

**250 WATER STREET
NEW YORK, NY 10038**

Subsurface Investigation Work Plan

NYSDEC BCP Number: C231127

Prepared for:

250 Water Street Owner LLC
19 West 24th Street, 12th Floor
New York, NY 10010

Prepared by:

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Submitted to:

New York State Department of Environmental Conservation
Division of Environmental Remediation
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APRIL 2026



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Subsurface Investigation Work Plan
250 Water Street, New York, NY (NYS BCP Site No. C231127)
April 2026

I, Greg Mendez-Chicas, certify that I am currently a Qualified Environmental Professional as defined in 6 NYCRR Part 375 and that this Subsurface Investigation Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

A handwritten signature in black ink, appearing to read "Greg Mendez-Chicas". The signature is fluid and cursive, with a long horizontal stroke at the end.

Greg Mendez-Chicas, CHMM #35031
Vice President

April 27, 2026

1. INTRODUCTION

Impact Environmental Engineering and Geology PLLC (IEEG) has prepared this Subsurface Investigation Work Plan for a limited pre-design subsurface geotechnical investigation to support future foundation design and constructability at 250 Water Street, New York, NY (the Site). The Site is currently in the New York State Brownfield Cleanup Program (BCP), Site No. C231127, which is administered by the New York State Department of Environmental Conservation (NYSDEC). 250 Seaport District, LLC (the Volunteer) entered into a Brownfield Cleanup Agreement (BCA), Index No. C231127-04-19, with the NYSDEC on August 1, 2019 to investigate and remediate the site.

The approximately 48,057-square-foot (1.1 acre) site is identified as Block 98, Lot 1 on the Borough of Manhattan tax map and occupies the entire city block bound by Pearl Street to the northwest (project north), Peck Slip to the northeast (project east), Water Street to the southeast (project south), and Beekman Street to the southwest (project west).

Past operations at this site include a factory, oil company, printer, metal works, chemical and glue company, trucking company, thermometer company workshop and factory at multiple locations. The Remedial Investigation (RI) identified historic fill material and impacts associated with the site's former use as a thermometer factory. Several metals, including lead and mercury, were detected across the site in the subsurface soil. The mercury contamination was generally located in the immediate vicinity of the former thermometer factory workshops. Several petroleum-related volatile organic compounds (VOCs), including benzene, toluene, ethylbenzene, and xylenes (BTEX) were detected in subsurface soil and groundwater near the location of the former underground storage tanks. Petroleum-related VOCs were reported in soil vapor and are related to the BTEX contamination found onsite. Chlorinated VOCs (CVOCs) including tetrachloroethene (PCE) and trichloroethene (TCE) were reported in the soil vapor samples but do not appear to be related to past site activities.

The remedy undertaken at the Site was implemented in accordance with the NYSDEC-approved November 9, 2021 Remedial Action Work Plan (RAWP) by Langan Engineering, Environmental, Surveying, Landscape Architecture and Geology, D.P.C. (Langan), on behalf of the Volunteer. The following activities were completed in order to achieve the 2,886,000 Gallons Objectives (RAOs) outlined in the November 15, 2021 Decision Document:

- A total of 3,064.96 tons of NYSDEC-approved virgin crushed stone and/or clean bluestone was imported in order to construct truck pads, stabilize construction, and construct the site cover system post-remedy.
- A total of 39,667.81 tons of contaminated soil/fill was disposed of off-site. Excavation and removal of soil/fill in the following areas:

- Excavation of soil/fill to approximately 16 feet bgs (el -1.5 feet NAVD88) for removal and off-site disposal of approximately 9,475.77 tons of mercury-impacted soil/fill in the RAWP-defined mercury hotspot.
- Excavation of soil/fill to approximately 16 to 19 feet bgs (el -8.0 feet NAVD88) for removal and off-site disposal of approximately 7,420.22 tons of the petroleum-impacted soil/fill in the RAWP-defined petroleum hotspot.
- Excavation across the site to approximately 11 to 16 feet bgs (ranging from approximately el -6 to el -3 feet NAVD88) for removal and off-site disposal of approximately 22,771.82 tons of contaminated soil/fill (including approximately 4,172.52 tons of hazardous lead-impacted soil/fill) for the achievement of Track 2 RURR SCOs.
- Decommissioning, removal, and closure of nine (9) 550-gallon USTs and one (1) 1,080-gallon UST.
- Collection and analysis of 54 confirmation endpoint soil samples from the base of the excavation to document post-remediation soil quality.
- Import and placement of approximately 12,308.05 tons of NYSDEC-approved fill meeting the lower of the NYSDEC Part 375 RURR and/or PGW SCPs to backfill over-excavated areas of the site to depths above the groundwater table.

A cover system has been installed consisting of geotextile fabric atop the Track 2-compliant soil followed by an approximately 6-inch-thick layer of imported ¾-inch virgin stone. Remaining contamination is present in soil at locations where confirmation endpoint soil samples exceeded the Track 2 RURR and/or PGW SCOs, but were excavated to the minimum depth required by the Track 2 remediation (15 feet bgs).

1.1 Objectives

A subsurface geotechnical investigation will be conducted at the Site to evaluate subsurface soil, groundwater, and bedrock conditions in support of anticipated site redevelopment and/or engineering design considerations. The investigation will be performed in general accordance with applicable guidance provided by the New York State Department of Environmental Conservation and in compliance with the requirements of the approved Site Management Plan (SMP) dated December 28, 2023.

2. PROPOSED SCOPE OF WORK

The geotechnical contractor, Ancora Engineering PLLC, will install two (2) geotechnical borings (AB-1 and AB-2) to 100-foot bgs in order to characterize the stratigraphy below the site for future pile installation and foundation design purposes. The locations of these borings are presented in **Figure 2**. These borings will be advanced via mud-rotary methods and a 3-3/4" tricone rotary bit. Casings utilized during drilling will be 4-inch, however 6-inch may be used if the boreholes become unstable. The borings will be advanced past 100-feet if evidence of class 1C or better bedrock is encountered. One (1) CME 45 truck mounted rig will be utilized for all drilling activities as part of this investigation. Soil samples will be collected using a 24-inch barrel split spoon for the first 15-feet to 20-feet. Samples will be collected at five-foot intervals thereafter for the remainder of each borehole. If rock is encountered, coring will be performed with 5-foot NX/2" core barrels, with continuous sampling over 10-feet. Generated soil cuttings will be stored in 55-gallon steel drums prior to backfilling.

After completion of borings AB-1 and AB-2, both boreholes will be converted to observation wells. The depth of the two (2) observation wells are to be determined based on the information ascertained from the borings. Each well screen will be a total length of 20 feet, which will be surrounded by filter sand pack material. A bentonite plug will be placed above the sand pack and clean backfill material will be placed along the length of the riser to the surface.

Casings will be extracted after the investigation is completed and while backfilling is being performed. Each of the boreholes will be backfilled utilizing a slurry of soil cuttings generated from the borings and grout. Each borehole will be completely backfilled to grade surface.

2.1 Environmental Controls

Dust, odor, and nuisance control will be accomplished by the contractor as described in this section. Field personnel will monitor all ground-intrusive activities and implement any corrective measures when applicable.

2.1.1 Odor Control

The emission of nuisance odors will be controlled at all times during subsurface investigation activities. If nuisance odors are identified, work will be halted, and the source of the odors will be identified and abated. Work will resume once odors have been adequately controlled. The NYSDEC and NYSDOH will be notified of all nuisance odor events and all other public complaints about the subject property.

All necessary means will be employed to prevent on- and off-site nuisances. At a minimum, procedures may include: (a) limiting the area of open excavations; (b) shrouding open excavations with tarps and other covers; and (c) using foams to cover exposed odorous soils. If odors develop and cannot be otherwise controlled, additional means to

eliminate odor nuisances will include: (a) direct load-out of soil to trucks for off-site disposal as feasible; (b) use of chemical odorants in spray or misting systems; and (c) use of staff to monitor odors in surrounding neighborhoods.

2.1.2 Dust Control

Particulate monitoring will be conducted in accordance with the Community Air Monitoring Plan (CAMP). If particulate levels at the site exceed the thresholds listed in the CAMP or if airborne dust is observed on the site or leaving the site, the dust suppression techniques listed below will be employed. The remedial party will also take measures listed below to prevent dust production at the site.

- Dust suppression will be achieved through the use of a dedicated on-site water source for road wetting. The water source will either be equipped with a water cannon, as required, or will be capable of spraying water directly onto off-road areas throughout the site.
- Gravel or other approved stone material will be used on roadways to provide a clean and dust-free road surface.
- On-site roads will be limited in total area to minimize the area required for water spraying.

2.2 Reporting, Oversight, and Monitoring

The Remedial Engineer responsible for certifying all reports will be an individual licensed to practice engineering in the State of New York; Brad Summerville, P.E. of IEEG, will have this responsibility. Should Mr. Summerville be unable to fulfill this responsibility, another suitably qualified New York State PE will certify in his place. Field personnel from IEEG will be on-site to monitor all ground intrusive activities activities. Daily reports will be generated following each day of oversight.

2.2.1 Daily Reporting

Daily reports will be submitted to NYSDEC and NYSDOH Project Managers for each day following the reporting period and will include:

- An update of progress made during the reporting day
- Locations of work and quantities of material imported and exported from the Site
- References to alpha-numeric map for Site activities
- A summary of any and all complaints with relevant details (names, phone numbers, etc.)
- A summary of CAMP findings, including corrective actions for instances where action levels were exceeded
- An explanation of notable Site conditions
- A description of anticipated Site activities
- The NYSDEC-assigned project number will appear on all reports

Daily reports are not intended to be the mode of communication for notification to the NYSDEC of emergencies (accident, spill) or other time-critical information. However, such conditions must also be included in the daily reports. Emergency conditions will be addressed directly to NYSDEC Project Manager via personal communications.

Daily reports will include a description of daily activities keyed to an alpha-numeric map for the Site that identifies work areas. These reports will include a summary of CAMP results, odor and dust excursions and corrective actions, and all complaints received from the public.

2.2.2 Soil Screening

Visual and olfactory soil screening will be conducted by field personnel under the direction of the RE during all activities, specifically during drilling and soil sampling associated with geotechnical borings. Soil screening will be performed continuously throughout intrusive activities to evaluate the presence of potential contamination and to inform handling procedures.

Residual contamination may be present in subsurface soils at locations where prior confirmation sampling identified exceedances of applicable Track 2 Restricted Use Residential (RURR) and/or Protection of Groundwater (PGW) Soil Cleanup Objectives (SCOs) although such areas were previously excavated to the minimum remedial depth (15 feet below grade surface).

2.2.3 Community Air Monitoring Program

Community air monitoring will be conducted in compliance with the New York State Department of Health (NYSDOH) Generic Community Air Monitoring Program (CAMP). The CAMP includes real-time monitoring for VOCs and particulates at the downwind perimeter of each designated work area when ground intrusive activities are in progress. Continuous monitoring is required for all ground-intrusive activities and during demolition of contaminated or potential contaminated structures.

The CAMP will include a minimum of four (4) CAMP stations positioned at each boundary of the Site perimeter. CAMP monitoring for VOC levels will be conducted with photoionization detectors (PIDs) calibrated to isobutylene, and monitoring for dust/particulates will be conducted with particulate sensors equipped with filters capable of detecting particulate matter less than 10 microns in diameter (PM10). The work zone is defined as the general area in which machinery is operating in support of remedial or redevelopment activities.

The following actions will be taken based on VOC levels measured:

- If total VOC levels exceed 5 parts per million (PPM) above background for the 15-minute average at the perimeter, work activities will be temporarily halted and monitoring continued. If levels readily decrease

(per instantaneous readings) below 5 ppm above background, work activities will resume with continued monitoring.

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

The following actions will be taken based on visual dust observations:

- If the downwind particulate level is 100 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work zone, then dust suppression must be employed. Work may continue with dust suppression techniques provided that downwind PM10 levels do not exceed $150 \mu\text{g}/\text{m}^3$ above the background level and provided that no visible dust is migrating from the work zone.
- If, after implementation of dust suppression techniques, downwind PM10 levels are greater than $150 \mu\text{g}/\text{m}^3$ above the background 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 PM10 concentration to within $150 \mu\text{g}/\text{m}^3$ of the upwind level and in preventing visible dust migration.

Exceedances observed in the CAMP will be reported to the NYSDEC and NYSDOH Project Managers and included in the daily report. In addition, a map showing the location of the downwind and upwind CAMP stations will be included in the daily report. A generic guidance for CAMP implementation is included in **Appendix A**.

2.3 Health and Safety

Health and safety procedures that will be employed during the Subsurface Investigation are presented in the approved-HASP, prepared by others during remediation, included in **Appendix B**.

2.4 Investigative Derived Waste

All drill cuttings and associated drilling fluids generated during mud-rotary drilling activities will be managed as investigation-derived waste (IDW). Drill cuttings exhibiting no visual, olfactory, or PID evidence of contamination may be reused for borehole abandonment, as appropriate, in combination with grout to form a slurry backfill; however, any excess materials will be containerized for off-site disposal.

All soil cuttings, excess drilling fluids, and groundwater generated during drilling, decontamination, and well development/purging activities will be collected and containerized in 55-gallon Department of Transportation (DOT)-approved drums. Liquid wastes will be stored in DOT-approved closed-top drums.

All containers will be properly labeled, sealed, and staged in a secure, designated area on-site pending waste characterization, if required. IDW will be transported off-site by a licensed waste hauler and disposed of at an appropriately permitted facility in accordance with applicable regulations, including 6 NYCRR Part 360.

3. PROJECT SCHEDULE

Field work will be initiated after a one (1) to two (2) week period following the approval of the Subsurface Investigation Work Plan by the NYSDEC. The NYSDEC case manager will be notified a minimum of 15 days in advance prior to start of work.

