamide	NEtFOSA	4151-50-2
Perfluorooctane sulfonamidoacetic acids	N-methylperfluorooctane sulfonamidoacetic acid	N-MeFOSAA	2355-31-9
	N-ethylperfluorooctane sulfonamidoacetic acid	N-EtFOSAA	2991-50-6
Perfluorooctane sulfonamide ethanols	N-methylperfluorooctane sulfonamidoethanol	MeFOSE	24448-09-7
	N-ethylperfluorooctane sulfonamidoethanol	EtFOSE	1691-99-2

Group	Chemical Name	Abbreviation	CAS Number
Ether sulfonic acids	9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid (F-53B Major)	9Cl-PF3ONS	756426-58-1
	11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (F-53B Minor)	11Cl-PF3OUdS	763051-92-9
	Perfluoro(2-ethoxyethane) sulfonic acid	PFEESA	113507-82-7

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ATTACHMENT B
Project Team Resumes



MARI C. CONLON

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.



SEBASTIAN SOTOMAYOR

Project Environmental Engineer

EDUCATION

B.S., Geological Sciences, Rutgers University

SPECIAL STUDIES AND COURSES

40-Hour OSHA Hazardous Waste Operations and Emergency Response Training (29 CFR 1910.120)

8-Hour OSHA Hazardous Waste Worker Refresher Training (29 CFR 1910.120)

30-Hour OSHA

NYSDEC 4-Hour Erosion and Sediment Control Training

OSHA HAZWOPER Site Supervisor

8-Hour DOT Hazmat Employee

10-Hour OSHA Construction Safety Training

NY SST Training

RCRA Hazardous Waste Generator Training

Sebastian is an engineer with six years of experience in environmental consulting, including soil, groundwater, and soil vapor investigations, subsurface investigations, in-situ chemical oxidation remediation, preparation of technical reports, and data collection and analysis. He has extensive experience conducting Phase I Environmental Site Assessments (ESAs), Phase II ESAs, Remedial Investigations, Waste Characterizations, and Remedial/Construction Oversight. He has drafted remedial investigation reports, remedial investigation work plans, remedial action work plans, remedial progress reports, along with various other letters and memos.

He focuses his time at Haley & Aldrich leading remedial investigations, monitoring subsurface exploration activities, training junior staff, task managing complex remedial projects, completing technical reports, and assisting in the development of remedial work plans.

RELEVANT PROJECT EXPERIENCE

Environmental

NP Staten Island Industrial, LLC, Former Port Mobil – Staten Island, Staten Island, NY. Sebastian serves as task manager and is responsible for on-site field management of a 240+ acre redevelopment with a significant history as a major oil storage facility (MOSF), and vast contamination of petroleum-related light nonaqueous phase liquid (LNAPL), training junior staff in leading in-field investigations including site-wide gauging & quarterly groundwater sampling events, preparing quarterly reports for the client, and overseeing the execution and oversight of remedial efforts. Under heavy regulatory oversight, Sebastian coordinated and managed the field effort during implementation of interim remedial measures. He managed daily operations and field staff performing inspections to ensure compliance with technical plans and construction specifications. He attended and participated in weekly meetings with the client and construction team to provide technical, regulatory, and risk management status updates and guidance.

Eleven W46 Realty LLC, 616 11th Avenue & 555 45th Street, New York, NY. Sebastian served as the task manager and was responsible for daily coordination with field staff, supporting them during their daily work, and interfaced with project team daily to keep field efforts focused and on track. Along with reviewing daily reports, preparation of sampling matrixes, and coordination with subcontractors, he ensured that project milestone schedules were achieved, and provided site training and skill development to junior staff.

159 Third Residence LLC, 151-169 Third Avenue, Brooklyn, NY. Sebastian served as the task manager and was responsible for daily coordination with field staff, supporting them during their daily work, and interfaced with project

team daily to keep field efforts focused and on track. Along with reviewing daily reports, preparation of sampling matrixes, and coordination with subcontractors, he ensured that project milestone schedules were achieved, and provided site training and skill development to junior staff.

Bedford Beverly Acquisitions LLC, Bedford Beverly Brownfield Site, BCP Site – C224384. Sebastian was the lead field engineer conducting the waste characterization event, successfully delineating both vertical and horizontal extents of contamination on-site. He was responsible for data collection, analysis, and drafted the waste characterization report. This event included 39 waste characterization grids and involved coordination with office support and in-field adjustments to complete the work.

Ferry Landing, LLC, Tarrytown Former MGP Site, Tarrytown, New York. Sebastian serves as the task manager and was responsible for preparing periodic review reports for the New York State Department of Environmental Conservation to comply with the approved remedial action. These reports summarize remedial actions completed during each reporting period. Remedial actions overseen by him include tri-annual dense nonaqueous phase liquid (DNAPL) extraction events, groundwater sampling events, compilation of data, and coordination with multiple parties.

Madison Realty Capital, New York State Superfund Site, Former NuHart Plastics, Site, New York State Superfund Site (NuHart West) and Brownfield Cleanup Program (BCP) Site (NuHart East), Brooklyn, New York. Sebastian served the lead staff engineer for the execution and oversight of the excavation and remediation of NuHart East. During remediation, Sebastian observed and documented the excavation and proper disposal of on-site soil required for the installation of foundation elements. In addition, he oversaw the proper cleaning and removal of several 10,000-gallon underground storage tanks encountered during the site-wide excavation. He also oversaw the in-situ mixing of zero valent iron at bottom of excavation for remedial purposes. NuHart is a high-profile site that requires coordination with the New York State Department of Environmental Conservation (NYSDEC), the New York Office of Environmental Remediation (NYCOER), local regulatory agencies, community stakeholders, and local elected officials.

Waterfront Management of NY, 89-91/93 Gerry Street, Brooklyn, New York. Sebastian conducted waste characterization events for both sites and successfully delineated the vertical and horizontal extent of lead contamination on site. He was responsible for data collection, analysis, and drafted both waste characterization reports. Sebastian also served as a field engineer during the remedial oversight phase of the project and was responsible for excavation oversight, collection of endpoint samples, implementation of community air monitoring, and proper disposal of on-site soil required for the installation of foundation elements.

Madison Realty Capital, River North, Staten Island, New York. As the lead field engineer, Sebastian was responsible for the execution of the remedial investigation at this approximately 2-acre site. He coordinated with drillers for the installation of approximately fifty soil borings, twenty soil vapor points, including soil borings to bedrock. Sebastian was also responsible for data collection and analysis, and completion of the remedial investigation report (RIR). Sebastian also led field staff through the waste characterization event, which included the installation of 115 soil borings to bedrock.

Madison Realty Capital, 644 East 14th Street, New York, New York. Sebastian was the lead field engineer during both the remedial investigation and waste characterization event. He successfully delineated the vertical and lateral extents of lead contamination on site and was responsible for data collection and analysis.

Panoramic Hudson LLC, 541 West 37th Street, Hudson Yards, New York. Sebastian served as a staff engineer for the preparation of offsite investigative reports, which included a limited ESA and a remedial investigation work plan (RIWP). He also led waste characterization activities, which included monitoring drilling activities, recording soil recovered by the drilling rig, and collecting suitable samples of soil to be analyzed.

The Jay Group, Speedway Portfolio, Multiple Boroughs, New York. As a staff engineer, Sebastian was responsible for the preparation of remedial investigations and leading field staff through said investigations. He was also responsible for data collection and analysis, completion of the remedial investigation reports (RIR). Sebastian also led remedial

oversight efforts, observed and documented excavation activities, implemented community air monitoring, and proper disposal of on-site soil required for the installation of foundation elements.

21 Craig Road, Montvale, NJ. Sebastian served as the lead field engineer for this project. Responsibilities included preparing the quarterly scopes of work, preparing field team for extensive groundwater sampling event, and leading its execution. This project spanned over two townships (Park Ridge, NJ, and Montvale, NJ) and over 100 monitoring wells. Groundwater sampling and gauging events were completed quarterly. Sebastian kept project timelines on schedule and completed each event within the given timeframe. Sebastian also compiled lab data, created groundwater contours, geologic contours, and isopleths used in reports submitted to the client.

Chemtrade, WR Grace, 235 Snyder Ave Berkley Heights, NJ. Sebastian served as the field engineer leading storm and wastewater investigations in an active chemical manufacturing facility. The client buying property needed to map out all stormwater and wastewater lines inside the facility to outfall location. Sebastian mapped water lines from respective sources across a web of pipes, storm drains, manholes, and outlets using dye tests and downhole CCTV camera inspections. Sebastian also sampled storm and wastewater from multiple points, created figures for both the site-wide piping and implementation of a new stormwater retention basin, and presented findings during client meetings.

34 Ackerly Road, Clarks Summit, PA. Sebastian served as a field engineer executing In-Situ chemical mixing on a former steel plating factory in Pennsylvania. This involved the mixing of emulsified vegetable oil and molasses as a means to break down cancerous chemical hexavalent chromium. Sebastian also participated in bi-annual groundwater sampling across the 12-acre site and assisted in preparation of remedial action reports for the client.

iPark Edgewater, Brownfield Redevelopment, Edgewater, NJ. Sebastian conducted quarterly groundwater sampling on-site, along with data collection, compilation, and completed quarterly reports for the client. Sebastian also led sediment sampling efforts on site to delineate the extents of contamination, collecting sediment samples during low tide in the Hudson River, and again analyzing the lab data to be used in reports submitted to the client.



BRIAN FITZPATRICK, CHMM

Corporate Director, Health and Safety

EDUCATION

M.P.A., Environmental Policy, Syracuse University
B.S., Environmental Science, University of Massachusetts-Amherst
A.S., Chemistry, Valley Forge Military Junior College
Commissioned Officer, United States Army

CERTIFICATIONS

Certified Hazardous Materials Manager (Reg. No. 13454)
Certified Department of Transportation Shipper
Certified International Air Transport Authority Shipper

PROFESSIONAL SOCIETIES

Alliance of Hazardous Materials Professionals
Academy of Certified Hazardous Materials Managers, New England Chapter

SPECIAL STUDIES AND COURSES

Department of Transportation	Radiation Safety Officer
International Air Transport Authority	RCRA Hazardous Waste
Incident Commander	Massachusetts Industrial Waste Water
Confined Space Entry and Rescue	Operator Grade 2I (expired)

AWARDS

Presidents Club Award (one million hours worked without a recordable injury, Cabot Corporation)
Chancellors Award for Excellence, Syracuse University

Brian has over 25 years of experience in developing, implementing, and managing a wide range of environmental, health, and safety (EH&S) solutions for a variety of clients. Brian has served as the Health and Safety Manager and Incident Commander at several research and development sites and has managed extensive programs to maintain and clean contaminated sites under Federal and State regulatory programs. He has provided expertise in managing EH&S programs as a consultant, and has actively developed, implemented, and managed these programs as an EH&S professional for various industries.

Brian is currently working as the Chief Health and Safety Officer for Haley & Aldrich, Inc. He, and his staff, are involved in every project Haley & Aldrich, Inc. undertakes. Brian is involved on several projects, directly overseeing the health and safety on the project site of our staff, our contractors, and the public. Brian also acts as support for our on-site health and safety staff on other larger construction and remediation projects.

Through Brian's leadership our safety culture and focus extend from the top of our organization to each and every Haley & Aldrich employee as well as subconsultants and subcontractors. Utilizing a Behavior Based Safety approach, Haley & Aldrich expects every project team member to play an important role in making our projects safe and has given authority to every Haley & Aldrich employee, subconsultant, and subcontractor to stop any activity at any time for health or safety concerns. Our record illustrates that our hard work is paying off. The company has gone 4 years without a lost time injury, and our TRIR and EMR have consistently improved each of the last 3 years.

RELEVANT PROJECT EXPERIENCE

Haley & Aldrich, Inc., Burlington, Massachusetts. As Chief Health and Safety Officer, Brian has led and facilitated the development and implementation of corporate health and safety (H&S) improvement plans to enhance compliance and improve H&S performance. In Brian's time with Haley & Aldrich, Inc., the company has realized dramatic improvement on H&S goals and in Key Performance Indicators. Brian is responsible for developing a risk competence culture, where our staff are empowered to look for and engage to address risk before anyone is injured. Brian oversees the development, implementation and continuous improvement of all H&S programs for the company.

Additional responsibilities include:

- Developing a safety culture through incident reporting, root cause analysis, behavior-based safety, hazard recognition and risk assessment, communication, and developing leaders;
- Monitoring proposed and existing SH&E regulations and legislation to determine their impact on operations and to ensure continued compliance;
- Overseeing the safety, industrial hygiene, and toxicology programs for over 600 staff members engaged in remediation, construction, health and safety, consulting, and general office work across 28 offices in the United States and on assignment to international project sites;
- Continuously seeks to improve H&S performance as measured by the OSHA Incident Rating (IR) and Worker's Compensation Experience Modification Rating (EMR), as well as Leading Indicators developed with the management team; and
- Participating in the corporate audit program as an auditor or lead auditor;

Energy Client, California. As Chief Health and Safety Officer, Brian led and facilitated the Alliance Partnership Safety Council in 2017, is still an active contributor to the council, and hosts routine contractor safety forums for the client. Brian is actively involved in the development and implementation of program safety, health, and environmental (SH&E) plans to ensure safe operations on project sites. Brian developed permits and Health and Safety Plans for large projects and routinely audits the site safety. Additional responsibilities include:

- Driving reporting and behavior-based safety initiatives to support our internal safety culture and developing monthly summary reports to illustrate performance to our client.
- Develop, assess and continuously improve site safety plans and practices, including specific safety protocols for working safely over and around water.
- Worked as an extension of the client's organization to provide assurance that the remedy was completed safely and consistent with client-specific requirements.
- Support on-site safety personnel in ensuring the health and safety of the general public, our staff, and our sub-contracted employees.
- Audits and visits sites to ensure compliance with our internal policies and client-specific requirements.

Energy Client, Ohio. As Chief Health and Safety Officer, Brian supports the project team in developing and executing client and project specific health and safety measures, such as a site specific Health and Safety Plan, Job Hazard Analyses, Industrial Hygiene program, and site specific training. Brian also routinely visits the site to assess current practices and condition and to ensure continuous improvement. Additional responsibilities include:

- Develop, assess, and continuously improve site safety plans and practices, including specific safety protocols to comply with supplemental EH&S requirements such as the Duke Health and Safety Handbook, Environmental Supplemental, and EHS Keys to Life.
- Develop, assess, and continuously improve site safety plans and practices to address the risks associated with the work being performed on site, as well as the environmental conditions and simultaneous operations, including trenching and excavation, hot work, work over and near water, heavy equipment, HAZWOPER, etc.
- Worked as an extension of the client's organization to provide assurance that the remedy was completed safely and consistent with client-specific requirements.
- Support on-site safety personnel in ensuring the health and safety of the general public, our staff, and our sub-contracted employees.
- Audits and visits site to ensure compliance with our internal policies and client-specific requirements.



BRIAN A. FERGUSON

Senior Engineer

EDUCATION

M. S. Geotechnical Engineering, Tufts University, Medford, Massachusetts; 2012

B. S. Civil Engineering, State University of New York - Environmental, Science, and Forestry, Syracuse, New York; 2000
Ass. Science Degree in Applied Science and Technology (Nuclear Engineering), Thomas A. Edison State College,
Trenton, New Jersey; 2000

PROFESSIONAL SOCIETIES

Order of the Engineer – 2000

Boston Society of Civil Engineers (BSCE)

American Society of Civil Engineers (ASCE)

SPECIAL STUDIES AND COURSES

American Concrete Institute – Certified Field Technician Certified Grade 1

Radiation Safety and Operations of Nuclear Testing Equipment – Troxler

40-Hour OSHA Hazardous Waste Operations Training (+ 8-Hour annual refresher)

10-Hour OSHA Construction training

Confined Space Entry Training

16-Hour Asbestos Operations and Maintenance

Mr. Ferguson has over six years of experience serving as project engineer on a variety of real estate development projects. His project experience has included monitoring field investigations and performing construction oversight, performing due diligence and engineering analyses, performing geotechnical analyses and developing geotechnical recommendations, and preparing geotechnical reports and project specifications.

In addition to providing engineering design support, Mr. Ferguson has managed and participated in a number of field service activities. Field work has included construction monitoring and documentation of contractors' deep and shallow foundation related construction, including slurry walls, caissons, pile driving, pile cap installation, earthwork, backfilling and compaction, installation of soldier pile and wood lagging support systems, installation of tie backs, reading inclinometers, conducting in-place field unit weight tests, tie-back load testing, seismograph installation, monitoring, and evaluating, and preparation of footing bearing surfaces. Other responsibilities have included site development activities, including placement of utilities and subgrade preparation for roads; observations and testing to determine that work is completed in compliance with contract documents; on-site soil management; sampling of soil and groundwater for chemical laboratory testing and conducting in situ field screening; maintenance of job records including pile driving logs, results of field density tests, records of caisson and footing installations; preparation of daily field reports; in contact with key personnel; and resolution of field related problems.

RELEVANT PROJECT EXPERIENCE

St. Elizabeths Hospital – West Campus Forensic Evaluations, Washington, D.C. Project Engineer for forensic evaluations on the adaptive reuse of former hospital buildings. Responsibilities included coordination of a field exploration program, including test borings and test pits to obtain subsurface information for project design and construction, overseeing multiple field personnel, subcontractors, assisting with project management, reviewing subcontractors invoices, reviewing and summarizing subsurface data and writing data reports.

TUFTS University, New Central Energy Plant, Medford, MA. Project engineer for a new Central Energy Plant that will house new co-generation steam boilers, centralized chilled water and electrical transformer switchgear that is planned to occupy approximately 20,000 square feet across two or three levels. Responsibilities included coordination of construction monitoring, observing SOE and footing installation, assisting with project management,

reviewing weekly field construction reports, reviewing and responding to geotechnical design submittals and attending project meetings.

Lahey Hospital and Medical Center – Stilts Infill Project, Burlington, MA Project Engineer for an addition to the existing Stilts building on the Lahey campus. Responsibilities included coordination and overseeing geotechnical and environmental subsurface investigations, coordination of construction monitoring, observing footing installation, assisting with project management, reviewing weekly field construction reports, reviewing and responding to geotechnical design submittals and attending project meetings.

Gloucester Beauport Hotel, Gloucester, MA Project engineer for a four story hotel with a seawall constructed adjacent to tidal beach. Responsibilities included coordination and overseeing geotechnical and environmental subsurface investigations, coordination of construction monitoring, assisting with project management, reviewing weekly field construction reports, reviewing and responding to geotechnical design submittals and attending project meetings, design and implementation of a sub-slab gas mitigation system.

275 Wyman Street, New Office Building, Waltham, MA. Project engineer for a new office building and parking garage founded on a shallow foundation system. Responsibilities included preparing proposals, assisting with management and planning of a subsurface investigation program, summarizing subsurface data and reviewing geotechnical test boring logs, coordination of construction monitoring and instrumentation monitoring programs, reviewing weekly field construction reports, reviewing and responding to specialty geotechnical design submittals and RFIs by others and attending project meetings.

Suffolk University - 20 Somerset Street, Boston, MA Project engineer for design of 8-story academic building with two levels of below grade finished space. Responsibilities included coordination of construction monitoring, observing SOE and footing installation, assisting with project management, reviewing weekly field construction reports, reviewing and responding to geotechnical design submittals and attending project meetings.

Worcester State University, New Student Housing, Worcester, MA Project engineer for design and construction of a 7-story residence/dining hall with a single level basement and a major site retaining wall structure. Responsibilities included overseeing geotechnical subsurface investigations, provided foundation recommendations and specifications, and prepared a retaining wall contract document. Responsibilities included coordination of construction monitoring, excavation and construction of footings, and soil reuse and management, assisting with project management, reviewing weekly field construction reports, reviewing and responding to geotechnical design submittals and attending project meetings.

University of Massachusetts Boston, General Academic Building No.1, Boston, MA. Project engineer responsible for assisting project manager in preliminary foundation engineering recommendations and construction considerations for a new academic building on a part of Columbia Point, a historic landfill area. Assisted in design phase services that included preparing foundation support design recommendations including the use of high allowable stresses for 190-ft long end-bearing H-piles and application of Slickcoat coating to address downdrag concerns and reduce foundation costs.

Waltham Watch Factory, Waltham, MA project engineer for redevelopment of former watch factory. Responsibilities included construction oversight of new precast parking garage, utility upgrades, soil remediation and management, installation of gas mitigation systems, assisting with project management, reviewing weekly field construction reports, reviewing and responding to geotechnical design submittals and attending project meetings.

Massachusetts Green High Performance Computing Center, Holyoke, MA. Project engineer for 60,000 sq. ft high level computing center and associated support utilities. Redevelopment of the site included recycling 50,000 cy of construction debris into the site fills at this historic site along the Connecticut River. Responsibilities included coordinating geotechnical and environmental field investigations, coordination of construction monitoring, seismic analysis, reviewing weekly field construction reports, reviewing and responding to geotechnical design submittals and attending project meetings.

The Shops at Riverwood, Hyde Park, MA. The project consisted of the redevelopment of a colonial era paper mill. The multi-building complex was demolished and the concrete and brick from the previous buildings were recycled. The project involved crushing 50,000 cy of brick and concrete and placement of excavated soils and recycled brick and concrete as compacted fill materials to support proposed buildings, pavement areas, and achieve 5 to 9 ft. raises in grade. Field Representative was responsible for management and reuse of brick and concrete stockpiles, in-place density testing, coordination of test pits, installation of soldier pile and versa-lok walls, and backfilling of underground vaults. Remedial activities included: excavation of 5,000 cy of petroleum contaminated soils, on-site cement batching in a pug mill, and placement of compacted recycled materials in roadway areas; delineation, excavation and off-site disposal of TSCA-regulated PCB contaminated soils associated with historical Askarel transformers and dioxin-contaminated soils associated with historical bleaching operations; and disposition of 1,000 tons of paper mill sludge encountered within an abandoned granite-walled sluiceway structure. In addition, assisted with weekly project meetings, maintaining a record of material reuse, and providing weekly field reports.

Harvard Law School, Cambridge, MA. The Harvard Law School project is located on Massachusetts Avenue in Cambridge. The project consisted of a multistory building above ground with 5 levels below ground for a parking garage. Field Representative was responsible for overseeing the installation of slurry walls into bedrock and LBEs with three installation rigs while monitoring the removal of urban fill and transfer to several different receiving facilities from another portion of the site. The slurry walls were constructed into bedrock. Other Field Representative activities were: testing of the slurry, management of the excavated soils, and record keeping of the Contractor's obstruction and down time of the equipment. In addition, assisted with weekly project meetings, maintaining a record of obstruction and machine time, and providing weekly field reports.

