



Remedial Investigation Workplan

For:

**Proposed Development
3 North Castle Drive
North Castle, New York**

Prepared for:

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CERTIFICATIONS

I, , certify that I am a professional engineer, and meet the definition of qualified environmental professional as defined in 6 NYCRR Part 375 and that this Remedial 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).

NY Professional Engineer # 102352

Date

Signature

It is a violation of Article 130 of New York State Education Law for any person to alter this document in any way without the express written verification of adoption by any New York State licensed engineer in accordance with Section 7209(2), Article 130, New York State Education Law.

1.0 INTRODUCTION

Armonk Development, LLC (the “Volunteer”) plans to enter into a Brownfield Cleanup Agreement (BCA) with the New York State Department of Environmental Conservation (NYSDEC) to investigate and remediate a 20.67-acre portion of the property located at 3 North Castle Drive, Westchester County, North Castle, New York (the “Site”). The Site is identified as a portion of 108.3-1-62.1 on the Westchester County tax map. The Site is bound to the north by undeveloped land and Route 22, and commercial properties beyond; to the west by undeveloped, wooded land and North Castle Road, undeveloped land, and Route 22 beyond; to the south by an IBM building and parking lots; and to the east by undeveloped wooded land and Armonk Indoor and sport fields beyond. A Site Location Map is presented as **Figure 1.1**.

This document comprises a Remedial Investigation Work Plan (RIWP) that describes the investigation activities to be conducted at the Site, as part of the Site’s planned remedial investigation and remediation. The Site is a portion of a larger 32.55-acre property located at 3 North Castle Drive, Westchester County, North Castle, New York (the “Subject Property”) The Site encompasses the area of planned development, extending to the Limits of Disturbance (LOD), the property line, or the limits of the proposed residential development depending on the location. Remediation cannot occur outside of the LOD toward the existing steep slopes along the western edge of the property due to local development restrictions.

This RIWP includes a description of the Site, summary of the Site history and previous environmental investigations, a description of the Site’s physical, geologic, hydrogeologic setting and subsurface features and a plan of action for further investigation of the areas of concern identified previously.

This RIWP has been prepared to achieve the following objectives:

- To complete the horizontal and vertical delineation of the nature and extent of contamination within the Site;
- To identify any potential source areas of contamination;
- To determine the remedial action needed to protect human health and the environment;
- and
- To collect sufficient data to advance a Track 2 remediation of the Site.

This RIWP is developed in general accordance with the Department's Remediation Technical Guidance for Site Investigation and Remediation (DER-10).

2.0 PROJECT BACKGROUND

2.1 SITE DESCRIPTION

The Site consists of a 20.67-acre area portion of Subject Property located at 3 North Castle Drive, Westchester County, North Castle, New York. The Subject Property is identified as 108.3-1-62.1 on the Westchester County tax map. The Site is bound to the north by undeveloped land and Route 22, and commercial properties beyond; to the west by undeveloped wooded land and North Castle Road, undeveloped land, and Route 22 beyond; to the south by an IBM building and parking lots; and to the east by undeveloped wooded land and Armonk Indoor and sport fields beyond. A Site Plan is presented as **Figure 2.1**.

2.2 PROPOSED DEVELOPMENT

The proposed Site development is anticipated to consist of the redevelopment of the Site with a multi-family use, with up to eighty-eight (88) townhouse units. The development will be supported by a loop road with ingress and egress along North Castle Drive; amenity structures such as a club house, stormwater management systems, driveways, parking, walking trails, and landscaping. Ten percent (8 units) of the multi-family units will be designated as affordable.

2.3 SITE HISTORY

The Site is currently vacant except for an asphalt roadway providing access to adjacent athletic fields located east of the Site. Prior to 1971, the Site was undeveloped. In 1971 the asphalt roadway that borders the Site to the west, and an access road on the central and southern portions of the Site were constructed. A review of historic aerial images identified that the Site was historically utilized for agricultural purposes. The former IBM North Castle facility and associated parking areas are situated south of the Site and was constructed between 1960 and 1964. Undeveloped land and the North Castle Community Park are located east of the Site. Undeveloped land is located immediately north and west of the Site, beyond which lies Armonk Bedford Road and commercial properties beyond.

2.4 PREVIOUS ENVIRONMENTAL INVESTIGATION

The following environmental reports were prepared for the subject property and are summarized in the following sections:

- *North Castle History: Volume 27 dated 2000* prepared by The North Castle Historical Society

Based on the North Castle Historical Society records, the property surrounding the Site has historically been utilized for agricultural purposes since 1790. Several houses were on the subject property and several orchards were noted. In 1955 IBM purchased the 443-acre property and assumed the maintenance of the apple orchard located on the subject Site. The trees were sprayed with chemicals by IBM Corporation up to fifteen (15) times per season to get worm-free fruit. IBM continued to produce and sell apples until 1962. Therefore, IBM used a different chemical application to prevent fruit growth but maintain flowering of the trees. While there is no known date for when IBM ceased spraying the trees, some aerial photos show some of the trees were still present right before the most recent sale in August 2017. Therefore, IBM may have been using the more unusual pesticide to kill the fruit for over 50 years. It should be noted that, It is unclear what type of pesticide would be used for this purpose and if it may have contained unusual chemicals.

- *Phase I ESA Report dated August 2, 2016*, prepared by Environmental Resources Management (ERM)

This Phase I ESA, which was relied on by the Site Owner when they acquired the Subject Property, and which was prepared by ERM, reported no RECs at the Site and pesticide application was identified as a de minimis condition. No further evaluation or sampling was recommended or performed.

- *Phase I ESA Report dated September 21, 2016*, prepared by Lagan Engineering, Environmental, Surveying, and Landscape Architecture, D.P.C. (Lagan) for Madonna Enterprises, LLC.

Lagan also prepared this pre-acquisition Phase I ESA for Madonna Enterprises, LLC., in which it reported no RECs at the Site and identified pesticide application as a de minimis condition. Lagan reported that the potential for residual pesticide related compounds exists; however, no further evaluation or testing was recommended. The Subject Property owner relied on both of these Phase I ESAs when they acquired the Site, neither of which revealed the lengthy orchard use and IBM's historical pesticide spraying to first produce apples and then to prevent them from being produced.

- *Geotechnical Investigation Report dated May 16, 2022*, prepared by SESI Consulting Engineers

SESI conducted a geotechnical investigation of the Subject Property in April 2022. The field investigation consisted of observing the excavation of 21 test pits between April 21 and April 25, 2022 and the drilling of 22 rock probes on April 27, 2022. The test pits were excavated to depths ranging from approximately 1.5± to 12± feet below the ground surface using a subcontracted rubber track-mounted excavator and the rock probes were drilled to depths of up to 22.5+ feet below the ground surface (ft-bgs).

Geologically, the Site soils are mapped as glacial soils overlying bedrock, consisting of varying amounts of sand, silt, gravel, cobbles and boulders. The bedrock generally consists of Fordham Gneiss, which is metamorphic rock of sedimentary and volcanic origin. Results of the investigation identified topsoil was encountered in all of the test pits, ranging in thickness from 4+ to 12+ inches, with a typical thickness on the order of 8+ inches. Below the topsoil, uncontrolled fill was encountered in the central portion of the Site and extended to a depth of 5.5+ ft-bgs. The fill material consisted of coarse to fine sand with varying amounts of silt and gravel and debris including asphalt and PVC. The natural soils encountered beneath the topsoil, and fill material, where encountered, were generally found to be granular soils consisting of primarily coarse to fine sand, with highly variable amounts of silt and gravel with isolated layers of fine-grained soils consisting of primarily silt with varying amounts of silt and gravel to the refusal depths of 1.5+ to 12+ ft-bgs. Cobbles and boulders were found in the majority of the test pits at various depths and were generally found to increase in size and frequency with depth. Refusal on weathered rock / bedrock was encountered in all of the test pits at depths ranging from approximately 1.5+ to 12+ ft-bgs. Sound rock was encountered during the drilling of all of the rock probes at depths ranging from approximately 3+ to 20.5+ ft-bgs.

Groundwater seepage was encountered in SESI's test pits TP-7 and TP-12 at depths of 4± and 7± feet, respectively, which correlated to approximate elevations of 506 and 475. Additionally, groundwater was encountered during the drilling of rock probes RP-4 and RP-13 at depths of approximately 17± and 20± feet below the ground surface, respectively, which correlated to elevations of 460± and 472±. Mottling, which indicated the presence of a seasonal high groundwater table, was observed in test pits TP-7, TP-11 through TP-13, TP16, TP-17, and TP-19 at depths ranging from approximately 2± to 5± feet below the ground surface, which correlated

to elevations ranging from EL 435.5± to EL 506±. Water seepage was anticipated at the soil-rock interface and in the lower areas of the Site adjacent to the NYSDEC designated wetlands after periods of recent precipitation.

- *Limited Phase II Environmental Site Assessment Report*, Proposed Development, 3 North Castle Drive, North Castle, New York, prepared by SESI, March 2023 for AD.

The subsurface investigation activities completed at the Site by SESI consisted of two (2) events, which were performed on May 24th and November 15th, 2022 at the Subject Property. In total, thirty-three (33) soil borings were completed to a maximum depth of 1.5 feet below ground surface. Approximately half of the soil borings were advanced within the Site boundary. The samples were analyzed for Target Compound List (TCL) pesticides, arsenic, and lead. Eighty-four (84) subsurface soil samples were collected during the supplemental investigation to characterize the pesticide contamination. Pesticides, Arsenic, Lead, and Mercury in soil at concentrations exceeding the USCOs, RSCOs, RRSCOs and/or CSCOs.

- *Supplemental Environmental Investigation Report*, 3 North Castle Drive, North Castle, New York, prepared by Langan, August 2023 for JCAL Development Group, LLC

On June 21, 2023, Langan conducted a Supplemental Environmental Site Investigation (ESI) at the Subject Property to delineate elevated arsenic concentrations identified during previous investigation events. In total, sixteen (16) soil borings and forty-two (42) samples were collected and analyzed for arsenic. The soil borings were advanced to a maximum depth of two (2) feet below ground surface. All soil borings were advanced at portions of the Subject Property outside of the Site boundary. Results of the investigation identified arsenic in soil at concentrations exceeding the USCO, RSCO, RRSCO, and/or CSCO in twenty-seven (27) samples.

- *Phase II Environmental Site Assessment Report*, 3 North Castle Drive, North Castle, New York, prepared by SESI, January 2024 for AD

This report documented the investigations by SESI and Langan which occurred at the Subject Property between 2022 and 2024. Between October 25, and October 26, 2023, SESI returned to the Subject Property and installed an additional thirty-three (33) soil borings utilizing a hand-held, stainless-steel auger to delineate and further characterize the extent of pesticide related contamination. Samples were collected from 0 to 6 inches and from 6 to 12 inches below grade. A total of sixty-six (66) soil samples were collected and analyzed for TCL Pesticides, Arsenic, and

Lead. It should be noted that ten samples, equally distributed throughout the sampling area, were also chosen to be analyzed for the TCL+30/TAL. The majority of soil borings were advanced within the Site boundary. Suite in order to partially satisfy the requirements of potentially entering the NYSDEC BCP and determine if other contaminants were present beyond those associated with the past Pesticides application. Results of the investigation identified Pesticides, Arsenic, Lead, and Mercury in soil at concentrations exceeding the USCO, RSCO, RRSCO, and/or CSCO in forty-three (43) samples.

2.5 GEOLOGIC SETTING

According to the U.S. Geological Survey – Mount Kisco, NY Quadrangle map, the Site is approximately 478 feet above the North American Datum. Based on the subsurface investigations conducted by SESI, the stratigraphy of the Site, from the surface down, coarse to fine sand, with highly variable amounts of silt and gravel with isolated layers of fine-grained soils consisting of primarily silt with varying amounts of silt and gravel to the refusal depths of 1.5+ to 12+ ft-bgs. Refusal on weathered rock / bedrock was encountered at depths ranging from approximately 1.5+ to 12+ ft-bgs which correlates to elevations ranging from approximately 429+ to 520.75+. Sound rock was encountered at depths ranging from approximately 3+ to 20.5+ ft-bgs which correlates to elevations ranging from approximately EL 455± to EL 519±.

2.6 HYDROGEOLOGIC SETTING

During the geotechnical investigation in April 2022, groundwater seepage was encountered in test pits at depths ranging 4+ and 7+ ft-bgs. Additionally, groundwater was encountered during the drilling of rock probes at depths of approximately 17± and 20± ft-bgs which correlates to elevations of 460± and 472±. The direction of groundwater flow has not been calculated at this time, but is anticipated to follow the topography and flow in an easterly direction.

2.7 SUMMARY OF ENVIRONMENTAL ASSESSMENT

Based on the investigations conducted to date, the primary contaminants of concern (COCs) are anticipated to be metals and pesticides. COCs will be refined based on the Remedial Investigation (RI) results.

Soil (maximum concentrations):

- **Pesticides:**, 4,4'-DDD (1.01 mg/kg), 4,4'-DDE (11.2 mg/kg), 4,4'-DDT (4.96 mg/kg), Dieldrin (1.35 mg/kg).

- **Metals:** Arsenic (158 mg/kg), Lead (861 mg/kg)

3.0 FIELD REMEDIAL INVESTIGATION

Soil borings, soil vapor borings, and groundwater monitoring wells are proposed below based on the following rationale to complete the nature and extent delineation of contaminated soil, groundwater, and soil vapor within the Site. The applicable standards criteria and guidance (SCGs) for the Site soil are the USCOs for the planned Track.1 cleanup. The applicable criteria for sub-slab vapor are the New York State Department of Health (NYSDOH) Decision Matrices (May 2017). The applicable SCGs for the Site groundwater are the applicable 6 NYCRR Part 703 ambient water quality standards (AWQS) and Technical and Operational Guidance Series (TOGS) 1.1.1.

3.1 SOIL REMEDIAL INVESTIGATION

In order to further evaluate the soils, twenty-three (23) soil borings will be performed within the Site to further evaluate and delineate soil contamination. The proposed soil boring locations are shown on **Figure 3.1**. Soil sample locations were selected to achieve vertical characterization of TCL+30/TAL, PFAS, and 1,4-Dioxane to satisfy the requirements of entering the NYSDEC BCP. Furthermore, soil sample locations were also selected to achieve vertical delineation HAP contamination. The borings will be advanced to a depth of 15 ft-bgs or bedrock, whichever is shallower, using direct-push or other drilling methods as needed. Soil samples will be at a minimum of one sample collected from an discrete interval within each 5-foot soil core, based on field screening that includes visual observations, photoionization detector (PID) readings and olfactory observations. Boring logs documenting soil classifications, PID readings, and visual observations will be provided in the final report.

Upon retrieval of the sampling barrel, the collected sample shall be placed in glass jars and labeled, stored on site (on ice in a cooler if necessary), and transmitted to the NYSDOH ELAP-certified testing laboratory. Chain-of-custody procedures will be practiced following Section 15, EPA-600/4-82-029, Handbook for Sampling and Sample Preservation of Water and Waste Waters. Soil samples for VOC analysis will be collected in Encore ® vials.

A geologist or engineer will be on site during the drilling operations to provide continuous description of each soil sample, following the New York State Soil Description Procedure, and to retain representative portions of each sample.

The drilling contractor will be responsible advancing the soil probe to depths specified in this RIWP to facilitate soil sampling installing soil vapor probes, and installing monitoring wells to levels directed by the supervising geologist following specifications further outlined in this protocol.

Soil samples collected from the boring locations will be analyzed by a NYSDOH Environmental Laboratory Accreditation Program (ELAP) certified laboratory for TCL + 30/TAL including VOCs by EPA Method 8260C, SVOCs by EPA Method 8270D, pesticides by EPA Method 8081B, PCBs by EPA Method 8082A, TAL metals by EPA Methods 6010C, 7471B, and 9012, the 21 PFASs compounds by EPA Modified Method 1633, and 1-4,dioxane by EPA Method 8270. Category B deliverables will be requested on each sample chain of custody. SESI's field sampling procedures are described in the Quality Assurance Project Plan (QAPP) presented in **Appendix A**. The Sampling Plan for Emerging Contaminants is included as **Appendix B**.

Quality Assurance/Quality Control (QA/QC) samples will be collected and analyzed as specified in the QAPP. The number of duplicate, spiked, and blank samples analyzed will be collected at a frequency of 1 duplicate for every 20 samples. The inclusion and frequency of analysis of field blanks will be on the order of one per every 20 soil samples but not more than one per day. Samples to be analyzed for volatile organic compounds will be accompanied by a field blank for all matrix types and trip blank for water matrices. The proposed soil sample locations and the rationale for their locations are presented in following **Table 3.1**.

Table 3.1–Proposed Soil Sample Locations

Sample Name	Boring Depth (ft)	Depth (ft)	Rationale	Sample Media	Sample Type	Analysis
RI-SB6	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB7	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB8	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				

Sample Name	Boring Depth (ft)	Depth (ft)	Rationale	Sample Media	Sample Type	Analysis
RI-SB9	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB11	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB12	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		1-3'	Vertical Delineation of HAP Impacts			Arsenic
		7-8'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane			TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB14	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		1-3'	Vertical Delineation of HAP Impacts			Arsenic
		7-8'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane			TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB16	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB17	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL, PFAS, 1,4-Dioxane
		7-8'				
		13-14'				
RI-SB18	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB19	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB20	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB21	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	PFAS, 1,4-Dioxane
		1-3'	Vertical Delineation of HAP Impacts			Arsenic
		7-8'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane			TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB23	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		1-3'	Vertical Delineation of HAP Impacts			Arsenic, 4,4'-DDE
		7-8'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane			TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				

Sample Name	Boring Depth (ft)	Depth (ft)	Rationale	Sample Media	Sample Type	Analysis
RI-SB24	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB26	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB27	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB29	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL, PFAS, 1,4-Dioxane
		7-8'				
		13-14'				
RI-SB30	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB31	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB32	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB33	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	PFAS, 1,4-Dioxane
		7-8'				TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				
RI-SB34	15 or Bedrock	0-1'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane	Soil	Grab	TCL+30/TAL (less Pesticides, Aresenic, Lead), PFAS, 1,4-Dioxane
		1-3'	Vertical Delineation of HAP Impacts			Arsenic
		7-8'	Characterization for TCL+30/TAL, PFAS, & 1,4-Dioxane			TCL+30/TAL, PFAS, 1,4-Dioxane
		13-14'				

3.2 GROUNDWATER REMEDIAL INVESTIGATION

To investigate groundwater at the Site, a total of six (6) permanent groundwater monitoring wells will be installed as shown on **Figure 3.2**. The direction of groundwater flow at the Site has not been confirmed. Accordingly, monitoring well locations were selected to assess groundwater quality at the Site and determine groundwater flow contours. The wells will be installed in the bedrock to a depth of at least 25 ft-bgs. Each monitoring well will be constructed with 2-inch diameter well screens. The well screening will intersect the water table and extend to the bottom

of the well boring. The annular space of each well will be filled with well sand to at least 2 feet above the screening and will be sealed with hydrated bentonite or cement grout. Finally, each monitoring well will be completed with a flush-mount road-box or stickup as necessary. A typical boring and well construction log is provided in **Appendix C**.

The Groundwater RI is conducted to achieve the following:

- Delineate the nature and extent of Area of Concern (AOC)-specific contaminants in the Site groundwater, if present;
- Identify actual or potential impacts to sensitive receptors, e.g. surface water;
- Determine whether a contaminant plume exists;
- Gather sufficient data to determine groundwater flow direction and contour map and evaluate groundwater remedial alternatives, including, as appropriate, and
- Provide information on the background quality of the groundwater flowing into the Site.

The wells will be surveyed for location and elevation. The survey data will be provided pursuant to the DER-10 requirements in an acceptable format (e.g., North America Datum 83 [NAD83]). The wells will be gauged for groundwater depth to determine the groundwater elevation. The Site-specific groundwater flow direction and gradient will be determined based on the latest elevation data and summarized in the Remedial Investigation Report (RIR). The proposed well locations are shown on **Figure 3.2**.