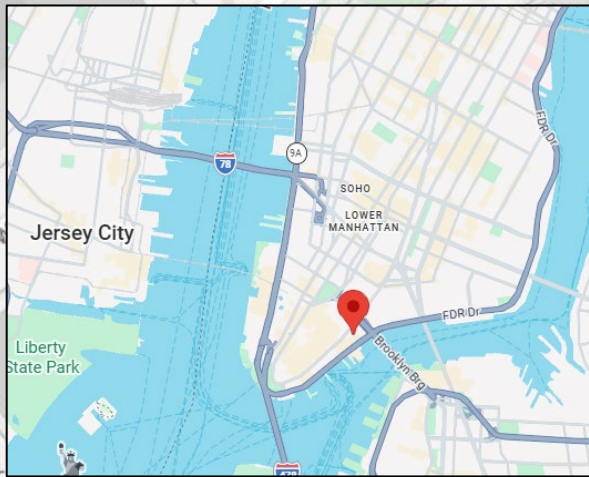
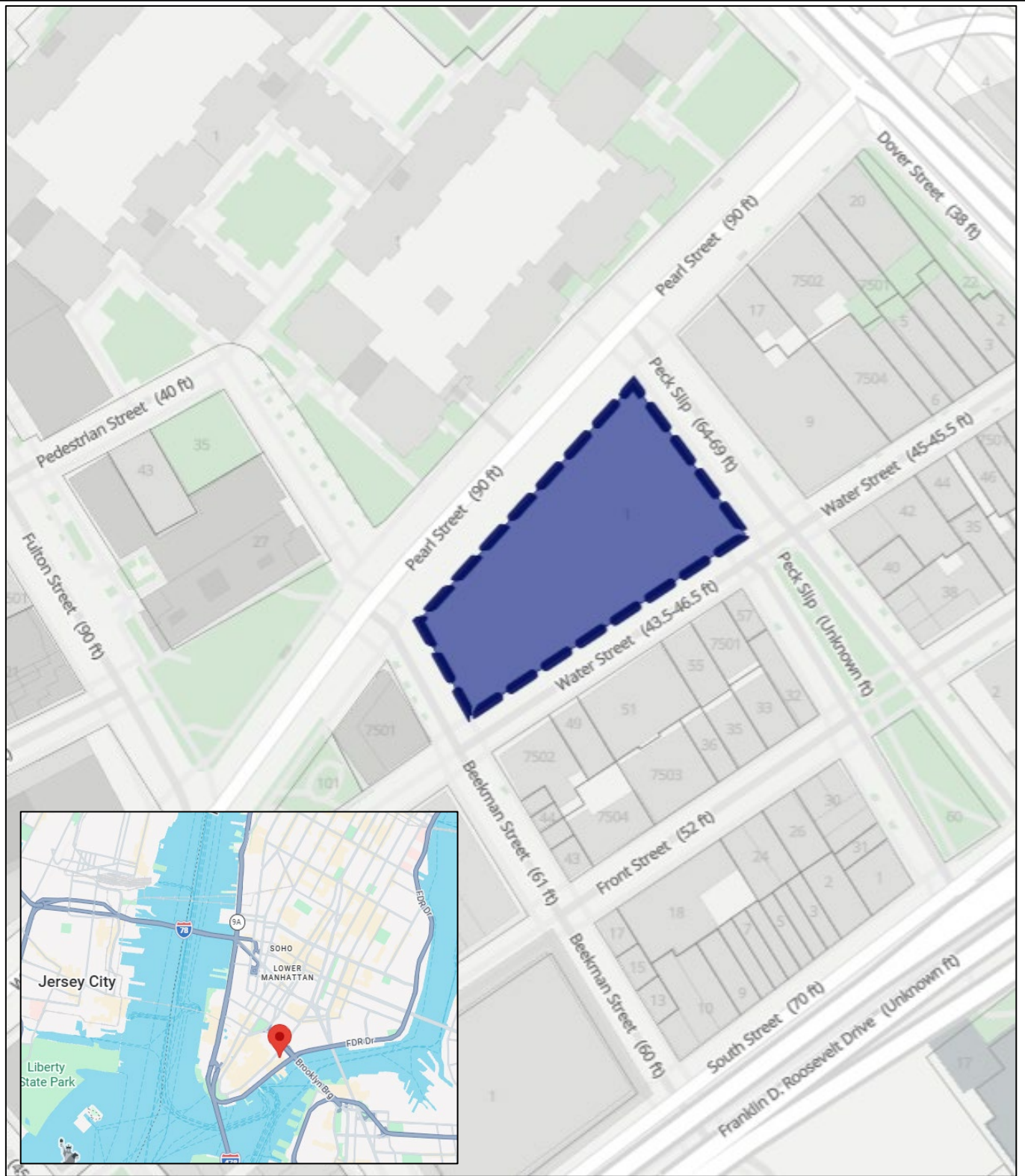
FIGURES

250 Water Street, New York, New York

Subsurface Investigation Work Plan



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250 Water Street, Manhattan,
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Site Location Map

Figure 1

Notes



Not to scale

Project #:	12774
Drawn By:	GMC
Checked By:	
Date:	03/30/22
Revisions	

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APPENDICES

250 Water Street, New York, New York

Subsurface Investigation Work Plan



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Appendix A

250 Water Street, New York, New York

Health and Safety Plan



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SITE MANAGEMENT PLAN HEALTH AND SAFETY PLAN

FOR

**250 WATER STREET
NEW YORK, NEW YORK
NYC Tax Block 98, Lot 1
NYSDEC BCP Site No. C231127**

Prepared For

**The Howard Hughes Corporation
199 Water Street, 28th Floor
New York, New York**

Prepared By:

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LANGAN

**July 2023
Langan Project No. 170381202**

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* Items to be posted prominently on-site or made readily available to personnel.

1.0 INTRODUCTION

1.1 General

This Site Management Plan (SMP) Health and Safety Plan (HASP) was developed to address disturbance of known and reasonably anticipated subsurface contaminants and comply with Occupational Safety and Health Administration (OSHA) Standard 29 Code of Federal Regulation (CFR) 1910.120(b)(4), Hazardous Waste Operations and Emergency Response for the property 250 Water Street adjacent to the South Street Seaport Historic District in New York, New York (the "Site"). The Site is identified on the Manhattan Borough Tax Map as Block 98, Lot 1.

This HASP provides the minimum requirements for implementing site operations during future remedial measure activities. All contractors performing work on this site must implement their own HASP that, at a minimum, adheres to this HASP. The contractor is responsible for their own health and safety and that of their subcontractors. Langan personnel will implement this HASP while onsite.

The content of this HASP may change or undergo revision based upon additional information made available to health and safety personnel, monitoring results, or changes in the work plan.

1.2 Site Location and Background

The 47,900-square-foot (\pm 1.09-acre) site is located at 250 Water Street adjacent to the South Street Seaport Historic District in New York, New York, and is identified as Block 98, Lot 1 on the New York City tax map. The site is occupying the entire city block bordered by Pearl Street to the north, Peck Slip to the east, Water Street to the south, and Beekman Street to the west. The site is currently vacant but was most recently used as an open-air commercial parking lot with a parking attendant kiosk and temporary storage shed near the center of the lot. The parking lot had a 400-vehicle capacity. The perimeter of the site is fenced with one automated barrier gates on Pearl Street. A site location map is provided as Figure 1.

Historical site uses include a factory, an oil company, a printer, a metal works, a chemicals and glue company, a chemical company, a trucking company, a thermometer company, a garage with two 550-gallon underground storage tanks (USTs), a machine shop, and a gasoline service station.

1.3 Summary of Work Tasks

1.3.1 Groundwater Sampling

Langan will sample groundwater from selected monitoring wells to evaluate groundwater quality. Groundwater samples will be collected from one or more of the existing monitoring well; however, if necessary, Langan may advance and complete new monitoring wells to replace or augment the existing monitoring wells.

Langan will sample monitoring wells in accordance with the Langan Low Flow Groundwater Sampling Standard Operating Procedure (SOP). Groundwater samples will be submitted to a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP)-certified laboratory and analyzed in accordance with work plan specifications.

If required by the work plan to install new monitoring wells, Langan will retain a drilling contractor to complete the wells in borings the contractor will advance to depth below grade surface (bgs) specified in the work plan. Borings will be installed at the approximate locations indicated in Langan's work plan but may be moved in the field based on utility clearance and accessibility. The drilling contractor will contact the appropriate utility mark-out authority and make available to their drilling staff the verification number and effective dates. Langan will record the verification number and effective dates from the drillers. Langan will also note the location of marked out utilities on the site plan and scan the data into the project folder.

While the contractor is advancing the soil borings, Langan personnel will screen soil for visual, olfactory, and instrumental indicators suggestive of a potential petroleum release. Instrument screening for the presence of volatile organic compounds (VOCs) may be performed with a duly field-calibrated photoionization detector (PID) (or equivalent). Langan personnel will collect soil samples from the proposed soil boring locations following the sampling plan outlined in the work plan.

Soil samples may be submitted to a NYSDOH ELAP-certified laboratory and analyzed in accordance with work plan specifications.

1.3.2 Groundwater/Product Gauging

Langan may gauge one or more of the observation/monitoring wells to collect synoptic head data or determine the presence of product. When gauging, Langan may also survey head space VOCs within the well using a duly calibrated PID. When collected, gauging data will be based on the northernmost point at top of casing (TOC) using an interface probe (IP) capable of

determining the presence of free product in the monitoring well as light non-aqueous phase liquid (LNAPL) at the top of the water column. If gauging for dense non-aqueous phase liquid (DNAPL) at the base of the monitoring well, the IP may not be appropriate. The field engineer will coordinate with the project team to devise an alternative method to gauge the thickness of DNAPL at base of the well. Langan will decontaminate gauging equipment between wells as required by the work plan.

1.3.3 Product Bailing

Langan may remove free product from on-site monitoring wells as part of this HASP or subsequent SMP activities. Langan will may use a bailer, peristaltic pump or submersible as determined by the work plan. Langan will record the volume of product and groundwater recovered. Recovered product and groundwater will be drummed in accordance with procedures outlined in the work plan.

1.3.4 Excavation and Soil Screening

As part of a potential future excavation activity, Langan personnel may be on-site to document excavation and related activities. Pursuant to these activities, Langan will screen excavated soil material for visual, olfactory, and instrumental indicators suggestive of a potential chemical or petroleum release. Instrument screening for the presence of volatile organic compounds (VOCs) may be performed with a duly calibrated photoionization detector (PID). Contractors will excavate for utilities, foundation components and potential grading using heavy equipment and hand tools. Contractors will notify Langan personnel if they identify indications suggestive of a potential chemical or petroleum release. Contaminated material shall be handled, and property disposed in accordance with federal, state and city regulations, criteria and guidelines.

Soil samples from excavation (endpoint or delineation sampling (along with QA/QC samples) may be collected and subsequently submitted to a NYSDOH ELAP-certified laboratory and analyzed in accordance with work plan specifications.

1.3.5 Soil Sampling

As part of the excavation activities, soil samples (waste characterization, excavation endpoint, delineation, or quality assurance/quality control [QA/QC]) may be collected during construction, as required. Langan personnel will coordinate with the contractor in sampling soil (in accordance with the work plan, where applicable).

Soil samples excavation endpoint or delineation sampling (along with QA/QC samples) may be collected and subsequently submitted to a NYSDOH ELAP-certified laboratory and analyzed in

accordance with work plan specifications.

1.3.6 Stockpiling

Potentially impacted soil may be stockpiled pending laboratory analysis and determining proper off-site disposal. Visibly contaminated soil, if encountered, shall be segregated and stockpiled on at least 10 millimeters of plastic sheeting; reusable soil and fill shall be segregated and stockpiled separately from unusable fill, concrete and other debris; the stockpiles shall be kept covered with 6 millimeters thick plastic sheeting; the plastic sheeting covering the stockpiles shall be anchored firmly in place by weights, stakes, or both; the Contractor shall maintain the plastic sheeting.

1.3.7 Characterization of Excavated Material

When required by the work plan, Langan personnel will characterize excavated soil or clean backfill in accordance with Langan standards.

1.3.8 Observation/Monitoring Well Plugging and Abandonment

At an unspecified future date, the observation/monitoring wells will be abandoned. Plugging and abandonment will be in accordance with federal and state requirements. Langan may retain a drilling contractor to complete the plugging and abandonment activities. The contractor will contact the appropriate utility mark-out authority and make available to their field staff the verification number and effective dates. Langan may observe the plugging and abandonment of one or more observation/monitoring wells to document that the plugging and abandonment activities were completed in accordance with the work plan and regulations.

1.3.9 QA/QC Sampling

Samples for quality assurance/quality control [QA/QC] samples may also be collected and submitted to an approved laboratory and analyzed in accordance with work plan specifications. Information regarding the QA/QC samples including required method of analysis may be included in the same COC as the soil samples unless otherwise instructed by the work plan.

1.3.10 Equipment Decontamination

Before the start of the day's sampling and after sampling each run, sampling equipment will be decontaminated by the decontamination process outlined Attachment B - Decontamination Procedures. Decontamination wastes and purge water will be temporarily stored on site pending analytical results.

1.3.11 Management of Investigative-Derived Waste

The investigative-derived waste (IDW) generated during this investigation will be contained in DOT-approved 55-gallon drums. The drums will be temporarily stored on the site or as directed by the client representative. All drums will be filled between to two-thirds full to allow easy maneuvering during drum pickup and disposal. Drum labels are to be provided by Langan (Environmental Closet). All drums will be labeled as "IDW Pending Analysis" until sample data are reported from the laboratory. Drum labels will include date filled and locations where waste was generated along with the standard information required by the labels in accordance with the Langan SOP09, Drum Labeling.

Closed top drums are to be used to store liquids. Debris, including plastic sheeting, polyethylene tubing, personal protection equipment (PPE), decontamination debris, etc. will be segregated from and disposed in large heavy duty garbage bags and disposed of at the site. Excess unused glassware should be returned to the lab along with the last day of collection samples.

1.3.12 Drum Sampling

Langan personnel may collect drum samples, as required, prior to off-site drum disposal. Samples will be placed into laboratory-supplied batch-certified clean glassware and submitted to an approved laboratory and analyzed in accordance with work plan specifications, if required.

1.3.13 Surveying

Surveying activities may be completed by Langan. Surveying will be conducted by licensed surveyors.

2.0 IDENTIFICATION OF KEY PERSONNEL/HEALTH AND SAFETY PERSONNEL

The following briefly describes the health and safety (H&S) designations and general responsibilities that may be employed for this site. The titles have been established to accommodate the project needs and requirements and ensure the safe conduct of site activities. The H&S personnel requirements for a given work location are based on the proposed site activities.

2.1 Langan Project Manager

The Langan Environmental Project Manager (PM) is Michael Au, his responsibilities include:

- Ensuring that this HASP is developed, current, and approved prior to on-site activities.

- Ensuring that the tasks in the project are performed in a manner consistent with Langan's comprehensive *Health and Safety Program for Hazardous Waste Operations* and this HASP.

2.2 Langan Corporate Health and Safety Manager

The Langan Corporate Health and Safety Manager is Tony Moffa. His responsibilities include:

- Updating the *Construction Health and Safety Program for Hazardous Waste Operations*.
- Assisting the site Health and Safety Officer (HSO) with the development of the HASP, updating HASP as dictated by changing conditions, job site inspection results, etc., and approving changes to this HASP.
- Assisting the HSO in the implementation of this HASP and conducting Jobsite Safety Inspections and assisting with communication of results and correction of shortcomings found.
- Maintaining records on personnel (medical evaluation results, training and certifications, accident investigation results, etc.).