DRAFT

APPENDIX C
NYSDEC Emerging Contaminant
Field Sampling Guidance



Department of
Environmental
Conservation

SAMPLING, ANALYSIS, AND ASSESSMENT OF PER- AND POLYFLUOROALKYL SUBSTANCES (PFAS)

Under NYSDEC's Part 375 Remedial Programs

April 2023



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ERRATA SHEET for

SAMPLING, ANALYSIS, AND ASSESSMENT OF PER- AND POLYFLUOROALKYL SUBSTANCES (PFAS) Under NYSDEC's Part 375 Remedial Programs Issued January 17, 2020

Citation and Page Number	Current Text	Corrected Text	Date
Title of Appendix I, page 32	Appendix H	Appendix I	2/25/2020
Document Cover, page 1	Guidelines for Sampling and Analysis of PFAS	Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Under NYSDEC's Part 375 Remedial Programs	9/15/2020
Data Assessment and Application to Site Cleanup Page 3	Until such time as Ambient Water Quality Standards (AWQS) and Soil Cleanup Objectives (SCOs) for PFOA and PFOS are published	Until such time as Soil Cleanup Objectives (SCOs) for PFOA and PFOS are published	3/28/2023
Water Sample Results Page 3	PFOA and PFOS should be further assessed and considered as potential contaminants of concern in groundwater or surface water if PFOA or PFOS is detected in any water sample at or above 10 ng/L (ppt) and is determined to be attributable to the site, either by a comparison of upgradient and downgradient levels, or the presence of soil source areas, as defined below.	NYSDEC has adopted ambient water quality guidance values for PFOA and PFOS. Groundwater samples should be compared to the human health criteria of 6.7 ng/l (ppt) for PFOA and 2.7 ng/l (ppt) for PFOS. These guidance values also include criteria for surface water for PFOS applicable for aquatic life, which may be applicable at some sites. Drinking water sample results should be compared to the NYS maximum contaminant level (MCL) of 10 ng/l (ppt). Analysis to determine if PFOA and PFOS concentrations are attributable to the site should include a comparison between upgradient and downgradient levels, and the presence of soil source areas, as defined below.	3/28/2023
Soil Sample Results Page 3	Soil cleanup objectives for PFOA and PFOS have been proposed in an upcoming revision to 6 NYCRR Part 375-6. Until SCOs are in effect, the following are to be used as guidance values:	NYSDEC will delay adding soil cleanup objectives for PFOA and PFOS to 6 NYCRR Part 375-6 until the PFAS rural soil background study has been completed. Until SCOs are in effect, the following are to be used as guidance values:	3/28/2023
Protection of Groundwater Page 3	PFOA (ppb) 1.1 PFOS (ppb) 3.7	PFOA (ppb) 0.8 PFOS (ppb) 1.0	3/28/2023

Citation and Page Number	Current Text	Corrected Text	Date
Footnote 2 Page 3	The movement of PFAS in the environment is being aggressively researched at this time; that research will eventually result in more accurate models for the behaviors of these chemicals. In the meantime, DEC has calculated the guidance value for the protection of groundwater using the same procedure used for all other chemicals, as described in Section 7.7 of the Technical Support Document (http://www.dec.ny.gov/docs/remediation_hudson_pdf/techsuppdoc.pdf).	The Protection of Groundwater values are based on the above referenced ambient groundwater guidance values. Details on that calculation are available in the following document, prepared for the February 2022 proposed changes to Part 375 (https://www.dec.ny.gov/docs/remediation_hudson_pdf/part375techsupport.pdf). The movement of PFAS in the environment is being aggressively researched at this time; that research will eventually result in more accurate models for the behaviors of these chemicals. In the meantime, DEC has calculated the guidance value for the protection of groundwater using the same procedure used for all other chemicals, as described in Section 7.7 of the Technical Support Document (http://www.dec.ny.gov/docs/remediation_hudson_pdf/techsuppdoc.pdf).	3/28/2023
Testing for Imported Soil Page 4	If the concentrations of PFOA and PFOS in leachate are at or above 10 ppt (the Maximum Contaminant Levels established for drinking water by the New York State Department of Health), then the soil is not acceptable.	If the concentrations of PFOA and PFOS in leachate are at or above the ambient water quality guidance values for groundwater, then the soil is not acceptable.	3/28/2023
Routine Analysis, page 9	“However, laboratories analyzing environmental samples...PFOA and PFOS in drinking water by EPA Method 537, 537.1 or ISO 25101.”	“However, laboratories analyzing environmental samples...PFOA and PFOS in drinking water by EPA Method 537, 537.1, ISO 25101, or Method 533.”	9/15/2020
Additional Analysis, page 9, new paragraph regarding soil parameters	None	“In cases where site-specific cleanup objectives for PFOA and PFOS are to be assessed, soil parameters, such as Total Organic Carbon (EPA Method 9060), soil pH (EPA Method 9045), clay content (percent), and cation exchange capacity (EPA Method 9081), should be included in the analysis to help evaluate factors affecting the leachability of PFAS in site soils.”	9/15/2020

Citation and Page Number	Current Text	Corrected Text	Date
<p>Data Assessment and Application to Site Cleanup Page 10</p>	<p>Until such time as Ambient Water Quality Standards (AWQS) and Soil Cleanup Objectives (SCOs) for PFAS are published, the extent of contaminated media potentially subject to remediation should be determined on a case-by-case basis using the procedures discussed below and the criteria in DER-10. Target levels for cleanup of PFAS in other media, including biota and sediment, have not yet been established by the DEC.</p>	<p>Until such time as Ambient Water Quality Standards (AWQS) and Soil Cleanup Objectives (SCOs) for PFOA and PFOS are published, the extent of contaminated media potentially subject to remediation should be determined on a case-by-case basis using the procedures discussed below and the criteria in DER-10. Preliminary target levels for cleanup of PFOA and PFOS in other media, including biota and sediment, have not yet been established by the DEC.</p>	<p>9/15/2020</p>
<p>Water Sample Results Page 10</p>	<p>PFAS should be further assessed and considered as a potential contaminant of concern in groundwater or surface water (...)</p> <p>If PFAS are identified as a contaminant of concern for a site, they should be assessed as part of the remedy selection process in accordance with Part 375 and DER-10.</p>	<p>PFOA and PFOS should be further assessed and considered as potential contaminants of concern in groundwater or surface water (...)</p> <p>If PFOA and/or PFOS are identified as contaminants of concern for a site, they should be assessed as part of the remedy selection process in accordance with Part 375 and DER-10.</p>	<p>9/15/2020</p>

Citation and Page Number	Current Text	Corrected Text	Date
<p>Soil Sample Results, page 10</p>	<p>“The extent of soil contamination for purposes of delineation and remedy selection should be determined by having certain soil samples tested by Synthetic Precipitation Leaching Procedure (SPLP) and the leachate analyzed for PFAS. Soil exhibiting SPLP results above 70 ppt for either PFOA or PFOS (individually or combined) are to be evaluated during the cleanup phase.”</p>	<p>“Soil cleanup objectives for PFOA and PFOS will be proposed in an upcoming revision to 6 NYCRR Part 375-6. Until SCOs are in effect, the following are to be used as guidance values. “</p> <p>[Interim SCO Table]</p> <p>“PFOA and PFOS results for soil are to be compared against the guidance values listed above. These guidance values are to be used in determining whether PFOA and PFOS are contaminants of concern for the site and for determining remedial action objectives and cleanup requirements. Site-specific remedial objectives for protection of groundwater can also be presented for evaluation by DEC. Development of site-specific remedial objectives for protection of groundwater will require analysis of additional soil parameters relating to leachability. These additional analyses can include any or all the parameters listed above (soil pH, cation exchange capacity, etc.) and/or use of SPLP.</p> <p>As the understanding of PFAS transport improves, DEC welcomes proposals for site-specific remedial objectives for protection of groundwater. DEC will expect that those may be dependent on additional factors including soil pH, aqueous pH, % organic carbon, % Sand/Silt/Clay, soil cations: K, Ca, Mg, Na, Fe, Al, cation exchange capacity, and anion exchange capacity. Site-specific remedial objectives should also consider the dilution attenuation factor (DAF). The NJDEP publication on DAF can be used as a reference: https://www.nj.gov/dep/srp/guidance/rs/daf.pdf. ”</p>	<p>9/15/2020</p>

Citation and Page Number	Current Text	Corrected Text	Date
<p>Testing for Imported Soil Page 11</p>	<p>Soil imported to a site for use in a soil cap, soil cover, or as backfill is to be tested for PFAS in general conformance with DER-10, Section 5.4(e) for the PFAS Analyte List (Appendix F) using the analytical procedures discussed below and the criteria in DER-10 associated with SVOCs.</p> <p>If PFOA or PFOS is detected in any sample at or above 1 µg/kg, then soil should be tested by SPLP and the leachate analyzed for PFAS. If the SPLP results exceed 10 ppt for either PFOA or PFOS (individually) then the source of backfill should be rejected, unless a site-specific exemption is provided by DER. SPLP leachate criteria is based on the Maximum Contaminant Levels proposed for drinking water by New York State’s Department of Health, this value may be updated based on future Federal or State promulgated regulatory standards. Remedial parties have the option of analyzing samples concurrently for both PFAS in soil and in the SPLP leachate to minimize project delays. Category B deliverables should be submitted for backfill samples, though a DUSR is not required.</p>	<p>Testing for PFAS should be included any time a full TAL/TCL analyte list is required. Results for PFOA and PFOS should be compared to the applicable guidance values. If PFOA or PFOS is detected in any sample at or above the guidance values then the source of backfill should be rejected, unless a site-specific exemption is provided by DER based on SPLP testing, for example. If the concentrations of PFOA and PFOS in leachate are at or above 10 ppt (the Maximum Contaminant Levels established for drinking water by the New York State Department of Health), then the soil is not acceptable.</p> <p>PFOA, PFOS and 1,4-dioxane are all considered semi-volatile compounds, so composite samples are appropriate for these compounds when sampling in accordance with DER-10, Table 5.4(e)10. Category B deliverables should be submitted for backfill samples, though a DUSR is not required.</p>	<p>9/15/2020</p>

Citation and Page Number	Current Text	Corrected Text	Date
Footnotes	None	<p>¹ TOP Assay analysis of highly contaminated samples, such as those from an AFFF (aqueous film-forming foam) site, can result in incomplete oxidation of the samples and an underestimation of the total perfluoroalkyl substances.</p> <p>² The movement of PFAS in the environment is being aggressively researched at this time; that research will eventually result in more accurate models for the behaviors of these chemicals. In the meantime, DEC has calculated the soil cleanup objective for the protection of groundwater using the same procedure used for all other chemicals, as described in Section 7.7 of the Technical Support Document (http://www.dec.ny.gov/docs/remediation_hudson_pdf/techsuppdoc.pdf).</p>	9/15/2020
Additional Analysis, page 9	In cases... soil parameters, such as Total Organic Carbon (EPA Method 9060), soil...	In cases... soil parameters, such as Total Organic Carbon (Lloyd Kahn), soil...	1/8/2021
Appendix A, General Guidelines, fourth bullet	List the ELAP-approved lab(s) to be used for analysis of samples	List the ELAP- certified lab(s) to be used for analysis of samples	1/8/2021
Appendix E, Laboratory Analysis and Containers	Drinking water samples collected using this protocol are intended to be analyzed for PFAS by ISO Method 25101.	Drinking water samples collected using this protocol are intended to be analyzed for PFAS by EPA Method 537, 537.1, 533, or ISO Method 25101	1/8/2021
Water Sample Results Page 9	<p>“In addition, further assessment of water may be warranted if either of the following screening levels are met:</p> <ul style="list-style-type: none"> a. any other individual PFAS (not PFOA or PFOS) is detected in water at or above 100 ng/L; or b. total concentration of PFAS (including PFOA and PFOS) is detected in water at or above 500 ng/L” 	Deleted	6/15/2021

Citation and Page Number	Current Text	Corrected Text	Date
Routine Analysis, Page XX	Currently, New York State Department of Health’s Environmental Laboratory Approval Program (ELAP)... criteria set forth in the DER’s laboratory guidelines for PFAS in non-potable water and solids (Appendix H - Laboratory Guidelines for Analysis of PFAS in Non-Potable Water and Solids).	Deleted	5/31/2022
Analysis and Reporting, Page XX	As of October 2020, the United States Environmental Protection Agency (EPA) does not have a validated method for analysis of PFAS for media commonly analyzed under DER remedial programs (non-potable waters, solids). DER has developed the following guidelines to ensure consistency in analysis and reporting of PFAS.	Deleted	5/31/2022
Routine Analysis, Page XX	LC-MS/MS analysis for PFAS using methodologies based on EPA Method 537.1 is the procedure to use for environmental samples. Isotope dilution techniques should be utilized for the analysis of PFAS in all media.	EPA Method 1633 is the procedure to use for environmental samples.	
Soil Sample Results, Page XX	Soil cleanup objectives for PFOA and PFOS will be proposed in an upcoming revision to 6 NYCRR Part 375-6	Soil cleanup objectives for PFOA and PFOS have been proposed in an upcoming revision to 6 NYCRR Part 375-6	
Appendix A	“Include in the text... LC-MS/MS for PFAS using methodologies based on EPA Method 537.1”	“Include in the textEPA Method 1633”	
Appendix A	“Laboratory should have ELAP certification for PFOA and PFOS in drinking water by EPA Method 537, 537.1, EPA Method 533, or ISO 25101”	Deleted	
Appendix B	“Samples collected using this protocol are intended to be analyzed for PFAS using methodologies based on EPA Method 537.1”	“Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633”	

Citation and Page Number	Current Text	Corrected Text	Date
Appendix C	“Samples collected using this protocol are intended to be analyzed for PFAS using methodologies based on EPA Method 537.1”	“Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633”	
Appendix D	“Samples collected using this protocol are intended to be analyzed for PFAS using methodologies based on EPA Method 537.1”	“Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633”	
Appendix G		Updated to include all forty PFAS analytes in EPA Method 533	
Appendix H		Deleted	
Appendix I	Appendix I	Appendix H	
Appendix H	“These guidelines are intended to be used for the validation of PFAS analytical results for projects within the Division of Environmental Remediation (DER) as well as aid in the preparation of a data usability summary report.”	“These guidelines are intended to be used for the validation of PFAS using EPA Method 1633 for projects within the Division of Environmental Remediation (DER).”	
Appendix H	“The holding time is 14 days...”	“The holding time is 28 days...”	
Appendix H, Initial Calibration	“The initial calibration should contain a minimum of five standards for linear fit...”	“The initial calibration should contain a minimum of six standards for linear fit...”	
Appendix H, Initial Calibration	Linear fit calibration curves should have an R ² value greater than 0.990.	Deleted	
Appendix H, Initial Calibration Verification	Initial Calibration Verification Section	Deleted	
Appendix H	secondary Ion Monitoring Section	Deleted	
Appendix H	Branched and Linear Isomers Section	Deleted	

Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Under NYSDEC's Part 375 Remedial Programs

Objective

New York State Department of Environmental Conservation's Division of Environmental Remediation (DER) performs or oversees sampling of environmental media and subsequent analysis of PFAS as part of remedial programs implemented under 6 NYCRR Part 375. To ensure consistency in sampling, analysis, reporting, and assessment of PFAS, DER has developed this document which summarizes currently accepted procedures and updates previous DER technical guidance pertaining to PFAS.

Applicability

All work plans submitted to DEC pursuant to one of the remedial programs under Part 375 shall include PFAS sampling and analysis procedures that conform to the guidelines provided herein.

As part of a site investigation or remedial action compliance program, whenever samples of potentially affected media are collected and analyzed for the standard Target Analyte List/Target Compound List (TAL/TCL), PFAS analysis should also be performed. Potentially affected media can include soil, groundwater, surface water, and sediment. Based upon the potential for biota to be affected, biota sampling and analysis for PFAS may also be warranted as determined pursuant to a Fish and Wildlife Impact Analysis. Soil vapor sampling for PFAS is not required.

Field Sampling Procedures

DER-10 specifies technical guidance applicable to DER's remedial programs. Given the prevalence and use of PFAS, DER has developed "best management practices" specific to sampling for PFAS. As specified in DER-10 Chapter 2, quality assurance procedures are to be submitted with investigation work plans. Typically, these procedures are incorporated into a work plan, or submitted as a stand-alone document (e.g., a Quality Assurance Project Plan). Quality assurance guidelines for PFAS are listed in Appendix A - Quality Assurance Project Plan (QAPP) Guidelines for PFAS.

Field sampling for PFAS performed under DER remedial programs should follow the appropriate procedures outlined for soils, sediments, or other solids (Appendix B), non-potable groundwater (Appendix C), surface water (Appendix D), public or private water supply wells (Appendix E), and fish tissue (Appendix F).

QA/QC samples (e.g. duplicates, MS/MSD) should be collected as specified in DER-10, Section 2.3(c). For sampling equipment coming in contact with aqueous samples only, rinsate or equipment blanks should be collected. Equipment blanks should be collected at a minimum frequency of one per day per site or one per twenty samples, whichever is more frequent.

Analysis and Reporting

The investigation work plan should describe analysis and reporting procedures, including laboratory analytical procedures for the methods discussed below. As specified in DER-10 Section 2.2, laboratories should provide a full Category B deliverable. In addition, a Data Usability Summary Report (DUSR) should be prepared by an independent, third-party data validator. Electronic data submissions should meet the requirements provided at: <https://www.dec.ny.gov/chemical/62440.html>.

DER has developed a *PFAS Analyte List* (Appendix G) for remedial programs to understand the nature of contamination at sites. It is expected that reported results for PFAS will include, at a minimum, all the compounds listed. If lab and/or matrix specific issues are encountered for any analytes, the DER project manager, in consultation with the DER chemist, will make case-by-case decisions as to whether certain analytes may be temporarily or permanently discontinued from analysis at each site. As with other contaminants that are analyzed for at a site, the *PFAS Analyte List* may be refined for future sampling events based on investigative findings.

Routine Analysis

EPA Method 1633 is the procedure to use for environmental samples. Reporting limits for PFOA and PFOS in aqueous samples should not exceed 2 ng/L. Reporting limits for PFOA and PFOS in solid samples should not exceed 0.5 µg/kg. Reporting limits for all other PFAS in aqueous and solid media should be as close to these limits as possible. If laboratories indicate that they are not able to achieve these reporting limits for the entire *PFAS Analyte List*, site-specific decisions regarding acceptance of elevated reporting limits for specific PFAS can be made by the DER project manager in consultation with the DER chemist. Data review guidelines were developed by DER to ensure data comparability and usability (Appendix H - Data Review Guidelines for Analysis of PFAS in Non-Potable Water and Solids).

Additional Analysis

Additional laboratory methods for analysis of PFAS may be warranted at a site, such as the Synthetic Precipitation Leaching Procedure (SPLP) and Total Oxidizable Precursor Assay (TOP Assay).

In cases where site-specific cleanup objectives for PFOA and PFOS are to be assessed, soil parameters, such as Total Organic Carbon (Lloyd Kahn), soil pH (EPA Method 9045), clay content (percent), and cation exchange capacity (EPA Method 9081), should be included in the analysis to help evaluate factors affecting the leachability of PFAS in site soils.

SPLP is a technique used to determine the mobility of chemicals in liquids, soils and wastes, and may be useful in determining the need for addressing PFAS-containing material as part of the remedy. SPLP by EPA Method 1312 should be used unless otherwise specified by the DER project manager in consultation with the DER chemist.

Impacted materials can be made up of PFAS that are not analyzable by routine analytical methodology. A TOP Assay can be utilized to conceptualize the amount and type of oxidizable PFAS which could be liberated in the environment, which approximates the maximum concentration of perfluoroalkyl substances that could be generated if all polyfluoroalkyl substances were oxidized. For example, some polyfluoroalkyl substances may degrade or transform to form perfluoroalkyl substances (such as PFOA or PFOS), resulting in an increase in perfluoroalkyl substance concentrations as contaminated groundwater moves away from a source. The TOP Assay converts, through oxidation, polyfluoroalkyl substances (precursors) into perfluoroalkyl substances that can be detected by routine analytical methodology.¹

¹ TOP Assay analysis of highly contaminated samples, such as those from an AFFF (aqueous film-forming foam) site, can result in incomplete oxidation of the samples and an underestimation of the total perfluoroalkyl substances.

Commercial laboratories have adopted methods which allow for the quantification of targeted PFAS in air and biota. The EPA’s Office of Research and Development (ORD) is currently developing methods which allow for air emissions characterization of PFAS, including both targeted and non-targeted analysis of PFAS. Consult with the DER project manager and the DER chemist for assistance on analyzing biota/tissue and air samples.

Data Assessment and Application to Site Cleanup

Until such time as Soil Cleanup Objectives (SCOs) for PFOA and PFOS are published, the extent of contaminated media potentially subject to remediation should be determined on a case-by-case basis using the procedures discussed below and the criteria in DER-10. Preliminary target levels for cleanup of PFOA and PFOS in other media, including biota and sediment, have not yet been established by the DEC.

Water Sample Results

NYSDEC has adopted ambient water quality guidance values for PFOA and PFOS. Groundwater samples should be compared to the human health criteria of 6.7 ng/l (ppt) for PFOA and 2.7 ng/l (ppt) for PFOS. These human health criteria should also be applied to surface water that is used as a water supply. This guidance also includes criteria for surface water for PFOS applicable for aquatic life, which may be applicable at some sites. Drinking water sample results should be compared to the NYS maximum contaminant level (MCL) of 10 ng/l (ppt). Analysis to determine if PFOA and PFOS concentrations are attributable to the site should include a comparison between upgradient and downgradient levels, and the presence of soil source areas, as defined below.

If PFOA and/or PFOS are identified as contaminants of concern for a site, they should be assessed as part of the remedy selection process in accordance with Part 375 and DER-10.

Soil Sample Results

NYSDEC will delay adding soil cleanup objectives for PFOA and PFOS to 6 NYCRR Part 375-6 until the PFAS rural soil background study has been completed. Until SCOs are in effect, the following are to be used as guidance values:

Guidance Values for Anticipated Site Use	PFOA (ppb)	PFOS (ppb)
Unrestricted	0.66	0.88
Residential	6.6	8.8
Restricted Residential	33	44
Commercial	500	440
Industrial	600	440
Protection of Groundwater ²	0.8	1.0

PFOA and PFOS results for soil are to be compared against the guidance values listed above. These guidance values are to be used in determining whether PFOA and PFOS are contaminants of concern for the site and for determining remedial action objectives and cleanup requirements. Site-specific remedial objectives for protection of groundwater can also be presented for evaluation by DEC. Development of site-specific remedial objectives for protection of groundwater will require analysis of additional soil parameters relating to leachability. These

² The Protection of Groundwater values are based on the above referenced ambient groundwater guidance values. Details on that calculation are available in the following document, prepared for the February 2022 proposed changes to Part 375 (https://www.dec.ny.gov/docs/remediation_hudson_pdf/part375techsupport.pdf). The movement of PFAS in the environment is being aggressively researched at this time; that research will eventually result in more accurate models for the behaviors of these chemicals. In the meantime, DEC has calculated the guidance value for the protection of groundwater using the same procedure used for all other chemicals, as described in Section 7.7 of the Technical Support Document (http://www.dec.ny.gov/docs/remediation_hudson_pdf/techsuppdoc.pdf).

additional analyses can include any or all the parameters listed above (soil pH, cation exchange capacity, etc.) and/or use of SPLP.