Two (2) rounds of sampling will be conducted from each well. The first round will be conducted after monitoring well installations, and the second round will be conducted prior to remedial action (no sooner than 30 days from the first round). The data will be analyzed to determine whether groundwater contamination exists, the magnitude and the extent of the potential contaminant plume. In addition to the analytical data, field measurements and chemical analyses will be conducted to characterize the impacted groundwater.

The wells will be sampled for TCL + 30/TAL metals, PFAS, and 1-4 dioxane. The VOCs will be analyzed by EPA Method 8260C, SVOCs by EPA Method 8270D, pesticides by EPA Method 8081B, PCBs by EPA Method 8082A, TAL metals by EPA Methods 6010C, 7471B, and 9012, PFAS compounds by Modified EPA Modified Method 537, and 1-4,dioxane by EPA Method 8270 SIM. the QAPP which describes all field sampling procedures is included as **Appendix A**, and

the Sampling Plan for Emerging Contaminants is included as **Appendix B**. The proposed groundwater monitoring wells and the rationale for their locations are presented in the **Table 3.2** below.

Table 3.2–Proposed Groundwater Monitoring Wells

Well ID	Location	Rationale	Total Depth (ft)	Screen Length (ft)	Analysis
RI-MW1	Northern Portion of Site	Investigate Groundwater Quality	25	15' (10-25')	TCL+30/TAL, PFAS, 1,4-Dioxane
RI-MW2	Western Portion of Site	Investigate Groundwater Quality	25	15' (10-25')	TCL+30/TAL, PFAS, 1,4-Dioxane
RI-MW3	Eastern Portion of Site	Investigate Groundwater Quality	25	15' (10-25')	TCL+30/TAL, PFAS, 1,4-Dioxane
RI-MW4	Western Portion of Site	Investigate Groundwater Quality	25	15' (10-25')	TCL+30/TAL, PFAS, 1,4-Dioxane
RI-MW5	Eastern Portion of Site	Investigate Groundwater Quality	25	15' (10-25')	TCL+30/TAL, PFAS, 1,4-Dioxane
RI-MW6	Southern Portion of Site	Investigate Groundwater Quality	25	15' (10-25')	TCL+30/TAL, PFAS, 1,4-Dioxane

Groundwater samples will be analyzed by a NYSDOH ELAP certified laboratory, and Category B deliverables will be requested on each sample chain of custody. In addition, QA/QC samples will be collected and analyzed as specified in the QAPP. Specifically, the number of duplicate, spiked and blank samples analyzed will be a minimum of 1 duplicate for every 20 samples. For the aqueous matrix, field blanks will be collected at a frequency of one per day. Samples to be analyzed for volatile organic compounds will be accompanied by a trip blank for each shipment and field blanks water matrix.

The wells will be sampled using the low flow technique, when possible. A flow rate of 100 ml to 250 ml per minute is used to purge the wells. Drawdown should not exceed 0.3 feet. At the initiation of low flow purging water levels and field parameters are recorded. Field parameters are then monitored every five minutes during low flow purging using a flow through cell. When three consecutive measurements of pH differ by 0.1 units or less, with ORP within 10 mv or less, turbidity varies 10 percent or less, conductivity differs by 3 percent or less and dissolved oxygen by 10 percent or less, sampling may begin. Flow through cells allow continuous real-time readings. When the parameters stabilize, the flow through cell is disconnected and sample bottles are filled directly from the tubing. If the parameters of a well do not stabilize in a timely manner, the groundwater sample will be collected after emptying three well volumes from the well being sampled. In addition to water samples collected from the monitoring wells, two types of "blanks"

will be collected and submitted to the chemical laboratory for analyses. The blanks will consist of 40 ml VOA vials, as follows:

- A trip blank will be prepared before the sample bottles are sent by the laboratory. It consists of a sample of distilled, deionized water that accompanies the other sample bottles into the field and back to the laboratory. A trip blank will be included with each shipment of samples where sampling and analysis for TCL volatiles is planned (water matrix only). The trip blank will be analyzed for TCL VOCs as a measure of potential contamination from background sources and their effect on the results.
- In order to check for contaminant carryover when non-dedicated sampling equipment is used, a rinsate blank will be submitted to the laboratory. This blank will also be analyzed for TCL VOCs.

3.3 SOIL VAPOR INVESTIGATION

SESI will collect five (5) soil vapor samples from five (5) soil vapor locations at the Site. In addition, collocated ambient air samples will be collected at each soil vapor sample location. The proposed soil vapor point locations are shown on **Figure 3.3**. The purpose of the soil vapor investigation is to assess the potential for vapor intrusion into future buildings.

The soil gas samples will be collected in accordance with the procedures of the NYSDOH October 2006 Guidance for Evaluating Soil Vapor Intrusion in the State of New York. Specifically, the sub-slab soil vapor probes will be advanced using direct push sampling equipment and samples will be collected by installing vapor implants. The soil vapor depth will be based on the final construction and development plan. A sacrificial vapor point connected to flexible tubing will be inserted into the borehole. The annular space of the borehole will be filled with sand and the surface will be sealed with bentonite to seal the surface. Prior to sampling the tubing system will be purged of ambient air with a low-flow pump.

The ambient air and sub-slab soil vapor samples will be collected into laboratory supplied 1 liter or 2.7-liter, stainless-steel summa canisters. The summa canisters will be equipped with a manometer to verify the canister is under vacuum, and a flow controller will be set to a flow rate of 200 ml/min. A sample log sheet will be maintained summarizing sample identification, date and time of sample collection, sampling depth, identity of samplers, sampling methods and

devices, soil vapor purge volumes, volume of the soil vapor extracted, vacuum of canisters before and after the samples are collected, apparent moisture content of the sampling zone, and chain of custody protocols. The vapor samples will be sent to a certified laboratory for analysis of VOCs in accordance with EPA Method TO-15. In addition to the soil vapor, one ambient air sample will be collected with a 6-liter summa canister set to a flow rate of 200 ml/min. The field sampling procedures are described in the QAPP, which is included as **Appendix A**.

As part of the vapor sampling, a tracer gas will be used to serve as a QA/QC device to verify the integrity of the soil vapor probe seal. Helium will be used as the tracer gas, and a box will serve to keep it in contact with the probe during testing. A portable monitoring device will be used to analyze a sample of soil vapor for the tracer prior to sampling. If the tracer sample results show a significant presence of the tracer, the probe seals will be adjusted to prevent infiltration. At the conclusion of the sampling round, tracer monitoring will be performed a second time to confirm the integrity of the probe seals. SESI's field sampling procedures are described in the QAPP presented in **Appendix A**. In addition to the soil vapor, one ambient air sample will be collected with a 6-liter summa canister set to a flow rate of 100 ml/min. The proposed soil vapor sample points are presented in the **Table 3.3** below.

Table 3.3—Proposed Soil Vapor Sample Locations

Location Name	Location	Rationale	Proposed Sampling Depth (ft)	Sample Media	Sample Type	Analysis
RV-SV1	Northern Portion of Site	Investigate Soil Vapor Quality	5	Soil Vapor/Ambient Air	(200 mL/min)	TO-15
RI-SV2	Western Portion of Site	Investigate Soil Vapor Quality	5	Soil Vapor/Ambient Air	(200 mL/min)	TO-15
RI-SV3	Central Portion of Site	Investigate Soil Vapor Quality	5	Soil Vapor/Ambient Air	(200 mL/min)	TO-15
RI-SV4	Eastern Portion of Site	Investigate Soil Vapor Quality	5	Soil Vapor/Ambient Air	(200 mL/min)	TO-15
RI-SV5	Southern Portion of Site	Investigate Soil Vapor Quality	5	Soil Vapor/Ambient Air	(200 mL/min)	TO-15

4.0 DECONTAMINATION AND IDW

Equipment utilized for ground intrusive activities (i.e. borings and wells) will be decontaminated between each boring if free phase product is encountered. Equipment utilized for sample collection (i.e. spoons, trowels) will be decontaminated between each sample unless disposable equipment is utilized. Appropriate decontamination areas will be established to support work being conducted in each area of the Site. PFAS free certified deionized water, supplied from the laboratory, will be used for the decontamination of the sampling tools if needed. Locally supplied water, if available, or water supplied by the driller in a tank, will be used to decontaminate the equipment.

All investigative derived waste (IDW) of soil cuttings and purged groundwater will be containerized, sampled, and properly disposed of pursuant to DER-10 requirements. Disposable sampling equipment, including macro core liners, spoons, gloves, bags, paper towels, and PPE that contacts environmental media, will be double bagged and disposed of as municipal trash in a facility trash dumpster as non-hazardous refuse.

5.0 SURVEY

After the RI sampling scope is completed, a survey will be completed, which includes the locations and elevations of all the monitoring wells, soil borings, and soil vapor points. Survey datum will be provided relative to NAD83. Elevation datum will be provided relative to NAVD88.

6.0 HUMAN HEALTH EXPOSURE ASSESSMENT

A qualitative human health exposure assessment will be performed for the Site in accordance with the NYSDOH's Qualitative Human Health Exposure Assessment guidance document. Sampling data, along with the physical conditions of the contaminant sources or physical hazards near the Site, will be reviewed. Potential on-site and off-site exposures will be evaluated. The Exposure Assessment will describe the nature and size of the population exposed, or potentially exposed, to the contaminants that are present at, or migrating from the Site, and will characterize the exposure setting, identify exposure pathways, and evaluate contaminant fate and transport.

Several objectives will be met by the exposure assessment. First, applicable Site information and characterization data for environmental media of concern will be evaluated. Applicable SCGs, including Part 375 SCOs and CP-51 SCOs for soil, and AWQS for groundwater and surface water, will be applied. Second, a qualitative assessment will be made if there is a potential for off-Site migration of any contaminants.

An assessment of current and future Site activities and Site use will be conducted in relation to potential human exposure. Next, potential exposure pathways will be identified, and each aspect of the potential exposure pathway will be evaluated. Soil and groundwater contamination will be addressed and the impact of remediation on future exposure scenarios will be analyzed.

7.0 FISH AND WILDLIFE IMPACT ANALYSIS

A Fish and Wildlife Resources Impact Analysis (FWIA) Decision Key will be completed prior to the excavation work to determine if a FWIA is needed. Contaminant migration pathways and any fish and wildlife exposure pathways will be identified. As stated in the FWIA, "if no resources are associated with the site or if there is no potential for contaminant migration to the resources, then only the necessary information to support that conclusion should be provided."

If resources are identified, or migration pathways exist, a FWIA will be completed and submitted as part of the RI Report. The FWIA would include qualitative estimates of the following: 1) the routes, intensity, frequency, and duration of actual or potential exposures to chemicals; 2) the nature and size of the population exposed to the contaminants that are present at or migrating from the site; 3) the exposure setting and possible exposure pathways; and 4) contaminant fate and transport.

A Fish & Wildlife assessment is not anticipated for this Site due to its urban location and distance from surface water bodies and wildlife areas.

8.0 DUSR

Following the completion of the laboratory analysis program, a Data Usability Summary Report (DUSR) will be completed for the lab data and included as part of the RI Report. The DUSR will include available datasets from previous investigations, as well as data from this phase of Site characterization. The DUSR is carried out as specified in DER-10 to evaluate the quality control measures that were implemented during the field and laboratory analytical programs, with the objective of determining whether the reported analytical data are representative and usable for decision making. The DUSR will evaluate whether the data are technically defensible (i.e. were all analytical data requirements met and documented?). Data usability analysis reviews the Site data to determine whether they are adequate to draw conclusions regarding the nature and extent of contamination.

The items that will be reviewed as part of the DUSR will include the following:

- Completeness (number of samples collected and analyzed compared to plans)
- Chains of custody are complete and accurate
- Holding times
- Instrument calibration
- Relative percent difference between field duplicates
- Reasonableness of data (e.g. relationships between total and soluble analytes)
- Blank contamination

The DUSR will be conducted in accordance with guidelines provided under Appendix 2B of DER-10. The site-specific Quality Assurance Project Plan (QAPP) is included in **Appendix A**.

9.0 REMEDIAL INVESTIGATION REPORT

Following the completion of the RI activities and the receipt of sample results, a RIR report will be prepared. The RIR report will summarize the activities completed during the RI including analytical results, well construction and sampling logs, waste characterization information for disposal purposes, conclusions from the FWIA, if necessary, a DUSR and laboratory data packages. Scaled figures showing the sample locations and areas of contamination exceeding applicable standards will be prepared for soil, soil vapor, and groundwater. Sampling results will be summarized and discussed and the need for additional investigation and remediation will be evaluated (including the removal of hydraulic lifts, drains, subsurface pits, tanks, drains, etc. if applicable). In addition, analytical summary tables will be prepared for soil, soil vapor, and groundwater compared to applicable standards.

The RIR will also include: 1) a summary of the site history and previous investigations, 2) a description of current site conditions, 3) the identification of exposure pathways via a Qualitative Human Health Exposure Assessment; an analysis of the results, 4) a description of the nature and extent of the contamination including post remediation soil data collected during prior investigations (ie. UST, pit, oil/water separator, and lift removals) ; and 5) a detailed conclusions with recommendations.

Analytical data collected during the Remedial Investigation and previous data used for the selection of the remedy will be submitted in the NYSDEC approved Electronic Data Deliverable (EDD) format. EDDs will be prepared using the DEC's Environmental Information Management System (EIMS) database software application EQuIS™ for submission.

10.0 QUALITY ASSURANCE/QUALITY CONTROL

QA/QC is addressed in the QAPP included as **Appendix A**. The QAPP outlines procedures to be followed for sampling and analysis to ensure quality of the results. A DUSR will be prepared with the final reports to document the reliability of the sample results.

11.0 HEALTH AND SAFETY PLAN

A Site-specific Health and Safety Plan (HASP) has been prepared and is included as **Appendix**

D. All on-site personnel and visitors involved in the RI will be required to read and sign the HASP prior to entry of the Site.

12.0 COMMUNITY AIR MONITORING

A Community Air Monitoring Plan (CAMP) is provided as **Appendix E**, in accordance with DER-10 requirements for remedial investigation. The CAMP sets forth air monitoring procedures that will be utilized to measure airborne emissions during the RI, in order to minimize the release of contaminants to off-Site areas.

13.0 CITIZEN PARTICIPATION

Citizen participation activities will be performed throughout the RI process to involve and inform the public. The specific citizen participation activities to be performed are outlined in the Citizen Participation Plan (CPP), included as **Appendix F**.

14.0 REMEDIAL INVESTIGATION SCHEDULE

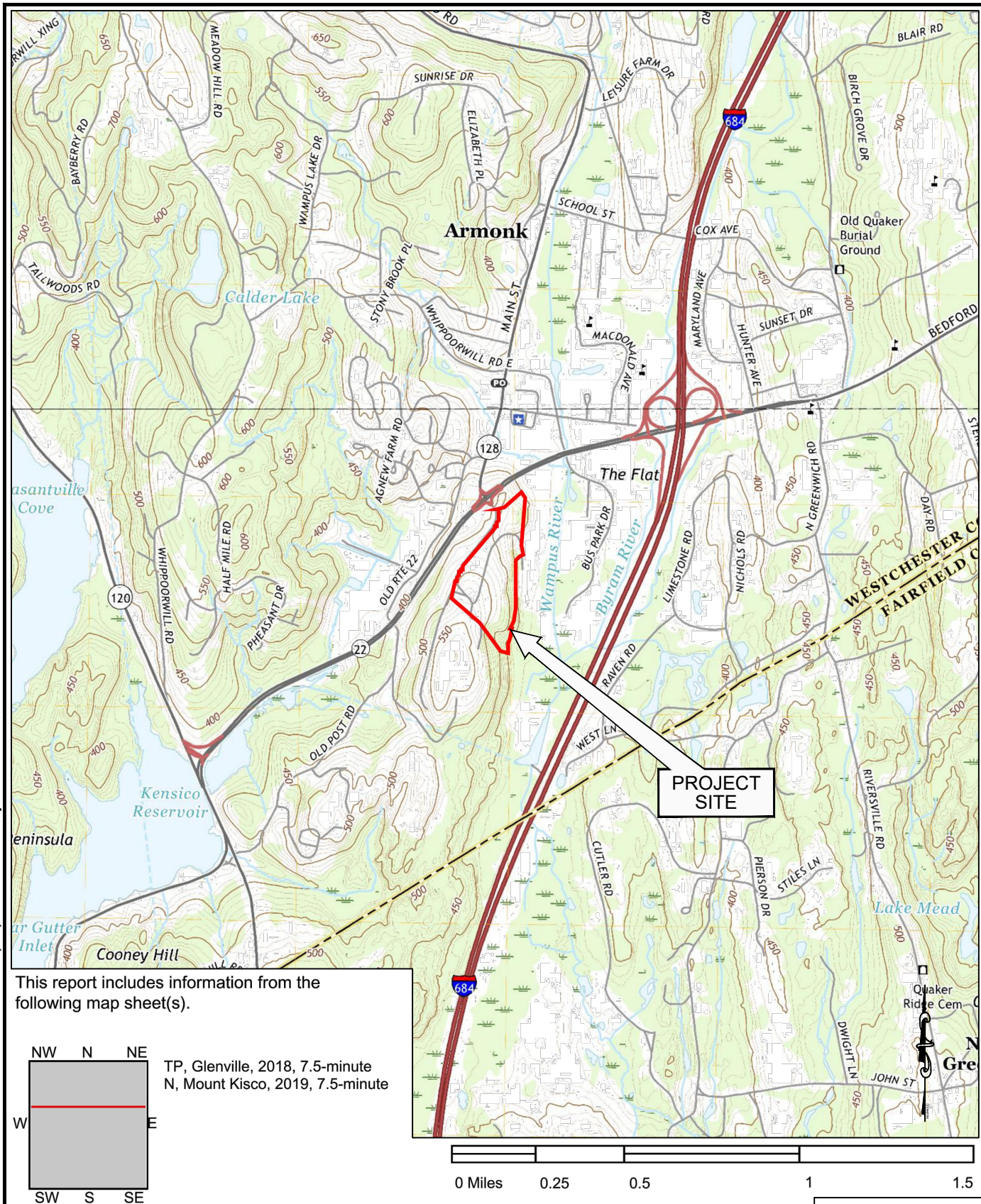
The proposed remedial investigation schedule is presented on **Table 14.1** below.