2.3 Langan Site Health & Safety Officer

The Langan site HSO is William Bohrer. His responsibilities include:

- Participating in the development and implementation of this HASP.
- When on-site, assisting the Langan Field Team Leader in conducting Tailgate Safety Meetings and Jobsite Safety Inspections and correcting any shortcomings in a timely manner.
- Ensuring that proper PPE is available, worn by employees, and properly stored and maintained.
- Controlling entry into and exit from the site contaminated areas or zones.
- Monitoring employees for signs of stress, such as heat stress, fatigue, and cold exposure.
- Monitoring site hazards and conditions.
- Knowing (and ensuring that all site personnel also know) emergency procedures, evacuation routes, and the telephone numbers of the ambulance, local hospital, poison control center, fire department, and police department.
- Resolving conflicts that may arise concerning safety requirements and working conditions.
- Reporting all incidents, injuries, and near misses to the Langan Incident/Injury Hotline immediately and the client representative.

2.4 Langan Field Team Leader Responsibilities

The Langan Field Team Leader (FTL) is to be determined prior to the start of field activities. The Field Team Leader's responsibilities include:

- The management of the day-to-day site activities and implementation of this HASP in the field.
- Participating in and/or conducting Tailgate Safety Meetings and Jobsite Safety Inspections and correcting any shortcomings in a timely manner.
- When a Community Air Monitoring Operating Program (CAMP) is part of the scope, the FTL will set up and maintain community air monitoring activities and instruct the responsible contractor to implement organic vapor or dust mitigation when necessary.
- Overseeing the implementation of activities specified in the RAP.

2.5 Contractor Responsibilities

The contractor must develop and implement their own HASP for their employees, their subcontractors, and consultants. The contractor is responsible for their own health and safety and that of their subcontractors. Contractors operating on the site must designate their own FTL, HSO, and Health and Safety Manager (HSM). The contractor's HASP will be at least as stringent as this HASP. The contractor must be familiar with and abide by the requirements outlined in their own HASP. A contractor may elect to adopt Langan's HASP as its own if it has given written notification to Langan, but where Langan's HASP excludes provisions pertinent to the contractor's work (i.e., confined space entry); the contractor must provide written addendums to this HASP. Additionally, the contractor must:

- Ensure their employees are trained in the use of all appropriate PPE for the tasks involved.
- Notify Langan of any hazardous material brought onto the job site or site-related area, the hazards associated with the material, and must provide a material safety data sheet (MSDS) or safety data sheet (SDS) for the material.
- Have knowledge of, understand, and abide by all current federal, state, and local health and safety regulations pertaining to the work.
- Ensure their employees handling hazardous materials, if identified at the Site, have received current training in the appropriate levels of 29 CFR 1910.120, *Hazardous Waste Operations and Emergency Response* (HAZWOPER) if hazardous waste is identified at the Site.
- Ensure their employees handling hazardous materials, if identified at the Site, have been fit-tested within the year on the type of respirator they will wear; and
- Ensure all air monitoring is in place pertaining to the health and safety of their employees as required by OSHA 1910.120; and

- All contractors must adhere to all federal, state, and local regulatory requirements.

3.0 TASK/OPERATION SAFETY AND HEALTH RISK ANALYSES

A Task-Hazard Analysis (Table 1) was completed for general construction hazards that may be encountered at the Site. The potential contaminants that might be encountered during the field activities and the exposure limits are listed in Table 2 complete inventory of MSDS/SDS for chemical products used on site is included in Attachment E.

3.1 Specific Task Safety Analysis

3.1.1 Groundwater Sampling

Sampling groundwater requires the donning of chemical resistant gloves in addition to the standard PPE and cut resistant gloves when cutting sampling-tubing to length.

3.1.2 Monitoring Well Gauging

Langan will don work gloves when opening the well box pulling the well plug and nitrile gloves when handling the interface probe in addition to standard PPE. Langan may record the head space VOCs with a PID and record the survey data. If product is observed in the well, Langan personnel may use product absorbing socks and pads.

3.1.3 Plugging and Abandonment of Observation/Monitoring Wells

Langan personnel are not to operate equipment nor assist in the plugging and abandonment of the observation/monitoring wells. These tasks are to be completed by the contractor.

3.1.4 Indoor Drilling and Excavation

The work scope may require indoor excavation where there may not be adequate ventilation sufficient to safely operate any rig or excavation equipment powered by an internal combustion engine. Where possible, all such work should be done by equipment powered by electricity. If such equipment is used and must be directly wired to the buildings electrical system or to an independent system, this work must be completed by a licensed electrician in accordance with all electrical codes applicable to the work.

Indoor work which is to be completed with equipment powered by an internal combustion engine must incorporate air monitoring of carbon monoxide (CO) using calibrated air monitoring equipment (MultiRAE or equivalent). In addition, the work plan should incorporate mitigation for

venting engine exhaust fumes directly to the outdoors and for circulating fresh air into the work area.

The OSHA Time Weighted Average (TWA) Permissible Exposure Limit (PEL) for CO from 50 to 35 parts per million (ppm). Langan will monitor CO with a suitable monitoring device. If CO levels exceed 5 ppm, Langan will instruct contractors to begin mitigation measures. These measures are at a minimum:

- Increase air circulation using industrial size fans to bring additional fresh air into the building or vent exhaust to the outside.
- Modify the passive exhaust method being used to increase venting circulation by using wider diameter tubing or sealing tubing connections; or
- Modify the work schedule where the rig is turned off to allow time for CO levels to fall back to background.

All work must cease if CO levels reach 35 ppm. The Langan engineer is to report to the PM and H&S officer when an action level is reached.

3.1.5 Soil Screening and Sampling

Sampling the soil requires the donning of chemical resistant gloves in addition to the standard PPE. Langan personnel are not to operate drilling or excavation equipment nor open sampling devices (acetate liners, sonic sample bags, etc.). These tasks are to be completed by the driller or excavation contractor.

3.1.6 Stockpile Sampling

Langan personnel are not to scale or otherwise climb stockpiles. If the soil sampling plan requires sampling from the stockpile above ground level, samples are to be obtained using suitable excavation equipment operated by the contractor (i.e., front end loader).

3.1.7 Drum Sampling

Drilling fluid, rinse water, grossly contaminated soil samples and cuttings will be containerized in 55-gallon drums for disposed off-site. Each drum must be labeled in accordance with the Langan Drum Labeling Standard Operating Procedure (SOP-#9). Sampling drums requires the donning of work gloves when opening the drums and chemical resistant gloves when sampling in addition to standard PPE.

Langan personnel and contractors are not to move or opened any orphaned (unlabeled) drum found on the site without approval of the project manager.

3.2 Radiation Hazards

No radiation hazards are known or expected at the site.

3.3 Physical Hazards

Physical hazards, which may be encountered during site operations for this project, are detailed in Table 1.

3.3.1 Explosion

No explosion hazards are expected for the scope of work at this site.

3.3.2 Heat Stress

The use of Level C protective equipment, or greater, may create heat stress. Monitoring of personnel wearing personal protective clothing should commence when the ambient temperature is 72°F or above. Table 6 presents the suggested frequency for such monitoring. Monitoring frequency should increase as ambient temperature increases or as slow recovery rates are observed. Refer to Table 7 to assist in assessing when the risk for heat-related illness is likely. To use this table, the ambient temperature and relative humidity must be obtained (a regional weather report should suffice). Heat stress monitoring should be performed by the HSO or the FTL, who must be able to recognize symptoms related to heat stress.

To monitor the workers, be familiar with the following heat-related disorders and their symptoms:

- **Heat Cramps:** Painful spasms of arm, leg, or abdominal muscles, during or after work
- **Heat Exhaustion:** Headache, nausea, dizziness; cool, clammy, moist skin; heavy sweating; weak, fast pulse; shallow respiration, normal temperature
- **Heat Stroke:** Headache, nausea, weakness, hot dry skin, fever, rapid strong pulse, rapid deep respirations, loss of consciousness, convulsions, coma. *This is a life-threatening condition.*

Do not permit a worker to wear a semi-permeable or impermeable garment when they are showing signs or symptoms of heat-related illness.

To monitor the worker, measure:

- **Heart rate:** Count the radial pulse during a 30-second period as early as possible in the rest period. If the heart rate exceeds 100-beats per minute at the beginning of the rest period, shorten the next work cycle by one-third and keep the rest period the same. If

the heart rate still exceeds 100-beats per minute at the next rest period, shorten the following work cycle by one-third. A worker cannot return to work after a rest period until their heart rate is below 100-beats per minute.

- **Oral temperature:** Use a clinical thermometer (3 minutes under the tongue) or a similar device to measure the oral temperature at the end of the work period (before drinking). If oral temperature exceeds 99.6°F (37.6°C), shorten the next work cycle by one-third without changing the rest period. A worker cannot return to work after a rest period until their oral temperature is below 99.6°F. If oral temperature still exceeds 99.6°F (37.6°C) at the beginning of the next rest period, shorten the following cycle by one-third. Do not permit a worker to wear a semi-permeable or impermeable garment when oral temperature exceeds 100.6°F (38.1°C).

Prevention of Heat Stress - Proper training and preventative measures will aid in averting loss of worker productivity and serious illness. Heat stress prevention is particularly important because once a person suffers from heat stroke or heat exhaustion, that person may be predisposed to additional heat-related illnesses. To avoid heat, stress the following steps should be taken:

- Adjust work schedules.
- Mandate work slowdowns as needed.
- Perform work during cooler hours of the day if possible or at night if adequate lighting can be provided.
- Provide shelter (air-conditioned, if possible) or shaded areas to protect personnel during rest periods.
- Maintain worker's body fluids at normal levels. This is necessary to ensure that the cardiovascular system functions adequately. Daily fluid intake must equal the amount of water lost in sweat, i.e., eight fluid ounces (0.23 liters) of water must be ingested for every eight ounces (0.23 kilograms [kg]) of weight lost. The normal thirst mechanism is not sensitive enough to ensure that enough water will be drunk to replace lost sweat. When heavy sweating occurs, encourage the worker to drink more. The following strategies may be useful:
 - Maintain water temperature 50° to 60°F (10° to 16.6°C).
 - Provide small disposal cups that hold about four ounces (0.1-liters).
 - Have workers drink 16-ounces (0.5 liters) of fluid (preferably water or dilute drinks) before beginning work.
 - Urge workers to drink a cup or two every 15- to 20-minutes, or at each monitoring break. A total of 1- to 1.6-gallons (4- to 6-liters) of fluid per day are recommended, but more may be necessary to maintain body weight.
 - Train workers to recognize the symptoms of heat-related illness.

3.3.3 Cold-Related Illness

If work on this project begins in the winter months, thermal injury due to cold exposure can become a problem for field personnel. Systemic cold exposure is referred to as hypothermia. Local cold exposure is called frostbite.

- **Hypothermia** - Hypothermia is defined as a decrease in the patient core temperature below 96°F. The body temperature is normally maintained by a combination of central (brain and spinal cord) and peripheral (skin and muscle) activity. Interference with any of these mechanisms can result in hypothermia, even in the absence of what normally is considered a "cold" ambient temperature. Symptoms of hypothermia include shivering, apathy, listlessness, sleepiness, and unconsciousness.
- **Frostbite** - Frostbite is both a general and medical term given to areas of local cold injury. Unlike systemic hypothermia, frostbite rarely occurs unless the ambient temperatures are less than freezing and usually less than 20°F. Symptoms of frostbite are a sudden blanching or whitening of the skin; the skin has a waxy or white appearance and is firm to the touch; tissues are cold, pale, and solid.

Prevention of Cold-Related Illness - To prevent cold-related illness:

- Educate workers to recognize the symptoms of frostbite and hypothermia.
- Identify and limit known risk factors:
- Assure the availability of an enclosed, heated environment on or adjacent to the site.
- Assure the availability of dry changes of clothing.
- Assure the availability of warm drinks.
- Start (oral) temperature recording at the job site:
- At the FSO or Field Team Leader's discretion when suspicion is based on changes in a worker's performance or mental status.
- At a worker's request.
- As a screening measure, two times per shift, under unusually hazardous conditions (e.g., wind-chill less than 20°F, or wind-chill less than 30°F with precipitation).
- As a screening measure whenever anyone worker on the site develops hypothermia.

Any person developing moderate hypothermia (a core temperature of 92°F) cannot return to work for 48 hours.

3.3.4 Noise

Work activities during the proposed activities may be conducted at locations with high noise levels from the operation of equipment. Hearing protection will be used as necessary.

3.3.5 Hand and Power Tools

The use of hand and power tools can present a variety of hazards, including physical harm from being struck by flying objects, being cut or struck by the tool, fire, and electrocution. All hand and power tools should be inspected for health and safety hazards prior to use. If deemed unserviceable/un-operable, notify the supervisor and tag equipment out of service. Ground Fault Circuit Interrupters (GFCIs) are required for all power tools requiring direct electrical service.

3.3.6 Slips, Trips, and Fall Hazards

Care should be exercised when walking at the site, especially when carrying equipment. The presence of surface debris, uneven surfaces, pits, facility equipment, and soil piles contribute to tripping hazards and fall hazards. To the extent possible, all hazards should be identified and marked on the site, with hazards communicated to all workers in the area.

3.3.7 Utilities (Electrocution and Fire Hazards)

3.3.7.1 Utility Clearance

The possibility of encountering underground utilities poses fire, explosion, and electrocution hazards. All excavation work will be preceded by a review of available utility drawings and by notification of the subsurface work to N.Y. One –Call–Center.

3.3.7.2 Lockout-Tagout

The potential adverse effects of electrical hazards include burns, arc flashes, and electrocution, which could result in severe injury including death. Therefore, there is a procedure that establishes the requirements for the lockout/tag out (LOTO) of energy isolating devices in accordance with the OSHA electrical lockout and tagging requirements as specified in 29CFR1910.147 and 29 CFR 1926.417. This procedure will be used to ensure that all machines and equipment are isolated from potentially hazardous energy. If possible, equipment that could cause injury due to unexpected energizing, start-up, or release of stored energy will be locked/tagged, before field personnel performs work activities.

The facility owner/operator/representative is to be the authorized person that will initiate and perform the LOTO in accordance with applicable rules and practices. Inerting of electrical power sources is to be completed by an authorized and licensed electrician. Langan personnel will

follow LOTO protocols and practices including adding a separate lock/signature to the LOTO chain in accordance with said protocols and practices.