As the understanding of PFAS transport improves, DEC welcomes proposals for site-specific remedial objectives for protection of groundwater. DEC will expect that those may be dependent on additional factors including soil pH, aqueous pH, % organic carbon, % Sand/Silt/Clay, soil cations: K, Ca, Mg, Na, Fe, Al, cation exchange capacity, and anion exchange capacity. Site-specific remedial objectives should also consider the dilution attenuation factor (DAF). The NJDEP publication on DAF can be used as a reference:
<https://www.nj.gov/dep/srp/guidance/rs/daf.pdf>.

Testing for Imported Soil

Testing for PFAS should be included any time a full TAL/TCL analyte list is required. Results for PFOA and PFOS should be compared to the applicable guidance values. If PFOA or PFOS is detected in any sample at or above the guidance values then the source of backfill should be rejected, unless a site-specific exemption is provided by DER based on SPLP testing, for example. If the concentrations of PFOA and PFOS in leachate are at or above the ambient water quality guidance values for groundwater, then the soil is not acceptable.

PFOA, PFOS and 1,4-dioxane are all considered semi-volatile compounds, so composite samples are appropriate for these compounds when sampling in accordance with DER-10, Table 5.4(e)10. Category B deliverables should be submitted for backfill samples, though a DUSR is not required.

DRAFT

Appendix A - Quality Assurance Project Plan (QAPP) Guidelines for PFAS

The following guidelines (general and PFAS-specific) can be used to assist with the development of a QAPP for projects within DER involving sampling and analysis of PFAS.

General Guidelines in Accordance with DER-10

- Document/work plan section title – Quality Assurance Project Plan
- Summarize project scope, goals, and objectives
- Provide project organization including names and resumes of the project manager, Quality Assurance Officer (QAO), field staff, and Data Validator
 - The QAO should not have another position on the project, such as project or task manager, that involves project productivity or profitability as a job performance criterion
- List the ELAP certified lab(s) to be used for analysis of samples
- Include a site map showing sample locations
- Provide detailed sampling procedures for each matrix
- Include Data Quality Usability Objectives
- List equipment decontamination procedures
- Include an “Analytical Methods/Quality Assurance Summary Table” specifying:
 - Matrix type
 - Number or frequency of samples to be collected per matrix
 - Number of field and trip blanks per matrix
 - Analytical parameters to be measured per matrix
 - Analytical methods to be used per matrix with minimum reporting limits
 - Number and type of matrix spike and matrix spike duplicate samples to be collected
 - Number and type of duplicate samples to be collected
 - Sample preservation to be used per analytical method and sample matrix
 - Sample container volume and type to be used per analytical method and sample matrix
 - Sample holding time to be used per analytical method and sample matrix
- Specify Category B laboratory data deliverables and preparation of a DUSR

Specific Guidelines for PFAS

- Include in the text that sampling for PFAS will take place
- Include in the text that PFAS will be analyzed by EPA Method 1633
- Include the list of PFAS compounds to be analyzed (*PFAS Analyte List*)
- Include the laboratory SOP for PFAS analysis
- List the minimum method-achievable Reporting Limits for PFAS
 - Reporting Limits should be less than or equal to:
 - Aqueous – 2 ng/L (ppt)
 - Solids – 0.5 µg/kg (ppb)
- Include the laboratory Method Detection Limits for the PFAS compounds to be analyzed
-
- Include detailed sampling procedures
 - Precautions to be taken
 - Pump and equipment types
 - Decontamination procedures
 - Approved materials only to be used
- Specify that regular ice only will be used for sample shipment
- Specify that equipment blanks should be collected at a minimum frequency of 1 per day per site for each matrix

Appendix B - Sampling Protocols for PFAS in Soils, Sediments and Solids

General

The objective of this protocol is to give general guidelines for the collection of soil, sediment and other solid samples for PFAS analysis. The sampling procedure used should be consistent with Sampling Guidelines and Protocols – Technological Background and Quality Control/Quality Assurance for NYS DEC Spill Response Program – March 1991 (http://www.dec.ny.gov/docs/remediation_hudson_pdf/sgpsect5.pdf), with the following limitations.

Laboratory Analysis and Containers

Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633.

The preferred material for containers is high density polyethylene (HDPE). Pre-cleaned sample containers, coolers, sample labels, and a chain of custody form will be provided by the laboratory.

Equipment

Acceptable materials for sampling include stainless steel, HDPE, PVC, silicone, acetate, and polypropylene. Additional materials may be acceptable if pre-approved by New York State Department of Environmental Conservation's Division of Environmental Remediation.

No sampling equipment components or sample containers should come in to contact with aluminum foil, low density polyethylene, glass, or polytetrafluoroethylene (PTFE, Teflon™) materials including sample bottle cap liners with a PTFE layer.

A list of acceptable equipment is provided below, but other equipment may be considered appropriate based on sampling conditions.

- stainless steel spoon
- stainless steel bowl
- steel hand auger or shovel without any coatings

Equipment Decontamination

Standard two step decontamination using detergent (Alconox is acceptable) and clean, PFAS-free water will be performed for sampling equipment. All sources of water used for equipment decontamination should be verified in advance to be PFAS-free through laboratory analysis or certification.

Sampling Techniques

Sampling is often conducted in areas where a vegetative turf has been established. In these cases, a pre-cleaned trowel or shovel should be used to carefully remove the turf so that it may be replaced at the conclusion of sampling. Surface soil samples (e.g. 0 to 6 inches below surface) should then be collected using a pre-cleaned, stainless steel spoon. Shallow subsurface soil samples (e.g. 6 to ~36 inches below surface) may be collected by digging a hole using a pre-cleaned hand auger or shovel. When the desired subsurface depth is reached, a pre-cleaned hand auger or spoon shall be used to obtain the sample.

When the sample is obtained, it should be deposited into a stainless steel bowl for mixing prior to filling the sample containers. The soil should be placed directly into the bowl and mixed thoroughly by rolling the material into the middle until the material is homogenized. At this point the material within the bowl can be placed into the laboratory provided container.

Sample Identification and Logging

A label shall be attached to each sample container with a unique identification. Each sample shall be included on the chain of custody (COC).

Quality Assurance/Quality Control

- Immediately place samples in a cooler maintained at $4 \pm 2^\circ$ Celsius using ice
- Collect one field duplicate for every sample batch, minimum 1 duplicate per 20 samples. The duplicate shall consist of an additional sample at a given location
- Collect one matrix spike / matrix spike duplicate (MS/MSD) for every sample batch, minimum 1 MS/MSD per 20 samples. The MS/MSD shall consist of an additional two samples at a given location and identified on the COC
- Request appropriate data deliverable (Category B) and an electronic data deliverable

Documentation

A soil log or sample log shall document the location of the sample/borehole, depth of the sample, sampling equipment, duplicate sample, visual description of the material, and any other observations or notes determined to be appropriate. Additionally, care should be performed to limit contact with PFAS containing materials (e.g. waterproof field books, food packaging) during the sampling process.

Personal Protection Equipment (PPE)

For most sampling Level D PPE is anticipated to be appropriate. The sampler should wear nitrile gloves while conducting field work and handling sample containers.

Field staff shall consider the clothing to be worn during sampling activities. Clothing that contains PTFE material (including GORE-TEX®) or that have been waterproofed with PFAS materials should be avoided. All clothing worn by sampling personnel should have been laundered multiple times.

Appropriate rain gear (PVC, polyurethane, or rubber rain gear are acceptable), bug spray, and sunscreen should be used that does not contain PFAS. Well washed cotton coveralls may be used as an alternative to bug spray and/or sunscreen.

PPE that contains PFAS is acceptable when site conditions warrant additional protection for the samplers and no other materials can be used to be protective. Documentation of such use should be provided in the field notes.

Appendix C - Sampling Protocols for PFAS in Monitoring Wells

General

The objective of this protocol is to give general guidelines for the collection of groundwater samples for PFAS analysis. The sampling procedure used should be consistent with Sampling Guidelines and Protocols – Technological Background and Quality Control/Quality Assurance for NYS DEC Spill Response Program – March 1991 (http://www.dec.ny.gov/docs/remediation_hudson_pdf/sgpsect5.pdf), with the following limitations.

Laboratory Analysis and Container

Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633.

The preferred material for containers is high density polyethylene (HDPE). Pre-cleaned sample containers, coolers, sample labels, and a chain of custody form will be provided by the laboratory.

Equipment

Acceptable materials for sampling include: stainless steel, HDPE, PVC, silicone, acetate, and polypropylene. Additional materials may be acceptable if pre-approved by New York State Department of Environmental Conservation's Division of Environmental Remediation.

No sampling equipment components or sample containers should come in contact with aluminum foil, low density polyethylene, glass, or polytetrafluoroethylene (PTFE, Teflon™) materials including plumbers tape and sample bottle cap liners with a PTFE layer.

A list of acceptable equipment is provided below, but other equipment may be considered appropriate based on sampling conditions.

- stainless steel inertia pump with HDPE tubing
- peristaltic pump equipped with HDPE tubing and silicone tubing
- stainless steel bailer with stainless steel ball
- bladder pump (identified as PFAS-free) with HDPE tubing

Equipment Decontamination

Standard two step decontamination using detergent (Alconox is acceptable) and clean, PFAS-free water will be performed for sampling equipment. All sources of water used for equipment decontamination should be verified in advance to be PFAS-free through laboratory analysis or certification.

Sampling Techniques

Monitoring wells should be purged in accordance with the sampling procedure (standard/volume purge or low flow purge) identified in the site work plan, which will determine the appropriate time to collect the sample. If sampling using standard purge techniques, additional purging may be needed to reduce turbidity levels, so samples contain a limited amount of sediment within the sample containers. Sample containers that contain sediment may cause issues at the laboratory, which may result in elevated reporting limits and other issues during the sample preparation that can compromise data usability. Sampling personnel should don new nitrile gloves prior to sample collection due to the potential to contact PFAS containing items (not related to the sampling equipment) during the purging activities.

Sample Identification and Logging

A label shall be attached to each sample container with a unique identification. Each sample shall be included on the chain of custody (COC).

Quality Assurance/Quality Control

- Immediately place samples in a cooler maintained at $4 \pm 2^{\circ}$ Celsius using ice
- Collect one field duplicate for every sample batch, minimum 1 duplicate per 20 samples. The duplicate shall consist of an additional sample at a given location
- Collect one matrix spike / matrix spike duplicate (MS/MSD) for every sample batch, minimum 1 MS/MSD per 20 samples. The MS/MSD shall consist of an additional two samples at a given location and identified on the COC
- Collect one equipment blank per day per site and minimum 1 equipment blank per 20 samples. The equipment blank shall test the new and decontaminated sampling equipment utilized to obtain a sample for residual PFAS contamination. This sample is obtained by using laboratory provided PFAS-free water and passing the water over or through the sampling device and into laboratory provided sample containers
- Additional equipment blank samples may be collected to assess other equipment that is utilized at the monitoring well
- Request appropriate data deliverable (Category B) and an electronic data deliverable

Documentation

A purge log shall document the location of the sample, sampling equipment, groundwater parameters, duplicate sample, visual description of the material, and any other observations or notes determined to be appropriate. Additionally, care should be performed to limit contact with PFAS containing materials (e.g. waterproof field books, food packaging) during the sampling process.

Personal Protection Equipment (PPE)

For most sampling Level D PPE is anticipated to be appropriate. The sampler should wear nitrile gloves while conducting field work and handling sample containers.

Field staff shall consider the clothing to be worn during sampling activities. Clothing that contains PTFE material (including GORE-TEX®) or that have been waterproofed with PFAS materials should be avoided. All clothing worn by sampling personnel should have been laundered multiple times.

Appropriate rain gear (PVC, polyurethane, or rubber rain gear are acceptable), bug spray, and sunscreen should be used that does not contain PFAS. Well washed cotton coveralls may be used as an alternative to bug spray and/or sunscreen.

PPE that contains PFAS is acceptable when site conditions warrant additional protection for the samplers and no other materials can be used to be protective. Documentation of such use should be provided in the field notes.

Appendix D - Sampling Protocols for PFAS in Surface Water

General

The objective of this protocol is to give general guidelines for the collection of surface water samples for PFAS analysis. The sampling procedure used should be consistent with Sampling Guidelines and Protocols – Technological Background and Quality Control/Quality Assurance for NYS DEC Spill Response Program – March 1991 (http://www.dec.ny.gov/docs/remediation_hudson_pdf/sgpsect5.pdf), with the following limitations.

Laboratory Analysis and Container

Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633.

The preferred material for containers is high density polyethylene (HDPE). Pre-cleaned sample containers, coolers, sample labels, and a chain of custody form will be provided by the laboratory.

Equipment

Acceptable materials for sampling include: stainless steel, HDPE, PVC, silicone, acetate, and polypropylene. Additional materials may be acceptable if pre-approved by New York State Department of Environmental Conservation's Division of Environmental Remediation.

No sampling equipment components or sample containers should come in contact with aluminum foil, low density polyethylene, glass, or polytetrafluoroethylene (PTFE, Teflon™) materials including sample bottle cap liners with a PTFE layer.

A list of acceptable equipment is provided below, but other equipment may be considered appropriate based on sampling conditions.

- stainless steel cup

Equipment Decontamination

Standard two step decontamination using detergent (Alconox is acceptable) and clean, PFAS-free water will be performed for sampling equipment. All sources of water used for equipment decontamination should be verified in advance to be PFAS-free through laboratory analysis or certification.

Sampling Techniques

Where conditions permit, (e.g. creek or pond) sampling devices (e.g. stainless steel cup) should be rinsed with site medium to be sampled prior to collection of the sample. At this point the sample can be collected and poured into the sample container.

If site conditions permit, samples can be collected directly into the laboratory container.

Sample Identification and Logging

A label shall be attached to each sample container with a unique identification. Each sample shall be included on the chain of custody (COC).

Quality Assurance/Quality Control

- Immediately place samples in a cooler maintained at $4 \pm 2^\circ$ Celsius using ice
- Collect one field duplicate for every sample batch, minimum 1 duplicate per 20 samples. The duplicate shall consist of an additional sample at a given location
- Collect one matrix spike / matrix spike duplicate (MS/MSD) for every sample batch, minimum 1 MS/MSD per 20 samples. The MS/MSD shall consist of an additional two samples at a given location and identified on the COC
- Collect one equipment blank per day per site and minimum 1 equipment blank per 20 samples. The equipment blank shall test the new and decontaminated sampling equipment utilized to obtain a sample for residual PFAS contamination. This sample is obtained by using laboratory provided PFAS-free water and passing the water over or through the sampling device and into laboratory provided sample containers
- Request appropriate data deliverable (Category B) and an electronic data deliverable

Documentation

A sample log shall document the location of the sample, sampling equipment, duplicate sample, visual description of the material, and any other observations or notes determined to be appropriate. Additionally, care should be performed to limit contact with PFAS containing materials (e.g. waterproof field books, food packaging) during the sampling process.

Personal Protection Equipment (PPE)

For most sampling Level D PPE is anticipated to be appropriate. The sampler should wear nitrile gloves while conducting field work and handling sample containers.

Field staff shall consider the clothing to be worn during sampling activities. Clothing that contains PTFE material (including GORE-TEX®) or that have been waterproofed with PFAS materials should be avoided. All clothing worn by sampling personnel should have been laundered multiple times.

Appropriate rain gear (PVC, polyurethane, or rubber rain gear are acceptable), bug spray, and sunscreen should be used that does not contain PFAS. Well washed cotton coveralls may be used as an alternative to bug spray and/or sunscreen.

PPE that contains PFAS is acceptable when site conditions warrant additional protection for the samplers and no other materials can be used to be protective. Documentation of such use should be provided in the field notes.

Appendix E - Sampling Protocols for PFAS in Private Water Supply Wells

General

The objective of this protocol is to give general guidelines for the collection of water samples from private water supply wells (with a functioning pump) for PFAS analysis. The sampling procedure used should be consistent with Sampling Guidelines and Protocols – Technological Background and Quality Control/Quality Assurance for NYS DEC Spill Response Program – March 1991 (http://www.dec.ny.gov/docs/remediation_hudson_pdf/sgpsect5.pdf), with the following limitations.

Laboratory Analysis and Container

Drinking water samples collected using this protocol are intended to be analyzed for PFAS by EPA Method 537, 537.1, 533, or ISO Method 25101. The preferred material for containers is high density polyethylene (HDPE). Pre-cleaned sample containers, coolers, sample labels, and a chain of custody form will be provided by the laboratory.

Equipment

Acceptable materials for sampling include stainless steel, HDPE, PVC, silicone, acetate, and polypropylene. Additional materials may be acceptable if pre-approved by New York State Department of Environmental Conservation's Division of Environmental Remediation.

No sampling equipment components or sample containers should come in contact with aluminum foil, low density polyethylene, glass, or polytetrafluoroethylene (PTFE, Teflon™) materials (e.g. plumbers tape), including sample bottle cap liners with a PTFE layer.

Equipment Decontamination

Standard two step decontamination using detergent (Alconox is acceptable) and clean, PFAS-free water will be performed for sampling equipment. All sources of water used for equipment decontamination should be verified in advance to be PFAS-free through laboratory analysis or certification.

Sampling Techniques

Locate and assess the pressure tank and determine if any filter units are present within the building. Establish the sample location as close to the well pump as possible, which is typically the spigot at the pressure tank. Ensure sampling equipment is kept clean during sampling as access to the pressure tank spigot, which is likely located close to the ground, may be obstructed and may hinder sample collection.

Prior to sampling, a faucet downstream of the pressure tank (e.g., washroom sink) should be run until the well pump comes on and a decrease in water temperature is noted which indicates that the water is coming from the well. If the homeowner is amenable, staff should run the water longer to purge the well (15+ minutes) to provide a sample representative of the water in the formation rather than standing water in the well and piping system including the pressure tank. At this point a new pair of nitrile gloves should be donned and the sample can be collected from the sample point at the pressure tank.

Sample Identification and Logging

A label shall be attached to each sample container with a unique identification. Each sample shall be included on the chain of custody (COC).

Quality Assurance/Quality Control

- Immediately place samples in a cooler maintained at $4 \pm 2^\circ$ Celsius using ice
- Collect one field duplicate for every sample batch, minimum 1 duplicate per 20 samples. The duplicate shall consist of an additional sample at a given location
- Collect one matrix spike / matrix spike duplicate (MS/MSD) for every sample batch, minimum 1 MS/MSD per 20 samples. The MS/MSD shall consist of an additional two samples at a given location and identified on the COC
- If equipment was used, collect one equipment blank per day per site and a minimum 1 equipment blank per 20 samples. The equipment blank shall test the new and decontaminated sampling equipment utilized to obtain a sample for residual PFAS contamination. This sample is obtained by using laboratory provided PFAS-free water and passing the water over or through the sampling device and into laboratory provided sample containers.
- A field reagent blank (FRB) should be collected at a rate of one per 20 samples. The lab will provide a FRB bottle containing PFAS free water and one empty FRB bottle. In the field, pour the water from the one bottle into the empty FRB bottle and label appropriately.
- Request appropriate data deliverable (Category B) and an electronic data deliverable
- For sampling events where multiple private wells (homes or sites) are to be sampled per day, it is acceptable to collect QC samples at a rate of one per 20 across multiple sites or days.

Documentation

A sample log shall document the location of the private well, sample point location, owner contact information, sampling equipment, purge duration, duplicate sample, visual description of the material, and any other observations or notes determined to be appropriate and available (e.g. well construction, pump type and location, yield, installation date). Additionally, care should be performed to limit contact with PFAS containing materials (e.g. waterproof field books, food packaging) during the sampling process.

Personal Protection Equipment (PPE)

For most sampling Level D PPE is anticipated to be appropriate. The sampler should wear nitrile gloves while conducting field work and handling sample containers.

Field staff shall consider the clothing to be worn during sampling activities. Clothing that contains PTFE material (including GORE-TEX®) or that have been waterproofed with PFAS materials should be avoided. All clothing worn by sampling personnel should have been laundered multiple times.

Appendix F - Sampling Protocols for PFAS in Fish

This appendix contains a copy of the latest guidelines developed by the Division of Fish and Wildlife (DFW) entitled “General Fish Handling Procedures for Contaminant Analysis” (Ver. 8).

Procedure Name: General Fish Handling Procedures for Contaminant Analysis

Number: FW-005

Purpose: This procedure describes data collection, fish processing and delivery of fish collected for contaminant monitoring. It contains the chain of custody and collection record forms that should be used for the collections.

Organization: Environmental Monitoring Section
Bureau of Ecosystem Health
Division of Fish and Wildlife (DFW)
New York State Department of Environmental Conservation (NYSDEC)
625 Broadway
Albany, New York 12233-4756

Version: 8

Previous Version Date: 21 March 2018

Summary of Changes to this Version: Updated bureau name to Bureau of Ecosystem Health. Added direction to list the names of all field crew on the collection record. Minor formatting changes on chain of custody and collection records.