Table 14.1: Proposed Remedial Investigation Schedule

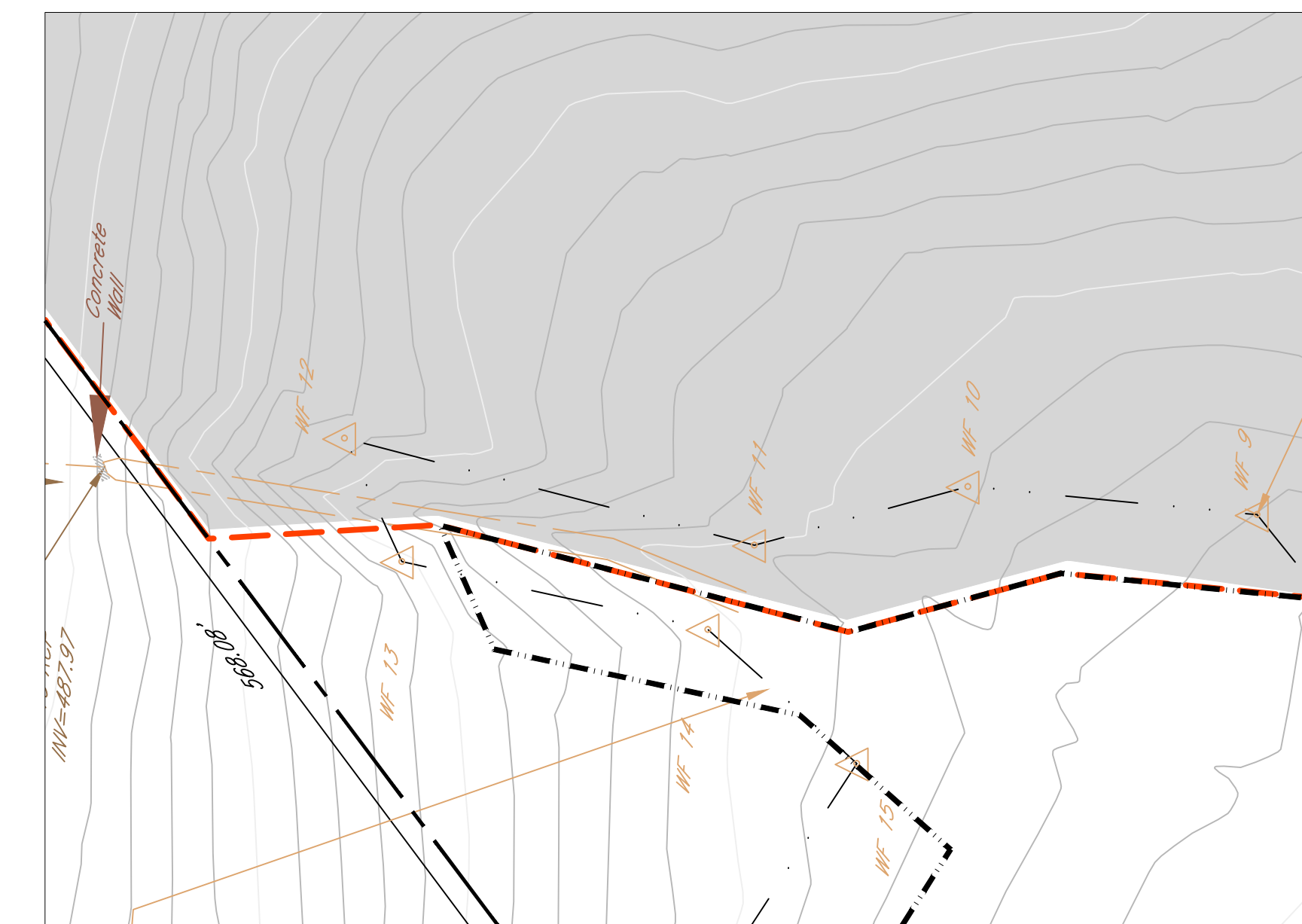
Activity	Scheduled Date
Remedial Investigation – Soil and Soil Vapor Sampling	To Be Determined
Remedial Investigation Groundwater Sampling	To Be Determined
Submit Draft RIR	To Be Determined

Figures

N:\ACAD\12456\CAD\12456 - FIG-1 - SITE LOCATION MAP.DWG 05/09/22 12:51:27PM, yelena.zolotova, LAYOUT:FIG-1



<p>EAGLE RIDGE 3 NORTH CASTLE DRIVE ARMONK, NY 10504</p> <p>SITE LOCATION MAP</p>	<p>SESI CONSULTING ENGINEERS D.P.C.</p> <p>SOILS / FOUNDATIONS SITE DESIGN ENVIRONMENTAL</p> <p>12A MAPLE AVE. PINE BROOK, N.J. 07058 PH: 973-808-9050</p>	<p>FIG-1.1</p> <p>DRAWN BY: yz</p> <p>CHECKED BY: TK</p> <p>SCALE: AS NOTED</p> <p>DATE: 05/09/22</p> <p>JOB NO.: 12456</p>
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LEGEND:	
	- SITE BOUNDARY
	- RI-SV1
	- PROPOSED SOIL VAPOR & APPROX. LOCATION BY SESI
	- SS-1
	- SOIL BORING NUMBER & APPROX. LOCATION BY SESI
	- SB-13A
	- SOIL BORING BY LANGAN
	- SS-27
	- SOIL BORING & APPROX. LOCATION BY SESI
	- RI-SB27
	- PROPOSED SOIL BORING & APPROX. LOCATION BY SESI
	- GROUND WATER TEST BORING LOCATION - BY LANGAN
	- SS-1
	- SOIL BORING NUMBER & APPROX. LOCATION BY SESI (OUTSIDE OF PROPOSED BCP BOUNDARY)
	- SB-13A
	- SOIL BORING BY LANGAN (OUTSIDE OF PROPOSED BCP BOUNDARY)
	- SS-27
	- SOIL BORING & APPROX. LOCATION BY SESI (OUTSIDE OF PROPOSED BCP BOUNDARY)
	- RI-SB27
	- PROPOSED SOIL BORING & APPROX. LOCATION BY SESI (OUTSIDE OF PROPOSED BCP BOUNDARY)
	- GROUND WATER TEST BORING LOCATION - BY LANGAN (OUTSIDE OF PROPOSED BCP BOUNDARY)
	- TP-4
	- TEST PIT NUMBER & APPROX. LOCATION - BY SESI
	- RP-4
	- ROCK PROBE NUMBER & APPROX. LOCATION - BY SESI
	- (R)
	- APPROX. DEPTH TO TOP OF ROCK (FT.)
	- APPROX. EL. OF TOP OF ROCK
	- APPROX. FILL THICKNESS (FT.)
	- SURVEYED WETLAND
	- WETLAND LIMIT OF DISTURBANCE
	- PROPOSED BCP AREA

Scale: 1" = 150'

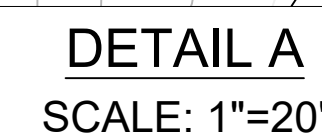
A horizontal scale bar with alternating black and white segments. The segments are labeled with the following values from left to right: 0, 75, 150, 300, 450, and 600.



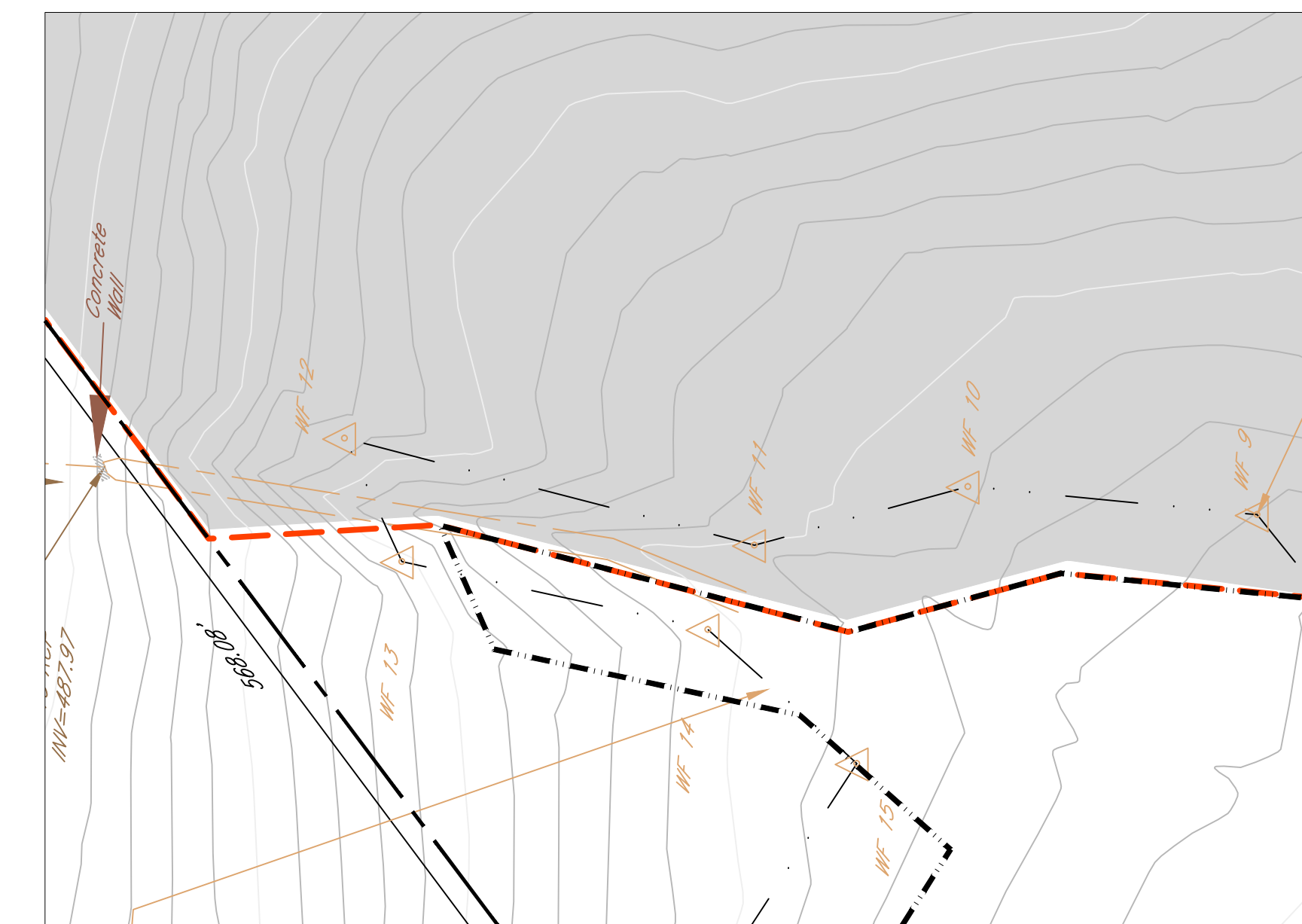
Unauthorized alterations or additions to this plan are a violation of section 7209 (2) of the New York State Education Law. Copies of this map not having the seal of the engineer shall not be valid.




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- Scale: 1" = 150'
-
- A horizontal graphic scale bar with alternating black and white segments. The segments are labeled with the following values from left to right: 0, 75, 150, 300, 450, and 600.



<u>LEGEND:</u>	
	- SITE BOUNDARY
	- SS-1 - SOIL BORING NUMBER & APPROX. LOCATION BY SESI
	- SB-13A - SOIL BORING BY LANGAN
	- SS-27 - SOIL BORING & APPROX. LOCATION BY SESI
	- RI-SB27 - PROPOSED SOIL BORING & APPROX. LOCATION BY SESI
	- GROUND WATER TEST BORING LOCATION - BY LANGAN
	- SS-1 - SOIL BORING NUMBER & APPROX. LOCATION BY SESI (OUTSIDE OF PROPOSED BCP BOUNDARY)
	- SB-13A - SOIL BORING BY LANGAN (OUTSIDE OF PROPOSED BCP BOUNDARY)
	- SS-27 - SOIL BORING & APPROX. LOCATION BY SESI (OUTSIDE OF PROPOSED BCP BOUNDARY)
	- RI-SB27 - PROPOSED SOIL BORING & APPROX. LOCATION BY SESI (OUTSIDE OF PROPOSED BCP BOUNDARY)
	- GROUND WATER TEST BORING LOCATION - BY LANGAN (OUTSIDE OF PROPOSED BCP BOUNDARY)
	- TP-4 - TEST PIT NUMBER & APPROX. LOCATION - BY SESI
	- RP-4 - ROCK PROBE NUMBER & APPROX. LOCATION - BY SESI
(8)	- APPROX. DEPTH TO TOP OF ROCK (FT.)
[463]	- APPROX. EL. OF TOP OF ROCK
	- APPROX. FILL THICKNESS (FT.)
	- SURVEYED WETLAND
	- WETLAND LIMIT OF DISTURBANCE
	- PROPOSED BCP AREA

Scale: 1" = 150'

0 75 150 300 450 600

Appendix A:

Quality Assurance Project Plan

3 North Castle Drive

NORTH CASTLE, NEW YORK

SESI PROJECT NO. 12456A

Quality Assurance Project Plan (QAPP)

Prepared for:

Armonk Development, LLC

15 Verbena Ave

Flora Park, New York 11001

Prepared by:

SESI CONSULTING ENGINEERS, D.P.C.

959 Route 46E, Floor 3, Suite 300

Parsippany, NJ 07054

FEBRUARY 2024

1.0 PROJECT DESCRIPTION

This document presents the quality assurance project plan (QAPP) for the Remedial Investigation Workplan (RIWP) for the proposed development of the property located at 3 North Castle Drive, North Castle, Westchester County, New York (the Site). The Site consists of a 32.55-acre area parcel and is identified as 108.3-1-62.1 on the Westchester County tax map. The Site is bound to the north by undeveloped land and Route 22, and commercial properties beyond; to the west by North Castle Road, undeveloped land, and Route 22 beyond; to the south by an IBM building and parking lots; and to the east by Armonk Indoor and sport fields.

The Site is currently vacant except for an asphalt roadway providing access to adjacent athletic fields located east of the Site. Historically, The Site was undeveloped land until 1971, when the asphalt roadway that borders the Site to the west, and an access road on the central and southern portions of the Site were constructed. A review of historic aerial images identified that the Site was historically utilized for agricultural purposes. The former IBM North Castle facility and associated parking areas are situated south of the Site and was constructed between 1960 and 1964. Undeveloped land and the North Castle Community Park are located east of the Site. Undeveloped land is located immediately north and west of the Site, beyond which lies Armonk Bedford Road and commercial properties beyond.

2.0 PROJECT ORGANIZATION

The RIWP will be conducted by Soils Engineering Services, Inc. (SESI), on behalf of Armonk Development, LLC. The organization of SESI's key project management and field staff, and respective areas of responsibility, is presented below.

2.1 Project Principal

Justin M. Protasiewicz, PE

Provide technical and administrative oversight and guidance throughout the project, assist in securing company resources, participate in technical review of deliverables, and attend key meetings as needed.

2.2 Principal Engineer

Justin M. Protasiewicz, PE

Provide technical guidance and review of reports, analytical data. Will have key involvement in screening and development of remedial alternatives.

2.3 Project Manager

Ryan Warren

Responsible for maintaining the day-to-day schedule for completing the fieldwork and deliverables according to BCP program requirements and client expectations.

2.4 Remedial Action Program Manager

Matt Majorossy

Responsible for coordinating and directing field efforts of SESI staff and subcontractors, and for maintaining that work is done according to QAPP specifications.

2.5 Field Team Leader

Ronnie Reynoso

Responsible for overseeing field work during the RI, including observing subcontractors, maintaining field notes, and collecting samples of various environmental media, in accordance with the NYSDEC-approved Work Plan.

2.6 Quality Assurance Officer

Matt Majorossy

Responsible for reviewing sampling procedures and certify that the data was collected and analyzed using the appropriate procedures.

3.0 QA/QC OBJECTIVES FOR MEASUREMENT OF DATA

In cases where NYSDOH ELAP Certification exists for a specific group or category of parameters, the laboratories performing analysis in connection with this project will have appropriate NYSDOH ELAP Certification. Analytical Service Protocol (ASP, January 2005) Category B deliverables are required for all samples.

Detection limits set by NYSDEC-ASP (January 2005) will be used for all sample analyses unless otherwise noted. If NYSDEC-ASP-dictated detection limits prove insufficient to assess project goals (i.e., comparison to drinking water standards or attainment of ARARs), then ASP Special Analytical Services (SAS) or other appropriate methods will be utilized.

The quality assurance/quality control objectives for all measurement data include completeness, representativeness, comparability, precision and accuracy.

3.1 COMPLETENESS

The analyses performed must be appropriate and inclusive. The parameters selected for analysis are chosen to meet the objectives of the study.

Completeness of the analyses will be assessed by comparing the number of parameters intended to be analyzed with the number of parameters successfully determined and validated. Data must meet QC acceptance criteria for 100 percent or more of requested determinations.

3.2 REPRESENTATIVENESS

Samples must be taken of the population and, where appropriate, the population will be characterized statistically to express the degree to which the data accurately and precisely represent a characteristic of a population, parameter variations at a sampling point, a process, or environmental condition.

Non-dedicated sampling devices will be cleaned between sampling points by washing and rinsing with Alcolnox® detergent, followed by a thorough rinse with distilled water. Specific cleaning techniques are described in the Field Sampling Procedure. Two types of blank samples will accompany each sample set where Target Compound List (TCL) volatiles are to be analyzed (water matrix only). A trip blank, consisting of a 40 ml VOA vial of organic-free water prepared by the laboratory, will accompany each set of sample bottles from the laboratory to the field and back. This bottle will remain sealed throughout the shipment and sampling process. This blank will be analyzed for TCL volatile organic compounds along with the groundwater samples to ensure that contamination with TCL volatile compounds has not occurred during the bottle preparation, shipment and sampling phase of the project. In order to check for contaminant carryover when non-dedicated sampling equipment is used, a rinsate blank will be submitted to the laboratory. This blank will also be analyzed for TCL volatile organic compounds. The TCL compounds are identified in the United States Environmental Protection Agency (USEPA) Contract Laboratory Program dated October 2016.

The analysis results obtained from the determination of identical parameters in field duplicate samples can be used to further assess the representativeness of the sample data.

3.3 COMPARABILITY

Consistency in the acquisition, preparation, handling and analysis of samples is necessary in order for the results to be compared where appropriate. Additionally, the results obtained from analyses of the samples will be compared with the results obtained in previous studies, if available.

To ensure the comparability of analytical results with those obtained in previous or future testing, all samples will be analyzed by NYSDEC-approved methods. The NYSDEC-ASP mandated holding times for various analyses will be strictly adhered to.

3.4 PRECISION AND ACCURACY

The validity of the data produced will be assessed for precision and accuracy. Analytical methods which will be used include gas chromatography/mass spectrometry (GC/MS), gas chromatography (GC), colorimetry, atomic spectroscopy, gravimetric and titrametric techniques. The following outlines the procedures for evaluating precision and accuracy, routine monitoring procedures, and corrective actions to maintain analytical quality control. All data evaluations will be consistent with NYSDEC-ASP procedures (June 2000). Data will be 100 percent compliant with NYSDEC-ASP requirements.

The number of duplicate, spiked and blank samples analyzed will a minimum of 1 duplicate for every 20 samples per each medium of groundwater and soil. The inclusion and frequency of analysis of field blanks will be on the order of one per every 20 samples (soil) but not more than one per day. For the aqueous matrix field blanks will be collected at a frequency of one per day. Samples to be analyzed for volatile organic compounds will be accompanied by a trip blank for each shipment and field blanks (water matrix) or field blanks (soil).

Quality assurance audit samples will be prepared and submitted by the laboratory QA manager for each analytical procedure used. The degree of accuracy and the recovery of analyte to be expected for the analysis of QA samples and spiked samples is dependent upon the matrix, method of analysis, and compound or element being determined. The concentration of the analyte relative to the detection limit is also a major factor in determining the accuracy of the measurement. The lower end of the analytical range for most analyses is generally accepted to be five times the detection

limit. At or above this level, the determination and spike recoveries for metals in water samples will be expected to range from 75 to 125 percent. The recovery of organic surrogate compounds and matrix spiking compounds determined by GC/MS will be compared to the guidelines for recovery of individual compounds as established by the United States Environmental Protection Agency Contract Laboratory Program dated 7/85 or as periodically updated.

The quality of results obtained for inorganic ion and demand parameters will be assessed by comparison of QC data with laboratory control charts for each test.

4.0 SAMPLING PROCEDURES

4.1 SAMPLING PROGRAM

The sampling program for this project will include soil, groundwater and soil vapor. Soil samples will be collected from split spoon sampling or macrocore devices retrieved from soil borings. Groundwater samples will be collected from groundwater monitoring wells using low flow purging techniques. Soil vapor samples will be collected from vapor points screened in the vadose zone using Summa Canisters.

4.1.1 Drilling/Sampling Procedures

Soil and groundwater samples will be collected by means of a soil boring program. Soil borings shall be completed using the hollow stem auger drilling methods, direct push methods, or rotary drilling methods, whichever methods are determined to be best suited to site conditions by the SESI project manager and SESI field team leader.

Soil samples will be collected from soil borings and analyzed in accordance with the NYSDEC-approved Work Plan. Monitoring wells for groundwater sample collection will be installed in select completed soil borings. Either hollow stem auger (HSA) or direct push drilling methods may be utilized for monitoring well completion.