SPECIAL NOTE: Project personnel will assume that all electrical equipment at the surface, subsurface, and overhead locations are energized until equipment has been designated and confirmed as de-energized by a utility company representative. Langan will notify the designated utility representative prior to working adjacent to this equipment and will verify that the equipment is energized or de-energized in the vicinity of the work location. No project work shall be performed by Langan personnel or subcontractors near energized electrical lines or equipment.

The FTL shall accompany the designated facility owner/operator/representative or authorized/licensed electrician in surveying to locate and identify all energy-isolating devices. Langan will note which switches, valves or other isolating devices are used for inerting the equipment and how they are set assuring LOTO. The lockout/tagout procedure involves, but is not limited to, electricity, motors, steam, natural gas, compressed air, hydraulic systems, digesters, sewers, etc.

3.3.8 Adequate Lighting

Indoor or night activities must be done under adequate lighting conditions. The Langan field engineer must be able to clearly see the equipment, all controls and have sufficient lighting to detail color labels. Battery operated lights are sufficient provide they cast a wide enough field to provide the required lighting and there are back-up batteries and emergency flashlights available. Electrically powered lights are suitable provided the electrical source is equipped with a ground fault interrupt circuit (GFIC) and the extensions cords are visually inspected and not used if they show cracked or missing insulation. If a generator is supplying the electricity, it must be outdoors and properly vented.

3.3.9 Physical Hazard Considerations for Material Handling

There are moderate to severe risks associated with moving heavy objects at the Site. The following physical hazards should be considered when handling materials at the Site:

- Heavy objects will be lifted and moved by mechanical devices rather than manual effort whenever possible.
- The mechanical devices will be appropriate for the lifting of moving tasks and will be operated only by trained and authorized personnel.
- Objects that require special handling or rigging will only be moved under the guidance of a person who has been specifically trained to move such objects.

- Lifting devices will be inspected, certified, and labeled to confirm their weight capacities. Defective equipment will be taken out of service immediately and repaired or destroyed.
- The wheels of any trucks being loaded or unloaded will be chocked to prevent movement. Outriggers will be fully extended on a flat, firm surface during operation.
- Personnel will not pass under a raised load, nor will a suspended load be left unattended.
- Personnel will not be carried on lifting equipment unless it is specifically designed to carry passengers.
- All reciprocating, rotating, or other moving parts will be always guarded.
- Accessible fire extinguishers, currently (monthly) inspected, will be available in all mechanical lifting devices.
- Verify all loads/materials are secure before transportation.

Material handling tasks that are unusual or require specific guidance will need a written addendum to this HASP. The addendum must identify the lifting protocols before the tasks are performed. Upon approval, the plan must be reviewed with all affected employees and documented. Any deviation from a written plan will require approval by the Langan HSM.

3.3.10 Hearing Conservation

Under the construction industry standard, the maximum permissible occupational noise exposure is 90 A-weighted decibels (dba) (8-hour TWA), and noise levels more than 90-dba must be reduced through feasible administrative and engineering controls. (20 CFR 1926.52). Hearing protection is required when working within 15-feet of vacuum extraction equipment and drill rigs.

3.3.11 Open Water

Employees working over or near water, where the danger of drowning exists, must be provided with U.S. Coast Guard-approved life jackets or buoyant work vests. Prior to and after each use, the buoyant work vests or life preservers must be inspected for defects that would alter their strength or buoyancy. Defective units must not be used.

And should a worker fall into the water, OSHA requires (29 CFR 1926.106(c)) that ring buoys with at least 90-feet of the line must be provided and readily available for emergency rescue operations. The distance between ring buoys must not exceed 200-feet. Another remedial action required by OSHA (29 CFR 1926.106(d)) is the use of lifesaving skiffs.

OSHA requires that at least one lifesaving skiff must be immediately available at locations where employees are working over or adjacent to water and must include the following provisions.

- The skiff must be in the water or capable of being quickly launched by one person.
- At least one person must be present and specifically designated to respond to water emergencies and operate the skiff at all times when there are employees above water.
- When the operator is on break another operator must be designated to provide requisite coverage when there are employees above water.
- The designated operator must either have the skiff always staffed or have someone remain in the immediate area such that the operator can quickly reach the skiff and perform rescue services.
- The skiff operator may be assigned other tasks provided the tasks do not interfere with the operator's ability to quickly reach the skiff.
- A communication system, such as a walkie-talkie, must be used to inform the skiff operator of an emergency and to inform the skiff operator where the skiff is needed.
- The skiff must be equipped with both a motor and oars.

Regarding the number of skiffs required and the appropriate maximum response time, the following factors must be evaluated:

- The number of work locations where there is a danger of falling into water.
- The distance to each of those locations.
- Water temperature and currents.
- Other hazards such as, but not limited to, rapids, dams, and water intakes.

Other regulations that present H&S practices and PPE for work on or near water include: 29 CFR 1910, Subpart T (401 – 440)

3.4 Biological Hazards

3.4.1 Animals

There is a possibility of encountering wildlife including reptiles, rodents, and other small and medium-size mammals. The Langan personnel is to avoid interacting with any wildlife.

3.4.2 Insects

Ticks and other biting or stinging insects may be encountered during site operations. Langan personnel should take necessary precautions including donning long sleeve shirts and insecticide to prevent bites and stings. After fieldwork, Langan personnel should perform a complete visual inspection of their clothing to insure they are not inadvertently harboring ticks. If they do observe a tick bite, they are to contact the HSM or HSO and report the event.

3.4.3 Plants

Poisonous plants may be encountered during site operations. Langan personnel should take necessary precautions including donning long sleeve shirts and applying preventative poison Ivy/Sumac lotion to prevent or limit the effects of exposure. If after fieldwork, Langan employees do observe a reaction to poisonous plant exposure, they are to contact the HSM or HSO and report the event.

3.4.4 Mold

This section is restricted to subsurface investigations where sampling soil, groundwater, soil or sub-slab vapor or ambient air in an indoor environment with slight to moderate mold impact. Mold exposure symptoms include nasal stuffiness, eye irritation, or wheezing.

The Langan field engineer is required to don a ½ face respirator with a minimum p-100 particulate filter and Tyvek™ type overclothing before entering mold impacted indoor work area. The Langan field engineer must be medically cleared and have been properly fitted for a respirator before donning one.

3.5 Additional Safety Analysis

3.5.1 Presence of Non-Aqueous Phase Liquids (NAPL)

PPE should be considered when NAPL is observed as NAPL is a typically flammable fluid and releases VOCs known to be toxic and/or carcinogenic. If NAPL is present in a monitoring well, vapors from the well casing may contaminate the work area breathing zone with concentrations of VOCs potentially exceeding health and safety action levels. In addition, all equipment used to monitor or sample NAPL (or ground water from wells containing NAPL) must be intrinsically safe. Equipment that directly contacts NAPL must also be resistant to organic solvents.

At a minimum, a PID should be used to monitor for VOCs when NAPL is observed. If NAPL is expected to be observed in an excavation or enclosed area, air monitoring must be started using calibrated air monitoring equipment designed to sound an audio alarm when atmospheric concentrations of VOC are within 10% of the LEL. In normal atmospheric oxygen concentrations, the LEL monitoring may be done with a Wheatstone bridge/catalytic bead type sensor (i.e., MultiRAE). However, in oxygen-depleted atmospheres (confined space), only an LEL designed to work in low-oxygen environments may be used. Best practices require that the LEL monitoring unit be equipped with a long sniffer tube to allow the LEL unit to remain outside the UST excavation.

When NAPL is present, Langan personnel are required to always use disposable nitrile gloves to prevent skin contact with contaminated materials. They should also consider having available a respirator and protective clothing (Tyvek® overalls), especially if NAPL is in abundance and there are high concentrations of VOCs.

All contaminated disposables including PPE and sampling equipment must be properly disposed of in labeled 55-gallon drums.

3.6 Job Safety Analysis

A Job Safety Analysis (JSA) is a process to identify existing and potential hazards associated with each job or task so these hazards can be eliminated, controlled, or minimized. A JSA will be performed at the beginning of each workday, and additionally whenever an employee begins a new task or moves to a new location. All JSAs must be developed and reviewed by all parties involved. A blank JSA form and documentation of completed JSAs are in Attachment G.

4.0 PERSONNEL TRAINING

4.1 Basic Training

Completion of an initial 40-hour HAZWOPER training program as detailed in OSHA's 29 CFR 1910.120(e) is required for all employees working on a site engaged in hazardous substance removal or other activities which expose or potentially expose workers to hazardous substances, health hazards, or safety hazards as defined by 29 CFR 1910.120(a). Annual 8-hour refresher training is also required to maintain competencies to ensure a safe work environment. In addition to these training requirements, all employees must complete the OSHA 10-hour Construction Safety and Health training and supervisory personnel must also receive eight additional hours of specialized management training. Training records are maintained by the HSM.

4.2 Initial Site-Specific Training

Training will be provided to specifically address the activities, procedures, monitoring, and equipment for site operations at the beginning of each field mobilization and the beginning of each discrete phase of work. The training will include the site and facility layout, hazards, and emergency services at the site, and will detail all the provisions contained within this HASP. For a HAZWOPER operation, training on the site must be for a minimum of 3 days. Specific issues that will be addressed include the hazards described in Section 3.0.

4.3 Tailgate Safety Briefings

Before starting work each day or as needed, the Langan HSO will conduct a brief tailgate safety meeting to assist site personnel in conducting their activities safely. Tailgate meetings will be documented in Attachment H. Briefings will include the following:

- Work plan for the day.
- Review of safety information relevant to planned tasks and environmental conditions.
- New activities/tasks being conducted.
- Results of Jobsite Safety Inspection Checklist.
- Changes in work practices.
- Safe work practices; and
- Discussion and remedies for noted or observed deficiencies.

5.0 MEDICAL SURVEILLANCE

All personnel who will be performing fieldwork involving potential exposure to toxic and hazardous substances (defined by 29 CFR 1910.120(a)) will be required to have passed an initial baseline medical examination, with follow-up medical exams thereafter, consistent with 29 CFR 1910.120(f). Medical evaluations will be performed by, or under the direction of, a physician board-certified in occupational medicine.

Additionally, personnel who may be required to perform work while wearing a respirator must receive medical clearance as required under CFR 1910.134(e), *Respiratory Protection*. Medical evaluations will be performed by, or under the direction of, a physician board-certified in occupational medicine. Results of medical evaluations are maintained by the HSM.

5.1 Mercury Monitoring

Langan includes medical monitoring for mercury during the initial baseline and annual physical.

5.2 Coronavirus

General Preventative Measures

Field personnel must follow general proper hygiene measures while in the field including:

- Avoid touching eyes, nose, and mouth.
- Cover coughs or sneezes with tissue and throw in the trash.
- Wash hands often with soap and water for 20 seconds after going to the bathroom, before eating, after blowing nose, coughing, or sneezing.

- Use hand sanitizer with at least 60% alcohol if soap and water are not available.
- Avoid physical contact with other people (e.g., no handshakes).
- Maintain a safe distance of at least six feet from other people (social distancing).
- Wear face coverings when around other workers to minimize the spread of COVID-19. (May be required in certain states or locations.)

Construction Trailers

Employees should avoid the use of shared construction trailers or where employees cannot maintain a safe distance (minimum 6-feet) from other workers. If trailer use is needed, areas such as desks, phones, chairs, and other public areas, should be cleaned and disinfected before and after use. Protocols should be developed to minimize trailer use to essential personnel, restrict use from any workers who are ill or showing symptoms of being ill, use face coverings and ensure a safe distance of six feet can be established between workers.

Communication

Include Coronavirus topics and prevention topics in daily tailgate meetings to ensure Coronavirus awareness is communicated daily. Discussions can focus on general topics including social distancing, prevention measures for field personnel, signs and symptoms, and latest news on the Coronavirus. Site-specific topics should include minimizing face-to-face contact, disinfecting/sterilizing field equipment, use of PPE to reduce exposure, site security, use of face coverings, and other potential exposure issues/concerns.

Sick/III Workers

No Langan employee is permitted to be onsite when ill and/or showing potential symptoms of the Coronavirus. Symptoms of the Coronavirus may appear 2-14 days after exposure and can range from mild to severe. The most common symptoms include fever, fatigue, dry cough, shortness of breath chills, repeated shaking with chills, muscle pain, headache, sore throat, or new loss of taste or smell. If an employee or subcontractor is observed being ill or exhibiting symptoms of Coronavirus, employees must immediately utilize their Stop Work Authority and contact their project manager to address the situation. If an employee observes another worker onsite exhibiting symptoms of Coronavirus, immediately utilize Stop Work Authority, notify their project manager, and site construction manager or safety officer. Work should resume when the safety and health of Langan and subcontractors is adequately addressed.

6.0 PERSONAL PROTECTIVE EQUIPMENT

6.1 Levels of Protection

Langan will provide PPE to Langan employees to protect them from the specific hazards they are likely to encounter on-site. Directly hired contractors will provide their employees with equivalent PPE to protect them from the specific hazards likely to be encountered on-site. Selection of the appropriate PPE must take into consideration: (1) identification of the hazards or suspected hazards; (2) potential exposure routes; and (3) the performance of the PPE construction (materials and seams) in providing a barrier to these hazards.

Human exposure to contaminants found in the subsurface can occur through three primary routes:

- Inhalation of gases, vapors, dust, or mists is a common route of exposure. Chemicals can enter and irritate the airways and the lungs. They can become deposited in the airways or can be absorbed through the lungs into the bloodstream.
- Direct contact of contaminants with the skin or eyes is a common route of exposure. Some substances are absorbed through the skin and can enter the bloodstream. Broken, cut, or cracked skin will allow substances to enter the body more easily.
- Ingestion or swallowing of food, drink, or other substances is the third route of exposure. Chemicals that get in or on food, utensils, or hands can be ingested. Substances can be absorbed into the blood.

Based on anticipated site conditions and the proposed work activities to be performed at the site, Level D protection will be used. The upgrading/downgrading of the level of protection will be based on continuous air monitoring results as described in Section 6.0 (when applicable). The decision to modify standard PPE will be made by the site HSO or FTL after conferring with the PM. The levels of protection are described below.