Originator or Revised by: Wayne Richter, Jesse Becker

Date: 26 April 2019

Quality Assurance Officer and Approval Date: Jesse Becker, 26 April 2019

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Appendix G – PFAS Analyte List

Group	Chemical Name	Abbreviation	CAS Number
Perfluoroalkyl sulfonic acids	Perfluorobutanesulfonic acid	PFBS	375-73-5
	Perfluoropentanesulfonic acid	PFPeS	2706-91-4
	Perfluorohexanesulfonic acid	PFHxS	355-46-4
	Perfluoroheptanesulfonic acid	PFHpS	375-92-8
	Perfluorooctanesulfonic acid	PFOS	1763-23-1
	Perfluorononanesulfonic acid	PFNS	68259-12-1
	Perfluorodecanesulfonic acid	PFDS	335-77-3
	Perfluorododecanesulfonic acid	PFDoS	79780-39-5
Perfluoroalkyl carboxylic acids	Perfluorobutanoic acid	PFBA	375-22-4
	Perfluoropentanoic acid	PFPeA	2706-90-3
	Perfluorohexanoic acid	PFHxA	307-24-4
	Perfluoroheptanoic acid	PFHpA	375-85-9
	Perfluorooctanoic acid	PFOA	335-67-1
	Perfluorononanoic acid	PFNA	375-95-1
	Perfluorodecanoic acid	PFDA	335-76-2
	Perfluoroundecanoic acid	PFUnA	2058-94-8
	Perfluorododecanoic acid	PFDoA	307-55-1
	Perfluorotridecanoic acid	PFTTrDA	72629-94-8
	Perfluorotetradecanoic acid	PFTeDA	376-06-7
Per- and Polyfluoroether carboxylic acids	Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6
	4,8-Dioxa-3H-perfluorononanoic acid	ADONA	919005-14-4
	Perfluoro-3-methoxypropanoic acid	PFMPA	377-73-1
	Perfluoro-4-methoxybutanoic acid	PFMBA	863090-89-5
	Nonafluoro-3,6-dioxaheptanoic acid	NFDHA	151772-58-6
Fluorotelomer sulfonic acids	4:2 Fluorotelomer sulfonic acid	4:2-FTS	757124-72-4
	6:2 Fluorotelomer sulfonic acid	6:2-FTS	27619-97-2
	8:2 Fluorotelomer sulfonic acid	8:2-FTS	39108-34-4
Fluorotelomer carboxylic acids	3:3 Fluorotelomer carboxylic acid	3:3 FTCA	356-02-5
	5:3 Fluorotelomer carboxylic acid	5:3 FTCA	914637-49-3
	7:3 Fluorotelomer carboxylic acid	7:3 FTCA	812-70-4
Perfluorooctane sulfonamides	Perfluorooctane sulfonamide	PFOSA	754-91-6
	N-methylperfluorooctane sulfonamide	NMeFOSA	31506-32-8
	N-ethylperfluorooctane sulfonamide	NEtFOSA	4151-50-2
Perfluorooctane sulfonamidoacetic acids	N-methylperfluorooctane sulfonamidoacetic acid	N-MeFOSAA	2355-31-9
	N-ethylperfluorooctane sulfonamidoacetic acid	N-EtFOSAA	2991-50-6
Perfluorooctane sulfonamide ethanols	N-methylperfluorooctane sulfonamidoethanol	MeFOSE	24448-09-7
	N-ethylperfluorooctane sulfonamidoethanol	EtFOSE	1691-99-2

Group	Chemical Name	Abbreviation	CAS Number
Ether sulfonic acids	9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid (F-53B Major)	9Cl-PF3ONS	756426-58-1
	11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (F-53B Minor)	11Cl-PF3OUdS	763051-92-9
	Perfluoro(2-ethoxyethane) sulfonic acid	PFEESA	113507-82-7

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Appendix H - Data Review Guidelines for Analysis of PFAS in Non-Potable Water and Solids

General

These guidelines are intended to be used for the validation of PFAS using EPA Method 1633 for projects within the Division of Environmental Remediation (DER). Data reviewers should understand the methodology and techniques utilized in the analysis. Consultation with the end user of the data may be necessary to assist in determining data usability based on the data quality objectives in the Quality Assurance Project Plan. A familiarity with the laboratory’s Standard Operating Procedure may also be needed to fully evaluate the data. If you have any questions, please contact DER’s Quality Assurance Officer, Dana Barbarossa, at dana.barbarossa@dec.ny.gov.

Preservation and Holding Time

Samples should be preserved with ice to a temperature of less than 6°C upon arrival at the lab. The holding time is 28 days to extraction for aqueous and solid samples. The time from extraction to analysis for aqueous samples is 28 days and 40 days for solids.

Temperature greatly exceeds 6°C upon arrival at the lab*	Use professional judgement to qualify detects and non-detects as estimated or rejected
Holding time exceeding 28 days to extraction	Use professional judgement to qualify detects and non-detects as estimated or rejected if holding time is grossly exceeded

*Samples that are delivered to the lab immediately after sampling may not meet the thermal preservation guidelines. Samples are considered acceptable if they arrive on ice or an attempt to chill the samples is observed.

Initial Calibration

The initial calibration should contain a minimum of six standards for linear fit and six standards for a quadratic fit. The relative standard deviation (RSD) for a quadratic fit calibration should be less than 20%.

The low-level calibration standard should be within 50% - 150% of the true value, and the mid-level calibration standard within 70% - 130% of the true value.

%RSD >20%	J flag detects and UJ non detects
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Continuing Calibration Verification

Continuing calibration verification (CCV) checks should be analyzed at a frequency of one per ten field samples. If CCV recovery is very low, where detection of the analyte could be in question, ensure a low level CCV was analyzed and use to determine data quality.

CCV recovery <70 or >130%	J flag results
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Blanks

There should be no detections in the method blanks above the reporting limits. Equipment blanks, field blanks, rinse blanks etc. should be evaluated in the same manner as method blanks. Use the most contaminated blank to evaluate the sample results.

Blank Result	Sample Result	Qualification
Any detection	<Reporting limit	Qualify as ND at reporting limit
Any detection	>Reporting Limit and >10x the blank result	No qualification
>Reporting limit	>Reporting limit and <10x blank result	J+ biased high

Field Duplicates

A blind field duplicate should be collected at rate of one per twenty samples. The relative percent difference (RPD) should be less than 30% for analyte concentrations greater than two times the reporting limit. Use the higher result for final reporting.

RPD >30%	Apply J qualifier to parent sample
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Lab Control Spike

Lab control spikes should be analyzed with each extraction batch or one for every twenty samples. In the absence of lab derived criteria, use 70% - 130% recovery criteria to evaluate the data.

Recovery <70% or >130% (lab derived criteria can also be used)	Apply J qualifier to detects and UJ qualifier to non detects
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Matrix Spike/Matrix Spike Duplicate

One matrix spike and matrix spike duplicate should be collected at a rate of one per twenty samples. Use professional judgement to reject results based on out of control MS/MSD recoveries.

Recovery <70% or >130% (lab derived criteria can also be used)	Apply J qualifier to detects and UJ qualifier to non detects of parent sample only
RPD >30%	Apply J qualifier to detects and UJ qualifier to non detects of parent sample only

Extracted Internal Standards (Isotope Dilution Analytes)

Problematic analytes (e.g. PFBA, PFPeA, fluorotelomer sulfonates) can have wider recoveries without qualification. Qualify corresponding native compounds with a J flag if outside of the range.

Recovery <50% or >150%	Apply J qualifier
Recovery <25% or >150% for poor responding analytes	Apply J qualifier
Isotope Dilution Analyte (IDA) Recovery <10%	Reject results

Signal to Noise Ratio

The signal to noise ratio for the quantifier ion should be at least 3:1. If the ratio is less than 3:1, the peak is discernable from the baseline noise and symmetrical, the result can be reported. If the peak appears to be baseline noise and/or the shape is irregular, qualify the result as tentatively identified.

Reporting Limits

If project-specific reporting limits were not met, please indicate that in the report along with the reason (e.g. over dilution, dilution for non-target analytes, high sediment in aqueous samples).

Peak Integrations

Target analyte peaks should be integrated properly and consistently when compared to standards. Ensure branched isomer peaks are included for PFAS where standards are available. Inconsistencies should be brought to the attention of the laboratory or identified in the data review summary report.

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APPENDIX D
Climate Screening Checklist

Climate Screening Checklist

Background Information

- Project Manager: **PENDING**
- Site Name: 2074-2080 McDonald Avenue Redevelopment Site (the “Site”)
- Site Number: **PENDING**
- Site Location: 2074-2080 McDonald Avenue, Brooklyn, New York
- Site Elevation (average above sea level): Approximately 27 feet (ft) above sea level (Google Earth)



- ClimAID Region ([Responding Climate Change in New York State \(ClimAID\) - NYSERDA](#)): Region 4 – New York City and Long Island



- Remedial Stage/Site Classification: Pending BCP Acceptance
- Contamination - Media Impacted/ Contaminants of Concern: Metals and semi-volatile organic compounds (SVOCs) in soil; and volatile organic compounds (VOCs), specifically petroleum-related VOCs (benzene, toluene, ethylbenzene, and xylenes [BTEX]) in soil vapor, sub-slab vapor, and indoor air.
- Proposed/Current Remedy: The remedy will be proposed on the completion of the pending Remedial Investigation (RI) when the extent of environmental impacts at the Site is determined in order to evaluate remedial alternatives, as required.
- What is the predicted timeframe of the remedy? Will components of the remedy still be in place in 10+ years? Remedy is anticipated for completion in approximately two years. If required, engineering controls will remain in place, be maintained, or replaced as needed for the duration of the requirement under future site management.
- Is the site in proximity to any sensitive receptors? (e.g., wetlands, waterbodies, residential properties, hospitals, schools, drinking water supplies, etc.) There is one sensitive receptor within 500 ft of the Site: Magen David Yeshivah, located at 2130 McDonald Avenue, Brooklyn, New York 11223, listed as an educational high school. The Site also has a school, the YDE Girls High School, located on the southern lot (Lot 42).

Is the site in a disadvantaged community (DAC) or potential environmental justice area (PEJA) (Use DECinfoLocator: [DECinfo Locator \(ny.gov\)](https://decinfo.locator.ny.gov/))?

Yes No

If the site is in a DAC or PEJA, will climate impacts be magnified? If yes, list how and why.

Yes No

Should thresholds of concern be lowered to account for magnification of impacts? If yes, indicate how lower thresholds will be used in the screening.

Yes No

Climate Screening Table*

Potential Climate Hazards	Relevant to the Site Location (Y/N/NA) ¹	Projected Change (Resilience Analysis and Planning Tool (RAPT)/arcgis.com ³	Potential to Impact Remedy (Y/N)	Is remedy/site already resilient? (Y/N) ⁴
Precipitation	N	N/A	N/A	N/A
Temperature ² (Extreme Heat or Cold Weather Impacts)	N	N/A	N/A	N/A
Sea Level Rise	N	N/A	N/A	N/A
Flooding	N	N/A	N/A	N/A
Storm Surge	N	N/A	N/A	N/A
Wildfire	N	N/A	N/A	N/A
Drought	N	N/A	N/A	N/A
Storm Severity	N	N/A	N/A	N/A
Landslides	N	N/A	N/A	N/A
Other Hazards:	N/A	N/A	N/A	N/A

* Links to potential data sources can be found on the following page

¹ If the first column is N --> The rest of the columns will be N/A, the hazard is not applicable to the site.

² Extreme Heat: periods of three or more days above 90°F- Extreme Cold: Individual days with minimum temperatures at or below 0 degrees F (NYSERDA ClimAID report)

³ List the projected change in specific terms or units e.g. inches of rainfall, feet of sea level rise, etc.

⁴ If final column is Y, provide reasoning, if the final column is N --> Climate Vulnerability Assessment (CVA) required.

Required Next Steps (If no further action is required, provide justification):

Upon development of the future remedy, more robust analysis of elements needed to aid in resiliency planning for the redevelopment will be incorporated into a Climate Vulnerability Assessment.

Potential Data Sources (not an exhaustive list)- from [Superfund Climate Resilience: Vulnerability Assessment | US EPA](#)

NYSERDA ClimAID report- [Responding Climate Change in New York State \(ClimAID\) - NYSERDA](#)

FEMA- [National Flood Hazard Layer | FEMA.gov](#)

NOAA- [National Storm Surge Risk Maps - Version 3 \(noaa.gov\)](#)

Department of Agriculture Forest Service [Wildfire Risk to Communities](#)

EPA [Climate Change Indicators in the United States](#)

EPA [Climate Resilience Evaluation & Awareness Tool \(CREAT\) | U.S. Climate Resilience Toolkit](#)

EPA [National Stormwater Calculator](#)

National Integrated Drought Information System [U.S. Drought Portal](#)

National Interagency Coordination Center [National Interagency Fire Center](#)

National Oceanic and Atmospheric Administration Coastal Services [Digital Coast](#)

- Resources to help communities assess coastal hazards, such as the [Sea Level Rise Viewer](#) for visualizing community-level impacts of flooding or sea level rise and [downloadable LIDAR data](#)

National Oceanic and Atmospheric Administration [National Centers for Environmental Information](#) website

National Oceanic and Atmospheric Administration [Sea Level Trends](#)

National Weather Service [Climate Prediction Center](#)

National Weather Service [National Hurricane Center](#)

National Weather Service [Sea, Lake, and Overland Surges from Hurricanes \(SLOSH\)](#)

National Weather Service [Storm Surge Hazard Maps](#)

U.S. Federal Government Climate Resilience Toolkit: [The Climate Explorer](#)

U.S. Army Corps of Engineers [Climate Preparedness and Resilience](#)

U.S. Geological Survey [Coastal Change Hazards Portal](#)

U.S. Geological Survey [Landslide Hazards Program](#)

U.S. Geological Survey [National Ground-water Monitoring Network Data Portal](#)

U.S. Geological Survey [National Climate Change Viewer](#)

U.S. Geological Survey [National Water Dashboard](#)

U.S. Geological Survey [StreamStats](#)

NYS Department of State- [Assess | Department of State \(ny.gov\)](#)

NYSERDA NY Coastal Floodplain Mapper- [Home Page \(ny.gov\)](#)

NYSDEC Coastal Erosion Hazards- [Coastal Areas Regulated By The CEHA Permit Program - NYDEC](#)

NYSDOH Heat Index- [health.ny.gov/environmental/weather/vulnerability_index/county_maps.htm](#)

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APPENDIX E
Green Sustainable Remediation Documentation

February 17, 2026
File No. 0214715

New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101

Attention: NYSDEC Case Manager, **Pending**

Subject: Green Site Remediation
2074-2080 McDonald Avenue
NYSDEC Site **Pending**
2074-2080 McDonald Avenue
Brooklyn, New York

H & A of New York Engineering and Geology, LLP (Haley & Aldrich of New York) presents the following environmental footprint analysis¹ in accordance with U.S. Environmental Protection Agency (EPA) 542-R-12-002 for the remedial investigation at 2074-2080 McDonald Avenue, Brooklyn, New York (Site).

2074-2080 MCDONALD AVENUE – TOTALS

The estimated totals for all components of the remedial investigation are:

- 109.8 Metric Million British Thermal Units (MMBtus) of energy used;
- 8.0 tons of total greenhouse gas emissions (CO₂e [includes consideration of carbon dioxide, methane, and nitrous oxide emissions]);
- 385.0 pounds (lbs) of nitrogen oxides (NO_x) + sulfur oxides (SO_x) + particulate matter (PM) emissions; and,
- 21.8 lbs of hazardous air pollutant (HAP) emissions.

Energy

- 35.4MMBtus used for on-Site activities, such as drilling.
- 0.01 MMBtus used for grid electricity generation.
- 27.3 MMBtus used for transportation of personnel, investigation materials, and waste disposal.
- 47.1 MMBtus used for off-Site activities.

¹ Spreadsheets for Environmental Footprint Analysis (SEFA) Version 3.0, November 2019.

Greenhouse Gas Emissions (CO₂e)

- 2.9 tons of CO₂e will be produced from on-Site activities, such as drilling.
- 0.00 tons of CO₂e will be produced from grid electricity generation.
- 2.2 tons of CO₂e will be produced from the transportation of personnel, investigation materials, and waste disposal.
- 2.9 tons will be produced from off-Site activities.

The majority of the remedial investigation footprint, including both energy use and CO₂e generation, is from off-Site activities, such as transportation. The on-Site activities are the smallest scope within the footprint and are primarily the result of drilling activities. Overall, the estimated footprint of the Site investigation is dominated by off-Site activities as well as transportation. Off-Site energy use is estimated to comprise 42.9 percent of all energy use and off-Site greenhouse gas emissions are expected to comprise 36.7 percent of all emissions for the remedial investigation.

Sincerely yours,

H & A OF NEW YORK ENGINEERING AND GEOLOGY, LLP

Hailey E. Russell
Technical Specialist

Mari C. Conlon
Senior Associate

https://haleyaldrich.sharepoint.com/sites/EmeraldDevelopersLLC/Shared Documents/0213688.2074-2080 McDonald Avenue/Deliverables/6. RIWP/Appendices/Appendix E - GSR/SEFA Spreadsheet/1. SEFA Summary Letter_DRAFT.docx

Environmental Footprint Summary

Core Element	Metric		Unit of Measure	Footprint						
				Remedial Investigation					Total	
Materials & Waste	M&W-1	Refined materials used on-site	Tons	1.4	0.0	0.0	0.0	0.0	0.0	1.4
	M&W-2	% of refined materials from recycled or reused material	%	0.0%						0.0%
	M&W-3	Unrefined materials used on-site	Tons	0.000	0.000	0.000	0.000	0.000	0.000	0.0
	M&W-4	% of unrefined materials from recycled or reused material	%							
	M&W-5	On-site hazardous waste disposed of off-site	Tons	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	M&W-6	On-site non-hazardous waste disposed of off-site	Tons	2.3	0.0	0.0	0.0	0.0	0.0	2.3
	M&W-7	Recycled or reused waste	Tons	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	M&W-8	% of total potential waste recycled or reused	%	0.0%						0.0%
Water (used on-site)	W-1	Public water use	MG	0.00009	0.0	0.0	0.0	0.0	0.0	0.0
	W-2	Groundwater use	MG	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	W-3	Surface water use	MG	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	W-4	Reclaimed water use	MG	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	W-5	Storm water use	MG	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	W-6	User-defined water resource #1	MG	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	W-7	User-defined water resource #2	MG	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	W-8	Wastewater generated	MG	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Energy	E-1	Total energy used (on-site and off-site)	MMBtu	109.8	0.0	0.0	0.0	0.0	0.0	109.8
	E-2	Energy voluntarily derived from renewable resources								
	E-2A	On-site renewable energy generation or use + on-site biodiesel use + biodiesel and other renewable resource use for transportation	MMBtu	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	E-2B	Voluntary purchase of renewable electricity	MWh	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	E-3	Voluntary purchase of RECs	MWh	0.0	0.0	0.0	0.0	0.0	0.0	0.0
E-4	On-site grid electricity use	MWh	0.001	0.000	0.000	0.000	0.000	0.000	0.0	
Air	A-1	On-site NOx, SOx, and PM emissions	Pounds	45.6	0.0	0.0	0.0	0.0	0.0	45.6
	A-2	On-site HAP emissions	Pounds	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	A-3	Total NOx, SOx, and PM emissions	Pounds	385.0	0.0	0.0	0.0	0.0	0.0	385.0
	A-3A	Total NOx emissions	Pounds	155.8	0.0	0.0	0.0	0.0	0.0	155.8
	A-3B	Total SOx emissions	Pounds	197.2	0.0	0.0	0.0	0.0	0.0	197.2
	A-3C	Total PM emissions	Pounds	32.0	0.0	0.0	0.0	0.0	0.0	32.0
	A-4	Total HAP emissions	Pounds	21.8	0.0	0.0	0.0	0.0	0.0	21.8
	A-5	Total greenhouse gas emissions	Tons CO2e*	8.0	0.0	0.0	0.0	0.0	0.0	8.0
Land & Ecosystems	Qualitative Description									

* Total greenhouse gases emissions (in CO2e) include consideration of CO2, CH4, and N2O (Nitrous oxide) emissions.

"MMBtu" = millions of Btus

"MG" = millions of gallons

"CO2e" = carbon dioxide equivalents of global warming potential

"MWh" = megawatt hours (i.e., thousands of kilowatt-hours or millions of Watt-hours)

"Tons" = short tons (2,000 pounds)

The above metrics are consistent with EPA's Methodology for Understanding and Reducing a Project's Environmental Footprint (EPA 542-R-12-002), February 2012

Notes:

Remedial Investigation - Energy & Air Compiled Results

Category	Total Energy	GHG	NOx	SOx	PM	NOx + SOx + PM	HAPs
	MMbtus	lbs CO2e	lbs	lbs	lbs	lbs	lbs
On-site (Scope 1)	35	5,738	43	1	1	46	0
Grid Electricity Generation (Scope 2)	0.008	1	0	0	0	0	0
Transportation (Scope 3a)	27	4,403	27	1	1	28	0
Other Off-Site (Scope 3b)	47	5,875	86	195	30	311	21
Remedy Totals	110	16,017	156	197	32	385	22

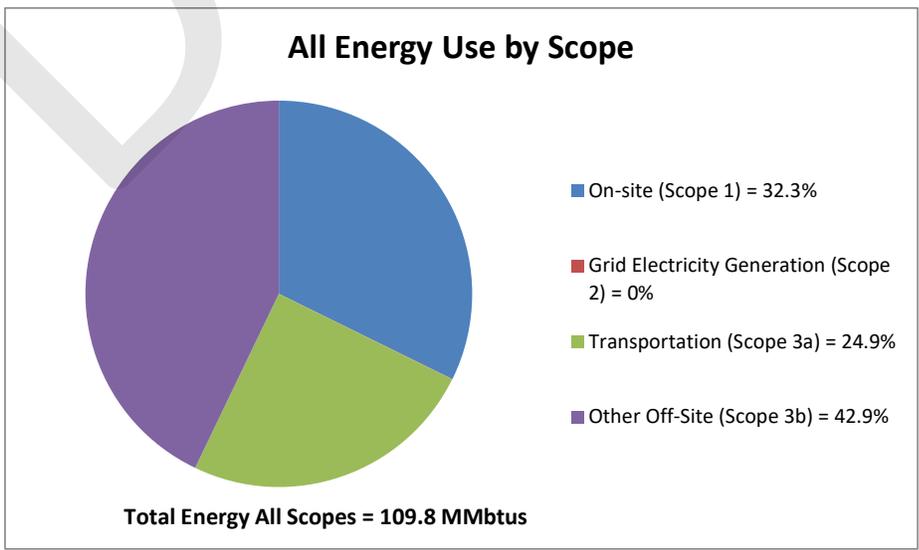
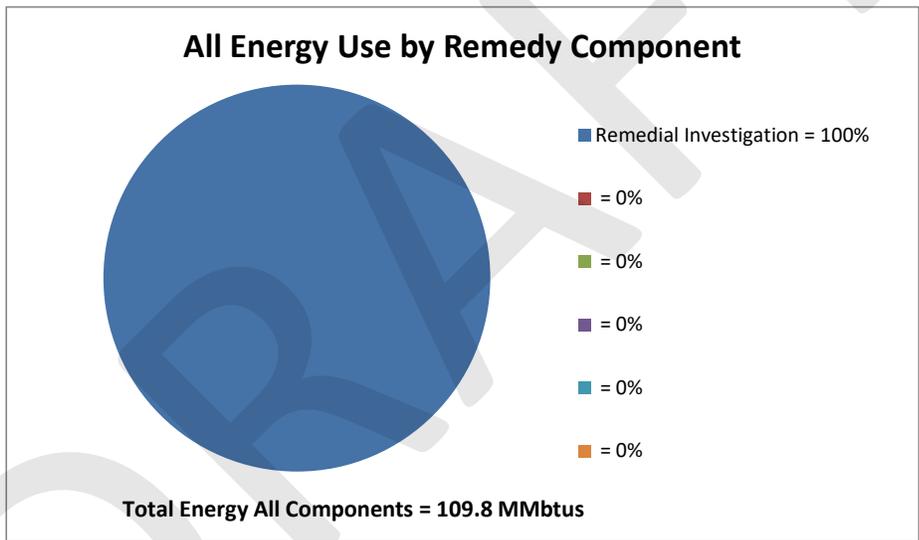
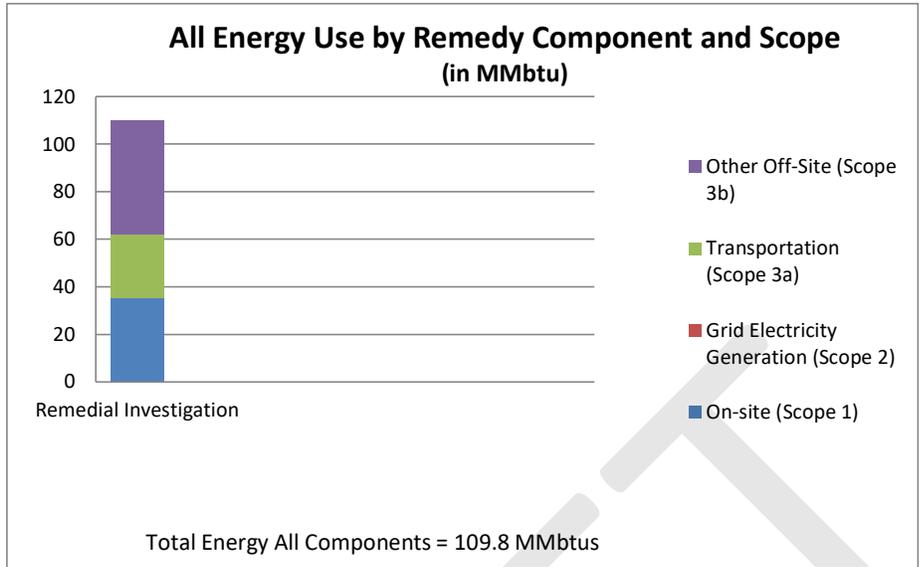
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Values that are forwarded to the "Summary" tab are indicated in orange.