Samples of the encountered overburden materials shall be collected continuously during drilling so that a complete soil profile is examined and described by the SESI field geologist. The sampling method employed shall be ASTM D-1586/Split Barrel Sampling using a standard 2-foot long, 2-inch outside diameter split- spoon sampler with a 140-pound hammer, in cases where HSA methods are used. Upon retrieval of the sampling barrel, the collected sample shall be placed in glass jars and labeled, stored on site (on ice in a cooler if necessary), and transmitted to the appropriate testing laboratory or

storage facility. Chain-of-custody procedures will be practiced following Section 15, EPA-600/4-82-029, Handbook for Sampling and Sample Preservation of Water and Waste Waters.

A geologist or engineer will be on site during the drilling operations to fully describe each soil sample, following the New York State Soil Description Procedure, and to retain representative portions of each sample.

The drilling contractor will be responsible for obtaining accurate and representative samples, informing the geologist of changes in drilling pressure, keeping a separate general log of soils encountered including blow counts [i.e., the number of blows from a soil sampling drive weight (140 pounds)] required to drive the split-spoon sampler in 6-inch increments and installing monitoring wells to levels directed by the supervising geologist following specifications further outlined in this protocol.

4.1.2 Monitoring Well Completion

Monitoring wells will be constructed of 0.010-inch slot size PVC well screen and riser casing. Other materials utilized for completion will be washed silica sand (Q-Rock No. 4 or approved equivalent) bentonite grout, Portland cement, and a protective steel locking well casing and cap with locks. The depth of the wells will be determined based on the depth to water, type of contaminant and field conditions encountered.

The monitoring well installation method for wells installed within unconsolidated sediments shall be to place the screen and riser assembly into the casing once the screen interval has been selected. At that time, a washed silica sand pack will be placed around the well screen if required to prevent screen plugging. If a sand pack is not warranted, the auger string will be pulled back to allow the native aquifer material to collapse 2 to 3 feet above the top of the screen. Bentonite pellets will then be added to the annulus between the casing and the inside auger to insure proper sealing. Cement/bentonite grout will continue to be added during the extraction of the augers until the entire aquifer thickness has been sufficiently sealed off from horizontal and/or vertical flow above the screened interval. During placement of sand and bentonite pellets, frequent measurements will be made to check the height of the sand pack and thickness of bentonite layers by a weighted drop tape measure.

A bolt-down protective curb box will be installed, flush with the ground, or steel “stick-up” protective casing and secured by a Portland cement seal. The cement seal shall extend

laterally at least 1 foot in all directions from the protective casing and shall slope gently away to drain water away from the well.

4.1.3 Well Development

All monitoring wells will be developed or cleared of all fine-grained materials and sediments that have settled in or around the well during installation so that the screen is transmitting representative portions of the groundwater. The development will be by one of two methods, pumping or bailing groundwater from the well until it yields relatively sediment-free water.

A decontaminated pump or bailer will be used and subsequently decontaminated after each use following procedures outlined in the Decontamination Protocol. Pumping or bailing will cease when the turbidity falls below 50 NTUs or until specific conductivity, pH, and temperature are stable (i.e., consecutive readings are within 10 percent with no overall upward or downward trends in measurements). Well development water will be contained in drums and properly disposed off-site.

4.1.4 Decontamination

All drilling equipment and associated tools including augers, drill rods, sampling equipment, wrenches and any other equipment or tools that have come in contact with contaminated materials will be decontaminated before any drilling on site begins, between each well, and prior to removing any equipment from the site. The preferred decontamination procedure will be to scrape the equipment from any residual soils and then rinse with water and Alconox®. Every effort will be made to minimize the generation of contaminated water, which will be drummed, to extent possible, for disposal.

4.1.5 PFAS Sampling Considerations

This section contains the materials limitations for Per- and polyfluoroalkyl substances sampling in accordance with the Draft NYSDEC Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (April 2023).

The groundwater samples will be analyzed for PFAS using USEPA Method 1633. Reporting limits for PFOA and PFOS will not exceed 2 nanograms per liter (ng/L). Category B deliverables and an electronic data deliverable will be completed.

PFAS are very persistent in the environment and in the human body. Due to their presence in a variety of products, persistence in the environment and very low drinking

water standards, care must be used when groundwater sampling for PFAS to avoid cross contamination from the sampling equipment and personal protective equipment (PPE).

No fabric softener will be used on clothing to be worn in field. Cosmetics, moisturizers, hand cream, unauthorized sunscreen, insect repellent or other related products will not be used the morning of sampling. The field samplers will wear powder-free nitrile gloves while filling and sealing the sample bottles. The sampling equipment components and sample containers will not come in contact with material that may potentially contain PFAS such as aluminum foil, low density polyethylene (LDPE), glass or polytetrafluoroethylene (PTFE, Teflon™) materials including sample bottle cap liners with a PTFE layer. Clothing that contains PTFE material (including GORE-TEX®) or that have been waterproofed with PFAS materials will be avoided. Food and drink packaging materials will be avoided, as well.

Sampling will be performed using certified PFAS-free sampling materials such as stainless steel, high density polyethylene (HDPE), PVC, silicone, acetate or polypropylene pump and tubing. Rinse water must be laboratory-provided certified PFAS-free distilled or de-ionized water. Standard two step decontamination using Alconox® detergent and clean certified PFAS-free water rinse will be performed for equipment that does come in contact with PFAS materials.

No waterproof field books, plastic clipboards, binders, or spiral hard cover will be used for PFAS containers. No adhesives (i.e. Post-It® Notes), sharpies, or permanent markers will be used for PFAS containers. The PFAS containers will be labeled with ballpoint pens. PFAS samples will be stored in separate cooler filled with regular ice only with no chemical (blue) ice packs.

Pre-cleaned sample bottles with closures, coolers, sample labels and a chain of custody form will be provided by the laboratory.

4.2 GROUNDWATER SAMPLING PROGRAM.

4.2.1 Well Evacuation

Prior to sampling a monitoring well, the static water level will be recorded. All well data will be recorded on a field sampling record. The wells will be sampled in accordance with the USEPA guidelines for the Low Flow Purging Sampling (LFPS). The purpose of LFPS is to collect groundwater samples from monitoring wells that are representative of ambient groundwater conditions in the aquifer. The LFPS method reduces turbidity which is needed particularly when sampling for metals.

4.2.2 Sampling Procedure

The wells will be sampled using the LFPS technique. A flow rate of 100 ml to 250 ml per minute is used to purge the wells. Drawdown should not exceed 0.3 feet. QED bladder

pumps or peristaltic pumps are used for this method. The pump intake is lowered to the mid-point of the water column or as subsurface features such as bedrock fractures or more permeable zones warrant. At the initiation of low flow purging a water level is recorded as well as field parameters. Field parameters are then monitored every five minutes during low flow purging using a flow through cell. When three consecutive measurements of pH differ by 0.1 units or less, with ORP within 10 mv or less, turbidity varies 10 percent or less, conductivity differs by 3 percent or less and dissolved oxygen by 10 percent or less, sampling may begin. Flow through cells are used so continuous real time readings are made. When the parameters stabilize the flow through cell is disconnected and sample bottles are filled directly from the tubing.

4.3 SOIL VAPOR SAMPLING

Soil vapor sampling will be conducted in accordance with NYSDOH Guidance for Evaluating Soil Vapor Intrusion in New York State (October 2006). Soil vapor samples will be collected in the vadose zone from shallow (5 feet) well points. Each vapor point will be installed in a shallow boring drilled either by hand-operated equipment (e.g. hand auger or percussion hammer drill), or by a small truck-mounted drill rig. Drilling equipment used shall be based on soil conditions, and the method that provides the most practical approach.

Each vapor point will consist of an inert sampling tube (polyethylene, stainless steel, or Teflon®) with a 6-inch screened section at the bottom through which soil vapors can be sampled. The screen slot size will be 0.0075 inches. A sampling zone will be created around the screened section by backfilling with 1 to 2 feet of porous coarse sand or glass beads, and at least three feet of bentonite will be placed above the porous sampling zone to form a seal from the surface. Native clean soil will be packed around the remaining annulus to the ground surface.

Each designated soil vapor sampling location will be purged of a minimum of three volumes using a low volume pump, and then attached to a regulator, and secured with a clamp. The regulator will then be attached to a 1-liter summa canister.

The regulator will be set to collect a soil vapor sample at a flow rate of less than 0.2 liters per minute. After the summa canister is filled, the valve will be closed.

Each canister will be listed according to a specific sample I.D. on a chain of custody form. Sample canisters will be delivered to the laboratory within 24 hours and analyzed for VOCs by method TO-15. The detection limit for VOCs will be 1 µg/m³ or less.

The soil vapor sampling effort will include the use of inert helium tracer gas to verify that the soil vapor samples are not diluted by ambient air. The atmosphere around the sampling tube will be enriched with the tracer gas, and the soil vapor sample will be

collected in the presence of the enriched tracer atmosphere. This will be accomplished by placing an inverted plastic pail over the sampling point and filling the pail with the tracer gas via a small tube penetrating the site of the pail. Refer to NYSDOH Guidance for Evaluating Soil Vapor Intrusion in New York State (October 2006).

Weather conditions in the 48 hours prior to the test, and during the test, will be noted, including average wind speed, precipitation, temperature, and barometric pressure.

4.4 SAMPLE PRESERVATION AND SHIPMENT

Since all bottles will contain the necessary preservatives as shown in Table 4.1, they need only be filled. The 40 ml VOA vials must be filled brim full with no air bubbles. The other bottles should be filled to within about 1 inch from the top.

The bottles will be sent from the laboratory in coolers which will be organized on a per site basis. Following sample collection, the bottles should be placed on ice in the shipping cooler. The samples will be cooled to 4°C, but not frozen.

Final packing and shipment of coolers will be performed in accordance with guidelines outlined in the ASP.

5.0 SAMPLE CUSTODY

The program for sample custody and sample transfer is in compliance with the NYSDEC-ASP, as periodically updated. If samples may be needed for legal purposes, chain-of-custody procedures, as defined by NEIC Policies and Procedures (USEPA-330/9-78-001-R, Revised June 1988) will be used. Sample chain-of-custody is initiated by the laboratory with selection and preparation of the sample containers. To reduce the chance for error, the number of personnel handling the samples should be minimized.

5.1 FIELD SAMPLE CUSTODY

A chain-of-custody record accompanies the samples from initial sample container selection and preparation at the laboratory, shipment to the field for sample containment and preservation, and return to the laboratory. Two copies of this record follow the samples to the laboratory. The laboratory maintains one file copy and the completed original is returned to the site inspection team. Individual sample containers provided by the laboratory are used for shipping samples. The shipping containers are insulated and ice is used to maintain samples at approximately 4°C until samples are returned and in the custody of the laboratory. All sample bottles within each shipping container are individually labeled and controlled. Samples are to be shipped to the laboratory within 24-48 hours of the day of collection depending on parameter holding times.

Each sample shipping container is assigned a unique identification number by the laboratory. This number is recorded on the chain-of-custody record and is marked with

indelible ink on the outside of the shipping container. The field sampler will indicate the sample designation/location number in the space provided on the appropriate chain-of-custody form for each sample collected. The shipping container is closed and a seal provided by the laboratory is affixed to the latch. This seal must be broken to open the container, and this indicates possible tampering if the seal is broken before receipt at the laboratory. The laboratory will contact the site investigation team leader and the sample will not be analyzed if tampering is apparent.

5.2 LABORATORY SAMPLE CUSTODY

The site investigation team leader or Project Quality Assurance Officer notifies the laboratory of upcoming field sampling activities and the subsequent transfer of samples to the laboratory. This notification will include information concerning the number and type of samples to be shipped as well as the anticipated date of arrival.

The laboratory sample program meets the following criteria:

- The laboratory has designated a sample custodian who is responsible for maintaining custody of the samples and for maintaining all associated records documenting that custody.
- Upon receipt of the samples, the custodian will check the original chain-of-custody documents and compare them with the labeled contents of each sample container for correctness and traceability. The sample custodian signs the chain-of-custody record and records the date and time received.
- Care is exercised to annotate any labeling or descriptive errors. In the event of discrepant documentation, the laboratory will immediately contact the site investigation team leader as part of the corrective action process. A qualitative assessment of each sample container is performed to note any anomalies, such as broken or leaking bottles. This assessment is recorded as part of the incoming chain-of-custody procedure.
- The samples are stored in a secured area at a temperature of approximately 4°C until analyses are to commence.
- A laboratory chain-of-custody record accompanies the sample or sample fraction through final analysis for control.
- A copy of the chain-of-custody form will accompany the laboratory report and will become a permanent part of the project records.

5.3 FINAL EVIDENCE FILES

Final evidence files include all originals of laboratory reports and are maintained under documented control in a secure area.

A sample or an evidence file is under custody if:

- It is in your possession; it is in your view, after being in your possession.
- It was in your possession and you placed it in a secure area.
- It is in a designated secure area.

6.0 CALIBRATION PROCEDURES

Instruments and equipment used to gather, generate or measure environmental data will be calibrated with sufficient frequency and in such a manner that accuracy and reproducibility of results are consistent with the appropriate manufacturer's specifications or project specific requirements. The procedures for instrument calibration, calibration verification, and the frequency of calibrations are described in the ASP. The calibration of instruments used for the determination of metals will be as described in the appropriate CLP standard operating procedures.

Calibration of other instruments required for measurements associated with these analyses will be in accordance with the manufacturer's recommendations and the standard operating procedures of the laboratory.

7.0 ANALYTICAL PROCEDURES

Analytical procedures shall conform to the most recent revision of the NYSDEC-ASP (June 2005) and are summarized on Table 7.1. In the absence of USEPA or NYSDEC guidelines, appropriate procedures shall be submitted for approval by NYSDEC prior to use.

The procedures for the sample preparation and analysis for organic compounds are as specified in the NYSDEC-ASP. Analytical cleanups are mandatory where matrix interferences are noted. No sample shall be diluted any more than 1 to 5 times. The sample shall be either re-extracted, re-sonicated, re-stream distilled, etc. or be subjected to any one analytical cleanup noted in SW846 or a combination thereof. The analytical laboratory shall expend such effort and discretion to demonstrate good laboratory practice and demonstrate an attempt to best achieve the method detection limit.

7.1 VOLATILE ORGANICS (VOA)

For the analysis of water samples for Target Compound List (TCL), volatile organic compounds (VOCs), no sample preparation is required. The analytical procedure for volatiles is detailed in NYSDEC-ASP (Volume I, Section D-I). A measured portion of the sample is placed in the purge and trap apparatus and the sample analysis is performed by gas chromatography/mass spectrometry for the first round. USEPA Method 8260C will be used, plus tentatively identified compounds (TICs). USEPA Methods 8010 or 8020 (gas chromatography with different detectors) will be used if subsequent rounds with lower limits of detection are warranted.

7.2 SEMI-VOLATILE ORGANIC COMPOUNDS

The extraction and analytical procedures used for preparation of water, soil and sediment samples for the analysis of the TCL semi-volatile organic compounds are described in NYSDEC-ASP Volume I, Section D-III. USEPA Method 8270D will be used, plus tentatively identified compounds (TICs).

Instrument calibration, compound identification, and quantitation are performed as described in Section 6 of this document and in the NYSDEC-ASP.

7.3 PESTICIDE AND PCB COMPOUNDS

The sample preservation procedures for gas chromatography for pesticides and PCB's will be as described in the NYSDEC-ASP methods (Section D-IV). The analysis of standard mixes, blanks and spiked samples will be performed at the prescribed frequency with adherence to the 72-hour requirement described in the method.

7.4 METALS

Water, soil and waste samples will be analyzed for the metals listed in Table 7.1. The detection limits for these metals are as specified in the NYSDEC-ASP, Section D-V. The instrument detection limits will be determined using calibration standards and procedures specified in the NYSDEC-ASP. The detection limits for individual samples may be higher due to the sample matrix. The procedures for these analyses will be as described in the NYSDEC-ASP.

The analyses for metals will be performed by atomic absorption spectroscopy (AAS) or inductively-coupled plasma emission spectroscopy (ICPES), as specified in the ASP with regard to AAS flame analysis.

7.5 PER- AND POLYFLUOROALKYL SUBSTANCES

The NYSDEC has developed a list of 40 PFAS Analytes List on Table 7.1 for remedial programs. These are:

- Perfluorobutanesulfonic acid
- Perfluoropentanesulfonic acid
- Perfluorohexanesulfonic acid
- Perfluoroheptanesulfonic acid
- Perfluorooctanesulfonic acid
- Perfluorononanesulfonic acid
- Perfluorodecanesulfonic acid
- Perfluorododecanesulfonic acid
- Perfluorobutanoic acid

- Perfluoropentanoic acid
- Perfluorohexanoic acid
- Perfluoroheptanoic acid
- Perfluorooctanoic acid
- Perfluorononanoic acid
- Perfluorodecanoic acid
- Perfluoroundecanoic acid
- Perfluorododecanoic acid
- Perfluorotridecanoic acid
- Perfluorotetradecanoic acid
- Perfluorohexadecanoic acid
- Hexafluoropropylene oxide dimer acid
- 4,8-Dioxa-3H-perfluorononanoic acid
- Perfluoro-3-methoxypropanoic acid
- Perfluoro-4-methoxybutanoic acid
- Nonafluoro-3,6-dioxaheptanoic acid
- 4:2 Fluorotelomer sulfonic acid
- 6:2 Fluorotelomer sulfonate
- 8:2 Fluorotelomer sulfonate
- 3:3 Fluorotelomer carboxylic acid
- 5:3 Fluorotelomer carboxylic acid
- 7:3 Fluorotelomer carboxylic acid
- Perflurorooctane sulfonamide
- N-methylperflurorooctane sulfonamide
- N-ethylperflurorooctane sulfonamide
- N-methyl perflurorooctanesulfonamidoacetic acid
- N-ethyl perflurorooctanesulfonamidoacetic acid
- N-methylperflurorooctane sulfonamidoethanol
- N-ethylperflurorooctane sulfonamidoethanol
- 9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid (F-53B Major)
- 11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (F-53B Minor)
- Perfluoro(2-ethoxyethane) sulfonic acid

Currently, ELAP does not offer certification for PFAS compounds in matrices other than finished drinking water. Per the NYSDEC July 2023 guidance on emergent contaminant sampling, the analytical procedure for soil and groundwater sampling of PFAS is Modified EPA Method 1633. The reporting limit for PFAS in soil samples is 0.5 ug/kg. Reporting limits for perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) in groundwater should not exceed 2 ng/L.

7.6 SITE SPECIFICITY OF ANALYSES

Work plans prepared for remedial investigation waste sites contain recommendations for the chemical parameters to be determined for each site. Thus, some or all of the referenced methods will apply to the analysis of samples collected at the individual waste sites. Analyses of Target Compound List (TCL) analytes will be performed on all samples.