Level D Protection (as needed)

- Safety glasses with side shields or chemical splash goggles
- Safety boots/shoes
- Coveralls (Tyvek® or equivalent)
- Hard hat
- Long sleeve work shirt and work pants
- Nitrile gloves
- Hearing protection

- Reflective safety vest

Level D Protection (Modified, as needed)

- Safety glasses with side shields or chemical splash goggles
- Safety boots/shoes (toe-protected)
- Disposable chemical-resistant boot covers.
- Coveralls (poly-coated Tyvek or equivalent to be worn when contact with wet contaminated soil, groundwater, or non-aqueous phase liquids is anticipated)
- Hard hat
- Long sleeve work shirt and work pants
- Nitrile gloves
- Hearing protection (as needed)
- Personal floatation device (for work within 5 ft of the water)
- Reflective traffic vest

Level C Protection (as needed)

- Full or Half face, air-purifying respirator, with NIOSH approved High-Efficiency Particulate Air (HEPA) filter.
- Inner (latex) and outer (nitrile) chemical-resistant gloves
- Safety glasses with side shields or chemical splash goggles
- Chemical-resistant safety boots/shoes
- Hard hat
- Long sleeve work shirt and work pants
- Coveralls (Tyvek® or equivalent)
- Hearing protection (as needed)
- Reflective safety vest

The action levels used in determining the necessary levels of respiratory protection and upgrading to Level C are summarized in Table 4. The written Respiratory Protection Program is maintained by the HSM and is available if needed. The monitoring procedures and equipment are outlined in Section 6.0 (when applicable).

6.2 Respirator Fit-Test

All Langan employees who may be exposed to hazardous substances at the work site must be in possession of a full or half face piece air-purifying respirator and have been successfully fit-tested within the past year. Fit-test records are maintained by the HSM.

6.3 Respirator Cartridge Change-Out Schedule

Respiratory protection is required to be worn when certain action levels (Table 2) are reached. A respirator cartridge change-out schedule has been developed to comply with 29 CFR 1910.134. The respirator cartridge change-out schedule for this project is as follows:

- Cartridges must be removed and disposed of at the end of each shift when cartridges become wet or the wearer experiences a breakthrough, whichever occurs first.
- If the humidity exceeds 85%, then cartridges must be removed and disposed of after 4 hours of use.

Respirators must not be stored at the end of the shift with contaminated cartridges left on. Cartridges must not be worn on the second day, no matter how short the time was the previous day they were used.

7.0 AIR QUALITY MONITORING AND ACTIONS LEVELS

7.1 Monitoring During Site Operations

Atmospheric air monitoring results may be collected and used to provide data to determine when exclusion zones need to be established and when certain levels of personal protective equipment are required. For all instruments, there are Site-specific action-level criteria that are used in making field health and safety determinations. Other data, such as the visible presence of contamination or the steady state nature of air contaminant concentration, are also used in making field health and safety decisions. Therefore, the HSO may establish an exclusion zone or require a person to wear a respirator even though atmospheric air contaminant concentrations are below established HASP action levels.

During site work involving disturbance of petroleum-impacted or fill material, real-time air monitoring may be conducted for methane and VOCs. A MultiRAE LEL/Oxygen (O₂) meter and FID will be used to monitor the LEL of methane, and a PID and/or FID will be used to monitor concentrations of VOCs at personnel breathing-zone height. Air monitoring will be the responsibility of the HSO or designee. Air monitoring may be conducted during intrusive activities associated with the completion of excavation, debris removal, and soil grading. All manufacturers' instructions for instrumentation and calibration will be available onsite.

Subcontractors' air monitoring plans must be equal to or more stringent than the Langan plan.

An air monitoring calibration log is provided in Attachment D of this HASP.

7.1.1 Volatile Organic Compounds

Monitoring with a PID, such as a MiniRAE 2000 (10.6v) or equivalent may occur during intrusive work in the Areas of Concern (AOCs). Colorimetric Indicator Tubes for benzene may be used as a backup for the PID if measurements remain above background monitor every 2 hours. The HSO will monitor the employee's breathing zone at least every 30 minutes, or whenever there is any indication that concentrations may have changed (odors, visible gases, etc.) since the last measurement. If VOC levels are observed above 5 ppm for longer than 5 minutes or if the site PPE is upgraded to Level C, the HSO will begin monitoring the site perimeter at a location downwind of the AOC every 30 minutes in addition to the employee breathing zone. Instrument action levels for monitored gases are provided in Table 4.

7.1.2 Metals

Based upon the site historical fill, there is a potential for the soils to contain Polycyclic Aromatic Hydrocarbons (PAHs) and metals. During invasive procedures which have the potential for creating airborne dust, such as excavation of dry soils, a real-time airborne dust monitor such as a Mini-Ram may be used to monitor for air particulates. The HSO will monitor the employee's breathing zone at least every 30 minutes, or whenever there is any indication that concentrations may have changed (appearance of visible dust) since the last measurement. If dust levels are observed to be greater than 0.100 milligrams per cubic meter (mg/m^3) or visible dust is observed for longer than 15 minutes or if the site PPE is upgraded to Level C, the HSO will begin monitoring the site perimeter at a location downwind of the AOC every 30 minutes in addition to the employee breathing zone. Instrument action levels for dust monitoring are provided in Table 4.

7.1.3 Methane

During soil excavation or other intrusive activities, direct reading air monitoring will be performed in the excavation area to determine exposure to workers. Monitoring with an LEL/O₂ meter and FID may occur during intrusive work in the AOCs. The HSO will monitor the employee's breathing zone at least hourly during intrusive activities. If LEL levels are observed above 20% the professional engineer (PE) or their designee will stop work and evacuate the area; warn others; and determine source of readings and take corrective actions. The Contractor will be responsible for mitigating explosive gas levels.

7.2 Monitoring Equipment Calibration and Maintenance

Instrument calibration must be documented and included in a dedicated safety and health logbook or on separate calibration pages of the field book. All instruments must be calibrated

before and after each shift. Calibration checks may be used during the day to confirm instrument accuracy. Duplicate readings may be taken to confirm individual instrument responses.

All instruments must be operated in accordance with the manufacturers' specifications. Manufacturers' literature, including an operation manual for each piece of monitoring equipment, will be maintained on-site by the HSO for reference.

7.3 Determination of Background Levels

Background (BKD) levels for VOCs, dust, and methane will be established prior to intrusive activities within the AOC at an upwind location. A notation of BKD levels will be referenced in the daily monitoring log. BKD levels are a function of prevailing conditions. BKD levels will be taken in an appropriate upwind location as determined by the HSO.

Table 4 lists the instrument action levels.

8.0 COMMUNITY AIR MONITORING PROGRAM

In accordance with the Excavation Work Plan (Appendix D of the SMP), community air monitoring will be conducted whenever ground-intrusive activities are performed within remaining contaminated soil/fill.

Community air monitoring will include continuous monitoring at the perimeter of the work zone for odor, VOCs, and dust. The work zone is defined as the general area in which machinery is operating in support of remediation activities. A portable PID will be used to monitor the work zone and for periodic monitoring for VOCs during activities such as soil and groundwater sampling and soil excavation. The site perimeter will be monitored for fugitive dust emissions by visual observations as well as instrumentation measurements.

The CAMP will include two to four CAMP stations based on the scope of work outlined in the 15-day notification to the NYSDEC (as required by the SMP) for any proposed ground-intrusive activities. CAMP during future investigation activities at the site (i.e. advancement of borings for waste characterization or geotechnical investigation) without active excavation will consist of two CAMP stations at upwind and downwind locations in relation to the work zone. CAMP during active excavation at the site (i.e. for future building foundation construction) will include four perimeter CAMP stations (one station for each boundary of the site). Each CAMP station will monitor for VOCs with a PID (or equivalent instrument) and dust emissions with equipment capable of measuring particulate matter less than 10 microns in diameter (PM-10).

When required, particulate or dust will be monitored continuously with real-time field instrumentation that will meet, at a minimum, the local standards or, default to the performance

standards below:

If VOC monitoring is required, the following actions will be taken based on VOC levels measured:

- If total VOC levels exceed 5 ppm above background for the 15-minute average at the perimeter, work activities will be temporarily halted and monitoring continued. If levels readily decrease (per instantaneous readings) below 5 ppm above background, work activities will resume with continued monitoring.
- If total VOC levels at the downwind perimeter of the hot zone persist at levels more than 5 ppm above background but less than 25 ppm, work activities will be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps work activities will resume provided that the total organic vapor level is 200-feet downwind of the hot 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 above background for the 15-minute average.
- If the total VOC level is above 25 ppm at the perimeter of the hot zone, activities will be shut down.

If dust monitoring with field instrumentation is required, the following actions will be taken based on instrumentation measurements:

- If the downwind particulate level is 100-micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression must be employed. Work may continue with dust suppression techniques provided that downwind particulate matter less than 10 microns (PM10) levels do not exceed $150 \mu\text{g}/\text{m}^3$ above the background level and provided that no visible dust is migrating from the work area.
- If, after implementation of dust suppression techniques, downwind PM10 levels are greater than $150 \mu\text{g}/\text{m}^3$ above the background level, work must be stopped, and a re-evaluation of activities initiated. Work can resume if dust suppression measures and other controls are successful in reducing the downwind PM10 concentration to within $150 \mu\text{g}/\text{m}^3$ of the upwind level and in preventing visible dust migration.

8.1 Dust, Odor, and Vapor Suppression Techniques

As documented in the SMP, subsurface contamination remains at the site following completion of the remedy. Remaining contamination includes areas of the site with previously identified nuisance odors and remaining soil/fill exceeding the NYSDEC Part 375 Restricted Use Restricted-Residential (RURR) and/or Protection of Groundwater (PGW) soil cleanup objectives (SCOs). As

such, mitigation measures (i.e. odor/vapor suppressing foam and dust suppression) will be available for use during future ground-intrusive activities in areas of the site with remaining contamination.

Preventative measures for dust generation may include wetting site fill and soil, construction of an engineered construction entrance with a gravel pad, a truck wash area, covering soils with tarps, and limiting vehicle speeds to five miles per hour.

Work practices to minimize odors and vapors include limiting the time that the excavations remain open, minimizing stockpiling of contaminated-source soil, and minimizing the handling of contaminated material. Offending odor and organic vapor controls may include the application of foam suppressants or tarps over the odor or VOC source areas. Foam suppressants may include biodegradable foams applied over the source material for short-term control of the odor and VOCs.

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

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

9.0 WORK ZONES AND DECONTAMINATION

9.1 Site Control

Work zones are intended to control the potential spread of contamination throughout the site and to assure that only authorized individuals are permitted into potentially hazardous areas.

Any person working in an area where the potential for exposure to site contaminants exists will only be allowed access after providing the HSO with proper training and medical documentation.

Exclusion Zone (EZ) - All activities which may involve exposure to site contaminants, hazardous materials, and/or conditions should be considered an EZ. Decontamination of field equipment will also be conducted in the Contaminant Reduction Zone (CRZ) which will be located on the perimeter of the EZ. The EZ and the CRZ will be delineated by cones, tapes, or other means. The HSO may establish more than one EZ where various levels of protection may be employed,

or different hazards exist. The size of the EZ must be determined by the HSO allowing adequate space for the activity to be completed, field members, and emergency equipment.

9.2 Contamination Zone

9.2.1 Personnel Decontamination Station

Personal hygiene, coupled with diligent decontamination, will significantly reduce the potential for exposure.

9.2.2 Minimization of Contact with Contaminants

During the completion of all site activities, personnel should attempt to minimize the chance of contact with contaminated materials. This involves a conscientious effort to keep "clean" during site activities. All personnel should minimize kneeling, splash generation, and another physical contact with contamination as PPE is intended to minimize accidental contact. This may minimize the degree of decontamination required and the generation of waste materials from site operations.

Field procedures will be developed to control spray and runoff and to ensure that unprotected personnel working nearby are not affected.

9.2.3 Personnel Decontamination Sequence

Decontamination may be performed by removing all PPE used in EZ and placing it in drums/trash cans at the CRZ. Baby wipes should be available for wiping hands and face. Drums/trash cans will be labeled by the field crews in accordance with all local, state, and federal requirements. Management plans for contaminated PPE, and tools are provided below.

9.2.4 Emergency Decontamination

If circumstances dictate that contaminated clothing cannot be readily removed, then remove gross contamination and wrap injured personnel with clean garments/blankets to avoid contaminating other personnel or transporting equipment. If the injured person can be moved, he/she will be decontaminated by site personnel as described above before emergency responders handle the victim. If the person cannot be moved because of the extent of the injury (a back or neck injury), provisions must be made to ensure that emergency response personnel will be able to respond to the victim without being exposed to potentially hazardous atmospheric conditions. If the potential for inhalation hazards exists, such as with open excavation, this area will be covered with polyethylene sheeting to eliminate any potential inhalation hazards. All

emergency personnel should be immediately informed of the injured person's condition, and potential contaminants, and provided with all pertinent data.

9.2.5 Hand-Held Equipment Decontamination

Hand-held equipment includes all monitoring instruments as stated earlier, samples, hand tools, and notebooks. The hand-held equipment is dropped at the first decontamination station to be decontaminated by one of the decontamination team members. These items must be decontaminated or discarded as waste prior to removal from the CRZ.

To aid in decontamination, monitoring instruments can be sealed in plastic bags or wrapped in polyethylene. This will also protect the instruments against contaminants. The instruments will be wiped clean using wipes or paper towels if contamination is visually evident. Sampling equipment, hand tools, etc. will be cleaned with non-phosphorous soap to remove any potentially contaminated soil and rinsed with deionized water. All decontamination fluids will be containerized and stored on-site pending waste characterization sampling and appropriate off-site disposal.

9.2.6 Heavy Equipment Decontamination

All heavy equipment and vehicles arriving at the work site will be free from contamination from offsite sources. Any vehicles arriving to work that are suspected of being impacted will not be permitted on the work site. Potentially contaminated heavy equipment will not be permitted to leave the EZ unless it has been thoroughly decontaminated and visually inspected by the HSO or his designee.

9.3 Support Zone

The support zone or cold zone will include the remaining areas of the job site. Break areas and support facilities (including equipment storage and maintenance areas) will be in this zone. No equipment or personnel will be permitted to enter the cold zone from the hot zone without passing through the decontamination station in the warm zone (if necessitated). Eating, smoking, and drinking will be allowed only in this area.

9.4 Communications

The following communications equipment will be utilized as appropriate.

- Telephones - A cellular telephone will be located with the HSO for communication with the HSM and emergency support services/facilities.

- Hand Signals - Hand signals must be used by field teams, along with the buddy system. The entire field team must know them before operations commence and their use covered during site-specific training. Typical hand signals are the following:

Hand Signal	Meaning
Hand gripping throat	Out of air, cannot breathe
Grip your partner's wrists or place both hands around the waist	Leave immediately without debate
Hands on top of head	Need assistance
Thumbs up	OK; I am all right; I understand
Thumbs down	No; negative
Simulated "stick" break with fists	Take a break; stop work

9.5 The Buddy System

When working in teams of two or more, workers will use the "buddy system" for all work activities to ensure that rapid assistance can be provided in the event of an emergency. This requires work groups to be organized such that workers can remain close together and maintain visual contact with one another. Workers using the "buddy system" have the following responsibilities:

- Provide his/her partner with assistance.
- Observe his/her partner for signs of chemical or heat exposure.
- Periodically check the integrity of his/her partner's PPE.
- Notify the HSO or other site personnel if emergency service is needed.