Voluntary Renewable Energy Use	Unit	Quantity
On-site renewable energy generation or use	MMBtu	0
On-site biodiesel use	MMBtu	0
Biodiesel and other renewable resource use for transportation	MMBtu	0
On-site renewable energy generation or use + on-site biodiesel use + biodiesel and other renewable resource use for transportation	MMBtu	0
Voluntary purchase of renewable electricity	MWh	0
Voluntary purchase of RECs	MWh	0

(This value is the sum of the three rows above)

This worksheet is not intended for user input. Values on this worksheet are obtained from the following file:
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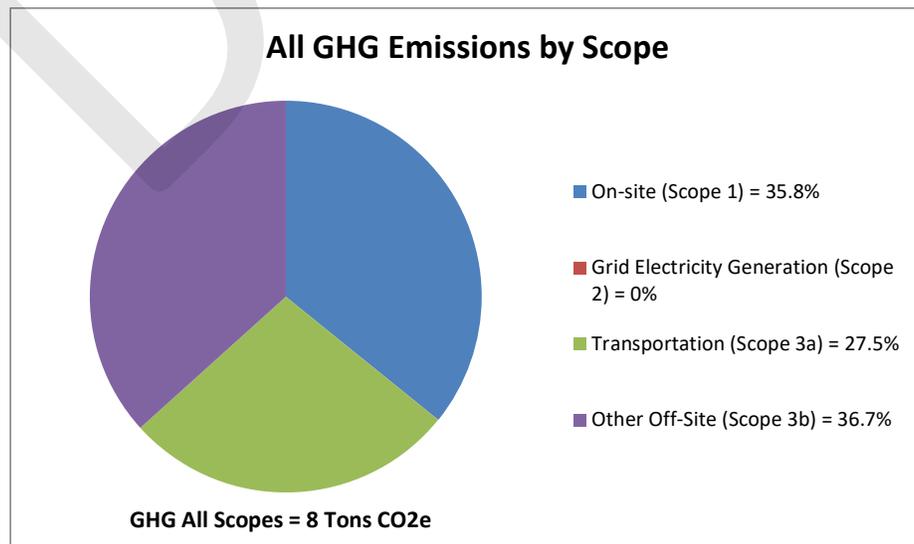
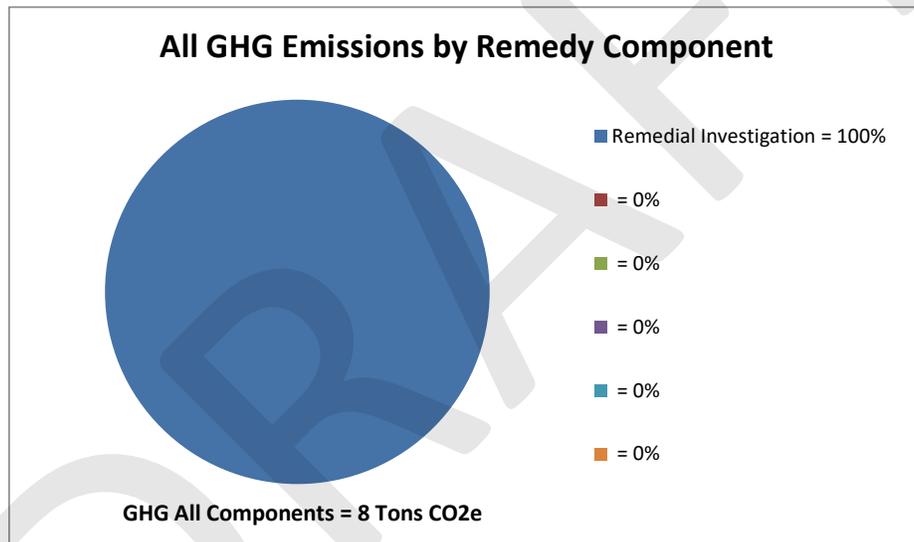
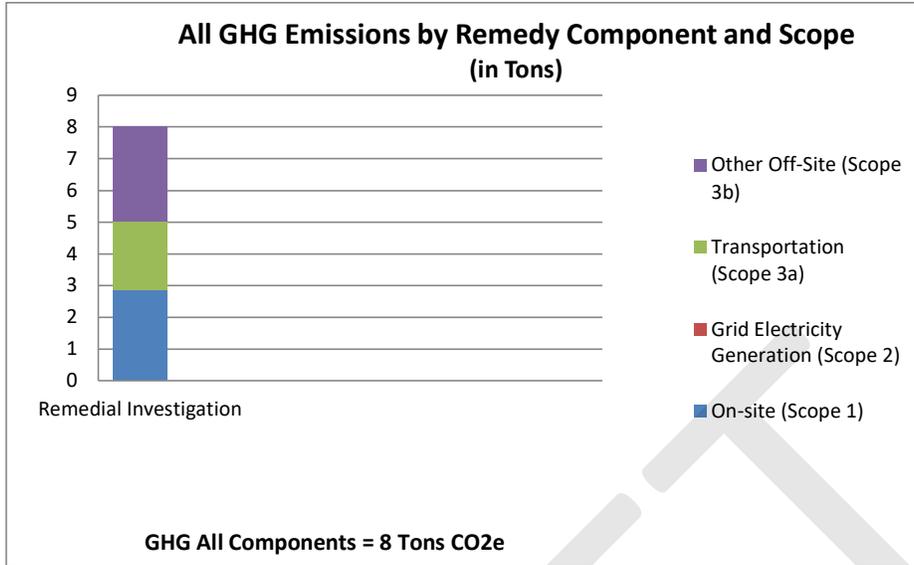
Total Energy MMbtus		Remedial Investigation					Total	
On-site (Scope 1)	35.4	0.0	0.0	0.0	0.0	0.0	35.4	
Electricity Generation (Scope 2)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Transportation (Scope 3a)	27.3	0.0	0.0	0.0	0.0	0.0	27.3	
Other Off-Site (Scope 3b)	47.1	0.0	0.0	0.0	0.0	0.0	47.1	
Total	109.8	0.0	0.0	0.0	0.0	0.0	109.8	

Remedial Investigation = 100%
 = 0%
 = 0%
 = 0%
 = 0%
 = 0%

On-site (Scope 1) = 32.3%
 Grid Electricity Generation (Scope 2) = 0%
 Transportation (Scope 3a) = 24.9%
 Other Off-Site (Scope 3b) = 42.9%

Total Energy All Components = 109.8 MMBtus
 Total Energy All Scopes = 109.8 MMBtus

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GHG Tons CO2e							
	Remedial Investigation					Total	
On-site (Scope 1)	2.9	0.0	0.0	0.0	0.0	0.0	2.9
Generation (Scope 2)	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Transportation (Scope 3a)	2.2	0.0	0.0	0.0	0.0	0.0	2.2
Other Off-Site (Scope 3b)	2.9	0.0	0.0	0.0	0.0	0.0	2.9
Total	8.0	0.0	0.0	0.0	0.0	0.0	8.0

Remedial Investigation = 100%

= 0%

= 0%

= 0%

= 0%

= 0%

On-site (Scope 1) = 35.8%

Grid Electricity Generation (Scope 2) = 0%

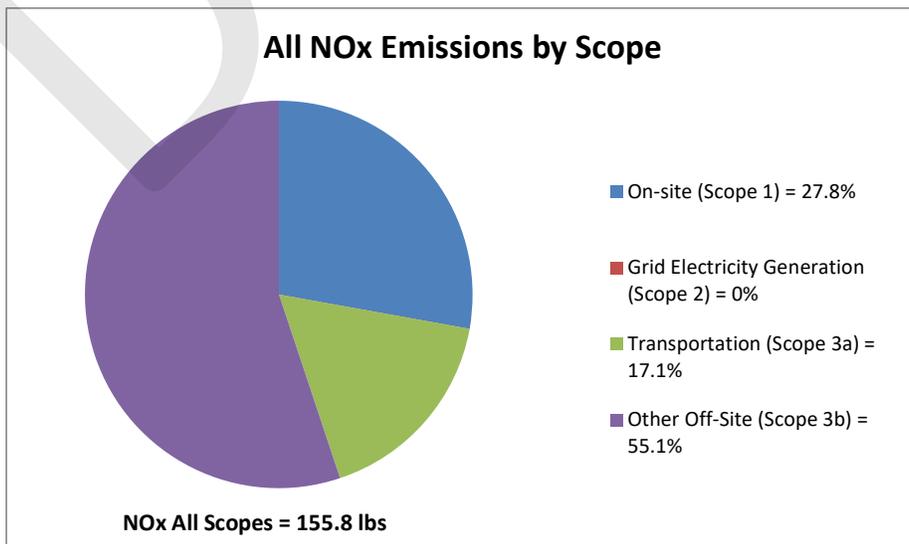
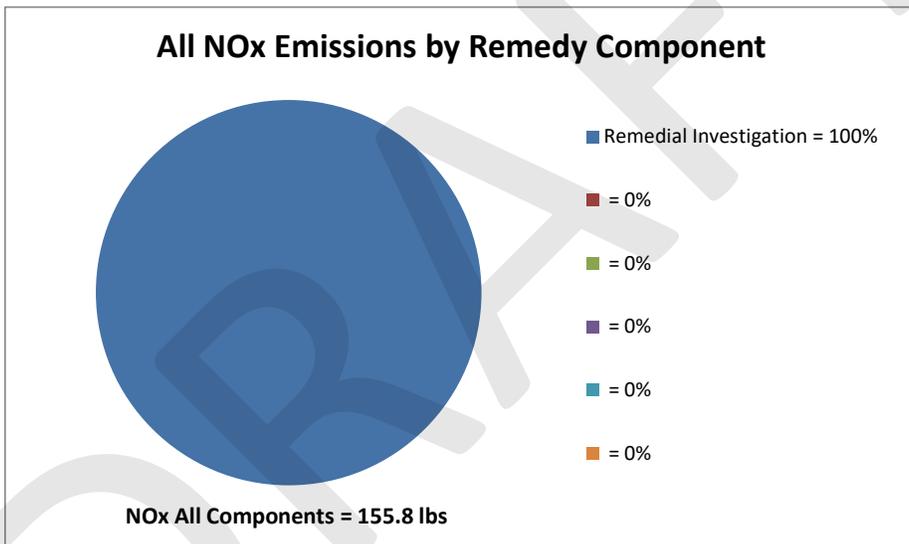
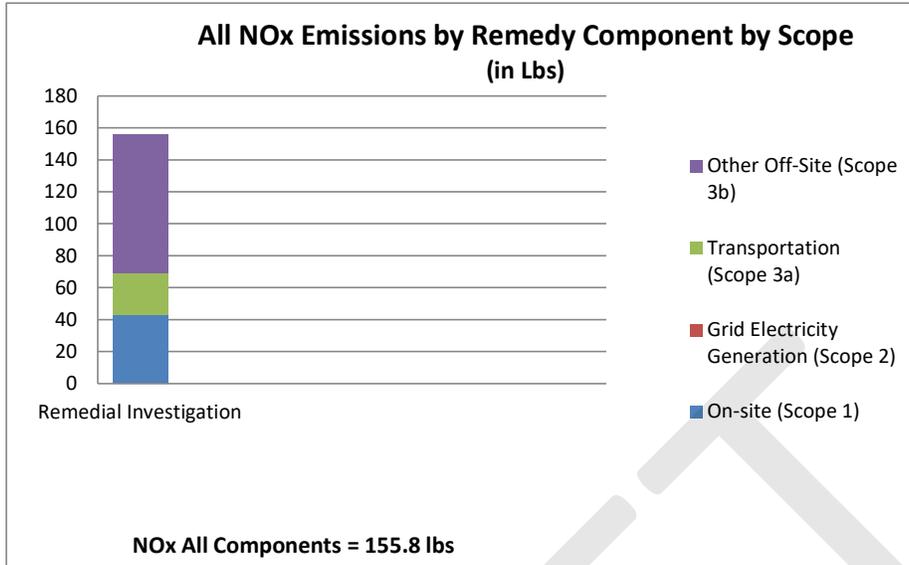
Transportation (Scope 3a) = 27.5%

Other Off-Site (Scope 3b) = 36.7%

GHG All Components = 8 Tons CO2e

GHG All Scopes = 8 Tons CO2e

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NOx lbs		Remedial Investigation					Total	
On-site (Scope 1)	43.4	0.0	0.0	0.0	0.0	0.0	43.4	
Generation (Scope 2)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Transportation (Scope 3a)	26.6	0.0	0.0	0.0	0.0	0.0	26.6	
Other Off-Site (Scope 3b)	85.9	0.0	0.0	0.0	0.0	0.0	85.9	
Total	155.8	0.0	0.0	0.0	0.0	0.0	155.8	

Remedial Investigation = 100%

= 0%

= 0%

= 0%

= 0%

= 0%

On-site (Scope 1) = 27.8%

Grid Electricity Generation (Scope 2) = 0%

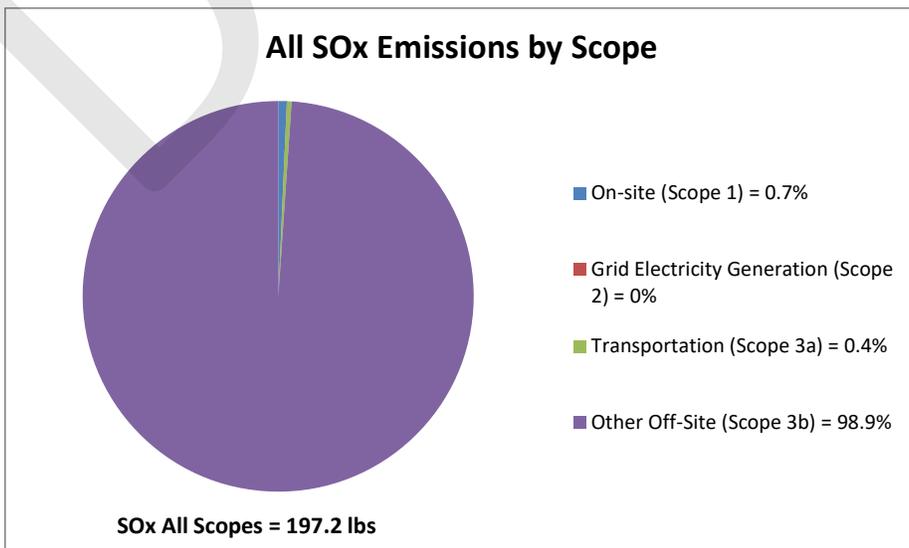
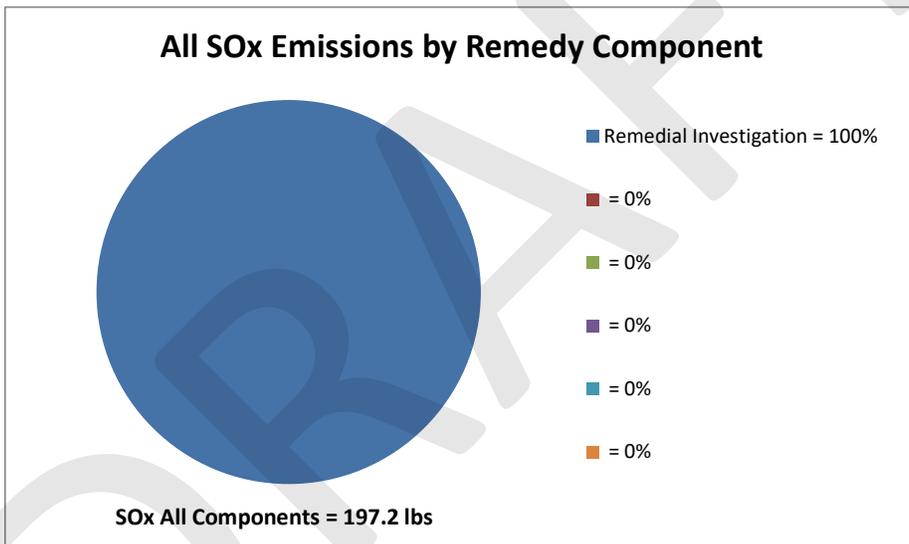
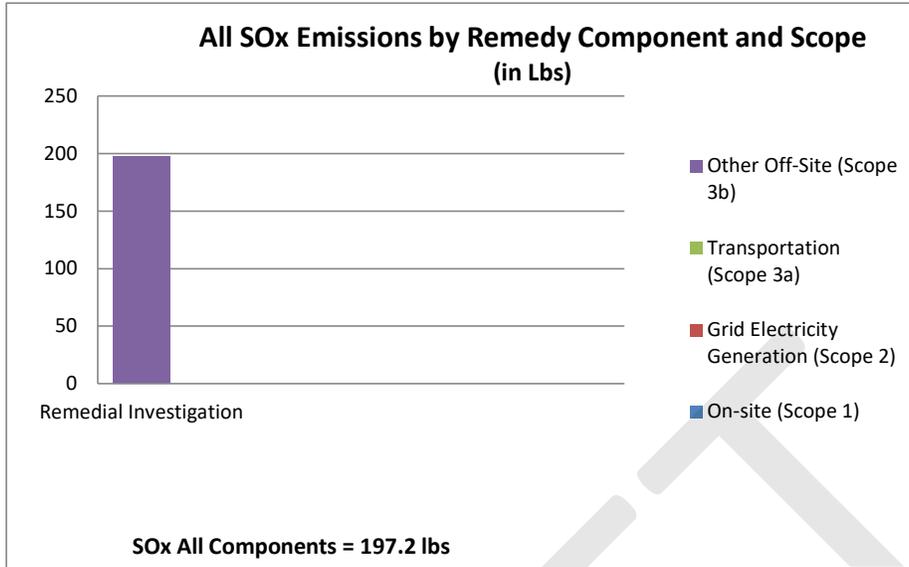
Transportation (Scope 3a) = 17.1%

Other Off-Site (Scope 3b) = 55.1%

NOx All Components = 155.8 lbs

NOx All Scopes = 155.8 lbs

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SOx lbs							
	Remedial Investigation					Total	
On-site (Scope 1)	1.4	0.0	0.0	0.0	0.0	0.0	1.4
Generation (Scope 2)	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Transportation (Scope 3a)	0.8	0.0	0.0	0.0	0.0	0.0	0.8
Other Off-Site (Scope 3b)	195.0	0.0	0.0	0.0	0.0	0.0	195.0
Total	197.2	0.0	0.0	0.0	0.0	0.0	197.2

Remedial Investigation = 100%

= 0%

= 0%

= 0%

= 0%

= 0%

SOx All Components = 197.2 lbs

SOx All Scopes = 197.2 lbs

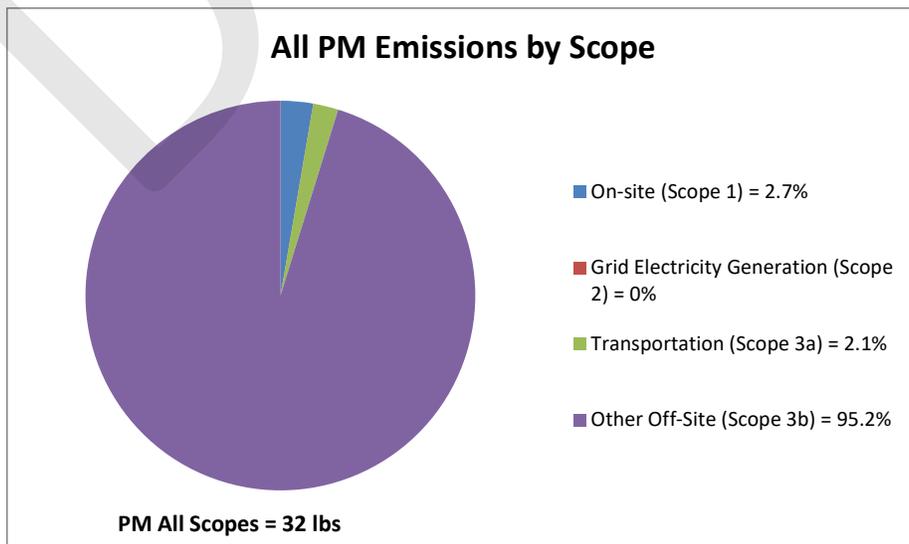
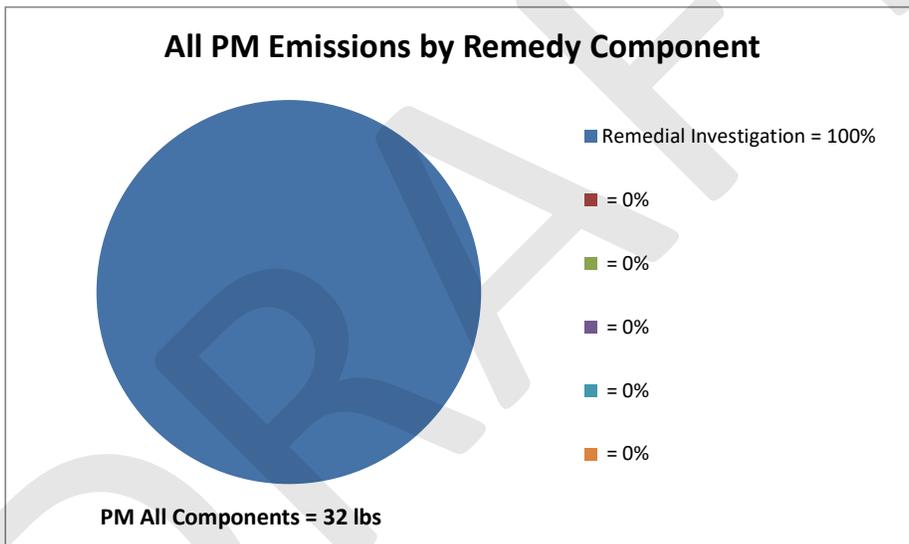
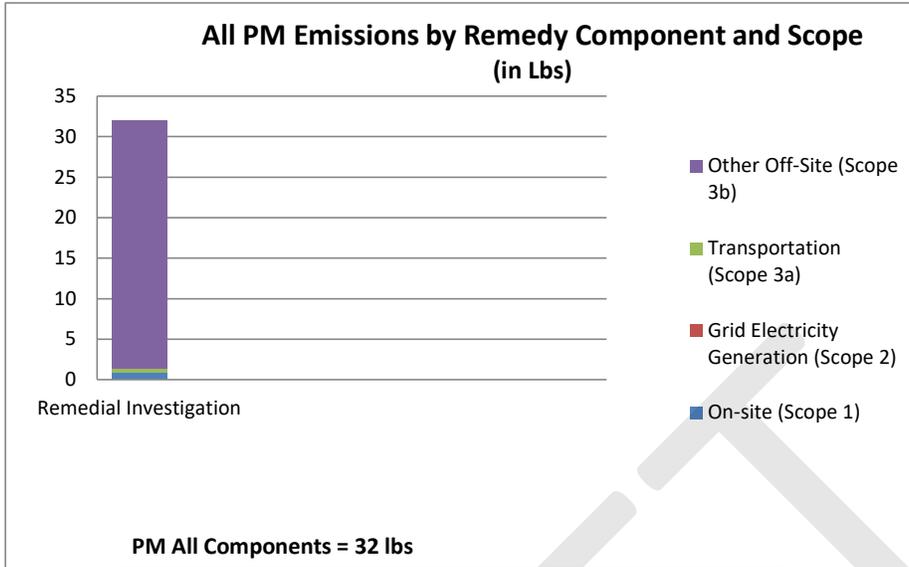
On-site (Scope 1) = 0.7%