TABLE 4.1 – SAMPLE CONTAINERIZATION

PARAMETER & ANALYTICAL METHOD	NO.	BOTTLE TYPE	PRESERVATIVE ⁽¹⁾	HOLDING TIME
Aqueous Samples				
SVOCs (BNAs) – USEPA 8270D or E	2	1-liter amber glass bottle	Ice to 4°C	7 days (until extraction) 40 days (extracted)
Pesticides – USEPA 8081B	2	1-liter amber glass bottle	Ice to 4°C	7 days (until extraction) 40 days (extracted)
PCBs – USEPA 8082A	2	1-liter amber glass bottle	Ice to 4°C	7 days (until extraction) 40 days (extracted)
VOCs – USEPA 8260C or D	2	40 mL, glass vial with septum cap	Hydrochloric Acid to pH <2 Ice to 4°C	14 days
Metals ⁽²⁾ – 6010C or D, Mercury 7470A	1	1-liter, plastic bottle	Nitric acid to pH <2 NaOH for cyanide Ice to 4°C	180 days Mercury: 28 days
Cyanide – SM 4500-CN-E	1	1-liter, plastic	Sodium Hydroxide to pH >12 Ice to 4°C	14 days
PFAS Compounds – USEPA Method 1633	2	500 ml HDPE or Polypropylene with non-Teflon lid	Chilled to 0 - 6 °C	14 days
Soil, Sediment, Solid Waste Samples				
VOCs – USEPA 8260C or D	3	15-gram EnCore samplers	Chilled to 0 - 6°C	14 days

PARAMETER & ANALYTICAL METHOD	NO.	BOTTLE TYPE	PRESERVATIVE ⁽¹⁾	HOLDING TIME
SVOCs (BNAs) and 1,4-Dioxane – USEPA 8270D SIM if RL cannot be reached	1	4-oz. glass jar with Teflon lid	Chilled to 0 - 6°C	14 days (until extraction, 40 days extracted)
Pesticides – USEPA 8081B	1	4-oz. glass jar with Teflon lid	Chilled to 0 - 6°C	14 days (until extraction) 40 days (extracted)
PCBs – USEPA 8082A	1	4-oz. glass jar with Teflon lid	Chilled to 0 - 6°C	none
Metals ⁽²⁾ – 6010C or D, Mercury 7471B	1	4-oz. glass jar with Teflon lid	Chilled to 0 - 6°C	180 days Cyanide: 14 days Mercury: 28 days
PFAS Compounds – USEPA Method 1633	2	500 ml HDPE or Polypropylene with non-Teflon lid	Chilled to 0 - 6°C	28 days
Soil Vapor / Indoor Air Samples				
VOCs – USEPA TO-15	1	Summa Canister	None	30 days

(1) All samples will be preserved with ice during collection and shipment to 0-6 degrees C.

(2) From verified time of sample receipt by the analytical laboratory (within 24 to 48 hours of collection).

(3) A complete list of compounds is provided on Table 7.1.

TABLE 4.2 – SAMPLING PROCEDURE FOR MONITORING WELLS USING VOLUME AVERAGED PURGING

1. Initial static water level recorded with an electric contact probe accurate to the nearest 0.1 foot.
2. Sampling device and electric contact probe decontaminated.
 - a. Sampling device and probe are rinsed with pesticide-grade methanol and distilled water.
 - b. Methanol is collected into a large funnel which empties into a five- gallon container.
3. Sampling device lowered into well.
 - a. Bailer lowered by dedicated PVC or polypropylene line.
4. Sample taken.
 - a. Sample is poured slowly from the open end of the bailer with the sample bottle tilted so that aeration and turbulence are minimized.
 - b. Duplicate sample is collected when appropriate.
5. Samples are capped, labeled and placed in laboratory coolers with ice packs or bagged ice.
6. All equipment is cleaned with successive rinses of pesticide-grade methanol and distilled water.
 - a. Dedicated line is disposed of or left at well site.
7. Equipment/wash blanks are collected when non-dedicated sampling equipment is used.
8. Chain-of-custody forms are completed in triplicate.
 - a. The original and one carbon copy are put into a zip-lock bag and placed into the cooler.
9. The original will be returned following sample analysis.
 - a. A second carbon copy is kept on file.
10. Cooler is sealed with strapping tape and chain-of-custody seals to assure integrity and to prevent tampering of sample.

**TABLE 4.3 – SAMPLING PROCEDURE FOR MONITORING WELLS USING LOW-
STRESS (LOW-FLOW) METHODS**

1. Initial static water level recorded with an electric contact probe accurate to the nearest 0.1 foot.
2. Sampling device is lowered into well. Slowly lower the pump, safety cable, tubing and electrical lines into the well to the depth specified for that well. Pump intake must be no less than 2 feet from the bottom of the well to prevent disturbance and resuspension of sediments which may be at the bottom of the well.
3. Measure water level again: Before starting the pump, measure the water level again with the pump in the well. Leave the water level measuring device in the well.
4. Purge Well: Start pumping the well at 200 to 500 milliliters per minute (ml/min). The water level should be monitored approximately every five minutes. Ideally, a steady flow rate should be maintained that results in a stabilized water level (drawdown of 0.3 ft or less). Pumping rates should, if needed, be reduced to the minimum capabilities of the pump to ensure stabilization of the water level. As noted above, care should be taken to maintain pump suction and to avoid entrainment of air in the tubing. Record each adjustment made to the pumping rate and the water level measured immediately after each adjustment.
5. Monitor Indicator Parameters: During purging of the well, monitor and record the field indicator parameters (turbidity, temperature, specific conductance, pH, Eh, and DO) approximately every five minutes. The well is considered stabilized and ready for sample collection when the indicator parameters have stabilized for three consecutive readings as follows (Puls and Barcelona, 1996):
 - a. 0.1 for pH
 - b. 3% for specific conductance (conductivity)
 - c. 10 mv for redox potential
 - d. 10% for DO and turbidity
6. Dissolved oxygen and turbidity usually require the longest time to achieve stabilization. The pump must not be removed from the well between purging and sampling.
7. Collect Samples: Collect samples at a flow rate between 100 and 250 ml/min and such that drawdown of the water level within the well does not exceed the maximum allowable drawdown of 0.3 ft. VOC samples must be collected first and directly into sample containers. All sample containers should be filled with minimal turbulence by allowing the ground water to flow from the tubing gently down the inside of the container.
8. Ground water samples to be analyzed for volatile organic compounds (VOCs) require pH adjustment. The appropriate EPA Program Guidance should be consulted to determine whether pH adjustment is necessary. If pH adjustment is necessary for VOC sample preservation, the amount of acid to be added to each sample vial prior to sampling should be determined, drop by drop, on a separate and

equal volume of water (e.g., 40 ml). Groundwater purged from the well prior to sampling can be used for this purpose.

9. Remove Pump and Tubing: After collection of the samples, the tubing, unless permanently installed, must be properly discarded or dedicated to the well for resampling by hanging the tubing inside the well.
10. Measure and record well depth.
11. Close and lock the well.
12. Samples are capped, labeled and placed in laboratory coolers with ice packs or bagged ice.
13. All equipment is cleaned with successive rinses of pesticide-grade methanol and distilled water.
 - a. Dedicated line is disposed of or left at well site.
14. Equipment/wash blanks are collected when non-dedicated sampling equipment is used.
15. Chain-of-custody forms are completed in triplicate.
 - a. The original and one carbon copy are put into a zip-lock bag and placed into the cooler. The original will be returned following sample analysis.
 - b. A second carbon copy is kept on file.
16. Cooler is sealed with strapping tape and chain-of-custody seals to assure integrity and to prevent tampering of sample.

TABLE 7-1 – CONTRACT-REQUIRED QUANTITATION LEVELS AND ANALYTICAL METHODS FOR ASP INORGANICS, ASP VOLATILES, ASP SEMI-VOLATILES, ASP PESTICIDES, AND PCBS

Insert from ASP B Appendix C

PFAS Compound List and Reporting and Method Detection Limits for Soil and Groundwater

	PFAS	Reporting Limit — Groundwater (ng/l)
1	Perfluorobutanesulfonic acid (PFBS)	1.6
2	Perfluoropentanesulfonic acid (PFPeS)	1.6
3	Perfluorohexanesulfonic acid (PFHxS)	1.6
4	Perfluoroheptanesulfonic acid (PFHpS)	1.6
5	Perfluorooctanesulfonic acid (PFOS)	1.6
6	Perfluorononanesulfonic acid (PFNS)	1.6
7	Perfluorodecanesulfonic acid (PFDS)	1.6
8	Perfluorododecanesulfonic acid (PFDoS)	1.6
9	Perfluorobutanoic acid (PFBA)	6.4
10	Perfluoropentanoic acid (PFPeA)	3.2
11	Perfluorohexanoic acid (PFHxA)	1.6
12	Perfluoroheptanoic acid (PFHpA)	1.6
13	Perfluorooctanoic acid (PFOA)	1.6
14	Perfluorononanoic acid (PFNA)	1.6
15	Perfluorodecanoic acid (PFDA)	1.6
16	Perfluoroundecanoic acid (PFUnA)	1.6
17	Perfluorododecanoic acid (PFDoA)	1.6
18	Perfluorotridecanoic acid (PFTTrDA)	1.6
19	Perfluorotetradecanoic acid (PFTeDA)	1.6
20	Hexafluoropropylene oxide dimer acid (HFPO-DA)	6.4

	PFAS	Reporting Limit — Groundwater (ng/l)
21	4,8-Dioxa-3H-perfluorononanoic acid (ADONA)	6.4
22	Perfluoro-3-methoxypropanoic acid (PFMPA)	3.2
23	Perfluoro-4-methoxybutanoic acid (PFMBA)	3.2
24	Nonafluoro-3,6-dioxaheptanoic acid (NFDHA)	3.2
25	4:2 Fluorotelomer sulfonic acid (4:2-FTS)	6.4
26	6:2 Fluorotelomer sulfonic acid (6:2-FTS)	6.4
27	8:2 Fluorotelomer sulfonic acid (8:2-FTS)	6.4
28	3:3 Fluorotelomer carboxylic acid (3:3 FTCA)	8.0
29	5:3 Fluorotelomer carboxylic acid (5:3 FTCA)	40
30	7:3 Fluorotelomer carboxylic acid (7:3 FTCA)	40
31	Perfluorooctane sulfonamide (PFOSA)	1.6
32	N-methylperfluorooctane sulfonamide (NMeFOSA)	1.6
33	N-ethylperfluorooctane sulfonamide (NEtFOSA)	1.6
34	N-methylperfluorooctane sulfonamidoacetic acid (N-MeFOSAA)	1.6
35	N-ethylperfluorooctane sulfonamidoacetic acid (N-EtFOSAA)	1.6
36	N-methylperfluorooctane sulfonamidoethanol (NMeFOSE)	16
37	N-ethylperfluorooctane sulfonamidoethanol (NEtFOSE)	16
38	9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid (F-53B Major) (9CL-PF3ONS)	6.4
39	11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (F-53B Minor) (11CL-PF3OUDS)	6.4
40	Perfluoro(2-ethoxyethane) sulfonic acid (PFEESA)	3.2
41	Perfluorohexadecanoic acid (PFHxDA) ¹	~
	1,4-dioxane	5

	PFAS	Reporting Limit — Soil (ng/g)
1	Perfluorobutanesulfonic acid (PFBS)	0.2
2	Perfluoropentanesulfonic acid (PFPeS)	0.2
3	Perfluorohexanesulfonic acid (PFHxS)	0.2
4	Perfluoroheptanesulfonic acid (PFHpS)	0.2
5	Perfluorooctanesulfonic acid (PFOS)	0.2
6	Perfluorononanesulfonic acid (PFNS)	0.2
7	Perfluorodecanesulfonic acid (PFDS)	0.2
8	Perfluorododecanesulfonic acid (PFDoS)	0.2
9	Perfluorobutanoic acid (PFBA)	0.8
10	Perfluoropentanoic acid (PFPeA)	0.4
11	Perfluorohexanoic acid (PFHxA)	0.2
12	Perfluoroheptanoic acid (PFHpA)	0.2
13	Perfluorooctanoic acid (PFOA)	0.2
14	Perfluorononanoic acid (PFNA)	0.2

	PFAS	Reporting Limit — Soil (ng/g)
15	Perfluorodecanoic acid (PFDA)	0.2
16	Perfluoroundecanoic acid (PFUnA)	0.2
17	Perfluorododecanoic acid (PFDoA)	0.2
18	Perfluorotridecanoic acid (PFTrDA)	0.2
19	Perfluorotetradecanoic acid (PFTeDA)	0.2
20	Hexafluoropropylene oxide dimer acid (HFPO-DA)	0.8
21	4,8-Dioxa-3H-perfluorononanoic acid (ADONA)	0.8
22	Perfluoro-3-methoxypropanoic acid (PFMPA)	0.4
23	Perfluoro-4-methoxybutanoic acid (PFMBA)	0.4
24	Nonafluoro-3,6-dioxaheptanoic acid (NFDHA)	0.4
25	4:2 Fluorotelomer sulfonic acid (4:2-FTS)	0.8
26	6:2 Fluorotelomer sulfonic acid (6:2-FTS)	0.8
27	8:2 Fluorotelomer sulfonic acid (8:2-FTS)	0.8
28	3:3 Fluorotelomer carboxylic acid (3:3 FTCA)	1.0
29	5:3 Fluorotelomer carboxylic acid (5:3 FTCA)	5.0
30	7:3 Fluorotelomer carboxylic acid (7:3 FTCA)	5.0
31	Perfluorooctane sulfonamide (PFOSA)	0.2
32	N-methylperfluorooctane sulfonamide (NMeFOSA)	0.2
33	N-ethylperfluorooctane sulfonamide (NEtFOSA)	0.2
34	N-methylperfluorooctane sulfonamidoacetic acid (N-MeFOSAA)	0.2
35	N-ethylperfluorooctane sulfonamidoacetic acid (N-EtFOSAA)	0.2
36	N-methylperfluorooctane sulfonamidoethanol (NMeFOSE)	2.0
37	N-ethylperfluorooctane sulfonamidoethanol (NEtFOSE)	2.0
38	9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid (F-53B Major) (9CL-PF3ONS)	0.8
39	11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (F-53B Minor) (11CL-PF3OUdS)	0.8
40	Perfluoro(2-ethoxyethane) sulfonic acid (PFEESA)	0.4
41	Perfluorohexadecanoic acid (PFHxDA) ¹	~

Source: EPA Analysis of Per- and Polyfluoroalkyl Substances (PFAS) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS, Second Draft Method 1633, November 2022

Data for this table are derived from the single-laboratory validation study and are only provided as examples for this draft method. The data will be updated to reflect the interlaboratory study results in a subsequent revision. Therefore, these criteria will change after interlaboratory validation.

¹ This compound was not listed in the EPA Method 1633 2nd draft and currently no known values exist

Appendix B:

Emerging Contaminant Sampling Plan



SOIL AND GROUNDWATER SAMPLING PLAN FOR EMERGING CONTAMINANTS

**FOR
Proposed Development
3 North Castle Drive
North Castle, New York**

Prepared for:

**ARMONK DEVELOPMENT, LLC
15 Verbena Ave
Flora Park, New York 1100**

Prepared By:

**Prepared by:
SESI CONSULTING ENGINEERS, D.P.C.
959 Route 46E, Floor 3, Suite 300
Parsippany, NJ 07054**

FEBRUARY 2024

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TABLES

TABLE 2.1	PFAS COMPOUNDS LIST
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LIST OF ACRONYMS

Acronym	Definition
DUSR	Data Usability Summary Report
ELAP	Environmental Laboratory Accreditation Program
HDPE	High-Density Polyethylene
LDPE	Low-density Polyethylene
MDL	Method Detection Limit
MS/MSD	Matrix Spike/Matrix Spike Duplicate
ng/L	Nanogram per liter
NYSDEC	New York State Department of Environmental Conservation
PFAS	Per and Polyfluoroalkyl Substances
PFOA	Perfluorooctanoic Acid
PFOS	Perfluorooctanesulfonic Acid
PTFE	Polytetrafluoroethylene
PPE	Personal Protective Equipment
PVC	Polyvinyl Chloride
QA/QC	Quality Assurance/Quality Control
TAL	Target Analyte List
TCL	Target Compound List
ug/kg	micrograms pers kilogram
USEPA	United States Environmental Protection Agency

1.0 PROJECT DESCRIPTION

This document presents the Soil and Groundwater Plan for Emerging Contaminants for the Remedial Investigation Work Plan for the proposed development at 3 North Castle Drive, Westchester County, North Castle, New York (the "Site"). The Site is identified as a portion of 108.3-1-62.1 on the Westchester County tax map and totals approximately 20.67-acres in size. The Site is currently vacant except for an asphalt roadway providing access to adjacent athletic fields located east of the Site.

The Site is bound to the north by undeveloped land and Route 22, and commercial properties beyond; to the west by undeveloped, wooded land and North Castle Road, undeveloped land, and Route 22 beyond; to the south by an IBM building and parking lots; and to the east by undeveloped wooded land and Armonk Indoor and sport fields beyond. The closest notable surface water body is the Wampus River, located approximately 490 feet east of the Site.

2.0 SOIL SAMPLING PLAN

The sampling will be performed in accordance with the New York State Department of Environmental Conservation (NYSDEC) Guidelines for Sampling and Analysis of PFAS Under NYSDC's Part 375 Remedial Programs, dated June 2021. The soil samples will be sent via chain of custody to an ELAP-certified laboratory and analyzed for TCL/TAL+30, 1,4-dioxane and the per and polyfluoroalkyl substances (PFAS) compounds listed in Table 2.1. The soil samples will be analyzed for PFAS using Draft Method 1633. Reporting limits for each PFAS compound will not exceed 0.5 micrograms per kilogram (ug/kg). NYSDC will be informed if detection limits on certain PFAS compounds cannot be met by the laboratory. Category B deliverables and an electronic data deliverable will be completed. A data usability summary report (DUSR) will be prepared by a data validator for all the analyses including PFAS and 1,4-dioxane. The method detection limit (MDL) for 1,4-dioxane will be no higher than 0.1 mg/kg (ppm).

Because PFAS compounds must be analyzed at concentrations in the ng/kg range, precautions must be taken to prevent cross-contamination during sampling events. Field sampling equipment that is used at multiple sites or sampling locations could become highly contaminated with PFAS. Soil sampling at this Site will involve the use of non-dedicated equipment, such as a Geoprobe direct push drill rig, which could be a source of cross-contamination. Decontamination procedures outlined in this document will be followed to avoid cross contamination and equipment will be verified as PFAS-free. Special care and consideration will be given to the field sampling equipment when stored and handled outside the Site boundaries or between different sample locations.

Items that may be directly in contact with the soil, including spoons, bowls, and direct push equipment, including any split spoon or sampling barrels, have a high likelihood of cross-contamination occurring if the proper decontamination procedures are not followed. These items should be known to be PFAS free. Items that will not directly contact the soil, including field books, Post-It® Notes, aluminum foil, recycled paper towels, binders, or spiral hard cover notebook, can be a source of PFAS contamination. Every effort will be made to ensure these items are PFAS-free.

For the sampling equipment, the following items, materials, and procedures will be used for decontamination:

- Municipal drinking water may be used for decontamination if it is known to be PFAS-free. Commercially available deionized water in a high-density polyethylene (HDPE) container may also be used for decontamination.
- Standard two step decontamination using Alconox® detergent and PFAS-free triple water rinse will be performed for the sampling equipment.
- Sampling equipment may be scrubbed with polyethylene or a polyvinyl chloride (PVC) brush to remove particulates.
- The sampling equipment components will not come in contact with material that may potentially contain PFAS such as aluminum foil, low density polyethylene (LDPE), polytetrafluoroethylene (PTFE, Teflon®) or other fluoropolymers.
- Soil sampling equipment will be decontaminated between each sampling point and at the conclusion of the workday. This is to ensure sampling equipment is decontaminated ahead of time for the next sampling event.

Equipment rinsate blanks will be collected daily for the equipment that comes in contact with the soil samples and is decontaminated and reused. If all the sampling materials are disposable, no field blanks will be collected. Field duplicates will be collected on a frequency of one (1) per 20 samples. One matrix spike and matrix spike duplicate (MS/MSD) will also be collected on a frequency of one (1) per 20 samples. A trip blank will accompany each laboratory shipment which includes analysis for volatile organic compounds.

3.0 GROUNDWATER SAMPLING PLAN

The sampling will be performed in accordance with the NYSDEC Guidelines for Sampling and Analysis of PFAS Under NYSDEC's Part 375 Remedial Programs, dated January 2021, the NYSDEC July 2018 letter on Groundwater Sampling for Emerging Contaminants, and the PFAS Groundwater Samples from Monitoring Well Sample Protocols Revision 1.2 August 9, 2019. The groundwater samples will be sent via chain of custody in a cooler at 4 degrees C to an ELAP-certified laboratory and analyzed for TCL/TAL+30, 1,4-dioxane and the PFAS compounds listed in Table 2.1. The groundwater samples will be analyzed for PFAS using Modified USEPA Draft Method 1633. Reporting limits for perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) will not exceed 2 nanogram per liter (ng/L). Category B deliverables and an electronic data deliverable will be completed. A DUSR will be prepared by a data validator for all the analyses including PFAS and 1,4-dioxane. The MDL for 1,4-dioxane will be no higher than 0.35 µg/l (ppb). In order to get the appropriate detection limit, the lab will run EPA Method 8270 in "selective ion monitoring" (SIM) mode for 1,4-dioxane.