10.0 NEAREST MEDICAL ASSISTANCE

The address and telephone number of the nearest hospital:

New York-Presbyterian Lower Manhattan Hospital
170 William Street
New York, New York
212-312-5000

A map with directions to the hospital is shown in Figure 2. This information will either be posted prominently at the site or will be available to all personnel all the time. Further, all field personnel, including the HSO & FTL, will know the directions to the hospital.

11.0 STANDING ORDERS/SAFE WORK PRACTICES

The standing orders, which consist of a description of safe work practices that must always be followed while on-site by Langan employees and contractors, are shown in Attachment A. The

site HSO and FTL each have the responsibility for enforcing these practices. The standing orders will be posted prominently at the site or are made available to all personnel at all times. Those who do not abide by these safe work practices will be removed from the site.

12.0 SITE SECURITY

No unauthorized personnel must be permitted access to the work areas.

13.0 UNDERGROUND UTILITIES

As provided in Langan's Underground Utility Clearance Guidelines, the following safe work practices should be followed by Langan personnel and the contractor before and during subsurface work in accordance with federal, state, and local regulations:

- Obtain available utility drawings from the property owner/client or operator.
- Provide utility drawings to the project team.
- In the field, mark the proposed area of subsurface disturbance (when possible).
- Ensure that the utility clearance system has been notified.
- Ensure that utilities are marked before beginning subsurface work.
- Discuss subsurface work locations with the owner/client and contractors.
- Obtain approval from the owner/client and operators for proposed subsurface work locations.
- Use safe digging procedures when applicable.
- Stay at least 10-feet from all equipment performing subsurface work.

14.0 SITE SAFETY INSPECTION

The Langan HSO or alternate will check the work area daily, at the beginning and end of each work shift, or more frequently to ensure safe work conditions. The HSO or alternate must complete the Jobsite Safety Inspection Checklist, found in Attachment F. Any deficiencies must be shared with the FTL, HSM, and PM and will be discussed at the daily tailgate meeting.

15.0 HAND AND POWER TOOLS

All hand- and electric-power tools and similar equipment must be maintained in a safe operating condition. All electric-power tools must be inspected before initial use. Damaged tools must be removed immediately from service or repaired. Tools must be used only for the purpose for which they were designed. All users must be trained in their safe operation.

16.0 EMERGENCY RESPONSE

16.1 General

This section establishes procedures and provides information for use during a project emergency. Emergencies happen unexpectedly and quickly, and require an immediate response; therefore, contingency planning and advanced training of staff is essential. Specific elements of emergency support procedures that are addressed in the following subsections include communications, local emergency support units, and preparation for medical emergencies, first aid for injuries incurred on site, record keeping, and emergency site evacuation procedures. In case of emergency, in addition to 911, call *WorkCare - Incident Intervention@* at 1-888-479-7787 to report their injuries. For all other communications, contact the Langan Incident Hotline at **973-560-4699** as soon as possible.

Should outside assistance be needed for accidents, fire, or release of hazardous substances, the emergency numbers will be available and posted at the site (Table 5) where a readily accessible telephone is made available for emergency use.

Also, in the event of an incident where a team member becomes exposed or suffers from an acute symptom from contact with site materials and must be taken to a hospital, a short medical data sheet (Attachment C) for that individual will be made available to the attending physician. The medical data sheet will include the following:

- Name, address, home phone
- Age, height, weight
- Name of person to be notified in case of an accident.
- Allergies
- Sensitivities
- Does he/she wear contact lenses?
- Short checklist of previous illness
- Name of personal physician and phone
- Name of company physician and phone
- Prescription and non-prescription medications currently used.

An incident reporting form is included in Attachment C.

16.2 Responsibilities

16.2.1 Health and Safety Officer (HSO)

The HSO is responsible for ensuring that all personnel are evacuated safely, and that machinery and processes are shut down or stabilized in the event of a stop work order or evacuation. The HSO is responsible for ensuring the HSM is notified of all incidents, all injuries, near misses, fires, spills, releases, or equipment damage. The HSO is required to immediately notify the HSM of any fatalities or catastrophes (three or more workers injured and hospitalized) so that the HSM can notify OSHA within the required time frame.

16.2.2 Emergency Coordinator

The HSO or their designated alternate will serve as the Emergency Coordinator. The Emergency Coordinator is responsible for ensuring that all personnel are evacuated safely, and that machinery and processes are shut down or stabilized in the event of a stop work order or evacuation. They are also responsible for ensuring the HSM is notified of all incidents, all injuries, near misses, fires, spills, releases, or equipment damage. The Emergency Coordinator is required to immediately notify the HSM of any fatalities or catastrophes (three or more workers injured and hospitalized).

The Emergency Coordinator must locate emergency phone numbers and identify hospital routes prior to beginning work on the sites. The Emergency Coordinator must make necessary arrangements to be prepared for any emergencies that could occur.

The Emergency Coordinator is responsible for implementing the Emergency Response Plan.

16.2.3 Site Personnel

Project site personnel are responsible for knowing the Emergency Response Plan and the procedures contained herein. All personnel are expected to notify the Emergency Coordinator of situations that could constitute a site emergency. Project site personnel, including all subcontractors, will be trained in the Emergency Response Plan.

16.3 Communications

Once an emergency has been stabilized, the injured Langan personnel should contact WorkCare - Incident Intervention@ at 1-888-479-7787 to report their injuries. For all other communications, contact the Langan Incident Hotline at **973-560-4699** as soon as possible.

16.4 Local Emergency Support Units

To be able to deal with any emergency that might occur during investigative activities at the site, the Emergency Notification Numbers (Table 5) will be posted and provided to all personnel conducting work within the EZ.

Figure 2 shows the hospital route map. Outside emergency number 911 and local ambulance should be relied on for response to medical emergencies and transport to emergency rooms. Always contact first responders when there are serious or life-threatening emergencies on the site. Project personnel are instructed not to drive injured personnel to the Hospital. In the event of an injury, provide first aid and keep the injured party calm and protected from the elements, and treat for shock when necessary.

16.5 Pre-Emergency Planning

Langan will communicate directly with administrative personnel from the emergency room at the hospital to determine whether the hospital has the facilities and personnel needed to treat cases of trauma resulting from any of the contaminants expected to be found on the site. Instructions for finding the hospital will be posted conspicuously in the site office and each site vehicle.

16.6 Emergency Medical Treatment

The procedures and rules in this HASP are designed to prevent employee injury. However, if an injury occurs, no matter how slight, it will be reported to the HSO immediately. First-aid equipment will be available on-site at the following locations:

- First Aid Kit: Contractor Vehicles
- Emergency Eye Wash: Contractor Vehicles

During the site safety briefing, project personnel will be informed of the location of the first aid station(s) that has been set up. Some injuries, such as severe cuts and lacerations or burns, may require immediate treatment. Any first-aid instructions that can be obtained from doctors or paramedics, before an emergency-response squad arrives at the site or before the injured person can be transported to the hospital, will be followed closely.

16.7 Personnel with current first aid and CPR certification will be identified.

Only in non-emergency situations may an injured person be transported to an urgent care facility. Due to hazards that may be present at the site and the conditions under which operations are conducted, an emergency may develop. Emergencies can be characterized as injury or acute

chemical exposure to personnel, fire or explosion, environmental release, or hazardous weather conditions.

16.8 Emergency Site Evacuation Routes and Procedures

All project personnel will be instructed on proper emergency response procedures and locations of emergency telephone numbers during the initial site safety meeting. If an emergency occurs because of the site investigation activities, including but not limited to fire, explosion, or significant release of toxic gas into the atmosphere, the Langan Project Manager will be verbally notified immediately. All heavy equipment will be shut down and all personnel will evacuate the work areas and assemble at the nearest intersection to be accounted for and to receive further instructions.

If an emergency arises, the FTL will implement an immediate evacuation of all project personnel due to immediate or impending danger. The FTL will also immediately communicate with the contractor to coordinate any needed evacuation of the property.

The FTL or Site Supervisor will give necessary instructions until the Designated Incident Commander (IC) assumes control. After the emergency has been resolved, the FTL or Site Supervisor will coordinate with the IC and indicate when staff should resume their normal duties. If dangers are present for those at the designated assembly point, another designated location of assembly will be established.

It will be the responsibility of the FTL or Site Supervisor to report a fire or emergency, assess the seriousness of the situation, and initiate emergency measures until the arrival of the local fire fighters or other first responders, should they be necessary. The FTL, working with emergency responders, may also order the closure of the Site for an indefinite period if it is deemed necessary.

Under no circumstances will incoming visitors be allowed to proceed to the area of concern, once an emergency evacuation has been implemented. Visitors or other persons present in the emergency must be instructed to evacuate the area. The FTL will ensure that access roads are not obstructed and will remain on-site to provide stand-by assistance upon the arrival of emergency personnel.

If it is necessary to temporarily control traffic in the event of an emergency, those persons controlling traffic will wear proper reflection warning vests until the arrival of police or fire personnel.

16.8.1 Designated Assembly Locations

All personnel will evacuate the site and assemble at a designated assembly location. The assembly location will be designated by Langan personnel and discussed during each shift's pre-job safety briefing.

16.8.2 Accounting for Personnel

All contractor and subcontractor supervisors are responsible for the accounting of all personnel assembled at the designated assembly area. The Designated Incident Commander must be notified if personnel are not found.

16.9 Fire Prevention and Protection

In the event of a fire or explosion, procedures will include immediately evacuating the site and notification of the Langan Project Manager of the investigation activities. Portable fire extinguishers will be provided at the work zone. The extinguishers located in the various locations should also be identified prior to the start of work. No personnel will fight a fire beyond the stage where it can be put out with a portable extinguisher (incipient stage).

16.9.1 Fire Prevention

Fires will be prevented by adhering to the following precautions:

- Good housekeeping and storage of materials.
- Storage of flammable liquids and gases away from oxidizers.
- Shutting off engines to refuel.
- Grounding and bonding metal containers during transfer of flammable liquids.
- Use of UL approved flammable storage cans.
- Fire extinguishers rated at least 10-pounds ABC located on all heavy equipment, in all trailers and near all hot work activities.

The person responsible for the control of fuel source hazards and the maintenance of fire prevention and/or control equipment is the HSO.

16.10 Significant Vapor Release

Based on the proposed tasks, the potential for a significant vapor release is low. However, if a release occurs, the following steps will be taken:

- Move all personnel to an upwind location. All non-essential personnel must evacuate.
- Upgrade to Level C Respiratory Protection.

- Downwind perimeter locations must be monitored for volatile organics.
- If the release poses a potential threat to human health or the environment in the community, the Emergency Coordinator must notify the Langan Project Manager.
- Local emergency response coordinators will be notified.

16.11 Overt Chemical Exposure

The following are standard procedures to treat chemical exposures. Other, specific procedures detailed on the Material Safety Data Sheet (MSDS) will be followed, when necessary.

SKIN AND EYE: Use copious amounts of soap and water from eye-wash kits and portable hand-wash stations.

CONTACT: Wash/rinse affected areas thoroughly, then provide appropriate medical attention. Skin must also be rinsed for 15 minutes if contact with caustics, acids, or hydrogen peroxide occurs. Affected items of clothing must also be removed from contact with skin.

Providing wash water and soap will be the responsibility of each individual contractor or subcontractor on-site.

16.12 Decontamination during Medical Emergencies

If emergency lifesaving first aid and/or medical treatment is required, normal decontamination procedures may need to be abbreviated or omitted. The HSO or designee will accompany contaminated victims to the medical facility to advise on matters involving decontamination when necessary. The outer garments can be removed if they do not cause delays, interfere with treatment or aggravate the problem. Respiratory equipment must always be removed. Protective clothing can be cut away. If the outer contaminated garments cannot be safely removed on site, a plastic barrier placed between the injured individual and clean surfaces should be used to help prevent contamination of the inside of ambulances and/or medical personnel. Outer garments may then be removed at the medical facility. No attempt will be made to wash or rinse the victim if his/her injuries are life threatening unless it is known that the individual has been contaminated with an extremely toxic or corrosive material which could also cause severe injury or loss of life to emergency response personnel. For minor medical problems or injuries, normal decontamination procedures will be followed.

16.13 Adverse Weather Conditions

In the event of adverse weather conditions, the HSO will determine if work will continue without potentially risking the safety of all field workers. Some of the items to be considered prior to determining if work should continue are:

- Potential for heat stress and heat-related injuries.
- Potential for cold stress and cold-related injuries.
- Treacherous weather-related working conditions (hail, rain, snow, ice, high winds).
- Limited visibility (fog).
- Potential for electrical storms.
- Earthquakes.
- Other major incidents.

Site activities will be limited to daylight hours, or when suitable artificial light is provided, and acceptable weather conditions prevail. The HSO will determine the need to cease field operations or observe daily weather reports and evacuate, if necessary, in case of severe inclement weather conditions.

16.14 Spill Control and Response

All small spills/environmental releases must be contained as close to the source as possible. Whenever possible, the MSDS will be consulted to assist in determining proper waste characterization and the best means of containment and cleanup. For small spills, sorbent materials such as sand, sawdust, or commercial sorbents should be placed directly on the substance to contain the spill and aid recovery. Any acid spills should be diluted or neutralized carefully prior to attempting recovery. Berms of earthen or sorbent materials can be used to contain the leading edge of the spills. All spill containment materials will be properly disposed of. An exclusion zone of 50 to 100 feet around the spill area should be established depending on the size of the spill.

All contractor vehicles must have spill kits on them with enough material to contain and absorb the worst-case spill from that vehicle. All vehicles and equipment must be inspected prior to being admitted on-site. Any vehicle or piece of equipment that develops a leak will be taken out of service and removed from the job site.

The following seven steps must be taken by the Emergency Coordinator:

1. Determine the nature, identity, and amounts of major spills.
2. Make sure all unnecessary persons are removed from the spill area.
3. Notify the HSO immediately.
4. Use proper PPE in consultation with the HSO.
5. If a flammable liquid, gas, or vapor is involved, remove all ignition sources and use non-sparking and/or explosion-proof equipment to contain or clean up the spill (diesel-only vehicles, air-operated pumps, etc.)
6. If possible, try to stop the leak with the appropriate material.