Grid Electricity Generation (Scope 2) = 0%

Transportation (Scope 3a) = 0.4%

Other Off-Site (Scope 3b) = 98.9%

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PM lbs		Remedial Investigation					Total	
On-site (Scope 1)	0.9	0.0	0.0	0.0	0.0	0.0	0.9	
Generation (Scope 2)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Transportation (Scope 3a)	0.7	0.0	0.0	0.0	0.0	0.0	0.7	
Other Off-Site (Scope 3b)	30.5	0.0	0.0	0.0	0.0	0.0	30.5	
Total	32.0	0.0	0.0	0.0	0.0	0.0	32.0	

Remedial Investigation = 100%

= 0%

= 0%

= 0%

= 0%

= 0%

PM All Components = 32 lbs

PM All Scopes = 32 lbs

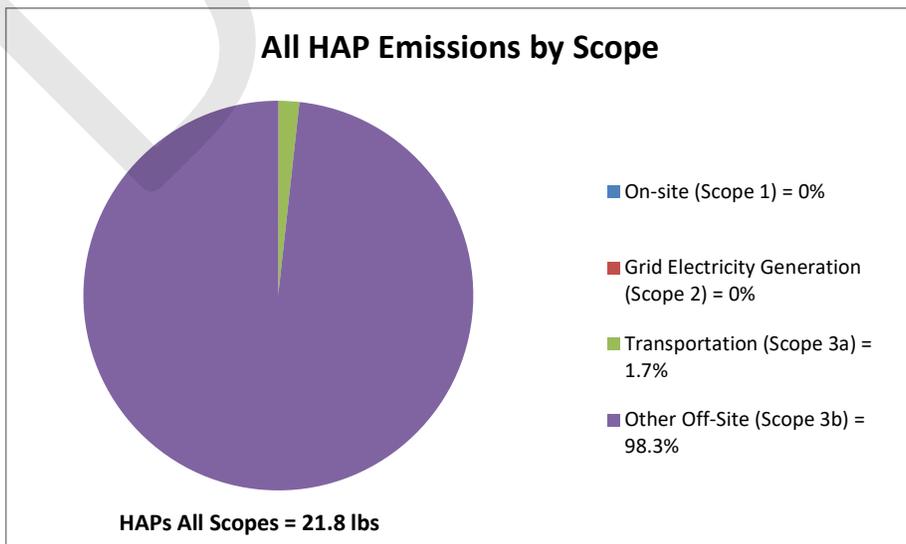
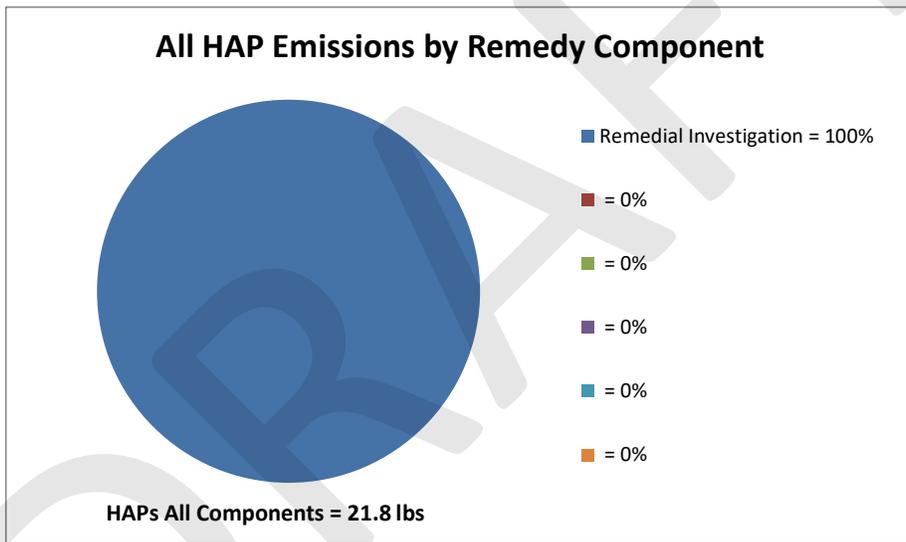
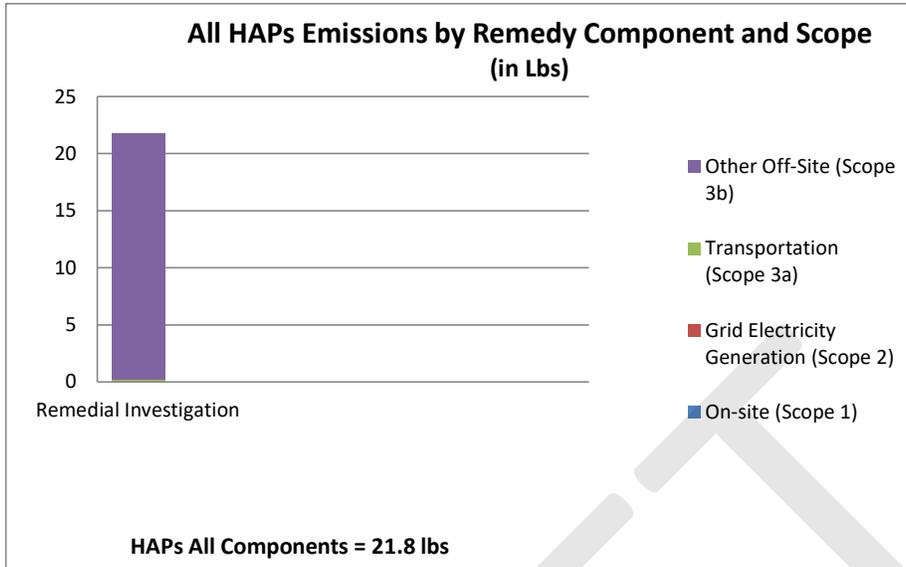
On-site (Scope 1) = 2.7%

Grid Electricity Generation (Scope 2) = 0%

Transportation (Scope 3a) = 2.1%

Other Off-Site (Scope 3b) = 95.2%

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HAPs lbs	Remedial Investigation						Total
On-site (Scope 1)	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Generation (Scope 2)	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Transportation (Scope 3a)	0.4	0.0	0.0	0.0	0.0	0.0	0.4
Other Off-Site (Scope 3b)	21.4	0.0	0.0	0.0	0.0	0.0	21.4
Total	21.8	0.0	0.0	0.0	0.0	0.0	21.8

Remedial Investigation = 100%

= 0%

= 0%

= 0%

= 0%

= 0%

On-site (Scope 1) = 0%

Grid Electricity Generation (Scope 2) = 0%

Transportation (Scope 3a) = 1.7%

Other Off-Site (Scope 3b) = 98.3%

HAPs All Components = 21.8 lbs

HAPs All Scopes = 21.8 lbs

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APPENDIX F
Health and Safety Plan

**HALEY & ALDRICH, INC.
SITE-SPECIFIC SAFETY PLAN**

FOR

2074-2080 McDonald Ave

Brooklyn, New York

Project/File No. 0213688

Gensuite EZ Scan®



BI - Developers

Prepared By: Joe Mastro

Date: 8/6/2025

Approvals: The following signatures constitute approval of this Health & Safety Plan.

Field Safety Manager: Luke J. McCartney

Date: 8/6/2025



Project Manager: Luke J. McCartney, P.G.

Date: 8/6/2025



HASP Valid Through: 12/31/2025

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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.

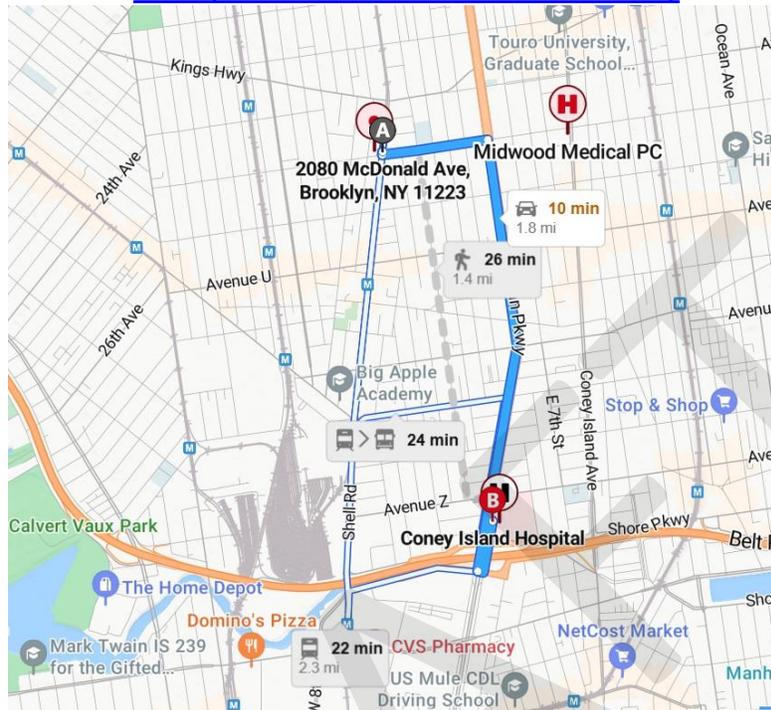
6 - TAKE CORRECTIVE ACTION

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

PROJECT INFORMATION AND CONTACTS	
Project Name: 2074-2080 McDonald Ave	Haley & Aldrich File No.: 0213688
Location: 2074-2080 McDonald Ave, Brooklyn, New York	
Client/Site Contact: Phone Number:	Volvy Landau 347-461-3626
Haley & Aldrich Field Representative: Phone Number: Emergency Phone Number:	Joseph Mastro 914-960-5599 914-960-2052
Haley & Aldrich Project Manager: Phone Number: Emergency Phone Number:	Luke J. McCartney, P.G. 551-655-7720 201-341-3722
Field Safety Manager: Phone Number: Emergency Phone Number:	Brian Ferguson 617-886-7439 617-908-2761
Subcontractor Project Manager: Phone Number:	Tim Kelly 631-524-6327
Nearest Hospital: Address: (see map on next page) Phone Number:	Coney Island Hospital 2601 Ocean Pkwy Brooklyn, NY 11235 718-616-3000
Nearest Occ. Health Clinic: http://www.talispoint.com/liberty/ext/ Address: (see map on next page) Phone Number:	ProHEALTH Care Associates, LLP 331 Kings Highway, Brooklyn, NY 11223 718-975-3774
Liberty Mutual Claim Policy	WC6-Z11-254100-035
WorkCare Injury & Illness HOTLINE	1-888-449-7787
Emergency Response Number:	911
Other Local Emergency Response Number:	N/A
Other Ambulance, Fire, Police, or Environmental Emergency Resources:	N/A

DIRECTIONS TO THE NEAREST HOSPITAL

[Liberty Mutual Medical Location Directory](#)

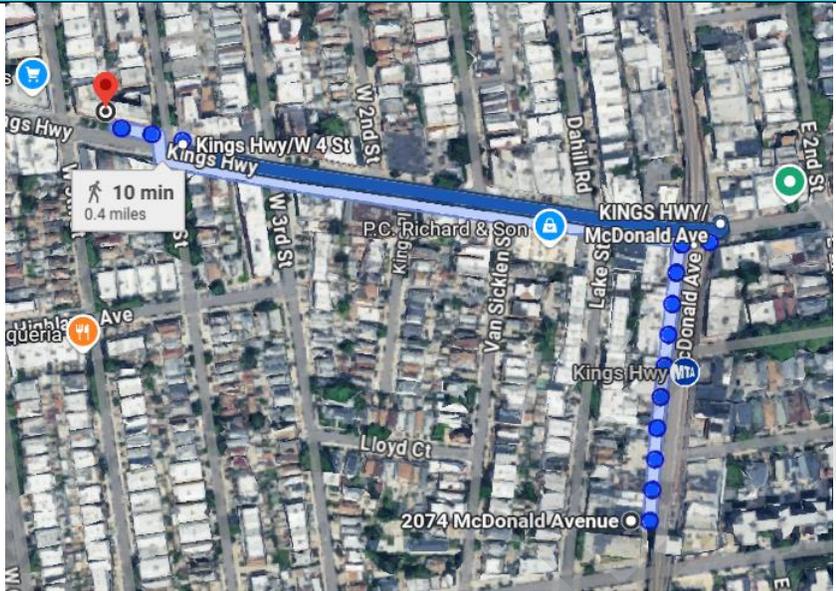


Directions to the Nearest Hospital:

↑	1. Leave from McDonald Ave	0.2 mi
↶	2. Turn left onto Avenue T	279 ft
↷	3. Turn right onto West St	0.3 mi
↶	4. Turn left onto Gravesend Neck Rd	272 ft
↑	5. Keep right at Gravesend Neck Rd	0.3 mi
↷	6. Turn right onto Ocean Pkwy	430 ft

↑	7. Keep straight on at Ocean Pkwy	0.5 mi
↶	8. Turn left onto Avenue Z	66 ft
↷	9. Turn right onto Ocean Parkway	0.2 mi
	10. Turn sharp left onto Ocean Pkwy	0.2 mi
	11. You have arrived at Ocean Pkwy . Your destination is on the right	

DIRECTIONS TO THE NEAREST URGENT CARE



Directions to the Nearest Occupational Clinic:

2074 McDonald Ave
Brooklyn, NY 11223

↑ Head north on McDonald Ave toward Colin Pl
0.1 mi

← Turn left onto Kings Hwy
Destination will be on the right
0.3 mi

331 Kings Hwy
Brooklyn, NY 11223

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:

The proposed scope of work includes due diligence and a limited investigation with the intention to evaluate environmental risk for acquisition purposes at a commercial property. Eight soil borings, four vapor points, and four monitoring wells sampling.

Project Task Breakdown

Task No.	Task Description	Employee(s) Assigned	Work Date(s) or Duration
1	Site Walk - Complete site walk to mark boring locations, inspect site, and complete work.	Joseph Mastro	1 Days
2	Underground Utility Clearance – Oversee GPR survey to be conducted by Nova Geophysical Services Corp. to clear boring locations and identify underground utilities, tanks, or other anomalies.	Joseph Mastro	1 Days
3	Drilling - Oversee installation of soil borings, monitoring wells, and soil vapor points by Lakewood Environmental Services Corp. using a Geoprobe drilling rig.	Joseph Mastro	2 Days
4-6	Soil, Groundwater, and Soil Vapor Sampling– Collect soil and soil vapor samples into laboratory provided containers. Collect groundwater sample from pump and water quality meter assembly into laboratory provided containers.	Joseph Mastro	2 Days

Subcontractor(s) Tasks

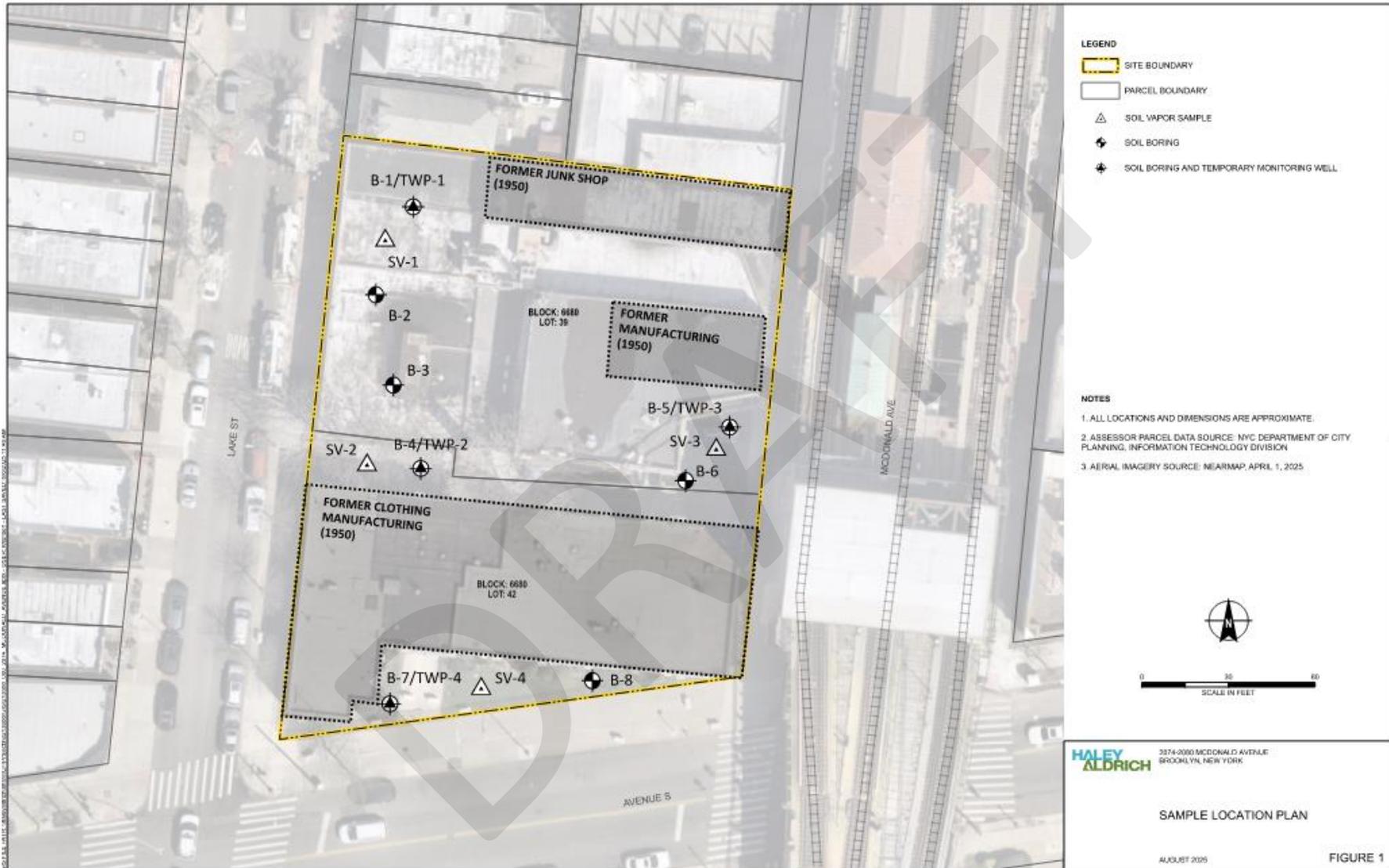
Firm Name	Work Activity	Work Date(s) or Duration
Lakewood Environmental Services Corp.	Drilling- Soil cores, monitoring well installation, soil vapor point installation, and drywell sampling.	2 Days
Nova Geophysical Services Corp	GPR Survey to clear boring locations and identify underground utilities, tanks, or other anomalies.	1 Days

Projected Start Date:	8/7/2025
Projected Completion Date:	8/8/2025

DRAFT

2. SITE OVERVIEW / DESCRIPTION	
Site Classification	
Public Facilities & Institutions	
Site Description	
The Site, identified as Block 6680 Lots 39 and 42 on the New York City Tax Map in a R5B/C4-4L zoning area, is currently improved with a two-story school (lot 42) and a two-story commercial building (Lot 39). The Site is approximately 31,480 square feet. The Site has been assigned an E-Designation for hazardous materials and noise as part of the Rheingold Rezoning.	
Background and Historic Site Usage	
Historical junk shop (1950's) manufacturing and welding facilities (1960's through mid-1970's).	
Site Status	
Indicate current activity status and describe operations at the site:	
Active	
Site is an active high school and commercial space.	
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:	
Soil, temporary monitoring well, and soil vapor as shown	

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? Unknown

Source of information about contaminants: Unknown

Contaminant of Concern	Location/Media	Concentration	Units
Arsenic	Soil	N/A	Select Units
Benzene	Soil/GW/Soil Vapor	N/A	
BTEX/VOCs	Soil/GW/Soil Vapor	N/A	
Ethylbenzene	Soil/GW/Soil Vapor	N/A	
Lead	Soil	N/A	
Mercury	Soil	N/A	
Polychlorinated biphenyls (PCBs)	Soil	N/A	
Polycyclic aromatic hydrocarbons (PAHs)	Soil	N/A	
Tetrachloroethylene	Soil/GW/Soil Vapor	N/A	
Trichloroethylene	Soil/GW/Soil Vapor	N/A	
Urban Fill	Soil	N/A	
Vinyl Chloride	Soil/GW/Soil Vapor	N/A	
Xylenes	Soil/GW/Soil Vapor	N/A	
Volatile Organic Compounds (VOCs)	Soil/GW/Soil Vapor	N/A	

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.

Benzene: Benzene is a colorless liquid with a sweet odor. It evaporates into the air very quickly and dissolves slightly in water. It is highly flammable and is formed from both natural processes and human activities

Breathing very high levels of benzene can result in death, while high levels can cause drowsiness, dizziness, rapid heart rate, headaches, tremors, confusion, and unconsciousness. Eating or drinking foods containing high levels of benzene can cause vomiting, irritation of the stomach, dizziness, sleepiness, convulsions, rapid heart rate, and death. The major effect of benzene from long-term (365 days or longer) exposure is on the blood. Benzene causes harmful effects on the bone marrow and can cause a decrease in red blood cells leading to anemia. It can also cause excessive bleeding and can affect the immune system, increasing the chance for infection. Some women who breathed high levels of benzene for many months had irregular menstrual periods and a decrease in the size of their ovaries. It is not known whether benzene exposure affects the developing fetus in pregnant women or fertility in men. Animal studies have shown low birth weights, delayed bone formation, and bone marrow damage when pregnant animals breathed benzene.