PFAS are very persistent in the environment and in the human body. There is evidence that exposure to PFAS can lead to adverse human health effects. EPA established the health advisory levels for PFAS in drinking water at 4 parts per trillion. Due to their presence in a variety of products, persistence in the environment and very low drinking water standards, care must be used when groundwater sampling for PFAS to avoid cross contamination from the sampling equipment and personal protective equipment (PPE).

4.0 SOIL SAMPLE COLLECTION AND HANDLING

The following considerations will be observed:

- No fabric softener will be used on clothing to be worn by the sampling personnel in the field. Clothing that contains PTFE material (including GORE-TEX®) or that has been waterproofed with PFAS-containing materials will be avoided.
- Cosmetics, moisturizers, hand cream, unauthorized sunscreen, insect repellent or other related products will not be used by the sampling staff on sampling days.
- Food and drink packaging materials such as pre-wrapped food or snacks (i.e. candy bars, microwave popcorn, etc.) will not be used in the sampling and staging areas.
- Sampling will be conducted with powderless nitrile gloves. The gloves will be changed frequently any time there is an opportunity for cross-contamination during sampling, including, but not limited to:
 - a. Immediately prior to sample collection
 - b. Each time sampling equipment is placed in and then removed from soil at a new location
 - c. Handling of any sample, including quality assurance/quality control (QA/QC) samples
 - d. After the handling of any non-dedicated sampling equipment
 - e. After contact with non-decontaminated surfaces
 - f. After decontamination of sampling equipment
 - g. When judged necessary by field personnel
- HDPE or polypropylene sample bottles with Teflon®-free caps, provided by the laboratory will be used. Sample containers will not come in contact with material that may potentially contain PFAS.
- Bottles will only be opened immediately prior to sampling.
- Dust and fibers will be kept out of sample bottles.
- The sample caps will never be placed directly on the ground during sampling. If the sampling staff must set the sample bottle cap down during sample collection and a second member of the sampling crew (wearing a fresh pair of powderless nitrile gloves) is not available, the cap will be set on a clean surface (cotton sheeting, HDPE sheeting, triple rinsed cooler lid, etc.).

- Regular size Sharpie® and thicker markers will be avoided. Fine and Ultra-Fine point Sharpie® markers may be used. Ballpoint pens may be used when labeling sample containers. If ballpoint pens do not write on the sample container labels, preprinted labels from the laboratory may be used.
- Sample bottles, coolers, sample labels and a chain of custody form will be provided by the analytical laboratory.
- PFAS samples will be collected prior to collecting non-PFAS samples.

5.0 SAMPLE SHIPMENT

In the absence of a formal USEPA guidance for PFAS sample storage, the documentation in USEPA Draft Method 1633 will be used as a guide for thermal preservation and holding times for soil or other samples. Samples will be chilled during storage and shipment and will not exceed 50°F (10° C) during the first 48 hours after collection.

The following procedures will be used by SESI for sample shipment:

- Regular ice will be used to cool and maintain the samples at or below 42.8°F (6°C). Chemical or blue ice may be used if it is known to be PFAS-free and the samples can be cooled and maintained at or below 42.8°F (6°C) during collection and through transit to the laboratory.
- The coolers will be periodically checked to ensure samples are well iced and at the proper temperature. Refresh with regular ice if needed. The ice may be double bagged in LDPE resealable storage bags. LDPE may be used if an equipment blank demonstrates the LDPE is PFAS-free.
- Chain of Custody and other forms will be single bagged in LDPE (e.g. Ziploc®) storage bags and taped to the inside of the cooler lid. LDPE may be used if an equipment blank demonstrates the LDPE is PFAS-free.
- The cooler(s) will be taped closed with a custody seal and picked up by the laboratory within 24 hrs.

Table 2.1: PFAS Compounds List*

Group	Chemical Name	Abbreviation	CAS Number
Perfluoroalkyl sulfonic acids	Perfluorobutanesulfonic acid	PFBS	375-73-5
	Perfluoropentanesulfonic acid	PFPeS	2706-91-4
	Perfluorohexanesulfonic acid	PFHxS	355-46-4
	Perfluoroheptanesulfonic acid	PFHpS	375-92-8
	Perfluorooctanesulfonic acid	PFOS	1763-23-1
	Perfluorononanesulfonic acid	PFNS	68259-12-1
	Perfluorodecanesulfonic acid	PFDS	335-77-3
	Perfluorododecanesulfonic acid	PFDoS	79780-39-5
Perfluoroalkyl carboxylic acids	Perfluorobutanoic acid	PFBA	375-22-4
	Perfluoropentanoic acid	PFPeA	2706-90-3
	Perfluorohexanoic acid	PFHxA	307-24-4
	Perfluoroheptanoic acid	PFHpA	375-85-9
	Perfluorooctanoic acid	PFOA	335-67-1
	Perfluorononanoic acid	PFNA	375-95-1
	Perfluorodecanoic acid	PFDA	335-76-2
	Perfluoroundecanoic acid	PFUnA	2058-94-8
	Perfluorododecanoic acid	PFDoA	307-55-1
	Perfluorotridecanoic acid	PFTTrDA	72629-94-8
	Perfluorotetradecanoic acid	PFTeDA	376-06-7
	Perfluorohexadecanoic acid	PFHxDA	67905-19-5
Per- and Polyfluoroether carboxylic acids	Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6
	4,8-Dioxa-3H-perfluorononanoic acid	ADONA	919005-14-4
	Perfluoro-3-methoxypropanoic acid	PFMPA	377-73-1
	Perfluoro-4-methoxybutanoic acid	PFMBA	863090-89-5
	Nonafluoro-3,6-dioxaheptanoic acid	NFDHA	151772-58-6
Fluorotelomer sulfonic acids	4:2 Fluorotelomer sulfonic acid	4:2-FTS	757124-72-4
	6:2 Fluorotelomer sulfonic acid	6:2-FTS	27619-97-2
	8:2 Fluorotelomer sulfonic acid	8:2-FTS	39108-34-4
Fluorotelomer carboxylic acids	3:3 Fluorotelomer carboxylic acid	3:3 FTCA	356-02-5
	5:3 Fluorotelomer carboxylic acid	5:3 FTCA	914637-49-3
	7:3 Fluorotelomer carboxylic acid	7:3 FTCA	812-70-4
Perfluorooctane sulfonamides	Perfluorooctane sulfonamide	PFOSA	754-91-6
	N-methylperfluorooctane sulfonamide	NMeFOSA	31506-32-8
	N-ethylperfluorooctane sulfonamide	NEtFOSA	4151-50-2
Perfluorooctane sulfonamidoacetic acids	N-methylperfluorooctane sulfonamidoacetic acid	N-MeFOSAA	2355-31-9
	N-ethylperfluorooctane sulfonamidoacetic acid	N-EtFOSAA	2991-50-6
Perfluorooctane sulfonamide ethanols	N-methylperfluorooctane sulfonamidoethanol	MeFOSE	24448-09-7
	N-ethylperfluorooctane sulfonamidoethanol	EtFOSE	1691-99-2
Ether sulfonic acids	9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid (F-53B Major)	9CI-PF3ONS	756426-58-1
	11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (F-53B Minor)	11CI-PF3OUdS	763051-92-9
	Perfluoro(2-ethoxyethane) sulfonic acid	PFEESA	113507-82-7

*Table source is NYSDEC Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (November 2022).

Appendix C:

Typical Boring/Well Construction Log

The subsurface information shown hereon was obtained for the design and estimating purposes for our client. It is made available to authorized users only that they may have access to the same information available to our client. It is presented in good faith, but it is not intended as a substitute for investigations, interpretations or judgment of such authorized users. Information on the logs should not be relied upon without the geotechnical engineers recommendations contained in the report from which these logs were extracted. Soil descriptions represent a field identification after D. M. Burmister unless otherwise noted.

<div>SESI</div> <div>CONSULTING ENGINEERS</div>					PROJECT NAME:		GEOPROBE NO.										
					LOCATION:		JOB NO.										
					METHOD:		GROUND ELEVATION:										
GEOPROBE BY:					DATE STARTED:		GROUNDWATER TABLE DEPTH:										
INSPECTOR:					DATE COMPLETED:		0 Hr.		24 Hr.	Date							
DEPTH (ft)	RECOVERY (in)	SAMPLE TUBE No.	DEPTH FROM (ft)		TO (ft)	ENVIRONMENTAL SOIL SAMPLE NAME	SOIL DESCRIPTION AND STRATIFICATION			PID							
0																	
5																	
10																	
15																	
20																	
25																	
30																	
35																	
40																	

Nominal I.D. of Hole	in.
Nominal I.D. of Barrel Sampler	1% in.

The subsurface information shown hereon was obtained for the design and estimating purposes for our client. It is made available to authorized users only that they may have access to the same information available to our client. It is presented in good faith, but it is not intended as a substitute for investigations, interpretations or judgment of such authorized users. Information on the logs should not be relied upon without the geotechnical engineers recommendations contained in the report from which these logs were extracted.

Approximate Change in Strata: _____ Inferred Change in Strata: _____

FIGURE #

Appendix D:

Health and Safety Plan

SITE-SPECIFIC HEALTH AND SAFETY PLAN

**Proposed Residential Development
1 North Castle Drive
North Castle, New York**

Prepared For:

**Armonk Development, LLC
15 Verbena Ave
Flora Park, New York 11001**

Prepared By:

**SESI CONSULTING ENGINEERS
959 Route 46E, Floor 3, Suite 300
Parsippany, NJ 07054**

Project No.: 12456A

February 2024

Disclaimer: This Health and Safety Plan (HASP) is based upon information provided [and, if applicable, conditions discovered during a site visit], and is limited by the project scope.

The HASP should be periodically reviewed and updated based on a number of factors, including but not limited to: (1) changes in applicable governmental requirements; (2) changes in procedures at the site; and (3) site conditions which were unknown to SESI Consulting Engineers (SESI) as of the time the HASP was prepared.

This HASP has been prepared for the sole and exclusive use of Armonk Development, LLC and may not be relied upon by any other person without the express written consent and authorization of SESI.

SITE-SPECIFIC HEALTH AND SAFETY PLAN

For

**Armonk Development, LLC
15 Verbena Ave
Flora Park, New York 11001
SESI Project NO.: 12456A**

Prepared by:

Steven Gustems, PG
SESI- Senior Project Manager

Approved by:

Justin M. Protasiewicz, PE
SESI-Principal

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LIST OF ACRONYMS AND ABBREVIATIONS

ACGIH	American Conference of Governmental Industrial Hygienists
COC	Constituent(s) of Concern
CRZ	Contamination Reduction Zone
EZ	Exclusion Zone
FS	Field Supervisor
GFCI	Ground Fault Circuit Interrupter
HASP	Health and Safety Plan
HSM	Health and Safety Manager
LEL	Lower Explosive Limit
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated Biphenyls
PEL	Permissible Exposure Limit
PID	Photoionization Detector
PM	Project Manager
PO	Project Officer
PPE	Personal Protective Equipment
SDS	Safety Data Sheet
SSO	Site Safety Officer
SVOC	Semi-Volatile Organic Compound
SZ	Support Zone
TLV	Threshold Limit Value
USCG	United States Coast Guard
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound

HEALTH AND SAFETY PLAN SUMMARY

The chemical hazards associated with site operations are related to inhalation, ingestion, and skin exposure to site Chemicals of Concern (COCs). COCs at the site include Metals and Pesticides. Concentrations of airborne COCs during site tasks may be measurable and will require air monitoring during certain operations.

The potential for inhalation of site COCs is low. The potential for dermal contact with soils containing site COCs during remedial operations is moderate.

The following table summarizes airborne contaminant action levels that will be used to determine the procedures and protective equipment necessary based on conditions as measured at the site.

Parameter	Reading	Action
Dust	0 to .5 mg/m ³	Normal operations
	0.5 to 1 mg/m ³	Begin soil wetting procedure (Level C protection would be needed beyond this point)
	> 1 mg/m ³	Stop work, fully implement dust control plan
Oxygen	≤ 19.5%	Stop work, evacuate confined spaces/work area, investigate cause of reading, and ventilate area
	> 19.5% to < 23.5%	Normal operations
	≥ 23.5%	Stop work, evacuate confined spaces/work area, investigate cause of reading, and ventilate area
Carbon Monoxide	0 ppm to ≤ 20 ppm	Normal operations
	> 20 ppm	Stop work, evacuate confined spaces/work area, investigate cause of reading, and ventilate area

The level of personal protection selected will be based on air monitoring of the work environment and an assessment by the Field Supervisor and Site Safety Officer. The following table presents a selection matrix to determine appropriate Personal Protective Equipment.

Task	Anticipated Level of Protection
Mobilization	Level D
Subsurface Intrusive Activities (Mass Excavation, Drilling, Soil Grouting)	Modified Level D/Level C
Earthwork/Grading	Level D
Additional Chemical Sampling / Delineation	Modified Level D/Level C
Decontamination	Modified Level D
Demobilization	Level D

1.0 INTRODUCTION

1.1 Objective

The objective of this Health and Safety Plan (HASP) is to provide a mechanism for establishing safe working conditions during remedial action activities. The safety organization, procedures, and protective equipment have been established based on an analysis of potential physical, chemical, and biological hazards. Specific hazard control methodologies have been evaluated and selected to minimize the potential of injury, illness, or other hazardous incident.

The HASP was written to meet the requirements of all applicable Federal, State, and local health and safety regulations, including 29 CFR 1910.120. The HASP is based on current knowledge regarding the specific chemical and physical hazards that are known or anticipated at the Site. This HASP is a dynamic document, for which changes and/or revisions may be realized as changes in scope and/or site conditions are encountered. Should revised documents be produced, said revised documents will refer to the specific changes and why they were made.

1.2 Site and Facility Description

This document presents the health and safety plan (HASP) for the Remedial Investigation Work Plan (RIWP) for the proposed development of the property located at 3 North Castle Drive, North Castle, Westchester County, New York (the Site). The Site consists of a portion of a 32.55-acre area parcel and is identified as 108.3-1-62.1 on the Westchester County tax map. The Site is bound to the north by undeveloped land and Route 22, and commercial properties beyond; to the west by North Castle Road, undeveloped land, and Route 22 beyond; to the south by an IBM building and parking lots; and to the east by Armonk Indoor and sport fields.

The Site is currently vacant except for an asphalt roadway providing access to adjacent athletic fields located east of the Site. Historically, The Site was undeveloped land until 1971, when the asphalt roadway that borders the Site to the west, and an access road on the central and southern portions of the Site were constructed. A review of historic aerial images identified that the Site was historically utilized for agricultural purposes. The former IBM North Castle facility and associated parking areas are situated south of the Site and was constructed between 1960 and 1964. Undeveloped land and the North Castle Community Park are located east of the Site. Undeveloped land is located immediately north and west of the Site, beyond which lies Armonk Bedford Road and commercial properties beyond.

1.3 Policy Statement

The policy of SESI Consulting Engineers (SESI) is to provide a safe and healthful work environment. No aspect of operations is of greater importance than injury and illness prevention. A fundamental principle of safety management is that all injuries, illnesses, and incidents are preventable. SESI will take every reasonable step to eliminate or control hazards in order to minimize the possibility of injury, illness, or incident.

This HASP prescribes the procedures that must be followed by SESI personnel during activities at the site. Operational changes that could affect the health and safety of personnel, the community, or the environment will not be made without the prior approval of

the Project Manager (PM) and the Health and Safety Manager (HSM). This document will be reviewed periodically by the HSM to ensure that it is current and technically correct. Any changes in site conditions and/or the scope of work will require a review and modification to this HASP. Such changes will be completed in the form of an addendum or a revision to the plan.

The provisions of this plan are mandatory for all SESI personnel and are advisory for all contractors, and subcontractors assigned to the project. ***Subcontractors will be responsible for preparing their own site-specific HASPs that meet the basic requirements outlined in this HASP.*** All visitors to SESI work areas at the site must abide by the requirements of this plan.

1.4 References

This HASP complies with applicable Occupational Safety and Health Administration (OSHA) regulations, United States Environmental Protection Agency (USEPA) regulations, and SESI health and safety policies and procedures. This plan follows the guidelines established in the following:

- *Standard Operating Safety Guides*, USEPA (Publication 9285.1-03, June 1992).
- *Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities*, NIOSH, OSHA, USCG, USEPA (86116, October 1985).
- *Title 29 of the Code of Federal Regulations (CFR)*, Part 1910.
- *Title 29 of the Code of Federal Regulations (CFR)*, Part 1926.
- *Pocket Guide to Chemical Hazards*, DHHS, PHS, CDC, NIOSH (2004).
- *Threshold Limit Values*, ACGIH (2005).
- *Guide to Occupational Exposure Values*, ACGIH (2005).
- *Quick Selection Guide to Chemical Protective Clothing*, Forsberg, K. and S.Z. Mansdorf, 2nd Ed. (1993).

1.5 Definitions

The following definitions (listed alphabetically) are applicable to this HASP:

- *Contamination Reduction Zone (CRZ)* - Area between the exclusion zone and support zone that provides a transition between contaminated and clean areas. Decontamination stations are located in this zone.
- *Exclusion Zone (EZ)* - Any portions of the site where hazardous substances are, or are reasonably suspected to be present, and pose an exposure hazard to on-site personnel.
- *Incident* - All losses, including first aid cases, injuries, illnesses, spills/leaks, equipment and property damage, motor vehicle accidents, regulatory violations, fires, and business interruptions.
- *On-Site Personnel* - All SESI and subcontractors involved with the project.
- *Project* - All on-site work performed under the scope of work.
- *Site* - The area described in Section 1.2, Site and Facility Description, where the work is to be performed by SESI personnel and subcontractors.
- *Support Zone (SZ)* - All areas of the site except the EZ and CRZ. The SZ surrounds the CRZ and EZ. Support equipment and break areas are located in this zone.
- *Subcontractor* - Includes contractor personnel hired by SESI.

- *Visitor* - All other personnel, except the on-site personnel.
- *Work Area* - The portion of the site where work activities are actively being performed. This area may change daily as work progresses and includes the SZ, CRZ, and EZ. If the work area is located in an area on the site that is not contaminated, or suspected of being contaminated, the entire work area may be a SZ.

2.0 PROJECT SCOPE OF WORK

This HASP contains information for the following tasks that SESI is anticipated to conduct at the Site. Should additional and/or different tasks be identified, amendments to this HASP will be required to address these changed items.

- Mobilization/Sample location stakeout;
- Soil Borings and Monitoring Well Installation;
- Excavation of contaminated soil “hot spots”;
- Earthwork and grading;
- Chemical sampling of soil and groundwater; and
- Decontamination and demobilization/site restoration.

3.0 ROLES AND RESPONSIBILITIES

3.1 All Personnel

All SESI project personnel must adhere to the procedures outlined in this HASP during the performance of their work. Each person is responsible for completing tasks safely and reporting any unsafe acts or conditions to their supervisor. No person may work in a manner that conflicts with these procedures. After due warnings, the PM will dismiss from the site any SESI employee or subcontractor who violates safety procedures.

All SESI project personnel will receive training in accordance with applicable regulations and be familiar with the requirements and procedures contained in this HASP prior to initiating site activities. In addition, all SESI personnel will attend an initial hazard briefing prior to beginning work at the site.

The roles of key safety personnel and subcontractors are outlined in the following sections. Key project personnel and contacts are summarized in **Table 1** on page 7.

3.2 Key Safety Personnel

3.2.1 Project Officer (PO)

The PO is responsible for providing resources to assure project activities are completed in accordance with this HASP, and for meeting all regulatory and contractual requirements.