7. Remove all surrounding materials that can react or compound with the spill.

In addition to the spill control and response procedures described in this HASP, Langan personnel will coordinate with the designated project manager relative to spill response and control actions. Notification to the Project Manager must be immediate and, to the extent possible, include the following information:

- Time and location of the spill.
- Type and nature of the material spilled.
- Amount spilled.
- Whether the spill has affected or has a potential to affect a waterway or sewer.
- A brief description of affected areas/equipment.
- Whether the spill has been contained.
- Expected time of cleanup completion. If spill cleanup cannot be handled by Langan's on-site personnel alone, such fact must be conveyed to the Project Manager immediately.

Langan will not make any notification of spills to outside agencies. The client will notify regulatory agencies as per their reporting procedures.

16.15 Emergency Equipment

The following minimum emergency equipment must be kept and maintained on site:

- Industrial first aid kit.
- Fire extinguishers (one per site).

16.16 Restoration and Salvage

After an emergency, prompt restoration of utilities, fire protection equipment, medical supplies, and other equipment will reduce the possibility of further losses. Some of the items that may need to be addressed are:

- Refilling fire extinguishers.
- Refilling medical supplies.
- Recharging eyewashes and/or showers.
- Replenishing spill control supplies.

16.17 Documentation

Immediately following an incident or near miss, unless emergency medical treatment is required, either the employee or a coworker must contact the Langan Incident/Injury Hotline at 1-(800)-9-

LANGAN (extension 4699) and the client representative to report the incident or near miss. For emergencies involving personnel injury and/or exposure, the HSO and affected employee will complete and submit an Employee Exposure/Injury Incident Report (Attachment C) to the Langan Corporate Health and Safety Manager as soon as possible following the incident.

17.0 SPECIAL CONDITIONS

This guideline contains information and requirements for special conditions that may not be routinely encountered.

17.1 Scope

The guideline applies to the specific projects identified within this document. Additional provisions will be addressed in each Site-Specific HEALTH AND SAFETY PLAN (HASP), as needed.

17.2 Responsibilities

Site Personnel - All site personnel must be alert to safety hazards on work sites and take action to minimize such hazards. Personnel must utilize the buddy system, watch for inappropriate behavior, and be alerted to changes in site conditions.

Health and Safety Officer (HSO) - The HSO is responsible for considering these procedures in the development of site-specific HASPs. The HSO must schedule frequent "tail gate" safety briefings to enhance safety awareness and discuss potential problems.

17.3 Procedures

The procedures outlined below must be followed when such conditions are encountered.

17.3.1 Ladders

Langan safety procedures must be used to ensure employee safety when using ladders in the office or work sites. All ladders must be coated or repaired to prevent injury to the employee from punctures or lacerations and to prevent snagging or clothing. Any wood ladders used must have an opaque covering except for identification or warning labels, which may be placed on one face only of a side rail.

17.3.1.1 Ladder Use

Employees must only use ladders for the purposes they were designed for and must not be used as scaffolding. Ladders will be maintained and inspected prior to use for slip hazards including

oil and grease. Employees must use ladders only on stable and level surfaces unless the ladder is secured to prevent possible displacement. Ladders should not be used on slippery surfaces unless secured or provided with slip-resistant feet to prevent accidental displacement. Ladders should not be used in locations where they could be displaced by workplace activities or traffic. Ladder rungs, cleats and steps must be parallel, level and uniformly spaced when the ladder is in the use position.

Employees should not be carrying anything including equipment that could cause injury if there was a fall while utilizing the ladder. The top and bottom of the ladder area must remain clear while in use. When ascending and descending the ladder, employees must face the ladder.

Ladders must not be loaded beyond the maximum intended load for which they were built or the manufacturer's rated capacity.

17.3.1.2 Portable Ladders

Rungs, cleats, and steps for portable ladders and fixed ladders must be spaced not less than 10 inches apart, nor more than 14-inches apart, as measured between center lines of the rungs, cleats, and steps. When used to access an upper landing surface, the ladder side rails must extend at least three feet above the upper landing surface to which the ladder is used to gain access. If this is not possible, due to the length of the ladder, then the top of the ladder must be secured at its top to a rigid support.

17.3.1.3 Step Stools

Rungs, cleats and steps of step stools must not be less than 8 inches apart, nor more than 12-inches apart, as measured between center lines of the rungs, cleats, and steps.

17.3.1.4 Extension Ladders

Rungs, cleats and steps of the base section of extension trestle ladders must be spaced not less than 8 inches apart, nor more than 18 inches apart, as measured between center lines of the rungs, cleats and steps. The rung spacing on the extension section of the extension trestle ladder must not be less than 6 inches nor more than 12-inches, as measured between the center lines of the rungs, cleats and steps. Ladders must be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately one-quarter of the working length of the ladder (the distance along the ladder between the foot and the top support).

17.3.1.5 Inspection

Ladders will be inspected for visible defects periodically, prior to utilization or after any occurrence that could have negatively affected the ladder. Portable ladders with defects including broken or missing rungs, cleats, or steps, broken or split rails, corroded components, or other faulty components must not be used. The ladder will be immediately marked as defective, tagged as "Do Not Use" or blocked from being used and removed from service until repaired.

17.3.2 First Aid/Cardiopulmonary Resuscitation (CPR)

Langan field and office personnel will be encouraged to be trained in First Aid and Cardiopulmonary Resuscitation (CPR). Training will be provided free of charge by Langan to all employees. Employees will receive a training certificate that will be kept on file with the Health & Safety Coordinator (HSC). Training and certification will be provided by a credited provider such as American Red Cross or equivalent.

17.3.2.1 Emergency Procedures

Prior to site work, the Langan employees certified in first aid and CPR will be identified in the site-specific HASP. Langan will endeavor to have at least one employee at a job site trained and able to render first aid and CPR. The site-specific HASP will contain first aid information on both potential chemical and physical hazards. Emergency procedures to be followed in case of injury or illnesses are provided in the HASP. The HASP will include emergency contact information including local police and fire departments, hospital emergency rooms, ambulance services, on-site medical personnel, and physicians. The HASP will also include directions and contact information for the nearest emergency facility in case immediate medical attention is required. The emergency contact information will be conspicuously posted at the worksite. Employees that are injured and require immediate medical attention must call either 911 or the local posted emergency contacts. Employees should use ambulatory services to transport injured workers to the nearest facility for emergency medical care. In areas where 911 is not available, the telephone numbers of physicians, hospitals, or ambulances must be conspicuously posted.

17.3.2.2 First Aid Supplies

First aid supplies are readily available to all Langan employees when required. First aid kits are in each Langan office. Portable first aid kits are available for employees to use at work sites. First aid kits should consist of items needed to treat employees for potential chemical and physical injuries. At a minimum, first aid kits should contain items to allow basic first aid to be rendered. Where the eyes or body of an employee may be exposed to corrosive materials,

suitable facilities for quick drenching or flushing of the eyes and body must be provided within the work area for immediate emergency use including eye wash.

First aid kits will be weatherproof with individually sealed packages of each item. All portable first aid kits must be inspected by Langan employees before and after use to ensure all used items are replaced. When out in the field, employees must check first aid kits weekly to ensure used items are replaced.

17.3.3 Hydrogen Sulfide

Langan employees with the potential to be exposed to hydrogen sulfide while at work sites must have training in hydrogen sulfide awareness. The training will include the identification of areas where employees could be exposed to hydrogen sulfide, health effects, permissible exposure limits, first aid procedures, and personnel protective equipment. Langan employees could be exposed to hydrogen sulfide while at job sites including petroleum refineries, hazardous waste treatment, storage and disposal facilities, uncontrolled hazardous waste sites, and remediation projects.

17.3.3.1 Characteristics

Hydrogen sulfide is a colorless gas with a strong odor of rotten eggs that is soluble in water. Hydrogen sulfide is used to test and make other chemicals. It is also found as a by-product of chemical reactions, such as in sewer treatment. It is a highly flammable gas and a dangerous fire hazard. Poisonous gases are produced in fires including sulfur oxides. Hydrogen sulfide is not listed as a carcinogen.

17.3.3.2 Health Effects

Hydrogen Sulfide can affect employees if inhaled or through contact with skin or eyes. Acute (or short-term) health effects of hydrogen sulfide exposure include irritation of the nose and throat, dizziness, confusion, headache, and trouble sleeping. Inhalation of hydrogen sulfide can irritate the lungs causing coughing and/or shortness of breath. Higher levels of exposure can cause a build-up of fluid in the lungs (pulmonary edema), a medical emergency, with severe shortness of breath.

Chronic (or long-term) health effects of low levels of exposure to hydrogen sulfide can cause pain and redness of the eyes with blurred vision. Repeated exposure may cause bronchitis with cough, phlegm, and shortness of breath.

17.3.3.3 *Protective Clothing and Equipment*

Respirators are required for those operations in which employees will be exposed to hydrogen sulfide above OSHA permissible exposure level. The maximum OSHA permissible exposure limit (PEL) for hydrogen sulfide is 20-parts of hydrogen sulfide vapor per million parts of air (20 ppm) for an 8-hour workday and the maximum short-term exposure limit (STEL) is 10 ppm for any 10-minute period.

Where employees are exposed to levels up to 100-parts of hydrogen sulfide vapor per million parts of air (100 ppm), the following types of respiratory protection are allowed:

- Any powered, air-purifying respirator with cartridge(s).
- Any air-purifying, full-facepiece respirator (gas mask) with a chin style, front- or back-mounted canister.
- Any supplied air system with escape self-contained breathing apparatus, if applicable; and,
- Any self-contained breathing apparatus with a full facepiece.

Respirators used by employees must have joint Mine Safety and Health Administration and the National Institute for Occupational Safety and Health (NIOSH) seal of approval. Cartridges or canisters must be replaced before the end of their service life, or the end of the shift, whichever occurs first. Langan employees that have the potential to be exposed to hydrogen sulfide will be trained in the proper use of respirators. Respirator training is discussed under– Langan’s Respiratory Protection Program.

Employees with potential exposure to hydrogen sulfide, or when required by the client, will wear a portable hydrogen sulfide gas detector. The detector should have an audible, visual and vibrating alarm. The detector may also provide detection for carbon monoxide, sulfur dioxide, and oxygen-deficient atmospheres. The hydrogen sulfide monitor will, at a minimum, be calibrated to detect hydrogen sulfide at a level of 20-parts of hydrogen sulfide vapor per million parts of air (20 ppm). Many portable gas detectors will have factory defaults with a low-level alarm at 10 ppm and a high-level alarm at 15 ppm. Langan employees must consult clients to determine if any site-specific threshold levels exist.

If the hydrogen sulfide gas detector sounds and employees are not wearing appropriate respiratory protection, employees must immediately vacate the area and meet at the assigned emergency location. Langan employees may not re- enter the site without proper respiratory protection and approval from the client or property owner if needed.

Employees must wear PPE to prevent eye and skin contact with hydrogen sulfide. Employees must wear appropriate protective clothing including boots, gloves, sleeves, and aprons, over any

parts of their body that could be exposed to hydrogen sulfide. Non-vented, impact-resistant goggles should be worn when working with or exposed to hydrogen sulfide.

17.3.3.4 Emergency and First Aid Procedures

Eye and Face Exposure

If hydrogen sulfide comes in contact with eyes, it should be washed out immediately with copious amounts of water for 30 minutes, occasionally lifting the lower and upper eye lids. Seek medical attention immediately.

Skin Exposure

If hydrogen sulfide contaminates clothing or skin, remove the contaminated clothing immediately and wash the exposed skin with copious amounts of water and soap. Seek medical attention immediately. Contaminated clothing should either be disposed of or washed before wearing again.

Breathing

If a Langan employee or other personnel breathe in hydrogen sulfide, immediately get the exposed person to fresh air. If breathing has stopped, artificial respiration should be started. Call for medical assistance or a doctor as soon as possible.

Safety Precautions

Hydrogen sulfide is a highly flammable gas and a dangerous fire hazard. Containers of hydrogen sulfide may explode in a fire situation. Poisonous gases are produced during fires.

Langan employees should contact property owners and operators prior to conducting work onsite to be aware of any site-specific contingency plans, identify where hydrogen sulfide is used at the facility, and be informed about additional safety rules or procedures.

17.3.4 Fire Protection/Extinguishers

Langan field personnel that have been provided with portable fire extinguishers for use at worksites will be trained to familiarize employees with general principles of fire extinguisher use and hazards associated with the incipient stage of firefighting. Training will be provided prior to the initial assignment for field work and annually thereafter.

Portable fire extinguishers must be visually inspected monthly and subjected to an annual maintenance check. Langan will retain records of the annual maintenance date.

17.3.5 Overhead lines

When field work is performed near overhead lines, the lines must be de-energized and grounded, or other protective measures must be provided before the work commences. If overhead lines are to be de-energized, arrangements must be made with the client, property owner, or organization that operates or controls the electric circuits involved to de-energize and ground them. If protective measures, such as guarding, isolating, or insulating, are provided, these precautions must prevent employees from contacting such lines directly with any part of their body or indirectly through conductive materials, tools, or equipment.

When unqualified Langan personnel are working in an elevated position near overhead lines, the location must be such that the person and the longest conductive object they may contact cannot come closer to any unguarded, energized overhead line than the following distances:

1. For voltages to ground 50-kilovolts (kV) or below – 10-feet; and
2. For voltages to ground over 50kV - 10 feet, plus 4-inches for every 10kV over 50kV.

As previously indicated, Langan does not retain qualified employees to perform work on energized equipment.

17.3.5.1 Vehicle and Equipment Clearance

Any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines must be operated so that a clearance of 10-feet is maintained. If the voltage of the overhead lines is higher than 50kV, the clearance must be increased by 4-inches for every 10kV over that voltage.

If any of the following discussed conditions occur, the clearance may be reduced.

- If the vehicle is in transit with its structure lowered, the clearance may be reduced to 4-feet. If the voltage is higher than 50kV, the clearance must be increased to 4-inches for every 10 kV over that voltage.
- If insulating barriers are installed to prevent contact with the lines, and if the barriers are rated for the voltage of the line being guarded and are not a part of or an attachment to the vehicle or its raised structure, the clearance may be reduced to a distance within the designed working dimensions of the insulating barrier.

Employees standing on the ground may not contact the vehicle or mechanical equipment or any of its attachments unless the employee is using protective equipment rated for the voltage, or the equipment is located so that no uninsulated part of its structure (that portion of the structure

that provides a conductive path to employees on the ground) can come closer to the overhead line than permitted.

If any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines is intentionally grounded, employees working on the ground near the point of grounding may not stand at the grounding location whenever there is a possibility of overhead line contact. Additional precautions, such as the use of barricades or insulation, must be taken to protect employees from hazardous ground potentials, depending on earth resistivity and fault currents, which can develop within the first few feet or more outward from the grounding point.