BTEX/VOCs: BTEX is an acronym for benzene, toluene, ethylbenzene and xylenes. These compounds are VOCs, are common in petroleum-related products (e.g., oil, gasoline, coal-tar DNAPL, etc.), and frequently co-occur at hazardous waste sites. Benzene, toluene, ethylbenzene, and xylenes have acute and chronic harmful effects on the central nervous system. Benzene is classified as a carcinogen. Short-term health effects of low-level BTEX exposure include drowsiness, dizziness, accelerated heart rate, headaches, tremors, confusion, and unconsciousness.

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/m³ averaged over an 8 hour shift.

Polychlorinated biphenyls (PCBs): are a group of manufactured organic chemicals that contain 209 individual chlorinated chemicals. PCBs are either oily liquids or solids and are colorless to light yellow in color. They have no known smell or taste. There are no known natural sources of PCBs. Some commercial PCB mixtures are known in the United States by their industrial trade name e.g. Aroclor.

Polycyclic aromatic hydrocarbons (PAHs): are a class of chemicals that occur naturally in coal, crude oil, and gasoline. They also are produced when coal, oil, gas, wood, garbage, and tobacco are burned. PAHs generated from these sources can bind to or form small particles in the air. High-temperature cooking will form PAHs in meat and in other foods. Naphthalene is a PAH that is produced commercially in the United States to make other chemicals and mothballs. Cigarette smoke contains many PAHs.

Tetrachloroethylene: is a colorless liquid with a sharp sweet odor. Tetrachloroethylene vapor is heavier than air and will be found in low lying areas.

Trichloroethylene: is a nonflammable colorless liquid with a sweet odor. Trichloroethylene vapor is heavier than air and is found in low lying areas.

Vinyl Chloride: is a colorless, flammable gas that evaporates very quickly. Vinyl chloride can be formed in the environment when soil organisms break down "chlorinated" solvents. In the environment, the highest levels of vinyl chloride are found in air around factories producing vinyl products. Vinyl chloride that is released by industries or formed by the breakdown of other chlorinated chemicals can enter the air and drinking water supplies. It is a common contaminant found near landfills.

Most exposure occurs when people breathe contaminated air. If a water supply is contaminated, vinyl chloride can enter household air when the water is used. It can be absorbed through the skin if handling vinyl products, contaminated soil, or bathing in contaminated water. Skin absorption is probably a minor route of exposure.

Vinyl chloride is very toxic and contact with this chemical should be avoided. Health effects can occur after several years of exposure such as damage to the nervous system, changes in the immune system and decrease in bone strength in fingers, arms, and joints. It can also increase a person's risk of developing cancer.

Xylenes: are colorless liquids with a faint, sweet odor. There are three forms of xylene (meta-, ortho-, and para-), which are referred to as isomers. They are chemically classified as hydrocarbons, meaning they contain hydrogen and carbon atoms. These are chemicals of serious flammability and will easily ignite with heat, sparks or flames. Their flash point range is between 85-115 degrees F. The PEL is 10 ppm averaged over an 8 hour shift.

Typically, these are solvents in making paint, adhesives, and other chemicals. Their odor threshold varies greatly, and this should not be the sole indicator in exposures. Their vapors are heavier than air, but less dense than water, therefore they float. Can be inhaled or absorbed through the skin. Inhalation can irritate throat and nose and cause coughing, headache or dizziness. Absorption can cause skin rash, dryness or redness. Repeated exposures may affect concentration, memory, vision, and muscle coordination.

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.

Site Hazards Checklist			
Weather			
Hot Temperatures	High Winds	Lightning Storms	Select Hazard
<p>Hot Temperatures</p> <p>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.</p> <p>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.</p>			
<p>High Winds</p> <p>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.</p> <p>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.</p>			

Lightning Storms

Where the threat of electrical storms and the hazard of lightning exist staff shall ensure site procedures exist to: (1) detect when lightning is in the near vicinity and when there is a potential for lightning and (2) to notify appropriate site personnel of these conditions and (3) implement protocols to stop work and seek shelter.

The 30-30 Rule states that if time between seeing the lightning and hearing the thunder is less than 30 seconds, you are in danger and must seek shelter. You must also stay indoors for more than 30 minutes after hearing the last clap of thunder.

Biological

Small Mammals

Stinging Insects

Choose an item.

Choose an item.

Small Mammals

Rodents, are the most abundant order of mammals. There are hundreds of species of rats; the most common are the black and brown rat. Other rodents you may encounter are mice, beavers, squirrels, guinea pigs, capybaras and coypu.

The Brown Rat has small ears, blunt nose, and short hair. It is approximately 14-18" long (with tail). They frequently infest garbage/rubbish, slaughterhouses, domestic dwellings, warehouses, and supermarkets. They also frequent any space with an easy meal and potential nesting sites. The Black Rat is identified by its tail, that is always longer than the length from the head to the body. It is also slimmer and more agile than the Brown rat. Its size varies according to its environment and food supply.

The House Mouse has the amazing ability to adapt and can frequently be found in human dwellings. In buildings, mice will live anywhere and difficult to keep out. Mice are omnivorous, they will eat anything. Rats and mice often become a serious problem in cold winter months when they seek food and warmth inside buildings. They may suddenly appear in large numbers when excavation work disturbs their in-ground nesting locations or their food source is changed.

Some major problems caused by rats and mice are contaminating the food they eat with urine and excrement. Gnawing into materials such as paper, wood, or upholstery, to use as nest material. Also gnawing plastic, cement, soft metals such as lead and aluminum, and wiring, which may cause a fire hazard. Occasionally biting people and may kill small animals. They, or the parasites they carry, like fleas, mites and worms, spread many diseases such as salmonella, trichinosis, rat bite fever, hantavirus, Weil's disease, and bubonic plague. They damage ornamental plants by burrowing among the roots or feeding on new growth. They also eat garden vegetables, such as corn and squash. These rodents have been a problem for centuries, because of their incredible ability to survive and are so difficult to eliminate. In addition, they are extremely compatible with human behavior and needs.

Avoid contact with rodents, if possible. Avoid contact with rodent excrement. Do not eat food or water that may have encountered rodent excrement. If exposed, wash hands and avoid touching your face with your hands.

Stinging Insects

Stinging Insects fall into two major groups: Apidae (honeybees and bumblebees) and vespids (wasps, yellow jackets, and hornets). Apidae are docile and usually do not sting unless provoked. The stinger of the honeybee has multiple barbs, which usually detach after a sting. Vespids have few barbs and can inflict multiple stings.

There are several kinds of stinging insects that might be encountered on the project site. Most stings will only result in a temporary injury. However, sometimes the effects can be more severe, even life-threatening depending on where you are stung and what allergies you have. Being stung in the throat area of the neck may cause edema (swelling caused by fluid build-up in the tissues) around the throat and may make breathing difficult.

In rare cases, a severe allergic reaction can occur. This can cause "anaphylaxis" or anaphylactic shock with symptoms appearing immediately or up to 30 minutes later. Symptoms include; Hives, itching and swelling in areas other than the sting site, swollen eyes/eyelids, wheezing, chest tightness, difficulty breathing, hoarse voice, swelling of the tongue, dizziness or sharp drop in blood pressure, shock, unconsciousness or cardiac arrest. Reactions can occur the first time you are stung or with subsequent stings. If you see any signs of reaction, or are unsure, call or have a co-worker call emergency medical services (e.g., 911) right away. Get medical help for stings near the eyes, nose or throat. Stay with the person who has been stung to monitor their reaction.

Staff who are allergic to bee stings are encouraged to inform their staff/project manager. If staff member carries an Epi-pen (i.e., epinephrine autoinjector) they are encouraged to inform their colleagues in case they are stung and are incapable of administering the injection. Examine site for any signs of activity or a hive/nest. If you see several insects flying around, see if they are entering/exiting from the same place. Most will not sting unless startled or attacked. Do not swat, let insects fly away on their own. If you must, walk away slowly or gently "blow" them away. If a nest is disturbed and you hear "wild" buzzing, protect your face with your hands and run from the area immediately. Wear long sleeves, long pants, and closed-toed boots. Wear light colored clothes such as khakis. Avoid brightly colored, patterned, or black clothing. Tie back long hair to avoid bees or wasps from entanglement. Do not wear perfumes, colognes or scented soaps as they contain fragrances that are attractive. If bee or wasp is found in your car, stop and leave windows open.

Location/Terrain			
Slip/Trip/Falls	Public Rd/Right of Way	SIMOPS	Economically Depressed

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.

Public Right of Way

H&A staff and their subcontractors conducting work on public roads and/or right of ways can be exposed to vehicular traffic and expose the public to the hazards of the job site. Where a hazard exists to site workers because of traffic or haulage conditions at work sites that encroach public streets or highways, a system of traffic controls in conformance with the Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD), or state program, is required. A Temporary Traffic Control Plan (TCP) describes traffic controls to be used for facilitating vehicle and pedestrian traffic through a temporary traffic control zone TCPs are required to provide for worker protection and safe passage of traffic through and around job sites with as little inconvenience and delay as possible.

The plan may range in scope from being very detailed, to merely referencing typical drawings contained in the MUTCD. The degree of detail in the TCP depends entirely on the complexity of the situation, and TCP's should be prepared by persons knowledgeable about the fundamental principles of temporary traffic control and the work activities to be performed.

H&A Project Managers or their subcontractors need to establish appropriate control measures and obtain any permits when project work is on or encroaches public roadways. You may need flaggers or police details. Cease work and notify the field supervisor immediately if any conditions are such that safety is jeopardized. Utilize protective vehicles whenever appropriate or position equipment so in between the work and oncoming traffic.

SIMOPS

SIMOPS are described as the potential class of activities which could bring about an undesired event or set of circumstances, e.g., safety, environment, damage to assets, schedule, commercial, financial, etc. SIMOPS are defined as performing two or more operations concurrently.

SIMOPS should be identified at an early stage before operations commence to understand issues such as schedule and physical clashes, maintenance activities, failure impacts, interferences between vessels, contracts and third part interfaces and environmental impacts.

Coordinate project with site activities. Identify and understand the hazards associated with the host and client's activities. Integrate site emergency response protocols where appropriate and

communicate to all project staff. Integrate site communication protocols and communicate to all project staff.

Economically Depressed Areas

Economically depressed areas may have high crime rates. Projects involving work in and around inactive industrial sites may bring staff into contact with indigent and homeless persons. Staff could be subjected to crime that includes but may not be limited to thievery, vandalism, and violence. Prior to the start of work staff need to understand the work locations and the potential for exposure to low level crime.

Staff members should never work alone in these areas. A buddy system is required. Conduct during daylight hours. Secure equipment and vehicles. If warranted, contact the local police department for a security detail. Leave the work area immediately and contact the local authorities if staff members feel threatened or are threatened.

Miscellaneous

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

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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 - Underground Utility Clearance

Ground disturbance activities such as excavating or drilling have the potential to contact underground utilities and may be considered a hazardous activity and a permit to work may be required. Once the H&A Project Manager has identified the work zone and the areas designated for ground disturbance the PM or designee is required to delineate the area with either white paint or flags so that the appropriate agencies know which area to check for their respective utilities. Haley & Aldrich staff members must ensure that permission has been gained from the property owner to access the property prior to site entry and before marking any proposed exploration or drilling locations.

The Project Manager shall verify that the proposed dig or drill zones are adequately marked or staked prior to the locators site visit, and that the appropriate Line Location Organization/ Contractor has been notified (a minimum of 72 business hours in advance) of all planned ground disturbance activities and a request for line location has been registered with the applicable One Call or dial Before You Dig organization when applicable. Personnel that are required to mark the area need to identify and understand the hazards associated with the project area which can range from a public roadway to a greenspace in a remote location.

See OP1020 Work Near Utilities.

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 5 – Water 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 6– Soil Vapor

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.

Select task from drop down menu. Click + to add additional tasks. Please ensure any project specific information is added to the task.

Task Physical Hazards Checklist				
Potential Task Hazards	Task 1 Site Walk	Task 2 Underground Utility Clearance	Task 3 Drilling	Task 4-6 Soil, water, soil vapor sampling
Compressed Gas	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Congested Area	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Ergonomics	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Energized Equipment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Generated Wastes	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Ground Disturbance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Hand/Power Tools	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Heavy Equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Line of Fire	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Manual Lifting	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Noise	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Overhead Utilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Repetitive Motion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Rotating Equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Slippery Surfaces	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Sharp Objects	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Traffic	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Underground Utilities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other: Specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Summary of Physical Hazards & Controls

Compressed Gas

Hazards associated with compressed gases include oxygen displacement, fires, explosions, and toxic gas exposures, as well as the physical hazards associated with pressurized containers. In most instances, accidents are caused by improper application, misuse of the gas, or its container by inadequately trained personnel. Special storage, use, and handling precautions are necessary to minimize accidents and control these hazards above.

See OP 1048 Compressed Gas Safety for more information.

Controls

- Visually inspect the cylinder prior to and after use for any damage. Report any damage to the vendor for direction.
- Ensure that cylinders are clearly identified. Labels must not be defaced or removed.
- Leave valve protection caps in place (if provided) until cylinders are secured and connected for use.
- Keep cylinder valves closed except when the cylinder is being used.
- When opening a cylinder valve, stand so the valve outlet is pointed away from yourself and all other employees. Open valves slowly.
- Replace protective caps and outlet caps or plugs before returning empty cylinders to the supplier.
- Never tamper with or alter cylinders, valves, or safety relief devices.
- Do not tighten connections or leaking fittings or attempt repairs while the system is under pressure.
- Do not subject cylinders to artificially low temperatures or temperatures above 125 F. Do not place them next to heat sources or allow a flame to contact any part of the cylinder.
- Avoid dragging or sliding cylinders. Do not lift cylinders by the caps.
- Firmly secure the cylinder and move with a suitable hand truck, lift truck, or crane with a cradle or platform.

Storage

- Provide adequate space or segregate by partitions and post a conspicuous sign that identifies the gas or hazard class.
- Storage areas should be dry, well-drained, ventilated, and fire resistant.
- Cylinders can be stored in the open, but they should be protected from the ground or continuous dampness to prevent rusting.
- Cylinders can usually be stored in the sun; but, cylinders must not exceed temperatures >125 F.
- Always refer to the manufacturers' storage requirements and SDSs.
- Storage areas should protect cylinders from damage. Do not store on unprotected platform edges or obstruct walkways or exits.
- Use brackets, chains, or straps around the upper third of the cylinder to secure cylinders in storage or in use.

Transport

- Cylinders must be stored upright, firmly secured, and be capped during transport.

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.

Energized Equipment

Energy sources including electrical, mechanical, hydraulic, pneumatic, or other sources in machines and equipment can be hazardous to workers. During servicing and maintenance of machines and equipment, the unexpected startup or release of stored energy can result in serious injury or death to workers.

Staff members that are required to work on energized equipment must first ensure that the source of energy is isolated and/or de-energized. In addition, any stored energy must also be released. Staff must ensure that the process to de-energize and isolate energy sources is documented and communicated to those who are working on the equipment. Staff must be trained on and understand the procedure.

See OP 1032 Control of Hazardous Energy for more information.

Controls

- Document process to de-energize or isolate energy sources.
- Ensure staff are appropriately trained to conduct work requiring LOTO.
- Affix log or tag to equipment to ensure improper start-up or release of energy.
- Execute an Energy Isolation Permit.

Ergonomics

Most Work-related Musculoskeletal Disorders (WMSDs) are caused by Ergonomic Stressors. Ergonomic Stressors are caused by poor workplace practices and/or insufficient design, which may present ergonomic risk factors. These stressors include, but not limited to, repetition, force, extreme postures, static postures, quick motions, contact pressure, vibration, and cold temperatures.

WMSDs are injuries to the musculoskeletal system, which involves bones, muscles, tendons, ligaments, and other tissues in the system. Symptoms may include numbness, tightness, tingling, swelling, pain, stiffness, fatigue, and/or redness. WMSD are usually caused by one or more Ergonomic Stressors. There may be individual differences in susceptibility and symptoms among employees performing similar tasks. Any symptoms are to be taken seriously and reported immediately.

See OP1053 Ergonomics for more information.

Controls

- Ensure workstations are ergonomically correct so bad posture is not required to complete tasks.
- Take periodic breaks over the course of the day.
- Stretch during break times.
- Break up tasks that require repetitive motion.
- Contact Corporate H&S with any ergonomic concerns

Generated Waste

Activities on environmental sites may generate waste that requires regulated handling and disposal. Excess sample solids, decontamination materials, poly sheeting, used PPE, etc. that are determined to be free of contamination through field or laboratory screening can usually be disposed into client-approved, on-site trash receptacles. Uncontaminated wash water may be discarded onto the ground surface away from surface water bodies in areas where infiltration can occur. Contaminated materials must be segregated into liquids or solids and drummed separately for off-site disposal.

Controls

- Manage waste properly through good work practices.
- Collect, store, containerize waste, and dispose of it properly.
- All wastes generated shall be containerized in an appropriate container (i.e. open or closed top 55-gallon drum, roll-off container, poly tote, cardboard box, etc.) as directed by the PM.
- Containers should be inspected for damages or defects
- Waste containers should be appropriately labeled indicating the contents, date the container was filled, owner of the material (including address) and any unique identification number, if necessary.
- Upon completion of filling the waste container, the container should be inspected for leaks and an appropriate seal.

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.

Hand and Power Tools

Hand and power tools can expose staff to a wide range of hazards depending upon the tool used. Hazards can include but are not limited to: falling, flying, abrasive, and splashing objects, or harmful dusts, fumes, mists, vapors, or gases.

Serious accidents often occur before steps are taken to evaluate and avoid or eliminate tool-related hazards. Staff must recognize the hazards associated with the different types of tools and the safety precautions necessary to prevent those hazards.

See OP 1026 Hand and Power Tools for more information.

Controls

- Keep all tools in good condition with regular maintenance.
- Use the right tool for the job. Do not use a tool for a task which it was not designed for.
- Examine each tool for damage before use and do not use damaged tools.
- For tools that are damaged or defective, red tag the tool and take out of service.
- Operate tools per the manufacturers' instructions.
- Use the appropriate personal protective equipment.
- All electrically powered tools will be connected through a ground fault circuit interrupter (GFCI).
- All personnel must be trained on the use of the tool they are utilizing.

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.

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.

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.

Overhead Utilities

When work is undertaken near overhead electrical lines, the distance maintained from those lines shall also meet the minimum distances for electrical hazards as defined in Table 1 below. Note: utilities other than overhead electrical utilities need to be considered when performing work.

Table 1 Minimal Radial Clearance Distances *

Normal System Voltage Kilovolts (kV)	Required Minimal Radial Clearance Distance (feet/meters)
0 – 50	10/3.05
51 – 100	12/3.66
101 – 200	15/4.57
201 – 300	10/6.1
301 – 500	25/7.62
501 – 750	35/10.67
750 - 1000	45/13.72

* For those locations where the utility has specified more stringent safe distances, those distances shall be observed.

Controls

- To prevent damage, guy wires shall be visibly marked and work barriers or spotters provided in those areas where work is being conducted.
 - When working around guy wires, the minimum radial clearance distances for electrical power shall be observed.
- The PM shall research and determine if the local, responsible utility or client has more restrictive requirements than those stated in Table 1.
- If equipment cannot be positioned in accordance with the requirements established in Table 1 the lines need to be de-energized.

Repetitive Motion

Repetitive Motion or Strain Injuries are injuries effecting muscles, nerves, and tendons by repetitive movement and overuse. Almost any kind of awkward or repetitive motion you make could lead to an

injury over time. Actions like bending or twisting of the wrists, reaching for materials, working with your hands above shoulder level, or grasping objects can increase wear and tear on the body. The condition mostly effects the upper body.

Controls

- Arrange your work zone, supplies and tools as much as possible to avoid reaching, leaning, bending and twisting your waist or wrists.
- During rest breaks, use stretches to loosen up your body.
- Vary tasks if you can so that you are not making the same movement repeatedly over for a long period.

Rotating Equipment

Exposure to rotating parts can occur when working near a drilling rig, or other similar equipment. All rotating parts should be covered with guards to prevent access by workers. When performing maintenance activities that require the rotating parts to be exposed, workers should not allow loose clothing, hands, or tools to approach the rotating parts. Energy isolation procedures must be followed, and guards must be replaced as soon as possible after completing the maintenance task.

Operation of drilling equipment also creates hazards associated with pinch points and rotating equipment. These are hazards where the body and extremities, especially the hands, can be caught in moving equipment and crushed.

Controls

- Evaluate work procedures to avoid placing the body and extremities in the path of rotating equipment and tools to avoid being struck by moving equipment, tools and machinery.
- Evaluate equipment and tool use to identify pinch points and develop procedures to avoid placing body parts in a position where they can be caught in moving equipment, tools and machinery.
- Follow energy isolation procedures if required
- Do not work near rotating equipment with long loose hair, loose clothing or jewelry.

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.

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.

Traffic

To ensure worker protection and the safe passage of traffic through and around job sites, Site Traffic Control procedures may need to be implemented on project sites. Job zone control and traffic management are necessary when Simultaneous Operations (SIMOPS) or third parties could be at risk of injury by entering the work zone, or when the work crew is at risk of injury by other operations.

Traffic patterns shall be evaluated. Conditions such as high pedestrian traffic, peak periods, daily deliveries or SIMOPS known, Heavy equipment traffic volume and light duty traffic volume shall be evaluated

Early identification and planning for site operations that require job zone control and traffic management, including SIMOPS, is the responsibility of the Project Manager and primary contractor manager. Traffic control plans shall be consistent with the Manual on Uniform Traffic Control Devices.

See OP1025 Signs, Signals, and Barricades and/or OP1043 Site Traffic Control for more information.

Controls

- Alternate walkways where possible.
- Use of the local police to direct traffic.
- Use of an air horn to alert drivers or other workers.
- Maintain good housekeeping and clean the area as work is completed.
- Use the 'buddy' or 'watchperson' system while performing work.

- Use a spotter for backing, tight maneuvers and bin/tank/equipment drop-offs.
- Use traffic control devices, field vehicles and barricades and avoid the use of caution tape.
- Park all vehicles (with wheels in a safe direction away from work) to block traffic with a flashing yellow light. Park so that access to the vehicle is away from oncoming traffic while working.
- When parking a vehicle and equipment, utilize a 'first move forward' driving practice.
- Work in an upright position, face traffic and make eye contact with drivers when possible.
- Minimize work time in traffic.
- Establish a 'Stop Work' hand signal.
- Personnel shall always wear high visibility vest

If public sites, such as public roads, bicycle paths or footpaths, are closed or rerouted, local and regulatory requirements shall be followed and traffic control permits shall be put in place. Proper traffic guiding equipment includes stop/slow paddle signs, flaggers, flashing lights and directional signs.

All personnel on-site should be aware of the plan of the day and the Traffic Control Plan should be communicated with all parties involved during the pre-shift meeting.