3.2.2 Project Manager (PM)

The PM is responsible for verifying that project activities are completed in accordance with the requirements of this HASP. The PM is responsible for confirming that the Field Supervisor (FS) has the equipment, materials, and qualified personnel to fully implement the safety requirements of this HASP, and/or that subcontractors assigned to this project meet the requirements established by SESI. It is also the responsibility of the PM to:

- Consult with the HSM on site health and safety issues;
- Verify that subcontractors meet health and safety requirements prior to commencing work;
- Verify that all incidents are thoroughly investigated;
- Approve, in writing, addenda or modifications of this HASP; and
- Suspend work or modify work practices, as necessary, for personal safety, protection of property, and regulatory compliance.

3.2.3 Health and Safety Manager (HSM)

The HSM or his designee, the health and safety manager (HSM), has overall responsibility for the technical health and safety aspects of the project, including review and approval of this HASP. Inquiries regarding health and safety procedures, project procedures, and other technical or regulatory issues should be addressed to this individual. The HSM or his designee must approve changes or addenda to this HASP.

3.2.4 Site Safety Officer (SSO)

The SSO is responsible for field health and safety issues, including the execution of this HASP. Questions in the field regarding health and safety procedures, project procedures, and other technical or regulatory issues should be addressed to this individual. The SSO will advise the PM on health and safety issues and will establish and coordinate the project air-monitoring program if one is deemed necessary (see Section 5.1, Air Monitoring). The SSO is the primary site contact on health and safety matters. It is the responsibility of the SSO to:

- Provide on-site technical assistance, if necessary;
- Participate in all accident/incident reports and ensure that they are reported to the HSM, client, and PM within 24 hours;
- Coordinate site and personal air monitoring as required, including equipment maintenance and calibration;
- Conduct site safety orientation training and safety meetings;
- Verify that project personnel have received the required physical examinations and medical certifications;
- Review site activities with respect to compliance with this HASP;
- Maintain required health and safety documents and records; and
- Assist the FS in instructing field personnel on project hazards and protective procedures.

3.2.5 Field Supervisor (FS)

The FS is responsible for implementing this HASP, including communicating requirements to on-site personnel and subcontractors. The FS will be responsible for informing the PM of changes in the work plan, procedures, or site conditions so that those changes may be addressed in this HASP. Other responsibilities are to:

- Consult with the SSO on site health and safety issues;
- Stop work, as necessary, for personal safety, protection of property, and regulatory compliance;

- Obtain a site map and determine and post routes to medical facilities and emergency telephone numbers;
- Notify local public emergency representatives (as appropriate) of the nature of the site operations, and post their telephone numbers (i.e., local fire department personnel who would respond for a confined space rescue);
- Observe on-site project personnel for signs of ill health effects;
- Investigate and report any incidents to the SSO;
- Verify that all on-site personnel have had applicable training;
- Verify that on-site personnel are informed of the physical, chemical, and biological hazards associated with the site activities, and the procedures and protective equipment necessary to control the hazards; and
- Issue/obtain any required work permits (hot work, confined space, etc.).

3.2.6 Field Personnel (FP)

All SESI field personnel are responsible for following the Health and Safety procedures specified in this HASP and work practices specified in applicable operation procedures. Some specific responsibilities include, but are not limited to:

- Reading and understanding the HASP;
- Reporting all accidents, incidents, injuries, or illnesses to the FS;
- Complying with the requests of the SSO;
- Immediately communicating newly identified hazards or noncompliance issues to the FS or SSO; and
- Stopping work in cases of immediate danger.

3.3 Subcontractors

Subcontractors and their personnel must understand and comply with applicable regulations and site requirements established in this HASP. Subcontractors will prepare their own site-specific HASP that must be consistent with the requirements of this HASP.

All subcontractor personnel will receive training in accordance with applicable regulations and be familiar with the requirements and procedures contained in this HASP prior to initiating site activities. All subcontractor personnel will attend an initial hazard briefing prior to beginning work at the site. Additionally, on-site subcontractor personnel must conduct daily site safety meetings.

Subcontractors must designate individuals to function as the PM, HSM, SSO, and FS. In some firms the HSM to be carried out by the PM. This is acceptable provided the PM has the required knowledge, training, and experience to properly address all hazards associated with the work, and to prepare, approve, and oversee the execution of the site-specific HASP. A subcontractor may designate the same person to perform the duties of both the SSO and the FS. However, depending on the level of complexity of a contractor's scope of work, it may be infeasible for one person to perform both functions satisfactorily.

3.4 Stop Work Authority

Every SESI employee and subcontractor is empowered, expected, and has the responsibility to stop the work of another co-worker if the working conditions or behaviors are considered unsafe.

3.5 All On-Site Personnel

All on-site SESI personnel (including SESI subcontractors) must read and acknowledge their understanding of their respective HASPs before commencing work and abide by the requirements of the plans. All on-site SESI personnel shall sign their HASP Acknowledgement Form following their review of their HASP.

All SESI project personnel will receive training in accordance with applicable regulations and be familiar with the requirements and procedures contained in this HASP prior to initiating site activities. In addition, all on-site personnel will attend an initial hazard briefing provided by the SSO prior to beginning work at the site and conduct daily safety meetings thereafter.

On-site personnel will immediately report the following to the FS or SSO:

- Personal injuries and illnesses no matter how minor;
- Unexpected or uncontrolled release of chemical substances;
- Symptoms of chemical exposure;
- Unsafe or hazardous situations;
- Unsafe or malfunctioning equipment;
- Changes in site conditions that may affect the health and safety of project personnel;
- Damage to equipment or property; and
- Situations or activities for which they are not properly trained.

3.6 Visitors

All SESI personnel and subcontractors visiting the Site must check in with the FS. Visitors will be cautioned to avoid skin contact with surfaces, soils, groundwater, or other materials that may impacted or be suspected to be impacted by constituents of concern (COCs).

Visitors requesting to observe work at the site must don appropriate personal protective equipment (PPE) prior to entry to the work area and must have the appropriate training and medical clearances to do so. If respiratory protective devices are necessary, visitors who wish to enter the work area must have been respirator-trained and fit tested for a respirator within the past 12 months.

Table 1 – Key Safety Personnel

SESI Personnel		
Role	Name	Address/Telephone No.

Project Officer (PO)	Justin M. Protasiewicz	Parsippany, NJ/973-808-9050 x244
Project Manager (PM)	Steven Gustems	Parsippany, NJ/973-808-9050 x247
Senior Project Engineer (SPE)	Justin M. Protasiewicz	Parsippany, NJ/973-808-9050 x244
Health and Safety Manager (HSM)	Todd Kelly	Parsippany, NJ/973-808-9050 x238
Site Safety Officer (SSO)	Todd Kelly	Parsippany, NJ/973-808-9050 x238
Field Supervisor (FS)	Jonanthan Stuart	Parsippany, NJ/973-808-9050 x244
Field Personnel	TBD	
Subcontractors		
Company/Role	Name	Address/Telephone No.
Drilling Subcontractor - TBD	TBD	TBD
Analytical Lab - TBD	TBD	TBD

4.0 PERSONAL PROTECTIVE EQUIPMENT

4.1 Levels of Protection

PPE is required to safeguard site personnel from various hazards. Varying levels of protection may be required depending on the levels of COCs and the degree of physical hazard. This section presents the various levels of protection and defines the conditions of use for each level. A summary of the levels is presented in **Table 2** on page 11.

4.1.1 Level D Protection

The minimum level of protection that will be required of project personnel at the site will be Level D, which will be worn when site conditions or air monitoring indicates no inhalation hazard exists. The following equipment will be used:

- Work clothing as prescribed by weather;
- Steel toe work boots, meeting American National Standards Institute (ANSI) Z41;
- Safety glasses or goggles, meeting ANSI Z87;
- Leather work gloves and/or nitrile surgical gloves;
- Hard hat, meeting ANSI Z89, when falling object hazards are present;
- Hearing protection (if noise levels exceed 85 dBA, then hearing protection with a USEPA NRR of at least 20 dBA must be used); and
- PFD if working on or near the water.

4.1.2 Modified Level D Protection

Modified Level D will be used when airborne contaminants are not present at levels of concern, but site activities present an increased potential for skin contact with contaminated materials. Modified Level D consists of:

- Nitrile gloves worn over nitrile surgical gloves;
- Latex/polyvinyl chloride (PVC) overboots when contact with COC-impacted media is anticipated;
- Steel toe work boots, meeting ANSI Z41;
- Safety glasses or goggles, meeting ANSI Z87;
- Face shield in addition to safety glasses or goggles when projectiles or splash hazards exist (e.g. during Power Washing activities);
- Hard hat, meeting ANSI Z89, when falling object hazards are present;

- Hearing protection (if noise levels exceed 85 dBA, then hearing protection with a USEPA NRR of at least 20 dBA must be used);
- Tyvek® suit (polyethylene coated Tyvek® suits for handling liquids) when body contact with COC-impacted media is anticipated; and
- PFD if working on or near the water.

4.1.3 Level C Protection

Level C protection will be required when the airborne concentration of COC reaches one-half of the OSHA Permissible Exposure Limit or ACGIH TLV. The following equipment will be used for Level C protection:

- Full-face, air-purifying respirator with combination organic vapor/HEPA cartridges;
- Polyethylene-coated Tyvek® suit, with ankles and cuffs taped to boots and gloves;
- Nitrile gloves worn over nitrile surgical gloves;
- Steel toe work boots, meeting ANSI Z41;
- Chemical-resistant boots with steel toes or latex/PVC overboots over steel toe boots;
- Hard hat, meeting ANSI Z89;
- Hearing protection (if noise levels exceed 85 dBA, then hearing protection with a USEPA NRR of at least 20 dBA must be used); and
- PFD if working on or near the water.

4.2 Selection of PPE

Equipment for personal protection will be selected based on the potential for contact, site conditions, ambient air quality, and the judgment of supervising site personnel and health and safety professionals. The PPE used will be chosen to be effective against the COCs present on the site.

4.3 Site Respiratory Protection Program

Respiratory protection is an integral part of employee health and safety at the site due to potentially hazardous concentrations of airborne COCs. The site respiratory protection program will consist of the following (as a minimum):

- All on-site personnel who may use respiratory protection will have an assigned respirator.
- All on-site personnel who may use respiratory protection will have been fit tested and trained in the use of a full-face air-purifying respirator within the past 12 months. Documentation of the fit test must be provided to the SSO prior to commencement of work.
- All on-site personnel who may use respiratory protection must within the past year have been medically certified as being capable of wearing a respirator. Documentation of the medical certification must be provided to the SSO, prior to commencement of site work.
- Only cleaned, maintained, NIOSH-approved respirators will be used.
- If respirators are used, the respirator cartridge is to be properly disposed of at the end of each work shift, or when load-up or breakthrough occurs.
- Contact lenses are not to be worn when a respirator is worn.

- All on-site personnel who may use respiratory protection must be clean-shaven. Mustaches and sideburns are permitted, but they must not touch the sealing surface of the respirator.
- Respirators will be inspected, and a negative pressure test performed prior to each use.
- After each use, the respirator will be wiped with a disinfectant, cleansing wipe. When used, the respirator will be thoroughly cleaned at the end of the work shift. The respirator will be stored in a clean plastic bag, away from direct sunlight in a clean, dry location, in a manner that will not distort the face piece.

4.4 Using PPE

Depending upon the level of protection selected, specific donning and doffing procedures may be required. The procedures presented in this section are mandatory if Modified Level D or Level C PPE is used. All personnel entering the EZ must put on the required PPE in accordance with the requirements of this HASP. When leaving the EZ, PPE will be removed in accordance with the procedures listed, to minimize the spread of COCs.

4.4.1 Donning Procedures

These procedures are mandatory only if Modified Level D or Level C PPE is used on the site:

- Remove bulky outerwear. Remove street clothes and store in clean location;
- Put on work clothes or coveralls;
- Put on the required chemical protective coveralls;
- Put on the required chemical protective boots or boot covers;
- Tape the legs of the coveralls to the boots with duct tape;
- Put on the required chemical protective gloves;
- Tape the wrists of the protective coveralls to the gloves;
- Don the required respirator and perform appropriate fit check (Level C);
- Put hood or head covering over-head and respirator straps and tape hood to facepiece (Level C); and
- Don remaining PPE, such as safety glasses or goggles and hard hat.

When these procedures are instituted, one person must remain outside the work area to ensure that each person entering has the proper protective equipment.

4.4.2 Doffing Procedures

The following procedures are only mandatory if Modified Level D or Level C PPE is required for the site. Whenever a person leaves the work area, the following decontamination sequence will be followed:

- Upon entering the CRZ, rinse contaminated materials from the boots or remove contaminated boot covers;
- Clean reusable protective equipment;
- Remove protective garments, equipment, and respirator (Level C). All disposable clothing should be placed in plastic bags, which are labeled with contaminated waste labels;
- Wash hands, face, and neck (or shower if necessary);

- Proceed to clean area and dress in clean clothing; and
- Clean and disinfect respirator for next use.

All disposable equipment, garments, and PPE must be bagged in plastic bags, labeled for disposal. See Section 7, Decontamination, for detailed information on decontamination stations.

4.5 Selection Matrix

The level of personal protection selected will be based on air monitoring of the work environment and an assessment by the FS and SSO of the potential for skin contact with COCs. The PPE selection matrix is presented in **Table 2** below. This matrix is based on information available at the time this plan was written. The Airborne Contaminant Action Levels in **Table 3** on page 12, Airborne Contaminant Action Levels, should be used to verify that the PPE prescribed in these matrices is appropriate.

Table 2 – PPE Selection Matrix

Task	Anticipated Level of Protection
Mobilization	Level D
Subsurface Intrusive Activities (Excavation, Drilling)	Modified Level D/Level C
Earthwork/Grading	Level D
Chemical Sampling / Delineation	Modified Level D/Level C
Decontamination	Modified Level D
Demobilization	Level D

5.0 AIR AND NOISE MONITORING

5.1 Air Monitoring

Air monitoring, sampling, and testing will be conducted to determine employee exposure to airborne constituents. The monitoring results will dictate work procedures and the selection of PPE. The SESI SSO will be responsible for defining appropriate air monitoring procedures and for utilizing the air monitoring results to determine appropriate procedures and PPE for project personnel. Air monitoring results should be recorded in field notebooks or on an air monitoring log (see Attachment 1 for a copy of the Air Monitoring Log). Any deviations from the procedures listed here should be documented and explained in the Air Monitoring Log.

The monitoring devices to be used are a PDR1000 particulate monitor (or equivalent) and a Rae Systems MultiRAE detector (PID with a 11.7 eV lamp/oxygen/LEL/hydrogen sulfide sensors). Colorimetric detector tubes may be utilized to estimate airborne concentrations of benzene and should be onsite during any activities that may result in elevated PID readings including drilling, excavating, and groundwater sampling.

Air monitoring will be conducted continuously with the LEL/Oxygen meter during drilling in areas where flammable vapors or gases are suspect. All work activity must stop where tests indicate the concentration of flammable vapors exceeds 10% of the LEL at a location

with a potential ignition source. Such an area must be ventilated to reduce the concentration to an acceptable level.

5.2 Noise Monitoring

Noise monitoring may be conducted as required. Hearing protection is mandatory for all employees in noise hazardous areas, such as around heavy equipment. As a general rule, sound levels that cause speech interference at normal conversation distance should require the use of hearing protection.

5.3 Monitoring Equipment Maintenance and Calibration

All direct-reading instrumentation calibrations should be conducted under the approximate environmental conditions the instrument will be used. Instruments must be calibrated before and after use, noting the reading(s) and any adjustments that are necessary. All air monitoring equipment calibrations, including the standard used for calibration, must be documented on a calibration log or in the field notebook. All completed health and safety documentation/forms must be reviewed by the SSO and maintained by the FS.

All air monitoring equipment will be maintained and calibrated in accordance with the specific manufacturer's procedures. Preventive maintenance and repairs will be conducted in accordance with the respective manufacturer's procedures. When applicable, only manufacturer-trained and/or authorized personnel will be allowed to perform instrument repairs or preventive maintenance.

If an instrument is found to be inoperative or suspected of giving erroneous readings, the SSO must be responsible for immediately removing the instrument from service and obtaining a replacement unit. If the instrument is essential for safe operation during a specific activity, that activity must cease until an appropriate replacement unit is obtained. The SSO will be responsible for ensuring a replacement unit is obtained and/or repairs are initiated on the defective equipment.

5.4 Action Levels

Table 3 below presents airborne contaminant action levels that will be used to determine the procedures and protective equipment necessary based on conditions as measured at the site.

Table 3 – Airborne Contaminant Action Levels

Parameter	Reading	Action
Total Hydrocarbons	0 ppm to \leq 1 ppm	Normal operations; continue hourly breathing zone monitoring
	> 1 ppm to 5 ppm	Increase monitoring frequency to every 15 minutes and use benzene detector tube to screen for the presence of benzene
	\geq 5 ppm to \leq 50 ppm	Upgrade to Level C PPE; continue screening for benzene
	> 50 ppm	Stop work; investigate cause of reading
	At any reading > 5 ppm	Monitor perimeter per CAMP
Benzene	\geq 1 ppm to 5 ppm	Upgrade to Level C PPE
	> 5 ppm	Stop work; investigate cause of reading

Parameter	Reading	Action
Dust	0 to .05 mg/m ³	Normal operations
	0.05 to 0.1 mg/m ³	Begin soil wetting procedure (Level C protection would be needed beyond this point)
	> 0.15 mg/m ³	Stop work, fully implement dust control plan
Oxygen	≤ 19.5%	Stop work, evacuate confined spaces/work area, investigate cause of reading, and ventilate area
	> 19.5% to < 23.5%	Normal operations
	≥ 23.5%	Stop work, evacuate confined spaces/work area, investigate cause of reading, and ventilate area
Carbon Monoxide	0 ppm to ≤ 20 ppm	Normal operations
	> 20 ppm	Stop work, evacuate confined spaces/work area, investigate cause of reading, and ventilate area
Hydrogen Sulfide	0 ppm to ≤ 5 ppm	Normal operations
	> 5 ppm	Stop work, evacuate confined spaces/work area, investigate cause of reading, and ventilate area
Flammable Vapors (LEL)	< 10% LEL	Normal operations
	≥ 10% LEL	Stop work, ventilate area, investigate source of vapors

6.0 WORK ZONES AND DECONTAMINATION

6.1 Work Zones

6.1.1 Authorization to Enter

Only personnel with the appropriate training and medical certifications (if respirators are required) will be allowed to work at the project site. The FS will maintain a list of authorized persons; only personnel on the authorized persons list will be allowed to enter the site work areas.

6.1.2 Site Orientation and Hazard Briefing

No person will be allowed in the work area during site operations without first being given a site orientation and hazard briefing. This orientation will be presented by the FS or SSO and will consist of a review of this HASP. This review must cover the chemical, physical, and biological hazards, protective equipment, safe work procedures, and emergency procedures for the project. Following this initial meeting, daily safety meetings will be held each day before work begins.

All people entering the site work areas, including visitors, must document their attendance at this briefing, as well as the daily safety meetings on the forms included with this plan.

6.1.3 Certification Documents

A training and medical file may be established for the project and kept on site during all site operations. Specialty training, such as first aid/cardiopulmonary resuscitation (CPR) certificates, as well as current medical clearances for all project field personnel required to wear respirators, will be maintained within that file. All project personnel must provide their training and medical documentation to the SSO prior to starting work.

6.1.4 Entry Log

A log-in/log-out sheet will be maintained at the site by the FS. Personnel must sign in and out on a log sheet as they enter and leave the work area, and the FS may document entry and exit in the field notebook.

6.1.5 Entry Requirements

In addition to the authorization, hazard briefing, and certification requirements listed above, no person will be allowed in any SESI work area unless they are wearing the minimum PPE as described in Section 4.0.

6.1.6 Emergency Entry and Exit

People who must enter the work area on an emergency basis will be briefed of the hazards by the FS or SSO. All activities will cease in the event of an emergency. People exiting the work area because of an emergency will gather in a designated safe area for a head count. The FS is responsible for ensuring that all people who entered the work area have exited in the event of an emergency.