17.3.6 Trade Secret

Langan employees could potentially be provided trade secret information by the client or property owner when site-specific information is provided about highly hazardous chemicals. Trade secret means any confidential formula, pattern, process, device, information, or compilation of information that is used in an employer's business, and that allows the employer to obtain an advantage over competitors who do not know or use it. Langan employees understand that this information should be kept confident and if required, may enter into a confidentiality agreement with the client.

17.3.7 Bloodborne Pathogens

Langan employees that can anticipate exposure to blood or other potentially infectious material while at work sites must have training in bloodborne pathogens. Applicable employees would include those trained in first aid and serving a designated role as an emergency medical care provider. Bloodborne pathogens are pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include but are not limited to, hepatitis B virus and human immunodeficiency virus.

17.3.7.1 Training

Langan employees with potential occupational exposure to blood or other potentially infectious material must participate in a training program. Training must be conducted prior to the initial assignment where there would be potential for exposure and annually thereafter within one year of previous training. The training program will be provided to Langan employees at no cost to them and during working hours.

Langan will ensure the training program must consist of the following:

- An accessible copy of the regulatory text of 29 CFR 1910.1030 and an explanation of its

contents.

- A general explanation of the epidemiology and symptoms of bloodborne diseases.
- An explanation of the modes of transmission of bloodborne pathogens.
- An explanation of Langan's exposure control plan and how the employee can obtain a copy of the written plan.
- An explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious materials.
- An explanation of the use and limitations of personal protective equipment (PPE) to prevent and reduce exposure.
- Information on the types, proper use, location, removal, handling, and disposal of PPE.
- An explanation of the basis for the selection of PPE.
- Information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine and vaccination will be offered free of charge.
- Information on the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials.
- An explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available.
- Information on the post-exposure evaluation and determining whether the employer is required to provide for the employee following an exposure incident.
- An explanation of the signs and labels and/or color coding required by paragraph 29 CFR 1910.1030(g)(1); and
- An opportunity for interactive questions and answers with the person conducting the training session.

Langan will develop and implement a written Exposure Control Plan, which will be designed to eliminate or minimize employee exposure to bloodborne pathogens. The Exposure Control Plan will contain the following elements:

- An exposure determination for employees.
- The schedule and method of implementation for Methods of Compliance (29 CFR 191.1030(d)), Hepatitis B Vaccination and Post-Exposure Evaluation and Follow-up (29 CFR 1910.1030(f)), Communication of Hazards to Employees (29 CFR 1910.1030(g)) and (h) Recordkeeping (29 CFR 1910.1030(h)).
- The procedure for the evaluation of circumstances surrounding exposure incidents.
- Ensure a copy of the Exposure Control Plan will be accessible to employees; and,
- The Exposure Control Plan must be reviewed and updated at least annually.

Langan employees with occupational exposure to bloodborne pathogens include any employees trained in first aid that would be expected to provide emergency medical care. This determination is made without regard to the use of PPE, which could eliminate or minimize exposure.

Universal precautions must be observed to prevent contact with blood or other potentially infectious materials. According to the concept of Universal Precautions, all human blood and certain human body fluids are treated as if known to be infectious for bloodborne pathogens. When differentiation between body fluid types is difficult or impossible, all body fluids must be considered potentially infectious materials.

Work practice controls must be used to eliminate or minimize employee exposure, if applicable. Since Langan employees will have occupational exposure only during the rendering of first aid, personnel protective equipment will be utilized to reduce or minimize exposure. PPE that could be available to Langan personnel when administering first aid includes safety glasses, gloves, and Tyvek suits or sleeves. PPE and first aid kits will be provided to employees at no cost to them.

Langan employees that render first aid in office areas will have access to hand-washing facilities or restrooms. For first aid rendered at field locations, first aid kits will contain an appropriate antiseptic hand cleanser and clean cloth/paper towels or antiseptic towelettes. After using antiseptic hand cleansers or towelettes, employees must wash their hands with soap and running water as soon as feasible.

After administering first aid, potentially infectious materials, including towels, personnel protective equipment, clothes, and bandages, must be placed in a container, which prevents leakage during collection, handling, processing, storage, transport, or shipping. All PPE will be disposed of after use. Any equipment or working surfaces which was been exposed to blood or potentially infectious materials due to an injury will be decontaminated prior to reuse.

Langan will make available the hepatitis B vaccine and vaccination series to all employees who have occupational exposure, and post-exposure evaluation and follow-up to all employees who have had an exposure incident. These services will be available to the employee at no cost to them through a medical provider.

17.3.7.2 Recordkeeping

Langan will maintain training and medical records for each employee with occupational exposure to blood or potentially infectious materials. Medical and training records will be maintained by Langan's H&S Department.

Training records will include the following:

- Dates of the training sessions.
- Contents or a summary of the training sessions.
- Names and qualifications of persons conducting the training; and
- Names and job titles of all persons attending the training sessions.

Training records must be maintained for 3 years from the date on which the training occurred. Medical records will be preserved and maintained for the duration of employment plus 30 years.

All records will be made available upon request to employees, the Assistant Secretary of Labor for Occupational Safety and Health, and the Director of the National Institute for Occupational Safety and Health Director of OSHA for examination and copying. Medical records must have written consent from the employee before releasing.

If Langan ceases to do business, all records must be transferred to the successor employer. The successor employer must receive and maintain these records.

If there will not be a successor, Langan will notify current employees of their rights to access records at least three months prior to the cessation of business.

18.0 RECORDKEEPING

The following is a summary of required health and safety logs, reports, and recordkeeping.

18.1 Field Change Authorization Request

Any changes to the work to be performed that are not included in the HASP will require an addendum that is approved by the Langan project manager and Langan HSM to be prepared. Approved changes will be reviewed with all field personnel at a safety briefing.

18.2 Medical and Training Records

Copies or verification of training (40-hour, 8-hour, supervisor, site-specific training, documentation of three-day on-the-job training (OJT)), and respirator fit-test records) and medical clearance for site work and respirator use will be maintained in the office and available upon request. Records for all subcontractor employees must also be available upon request. All employee medical records will be maintained by the HSM.

18.3 Onsite Log

A log of personnel on-site each day will be kept by the HSO or designee.

18.4 Daily Safety Meetings (“Tailgate Talks”)

Completed safety briefing forms will be maintained by the HSO.

18.5 Exposure Records

All personal monitoring results, laboratory reports, calculations, and air sampling data sheets are part of an employee exposure record. These records will be maintained by the HSO during site work. At the end of the project, they will be maintained according to 29 CFR 1910.1020.

18.6 Hazard Communication Program/MSDS-SDS

Material safety data sheets (MSDS) Safety Data Sheets (SDS) have been obtained for applicable substances and are included in this HASP (Attachment D). Langan’s written hazard communication program, in compliance with 29 CFR 1910.1200, is maintained by the HSM.

18.7 Documentation

Immediately following an incident or near miss, unless emergency medical treatment is required, either the employee or a coworker must contact the Langan incident/injury hotline at 1-800-952-6426, extension 4699, and the Project Manager to report the incident or near miss. The Project Manager will contact the client or client representative. A written report must be completed and submitted HSM within 24 hours of the incident. For emergencies involving personnel injury and/or exposure, the employee will complete and submit the Langan incident/injury report to the Langan corporate health and safety manager as soon as possible following the incident. Accidents will be investigated in-depth to identify all causes and to recommend hazard control measures.

18.7.1 Accident and Injury Report Forms

18.7.1.1 Accident/Incident Report

All injuries, no matter how slight, must be reported to the FTL and the PM immediately. The accident/incident report forms, attached in Attachment C, will be filled out on all accidents by the applicable contractor supervision personnel, the FTL, or the HSO. Copies of all accident/incident reports must be kept on-site and available for review. Project personnel will be instructed on the location of the first aid station, hospital, and doctor and ambulance service near the job. The emergency telephone numbers will be conspicuously posted in site vehicles near the work zone. First aid supplies will be centrally located and conspicuously posted between restricted and nonrestricted areas to be readily accessible to all on the site.

18.7.1.2 First Aid Treatment Record

The forms will be used for recording all non-lost time injuries treated by the project first-aid attendant, the local physician or hospital will be entered in detail on this record. "Minor" treatment of scratches, cuts, etc. will receive the same recording attention as treatment of more severe injuries.

18.7.1.3 OSHA Form 300

An OSHA Form 300 will be kept at the Langan Corporate Office in Parsippany, New Jersey. All recordable injuries or illnesses will be recorded on this form. Subcontractor employers must also meet the requirements of maintaining an OSHA 300 form. The Incident Report form used to capture the details of work-related injuries/illnesses meets the requirements of the OSHA Form 301 (supplemental record) and must be maintained with the OSHA Form 300 for all recordable injuries or illnesses. Forms for recording OSHA work-related injuries and illnesses are included in Attachment C.

19.0 CONFINED SPACE ENTRY

Confined spaces are not anticipated at the Site during planned construction activities. If confined spaces are identified, the contractor must implement their own confined space program that all applicable federal, state, and local regulations. Confined spaces **will not** be entered by Langan personnel.

20.0 HASP ACKNOWLEDGEMENT FORM

All Langan personnel and contractors will sign this HASP Compliance Agreement indicating that they have become familiar with this HASP and that they understand it and agree to abide by it.

Appendix B

250 Water Street, New York, New York

Community Air Monitoring Program (CAMP)
Plan



IMPACT ENVIRONMENTAL
170 Keyland Court
Bohemia, New York 11716
TEL: (631) 268-8800
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NYSDEC BROWNFIELD CLEANUP PROGRAM
Community Air Monitoring Plan – BCP # C231127
April 2, 2026

conducted at:

250 Water Street
New York, New York
County Tax Map Designation: Block 98; Lot 1

Submitted to:

Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway
Albany, New York, 12233-7020

Prepared For:

Tavros Holding LLC
19 West 24th Street, 12th Floor
New York, NY 10010

IEC Project # 21490



IMPACT ENVIRONMENTAL | 170 Keyland Court | Bohemia | New York | 11716 | 631.269.8800

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LIST OF ACRONYMS

Acronym	Definition
DER	Division of Environmental Remediation
CAMP	Community Air Monitoring Unit
Mcg/m ³	Micrograms Per Cubic Meter
NYS DEC	New York State Department of Environmental Conservation
NYS DOH	New York State Department of Health
PID	Photoionization Detector
PM-10	Particulate Matter Less Than 10 Micrometers in Size
PPM	Parts Per Million
VOC	Volatile Organic Compound

CERTIFICATION

I, Brad Summerville, am a Professional Engineer (PE) as defined in §43-140. I have primary direct responsibility for implementation of the Community Air Management Plan (CAMP) for the (250 Water Street, New York, NY) Site (DEC Site # C231127).

I certify that the CAMP has a plan for handling the prevention of exposure to the public from potential contaminant releases resulting from on-site investigative or remedial activities.

Brad Summerville, P.E.

Name

Signature

Date

1 INTRODUCTION

Impact Environmental prepared this Community Air Monitoring Plan (CAMP) to protect the community from any potential airborne releases that could result from field activities associated with construction activities for development (foundation installations, support of excavation, etc.) or remediation activities (remedial investigations or remedial action) at the property located at 250 Water Street, New York, New York, herein referred to as the "Site". This work is being performed under the auspices of the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program, DEC Project # C231127. This document has been prepared in accordance with the NYSDEC Program Policy Division of Environmental Remediation (DER)-10/Technical Guidance for Site Investigation and Remediation, dated May 3, 2010.

The CAMP is intended to protect off-site receptors and those not directly involved with remedial activities from potential airborne contaminant releases that result directly from investigative or remedial activities.

1.1 Objectives

The overall objectives of this document are as follows:

- Prevent exposure to the public from potential contaminant releases resulting from on-site investigative or remedial activities;
- Specify monitoring and documentation requirements; and
- Provide contingency details.

2 MONITORING

2.1 Community Air Monitoring Plan

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. Exceedances of action levels observed during performance of the CAMP will be reported to the DEC Project Manager and included in the Daily Report.

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.

2.2 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. A total of four (4) CAMP stations will be positioned at each boundary of the Site. 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.

2.3 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. A total of four (4) CAMP stations will be positioned at each boundary of the Site.

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 mcg/m³ above the upwind level and provided that no visible dust is migrating from the work area.

2. If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m³ above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m³ of the upwind level and in preventing visible dust migration.
3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

2.3.1 Special Requirements for Work Within 20 Feet of Potentially Exposed Individuals

Special Requirements CAMP is required when ground intrusive or soil handling is occurring within 20 feet of potentially exposed individuals or structures, as follows:

1. When work areas are within 20 feet of potentially exposed populations or occupied structures, the continuous monitoring locations for VOCs and particulates must reflect the nearest potentially exposed individuals and the location of ventilation system intakes for nearby structures. The use of engineering controls such as vapor/dust barriers, temporary negative-pressure enclosures, or special ventilation devices should be considered to prevent exposures related to the work activities and to control dust and odors. Consideration should be given to implementing the planned activities when potentially exposed populations are at a minimum, such as during weekends or evening hours in non-residential settings.
2. If total VOC concentrations opposite the walls of occupied structures or next to intake vents exceed 1 ppm, monitoring should occur within the occupied structure(s). Depending upon the nature of contamination, chemical-specific colorimetric tubes of sufficient sensitivity may be necessary for comparing the exposure point concentrations with appropriate pre-determined response levels (response actions should also be predetermined). Background readings in the occupied spaces must be taken prior to commencement of the planned work. Any unusual background readings should be discussed with NYSDOH prior to commencement of the work.

3. If total particulate concentrations opposite the walls of occupied structures or next to intake vents exceed 150 mcg/m³, work activities should be suspended until controls are implemented and are successful in reducing the total particulate concentration to 150mcg/m³ or less at the monitoring point.

2.4 Meteorological Monitoring

Meteorological monitoring will take place on a daily basis. It will consist of temperature, wind direction, and general atmospheric conditions (i.e. rain, snow, etc.). These parameters will be evaluated each morning and recorded in the field notebook. Wind direction should be monitored throughout the day so that upwind and downwind sampling locations can be adjusted if necessary. All readings will be recorded and be available for DEC personnel to review.

3 DOCUMENTATION

During the implementation of the CAMP, the following information will be recorded and maintained:

- Climatological conditions including temperature wind direction, and other atmospheric conditions along with the date and time of observations;
- Calibration of field instruments;
- CAMP monitoring locations;
- VOC 15-min readings as well as instantaneous readings, if necessary; All particulate readings; and
- Any exceedances to the response levels and the respective corrective actions.

VOC 1-min readings will be available for review by the State (NEYDEC and NYSDOH) if requested and included in each *Daily Field Report*. Additionally, the DEC will be notified immediately of any exceedances.