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
	Site Walk	Underground Utility Clearance	Drilling	Soil, Water, Soil Vapor Sampling
Hard hat	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Safety Glasses	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Safety Toed Shoes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Class 2 Safety Vest	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Hearing Protection	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Nitrile Gloves	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Cut Resistant Gloves	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Level of protection required	D	D	D	D
Required Safety Equipment				
First Aid Kit	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Safety Cones	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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)

HAZWOPER - 8 Hour (Annual Refresher)

Task Specific Training Requirements

Required Training Type	Task 1	Task 2	Task 3	Task 4
		Site Walk	Underground Utility Clearance	Drilling
Hazard Communication	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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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? Yes

Is perimeter monitoring required for community protection? No

Air monitoring plan not applicable No

Air Monitoring/Screening Equipment Requirements

Photo-Ionization Detector (PID) 10.6eV

The required equipment listed above must be on site. Work shall not commence unless the equipment is present and in working order.

Monitoring Plans

Parameter/Contaminant	Equipment	Action Level	Response Activity
Carbon Monoxide (CO)	4 Gas Meter	< 25 ppm	Continue work and monitoring. If fluctuation exists in acceptable range, contact SSO to investigate.
		>25 ppm	Cease work, exit the area or confined space and contact SSO.

Zone Location and Monitoring Interval

In the breathing zone/work area within the northwest warehouse/garage prior to and during operation of equipment with combustion motors.

Parameter/Contaminant	Equipment	Action Level	Response Activity
VOCs	PID 10.6 eV	< 10 ppm	Continue work and monitoring.
		>10 ppm for 5 minutes	Clear Instrument and Re-Monitor the Area. Implement PPE upgrades
		>10 ppm for >5 minutes	Evacuate the area and call the RHSM and/or PM for further guidance. Implement engineering controls.

Zone Location and Monitoring Interval

Breathing zone and edge of Exclusion Zone.

***If chemical does not have an action level use TLV or REL, whichever is lowest, to be used as an action level. If TLV or REL are the same as PEL, cut the PEL in half for an action level.**

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7. DECONTAMINATION & DISPOSAL METHODS		
<p>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.)</p>		
Personal Hygiene Safeguards		
<p>The following minimum personal hygiene safeguards shall be adhered to:</p> <ol style="list-style-type: none"> 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. <p>It is recommended that personnel present on site shower or bathe at home at the end of each day of working on the site.</p>		
Decontamination Supplies		
<p>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.</p>		
<input type="checkbox"/> Acetone	<input checked="" type="checkbox"/> Distilled Water	<input checked="" type="checkbox"/> Polyethylene Sheeting
<input checked="" type="checkbox"/> Alconox Soap	<input type="checkbox"/> Drums	<input type="checkbox"/> Pressure/Steam Cleaner
<input checked="" type="checkbox"/> Brushes	<input type="checkbox"/> Hexane	<input checked="" type="checkbox"/> Tap Water
<input checked="" type="checkbox"/> Disposal Bags	<input type="checkbox"/> Methanol	<input type="checkbox"/> Wash tubs
<input checked="" type="checkbox"/> 5 Gallon Buckets	<input checked="" type="checkbox"/> Paper Towels	<input type="checkbox"/> Other: Specify
Location of Decontamination Station		
<p>Near sample containerization area.</p>		

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.
Standard Disposal Methods for Contaminated Materials
<ul style="list-style-type: none"> • Excess sample solids, decontamination materials, rags, brushes, poly-sheeting, etc. that are determined to be free of contamination through field screening can usually be disposed into client-approved, on-site trash receptacles. • Uncontaminated wash water may be discarded onto the ground surface away from surface water bodies in areas where infiltration can occur. • Contaminated materials must be segregated into liquids or solids and containerized separately for offsite disposal.

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
<p>Internal Haley & Aldrich site personnel will communicate with other Haley & Aldrich staff member and/or subcontractors or contractors with:</p> <p>Face to Face Communication</p>
<p>External H&S site personnel will use the following means to communicate with off-site personnel or emergency services.</p> <p>Cellular Phones</p>
Visitors
<p>Project Site Will visitors be required to check-in prior to accessing the project site?</p> <p>Check with field staff on-site</p>
<p>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.</p> <p>Field Lead is responsible for facilitating authorized visitor access.</p>
Zoning
<p style="text-align: center;">Work Zone</p> <p>The work zone will be clearly delineated to ensure that the general public or unauthorized worker access is prevented. The following will be used:</p> <p>Cones</p>

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 and 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	Enter text	1 person	With field personnel
Emergency PPE	Specific Type	Quantity Stocked	Location Stored
Gloves - "Enter Type"	Nitrile	1 box	With field personnel

EVACUATION ALARM
Will be communicated during the Onsite Kickoff Meeting
EVACUATION ROUTES
Will be given a map after site specific training
EVACUATION MUSTER POINT(S)/ SHELTER AREA(S)
Will be given a locations 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 <i>Muster Point</i>
Fire – Large/Explosion	Notify SSO and contact 911	Evacuate immediately	Mobilize to <i>Muster Point</i>
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 <i>Shelter Location</i>
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 <i>Shelter Location</i>
<u>MUSTER POINT</u> Northeast corner of Lake Street and Ave S		<u>SHELTER LOCATION</u> 1675 E. 3 rd Street, Brooklyn, NY	
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.			

**ATTACHMENT A
HASP AMENDMENT FORM**

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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
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Health & Safety Approver Name (Print)	Health & Safety Approver Signature	Date
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**ATTACHMENT B
TRAINING REQUIREMENTS**

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TRAINING REQUIREMENTS
<p>Health and Safety Training Requirements</p>
<p>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.</p> <p>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.</p>
<p>40-Hour Health and Safety Training</p>
<p>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.</p>
<p>8-hour Annual Refresher Training</p>
<p>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.</p>
<p>8-Hour Supervisor Training</p>
<p>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.</p>
<p>Additional Training for Specific Projects</p>
<p>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:</p> <ul style="list-style-type: none"> • 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

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SITE ROLES AND RESPONSIBILITIES
Haley & Aldrich Personnel
Field Safety Manager (FSM)
<p>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.</p> <p>Specific duties of the FSM include:</p> <ul style="list-style-type: none"> • 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)
<p>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:</p> <ul style="list-style-type: none"> • 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)
<p>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:</p> <ul style="list-style-type: none"> • 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

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Safety
in everything we do

2074-2080 MCDONALD AVE

KEY TASK All Tasks as Below:

Subtask Category	Potential Hazards	Controls
Site Walk/GPR Survey	Slips, Trips, and Falls	<ul style="list-style-type: none"> • 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 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 – remove hazards as appropriate
GPR Survey	Vehicle traffic/safety	<ul style="list-style-type: none"> • Watch out for vehicular traffic in and around work area • Access work area along routes that are the least busy • Place safety cones and continually monitor ingress and egress of vehicles onto site • Use verbal and hand signals to alert personnel of approaching vehicles
Drilling	Work site access and controls	<ul style="list-style-type: none"> • Observe all work site access and controls before entering work area • Use only routes that are designated for personnel • Do not change or alter established work site access or controls • Place safety cones around the drilling location

Drilling	Utility locators and underground hazards	<ul style="list-style-type: none"> Observe work from a distance in case of utility strike Immediately evacuate work area in the event of a utility strike
Drilling	Heavy equipment	<ul style="list-style-type: none"> Personal protective equipment, licensed excavator/machine operators Maintain a safe distance from moving equipment and observe equipment swing radii
Drilling	Noise reduction	<ul style="list-style-type: none"> Personal protective equipment, ear plugs or ear muffs
Drilling	Cold stress	<ul style="list-style-type: none"> Take breaks indoors, hand warmers
Drilling	Heat Stress	<ul style="list-style-type: none"> Take breaks indoors, hydrate Limit physical exertion
Drilling	Weather-related hazards	<ul style="list-style-type: none"> Avoid slippery surfaces as a result of weather Seek shelter in the event of a lightning storm and stay clear of potential lightning receptors
Drilling	Vehicle traffic/safety	<ul style="list-style-type: none"> Same as above
Drilling	Slips, trips, and falls	<ul style="list-style-type: none"> Same as above
Soil, Soil Vapor, and Groundwater Sampling	Slips, trips, and falls	<ul style="list-style-type: none"> Same as above
Soil, Soil Vapor, and Groundwater Sampling	Vehicle traffic/safety	<ul style="list-style-type: none"> Same as above
Soil, Soil Vapor, and Groundwater Sampling	Weather-related hazards	<ul style="list-style-type: none"> Same as above
Soil, Soil Vapor, and Groundwater Sampling	Cold stress	<ul style="list-style-type: none"> Same as above
Soil, Soil Vapor, and Groundwater Sampling	Heat stress	<ul style="list-style-type: none"> Same as above
Soil, Soil Vapor, and Groundwater Sampling	Lifting	<ul style="list-style-type: none"> Same as above
Soil, Soil Vapor, and Groundwater Sampling	Tool/Equipment Use	<ul style="list-style-type: none"> Inspect any tools or equipment before you use them Ensure that any cords or plugs are not frayed or damaged

		<ul style="list-style-type: none">• Only use tools/equipment for the purpose they are meant to be used – tools/equipment are not toys to be played with• Think of the steps in which you will use the tools/equipment before using them• Handle all tools/equipment in a safe manner• If unsure how to use a tool/equipment, be sure to receive proper training or instruction prior to using them• Use tools/equipment at a safe pace• Do not force tools/equipment to work
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**ATTACHMENT E
PROJECT SITE FORMS**

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Health & Safety Tailgate Meeting Form

Project:	Project No.:
Location:	Project Manager:
Subcontractor(s):	Date:
Site Safety & Health Officer (SSHO):	SSHO Contact Info:

Emergency Procedures

If an emergency occurs, follow procedure outlined in the HASP and contact numbers below. If non-life-threatening injury occurs, contact PM to report the incident. Seek first-aid treatment from the Occupational Health Center, as outlined in the HASP.

Emergency Dispatch phone number if other than 911:	
Local Hospital:	Local Hospital Phone #:
Evacuation/Muster Point:	Alt Evacuation/Muster Point:

Simultaneous Operations (SIMOPS)

SIMOPS or Multi-Crew Activity	<input type="checkbox"/> Yes	<input type="checkbox"/> No	If yes, describe SIMOPS:
Has SIMOPS been communicated to all workforce?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
SIMOPS PIC:			Phone Number:

Task Identification

Task	Responsible Company	Task Supervisor

Required Permits/Forms *(check all that apply)*

<input type="checkbox"/> None	<input type="checkbox"/> Lifting Plan	<input type="checkbox"/> Other:
<input type="checkbox"/> Confined Space Entry Permit	<input type="checkbox"/> Hot Work Permit	<input type="checkbox"/> Other:
<input type="checkbox"/> Lock-out / Tag-out (LOTO)	<input type="checkbox"/> Ground Disturbance Permit	<input type="checkbox"/> Other:
<input type="checkbox"/> Excavation Permit	<input type="checkbox"/> Other:	<input type="checkbox"/> Other:

Discussion of Work Hazards *(check all that apply)*

<input type="checkbox"/> Chemical <input type="checkbox"/> Confined space <input type="checkbox"/> Congested work area <input type="checkbox"/> Elevated work <input type="checkbox"/> Ergonomics <input type="checkbox"/> Emergency egress	<input type="checkbox"/> Hazardous materials (lead, asbestos, etc.) <input type="checkbox"/> Hoisting and rigging <input type="checkbox"/> Hot work <input type="checkbox"/> Material handling <input type="checkbox"/> Noise pollution <input type="checkbox"/> Oxygen deficiency	<input type="checkbox"/> Radiological <input type="checkbox"/> Stored energy LOTO <input type="checkbox"/> Traffic control <input type="checkbox"/> Weather and/or temp extremes <input type="checkbox"/> Waste generation <input type="checkbox"/> Other:
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Required PPE *(check all that apply)*

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Hearing Protection	Safety Eyewear	Hard Hat	Safety Toed Shoes	Leather or Palm Protective	Safety Vest	Protective Clothing	Respiratory Protection	PFD	Face Shield	Fall Protection

Tailgate Topic / Hazard Discussion

Item	Discussion

Management of Change (MoC)

Does the work activity require a MoC? If yes, has it been authorized by applicable management? No Yes

Has the safety information been updated to incorporate any change in product, equipment, material or process? This information should include how to investigate accidents, audit compliance with safety procedures, and plan for emergency responses.
No Yes

Have the procedures for a MoC been reviewed and evaluated? No Yes

Have all affected staff been informed and trained on the new equipment, process, or other changes? Health and safety hazards must be emphasized including processes/procedures in an emergency. The training must occur before any staff is allowed to operate the equipment or perform the job relating to the changes. No Yes

Have written procedures been put into place for the next time there is a change in safety management? No Yes

<p>Best Practice(s) Observed? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, describe:</p>	<p>H&S Observations/ Near Misses/ Incidents Reported? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, describe:</p>
<p>Safe Work Interventions? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, describe:</p>	<p>Have additional hazards and risk controls been identified for future work? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, update appropriate job hazard analysis (JHA).</p>

Site Safety & Health Officer Acknowledgement

At the conclusion of the day, I certify that the work site has been inspected and is being left in a safe and clean condition and any incidents have been properly reported.

Signature

Date

PROJECT INFORMATION

Site Name:		Project Manager:	
Location:		Client Leader/LSRP:	
Client Name:		Scope of Work:	
Project Number:		Date of SSC Event:	

PROJECT BASICS (Completed prior to the start of field activities)

Site Contact Person Identified? Circle one: Yes No			
Contact Person/Company Name/Phone Number:			
Subcontractor & On-Site Representatives:			
Have the subsurface activities been explained to the subcontractor? Circle one: Yes No			
Public utility mark-out completed? Circle one: Yes No			
Public Mark-out/called in by Company/Representative:			Date:
Ticket Number:		Utilities Notified and Response received:	

PRE-CLEARANCE (Completed prior to breaking ground or determining final locations)

Private Utility Mark-out completed? Circle one: Yes No				Date:			
Work area and each intrusive location scanned for all utilities? Circle one: Yes No							
Private Mark-out completed by Subcontractor & Representative:							
Depth of accuracy (feet):		Limitations:					
Type of equipment used:							
Utility Identified & Marked-out	Depth (ft)	Yes	No	Utility Identified & Marked-out	Depth (ft)	Yes	No
Electricity (Red)				Sewer (Green)			
Gas (Yellow)				Telephone Data (Orange)			
Water (Blue)				Fuel/Oil			
Reclaimed H ₂ O/Irrigation (Purple)				Proposed excavation (white)			

SCOPE OF WORK

Scope of Work provided to subcontractors? Circle one: Yes No					
Number of intrusive locations:		Targeted depth (feet):		Diameter of Borehole (inches):	
Proposed intrusive locations within 10 feet of marked and/or known utility? Circle one: Yes No					
Final locations confirmed at least 10 feet away from all utilities? Circle one: Yes No					

FIELD OBSERVATIONS

Other Utilities & Visual Clues Observed	Yes	No	Other Utilities & Visual Clues Observed	Yes	No
Natural gas meters			Fire suppression		
Water meters			Fire hydrants		
Cable markers			Fire sprinkler lines		
Sewer drains/cleanouts			Sprinkler/irrigation systems		
Overhead lines (give 15' x 15' of clearance)			Utility poles with conduit leading to the ground		
Pipeline and pipeline markers			Utility boxes		
Underground storage tank (UST)			Manholes		
UST fill ports and vent pipes			Pavement scarring		
Lights			Remote buildings with no visible utilities		
Signage			Other (specify):		
Steam lines			Other (specify):		

Any mitigations taken if points cannot be obtained or site type was not listed: _____

Mitigations taken by whom: _____

Utility Point System: Gain points to protect against utility strike

Site Description	Minimum Points Needed
Combination of 2 or more Site Types	5
Commercial/Office Park	5
Downtown/Urban Development	5
Manufacturing/Active	5
Manufacturing/Non-Active	5
Mine	5
Rail	5
Residential	5
Roadway (right-of-way, highway, and secondary routes)	5
Roadway (right-of-way, rural route)	5
Universities/Government Campus/Airports	5
Abandoned/Non-Active/Vacant	3
Remote (field, woods, undisturbed)	2
Work over water	2
Site Type Not Listed Above	Consult with the PM, Utility Specialist, and Project Team
Cannot Gain Minimum Points	Perform hand clearing/soft dig/vacuum excavation

1 Point Value (2 Maximum from this Category)

Facility/contact supplied information (GIS figure with photo overlay; extensive client records and drawings)
The utilities have been marked using GPS or surveyed (with minimum accuracy of 0.1 foot)
A review of the work scope with a knowledgeable site contact (client contact, site manager, maintenance manager or other site personnel) about the site's history and utility locations/conditions (with a utility site drawing). A knowledgeable site contact is someone who has regular responsibilities for managing site infrastructure, construction activities, and/or retaining site drawings/figures.
A visual inspection of the site to verify that the utilities match the drawings and figures (completed after the State One Call Subsurface Clearance Checklist)
Confirmation of the low density of subsurface utilities (based on site maps, previous private utility locates)
Shallow boring advancement (<2 feet below ground surface (bgs) with non-mechanical drilling techniques)

2 Point Values

As-built drawings (plot plans, as-builts, pipeline or facilities maps, and/or lease drawings), reviewed and verified by client for updated changes
Confirmation that utilities cut off at street and align with drawings and figures
Drawing/figure (measured to scale, shows site utilities as visually verified during site walk); includes any new or repaired lines that match site (e.g., pavement scarring); depth and diameter of utilities; and recent (includes any new construction activity)
Survey data and figures produced by Haley & Aldrich and/or Haley & Aldrich site utility experience with additional site inspection
Site drawing and figures from prior private utility locate created by Haley & Aldrich (drawing must include GPS coordinates and utilities are to scale)
GPR/EM Cable location by private utility locate directly above proposed ground disturbance/borehole location

3 Point Values

Hand Clearing/Soft Dig/Vacuum Excavation to 5 feet bgs using the following soft dig clearance methods listed from least invasive to most: <ul style="list-style-type: none"> • Probing • Hand Digging • Hand Auguring • Vacuum Extraction • Air/Water Knife with Vacuum Extraction

3 Point Values (Open Excavations Only)

Hand Clearing/Soft Dig/Vacuum Excavation using the following soft dig clearance methods to confirm location of known utilities prior to using mechanical excavation: <ul style="list-style-type: none"> • Probing • Hand Digging • Vacuum Extraction

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APPENDIX G
NYSDOH CAMP Guidance Document

Appendix 1A

New York State Department of Health Generic Community Air Monitoring Plan

Overview

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

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical-specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for VOCs and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate DEC/NYSDOH staff.

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. "Periodic" monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or

overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions, particularly if wind direction changes. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

1. If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

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

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

4. All 15-minute readings must be recorded and be available for State (DEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

Particulate Monitoring, Response Levels, and Actions

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

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed $150 \text{ mcg}/\text{m}^3$ above the upwind level and provided that no visible dust is migrating from the work area.

2. If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than $150 \text{ mcg}/\text{m}^3$ above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within $150 \text{ mcg}/\text{m}^3$ of the upwind level and in preventing visible dust migration.

3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

December 2009

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Appendix 1B

Fugitive Dust and Particulate Monitoring

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

1. Reasonable fugitive dust suppression techniques must be employed during all site activities which may generate fugitive dust.
2. Particulate monitoring must be employed during the handling of waste or contaminated soil or when activities on site may generate fugitive dust from exposed waste or contaminated soil. Remedial activities may also include the excavation, grading, or placement of clean fill. These control measures should not be considered necessary for these activities.
3. Particulate monitoring must be performed using real-time particulate monitors and shall monitor particulate matter less than ten microns (PM10) with the following minimum performance standards:
 - (a) Objects to be measured: Dust, mists or aerosols;
 - (b) Measurement Ranges: 0.001 to 400 mg/m³ (1 to 400,000 :ug/m³);
 - (c) Precision (2-sigma) at constant temperature: +/- 10 :g/m³ for one second averaging; and +/- 1.5 g/m³ for sixty second averaging;
 - (d) Accuracy: +/- 5% of reading +/- precision (Referred to gravimetric calibration with SAE fine test dust (mmd= 2 to 3 :m, g= 2.5, as aerosolized);
 - (e) Resolution: 0.1% of reading or 1g/m³, whichever is larger;
 - (f) Particle Size Range of Maximum Response: 0.1-10;
 - (g) Total Number of Data Points in Memory: 10,000;
 - (h) Logged Data: Each data point with average concentration, time/date and data point number
 - (i) Run Summary: overall average, maximum concentrations, time/date of maximum, total number of logged points, start time/date, total elapsed time (run duration), STEL concentration and time/date occurrence, averaging (logging) period, calibration factor, and tag number;
 - (j) Alarm Averaging Time (user selectable): real-time (1-60 seconds) or STEL (15 minutes), alarms required;
 - (k) Operating Time: 48 hours (fully charged NiCd battery); continuously with charger;
 - (l) Operating Temperature: -10 to 50° C (14 to 122° F);
 - (m) Particulate levels will be monitored upwind and immediately downwind at the working site and integrated over a period not to exceed 15 minutes.
4. In order to ensure the validity of the fugitive dust measurements performed, there must be appropriate Quality Assurance/Quality Control (QA/QC). It is the responsibility of the remedial party to adequately supplement QA/QC Plans to include the following critical features: periodic instrument calibration, operator training, daily instrument performance (span) checks, and a record keeping plan.
5. The action level will be established at 150 ug/m³ (15 minutes average). While conservative,

this short-term interval will provide a real-time assessment of on-site air quality to assure both health and safety. If particulate levels are detected in excess of 150 ug/m³, the upwind background level must be confirmed immediately. If the working site particulate measurement is greater than 100 ug/m³ above the background level, additional dust suppression techniques must be implemented to reduce the generation of fugitive dust and corrective action taken to protect site personnel and reduce the potential for contaminant migration. Corrective measures may include increasing the level of personal protection for on-site personnel and implementing additional dust suppression techniques (see paragraph 7). Should the action level of 150 ug/m³ continue to be exceeded work must stop and DER must be notified as provided in the site design or remedial work plan. The notification shall include a description of the control measures implemented to prevent further exceedances.

6. It must be recognized that the generation of dust from waste or contaminated soil that migrates off-site, has the potential for transporting contaminants off-site. There may be situations when dust is being generated and leaving the site and the monitoring equipment does not measure PM₁₀ at or above the action level. Since this situation has the potential to allow for the migration of contaminants off-site, it is unacceptable. While it is not practical to quantify total suspended particulates on a real-time basis, it is appropriate to rely on visual observation. If dust is observed leaving the working site, additional dust suppression techniques must be employed. Activities that have a high dusting potential--such as solidification and treatment involving materials like kiln dust and lime--will require the need for special measures to be considered.

7. The following techniques have been shown to be effective for the controlling of the generation and migration of dust during construction activities:

- (a) Applying water on haul roads;
- (b) Wetting equipment and excavation faces;
- (c) Spraying water on buckets during excavation and dumping;
- (d) Hauling materials in properly tarped or watertight containers;
- (e) Restricting vehicle speeds to 10 mph;
- (f) Covering excavated areas and material after excavation activity ceases; and
- (g) Reducing the excavation size and/or number of excavations.

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

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