6.1.7 Contamination Control Zones

Contamination control zones are maintained to prevent the spread of contamination and to prevent unauthorized people from entering hazardous areas.

6.1.8 Exclusion Zone (EZ)

An EZ may consist of a specific work area or may be the entire area of potential contamination. All employees entering an EZ must use the required PPE and must have the appropriate training and medical clearance for hazardous waste work. The EZ is the defined area where there is a possible respiratory and/or contact health hazard. Cones, caution tape, or a posted site diagram will identify the location of each EZ.

6.1.9 Contamination Reduction Zone

The CRZ or transition area will be established, if necessary, to perform decontamination of personnel and equipment. All personnel entering or leaving the EZ will pass through this area to prevent any cross-contamination. Tools, equipment, and machinery will be decontaminated in a specific location. The decontamination of all personnel will be performed on site adjacent to the EZ. Personal protective outer garments and respiratory protection will be removed in the CRZ and prepared for cleaning or disposal. This zone is the only appropriate corridor between the EZ and the support zone (SZ) discussed below.

6.1.10 Support Zone (SZ)

The SZ is a clean area outside the CRZ located to prevent employee exposure to hazardous substances. Eating and drinking will be permitted in the support area only after proper decontamination. Smoking may be permitted in the SZ, subject to site requirements.

6.1.11 Posting

Work areas will be prominently marked and delineated using cones, caution tape, or a posted site diagram.

6.1.12 Site Inspections

The FS will conduct a daily inspection of site activities, equipment, and procedures to verify that the required elements are in place.

6.2 Decontamination

6.2.1 Personnel Decontamination

All personnel wearing Modified Level D or Level C protective equipment in the EZ must undergo personal decontamination prior to entering the SZ. The personnel decontamination area will consist of the following stations at a minimum:

- *Station 1:* Personnel leaving the contaminated zone will remove the gross contamination from their outer clothing and boots.
- *Station 2:* Personnel will remove their outer garment and gloves and dispose of it in properly labeled containers. Personnel will then decontaminate their hard hats, and boots with an aqueous solution of detergent or other appropriate cleaning solution. These items are then hand carried to the next station.
- *Station 3:* Personnel will thoroughly wash their hands and face before leaving the CRZ. Respirators will be sanitized and then placed in a clean plastic bag.

6.2.2 Equipment Decontamination

All vehicles that have entered the EZ will be decontaminated at the decontamination pad prior to leaving the zone. If the level of vehicle contamination is low, decontamination may be limited to rinsing of tires and wheel wells with water. If the vehicle is significantly contaminated, steam cleaning or pressure washing of vehicles and equipment may be required.

6.2.3 Personal Protective Equipment Decontamination

Where and whenever possible, single-use, external protective clothing must be used for work within the EZ or CRZ. This protective clothing must be disposed of in properly labeled containers. Reusable protective clothing will be rinsed at the site with detergent and water. The rinsate will be collected for disposal.

When removed from the CRZ, the respirator will be thoroughly cleaned with soap and water. The respirator face piece, straps, valves, and covers must be thoroughly cleaned at the end of each work shift, and ready for use prior to the next shift. Respirator parts may be disinfected with a solution of bleach and water (mixed at 2% bleach by volume), or by using a spray disinfectant

7.0 TRAINING AND MEDICAL SURVEILLANCE

7.1 Training

7.1.1 General

All on-site project personnel who work in areas where they may be exposed to site contaminants must be trained as required by OSHA Regulation 29 CFR 1910.120 (HAZWOPER). Field employees also must receive a minimum of three days of actual field experience under the direct supervision of a trained, experienced supervisor. Personnel who completed their initial training more than 12 months prior to the start of the project must

have completed an eight-hour refresher course within the past 12 months. The FS must have completed an additional eight hours of supervisory training and must have a current first-aid/CPR certificate (See Attachment 2).

7.1.2 Basic 40-Hour Course

The following is a list of the topics typically covered in a 40-hour HAZWOPER training course:

- General safety procedures;
- Physical hazards (fall protection, noise, heat stress, cold stress);
- Names and job descriptions of key personnel responsible for site health and safety;
- Safety, health, and other hazards typically present at hazardous waste sites;
- Use, application, and limitations of PPE;
- Work practices by which employees can minimize risks from hazards;
- Safe use of engineering controls and equipment on site;
- Medical surveillance requirements;
- Recognition of symptoms and signs which might indicate overexposure to hazards;
- Worker right-to-know (Hazard Communication OSHA 1910.1200);
- Routes of exposure to contaminants;
- Engineering controls and safe work practices;
- Components of a health and safety program and a site-specific HASP;
- Decontamination practices for personnel and equipment;
- Confined-space entry procedures; and
- General emergency response procedures.

7.1.3 Supervisor Course

Management and supervisors must receive an additional eight hours of training, which typically includes:

- General site safety and health procedures;
- PPE programs; and
- Air monitoring techniques.

7.1.4 Site-Specific Training

Site-specific training will be accomplished by on-site personnel reading this HASP, and through a thorough site briefing by the PM, FS, or SSO on the contents of this HASP before work begins. The review must include a discussion of the chemical, physical, and biological hazards; the protective equipment and safety procedures; and emergency procedures.

7.1.5 Daily Safety Meetings

Daily safety meetings will be held to cover the work to be accomplished, the hazards anticipated, the PPE and procedures required to minimize site hazards, and emergency procedures. The FS or SSO should present these meetings prior to beginning the day's fieldwork. No work will be performed in an EZ before a daily safety meeting has been held. An additional safety meeting must also be held prior to new tasks, or if new hazards are encountered. The daily safety meetings will be logged in the field notebook.

7.1.6 First Aid and CPR

At least one employee current in first aid/CPR will be assigned to the work crew and will be on the site during operations. Site records will document the presence of this individual. Refresher training in first aid (triennially) and CPR (annually) is required to keep the certificate current. These individuals must also receive training regarding the precautions and protective equipment necessary to protect against exposure to blood-borne pathogens.

7.2 Medical Surveillance

7.2.1 Medical Examination

All personnel who are potentially exposed to site contaminants must participate in a medical surveillance program as defined by OSHA at 29 CFR 1910.120 (f).

7.2.2 Pre-placement Medical Examination

All potentially exposed personnel must have completed a comprehensive medical examination prior to assignment, and periodically thereafter as defined by applicable regulations. The pre-placement and periodic medical examinations typically include the following elements:

- Medical and occupational history questionnaire;
- Physical examination;
- Complete blood count, with differential;
- Liver enzyme profile;
- Chest X-ray, at a frequency determined by the physician;
- Pulmonary function test;
- Audiogram;
- Electrocardiogram for persons older than 45 years of age, or if indicated during the physical examination;
- Drug and alcohol screening, as required by job assignment;
- Visual acuity; and
- Follow-up examinations, at the discretion of the examining physician or the corporate medical director.

The examining physician provides the employee with a letter summarizing his findings and recommendations, confirming the worker's fitness for work and ability to wear a respirator. Documentation of medical clearance will be available for each employee during all project site work.

Subcontractors will certify that all their employees have successfully completed a physical examination by a qualified physician. The physical examinations must meet the requirements of 29 CFR 1910.120 and 29 CFR 1910.134. Subcontractors will supply copies of the medical examination certificate for each on-site employee.

7.2.3 Other Medical Examinations

In addition to pre-employment, annual, and exit physicals, personnel may be examined:

- At employee request after known or suspected exposure to toxic or hazardous materials; and

- At the discretion of the SSO, HSM, or occupational physician in anticipation of, or after known or suspected exposure to toxic or hazardous materials.

7.2.4 Periodic Exam

Following the placement examination, all employees must undergo a periodic examination, similar in scope to the placement examination. For employees potentially exposed over 30 days per year, the frequency of periodic examinations will be annual. For employees potentially exposed less than 30 days per year, the frequency for periodic examinations will be 24 months.

7.2.5 Medical Restriction

When the examining physician identifies a need to restrict work activity, the employee's supervisor must communicate the restriction to the employee and the SSO. The terms of the restriction will be discussed with the employee and the supervisor.

8.0 GENERAL SAFETY PRACTICES

8.1 General Safety Rules

General safety rules for site activities include, but are not limited to, the following:

- At least one copy of this HASP must be in a location at the site that is readily available to personnel, and all project personnel shall review the plan prior to starting work.
- Consume or use food, beverages, chewing gum, and tobacco products only in the SZ or other designated area outside the EZ and CRZ. Cosmetics shall not be applied in the EZ or CRZ.
- Wash hands before eating, drinking, smoking, or using toilet facilities.
- Wear all PPE as required and stop work and replace damaged PPE immediately.
- Secure disposable coveralls, boots, and gloves at the wrists and legs and ensure closure of the suit around the neck.
- Upon skin contact with materials that may be impacted by COCs, remove contaminated clothing and wash the affected area immediately. Contaminated clothing must be changed. Any skin contact with materials potentially impacted by COCs must be reported to the FS or SSO immediately. If needed, medical attention should be sought.
- Practice contamination avoidance. Avoid contact with surfaces either suspected or known to be impacted by COCs, such as standing water, mud, or discolored soil. Equipment must be stored on elevated or protected surfaces to reduce the potential for incidental contamination.
- Remove PPE as required in the CRZ to limit the spread of COC-containing materials.
- At the end of each shift or as required, dispose of all single-use coveralls, soiled gloves, and respirator cartridges in designated receptacles designated for this purpose.
- Removing soil containing site COCs from protective clothing or equipment with compressed air, shaking, or any other means that disperses contaminants into the air is prohibited.

- Inspect all non-disposable PPE for contamination in the CRZ. Any PPE found to be contaminated must be decontaminated or disposed of appropriately.
- Recognize emergency signals used for evacuation, injury, fire, etc.
- Report all injuries, illnesses, and unsafe conditions or work practices to the FS or SSO.
- Use the “buddy system” during all operations requiring Level C PPE, and when appropriate, during Modified Level D operations.
- Obey all warning signs, tags, and barriers. Do not remove any warnings unless authorized to do so.
- Use, adjust, alter, and repair equipment only if trained and authorized to do so, and in accordance with the manufacturer’s directions.
- Personnel are to perform only tasks for which they have been properly trained and will advise their supervisor if they have been assigned a task for which they are not trained.
- The presence or consumption of alcoholic beverages or illicit drugs during the workday, including breaks, is strictly prohibited. Notify your supervisor if you must take prescription or over-the-counter drugs that indicate they may cause drowsiness or, that you should not operate heavy equipment.
- Remain upwind during site activities whenever possible.

8.2 Buddy System

On-site personnel must use the buddy system as required by operations. Use of the “buddy system” is required during all operations requiring Level C to Level A PPE, and when appropriate, during Level D operations. Crewmembers must observe each other for signs of chemical exposure, and heat or cold stress. Indications of adverse effects include, but are not limited to:

- Changes in complexion and skin coloration;
- Changes in coordination;
- Changes in demeanor;
- Excessive salivation and pupillary response; and
- Changes in speech pattern.

Crewmembers must also be aware of the potential exposure to possible safety hazards, unsafe acts, or non-compliance with safety procedures.

Field personnel must inform their partners or fellow crewmembers of non-visible effects of exposure to toxic materials that they may be experiencing. The symptoms of such exposure may include, but are not limited to:

- Headaches;
- Dizziness;
- Nausea;
- Blurred vision;
- Cramps; and
- Irritation of eyes, skin, or respiratory tract.

If protective equipment or noise levels impair communications, prearranged hand signals must be used for communication. Personnel must stay within line of sight of another team member.

8.3 Heat Stress

Heat stress is caused by a number of interacting factors, including environmental conditions, clothing, workload, etc., as well as the physical and conditioning characteristics of the individual. Since heat stress is one of the most common illnesses associated with heavy outdoor work conducted with direct solar load and, in particular, because wearing PPE can increase the risk of developing heat stress, workers must be capable of recognizing the signs and symptoms of heat-related illnesses. Personnel must be aware of the types and causes of heat-related illnesses and be able to recognize the signs and symptoms of these illnesses in both themselves and their co-workers.

Heat rashes are one of the most common problems in hot work environments. Commonly known as prickly heat, a heat rash is manifested as red papules and usually appears in areas where the clothing is restrictive. As sweating increases, these papules give rise to a prickling sensation. Prickly heat occurs in skin that is persistently wetted by unevaporated sweat, and heat rash papules may become infected if they are not treated. In most cases, heat rashes will disappear when the affected individual returns to a cool environment.

Heat cramps are usually caused by performing hard physical labor in a hot environment. These cramps have been attributed to an electrolyte imbalance caused by sweating. It is important to understand that cramps can be caused both by too much or too little salt.

Cramps appear to be caused by the lack of water replenishment. Because sweat is a hypotonic solution (plus or minus 0.3% NaCl), excess salt can build up in the body if the water lost through sweating is not replaced. Thirst cannot be relied on as a guide to the need for water; instead, water must be taken every 15 to 20 minutes in hot environments.

Under extreme conditions, such as working for 6 to 8 hours in heavy protective gear, a loss of sodium may occur. Drinking commercially available carbohydrate electrolyte replacement liquids is effective in minimizing physiological disturbances during recovery.

Heat exhaustion occurs from increased stress on various body organs due to inadequate blood circulation, cardiovascular insufficiency, or dehydration. Signs and symptoms include pale, cool, moist skin; heavy sweating; dizziness; nausea; headache, vertigo, weakness, thirst, and giddiness. Fortunately, this condition responds readily to prompt treatment.

Heat exhaustion should not be dismissed lightly, however, for several reasons. One is that the fainting associated with heat exhaustion can be dangerous because the victim may be operating machinery or controlling an operation that should not be left unattended; moreover, the victim may be injured when he or she faints. Also, the signs and symptoms seen in heat exhaustion are similar to those of heat stroke, which is a medical emergency.

Workers suffering from heat exhaustion should be removed from the hot environment, be given fluid replacement, and be encouraged to get adequate rest.

Heat stroke is the most serious form of heat stress. Heat stroke occurs when the body's system of temperature regulation fails and the body's temperature rises to critical levels. This condition is caused by a combination of highly variable factors, and its occurrence is difficult to predict. Heat stroke is a medical emergency. The primary signs and symptoms of heat stroke are confusion; irrational behavior; loss of consciousness; convulsions; a lack of sweating (usually); hot, dry skin; and an abnormally high body temperature, e.g., a rectal temperature of 41°C (105.8°F). If body temperature is too high, it causes death. The elevated metabolic temperatures caused by a combination of workload and environmental heat load, both of which contribute to heat stroke, are also highly variable and difficult to predict.

If a worker shows signs of possible heat stroke, professional medical treatment should be obtained immediately. The worker should be placed in a shady area and the outer clothing should be removed. The worker's skin should be wetted and air movement around the worker should be increased to improve evaporative cooling until professional methods of cooling are initiated and the seriousness of the condition can be assessed. Fluids should be replaced as soon as possible. The medical outcome of an episode of heat stroke depends on the victim's physical fitness and the timing and effectiveness of first aid treatment.

Regardless of the worker's protestations, no employee suspected of being ill from heat stroke should be sent home or left unattended unless a physician has specifically approved such an order.

Proper training and preventive measures will help avert serious illness and loss of work productivity. Preventing heat stress is particularly important because once someone suffers from heat stroke or exhaustion, that person may be predisposed to additional heat injuries.

8.4 Heat Stress Safety Precautions

Heat stress monitoring and work rest cycle implementation should commence when the ambient adjusted temperature exceeds 72°F. A minimum work rest regimen and procedures for calculating ambient adjusted temperature are described in **Table 4** below.

Table 4 – Work/Rest Schedule

Adjusted Temperature ^b	Work/Rest Regimen Normal Work Ensemble ^c	Work/Rest Regimen Impermeable Ensemble
90°F (32.2°C) or above	After each 45 minutes of work	After each 15 minutes of work
87.5° - 90°F (30.8°-32.2°C)	After each 60 minutes of work	After each 30 minutes of work
82.5° - 87.5°F (28.1° - 30.8°C)	After each 90 minutes of work	After each 60 minutes of work
77.5° - 82.5°F (25.3° - 28.1°C)	After each 120 minutes of work	After each 90 minutes of work
72.5° - 77.5°F (30.8° - 32.2°C)	After each 150 minutes of work	After each 120 minutes of work

- For work levels of 250 kilocalories/hour (Light-Moderate Type of Work)
- Calculate the adjusted air temperature (ta adj) by using this equation: $ta\ adj\ ^\circ F = ta\ ^\circ F + (13 \times \% \text{ sunshine})$. Measure air temperature (ta) with a standard mercury-in-glass thermometer, with the bulb shielded from radiant heat. Estimate percent sunshine by judging what percent time the sun is not covered by clouds that are thick enough to produce a shadow. (100 percent sunshine = no cloud cover and a sharp, distinct shadow; 0 percent sunshine = no shadows.)
- A normal work ensemble consists of cotton coveralls or other cotton clothing with long sleeves and pants.
- The information presented above was generated using the information provided in the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLV) Handbook.

In order to determine if the work rest cycles are adequate for the personnel and specific site conditions, additional monitoring of individual heart rates will be conducted during the rest cycle. To check the heart rate, count the radial pulse for 30 seconds at the beginning of the rest period. If the heart rate exceeds 110 beats per minute, shorten the next work period by one third and maintain the same rest period.

Additionally, one or more of the following control measures can be used to help control heat stress and are mandatory if any site worker has a heart rate (measure immediately prior to rest period) exceeding 115 beats per minute:

- Site workers will be encouraged to drink plenty of water and electrolyte replacement fluids throughout the day.
- On-site drinking water will be kept cool (50 to 60°F).
- A work regimen that will provide adequate rest periods for cooling down will be established, as required.
- All personnel will be advised of the dangers and symptoms of heat stroke, heat exhaustion, and heat cramps.
- Cooling devices, such as vortex tubes or cooling vests, should be used when personnel must wear impermeable clothing in conditions of extreme heat.
- Employees should be instructed to monitor themselves and co-workers for signs of heat stress and to take additional breaks as necessary.
- A shaded rest area must be provided. All breaks should take place in the shaded rest area.
- Employees must not be assigned to other tasks during breaks.
- Employees must remove impermeable garments during rest periods. This includes white Tyvek-type garments.

All employees must be informed of the importance of adequate rest, acclimation, and proper diet in the prevention of heat stress disorders.

8.5 Cold Stress

Cold stress normally occurs in temperatures at or below freezing, or under certain circumstances, in temperatures of 40°F. Extreme cold for a short time may cause severe injury to exposed body surfaces or result in profound generalized cooling, causing death. Areas of the body that have high surface area-to-volume ratio, such as fingers, toes, and ears, are the most susceptible. Two factors influence the development of a cold weather injury: ambient temperature and the velocity of the wind. For instance, 10°F with a wind of 15 miles per hour (mph) is equivalent in chilling effect to still air at 18°F. An equivalent chill temperature chart relating the actual dry bulb temperature and wind velocity is presented in **Table 5** below.

Table 5 – Wind Chill Temperature Chart

Estimated Wind Speed (in mph)	Actual Temperature Reading (°F)											
	50	40	30	20	10	0	-10	-20	-30	-40	-50	-60
Equivalent Chill Temperature (°F)												
Calm	50	40	30	20	10	0	-10	-20	-30	-40	-50	-60
5	48	37	27	16	6	-5	-15	-26	-36	-47	-57	-68
10	40	28	16	4	-9	-24	-33	-46	-58	-70	-83	-95
15	36	22	9	-5	-18	-32	-45	-58	-72	-85	-99	-112

20	32	18	4	-10	-25	-39	-53	-67	-82	-96	-110	-121
25	30	16	0	-15	-29	-44	-59	-74	-88	-104	-118	-133
30	28	13	-2	-18	-33	-48	-63	-79	-94	-109	-125	-140
35	27	11	-4	-20	-35	-51	-67	-82	-98	-113	-129	-145
40	26	10	-6	-21	-37	-53	-69	-85	-100	-116	-132	-148
(Wind speeds greater than 40 mph have little additional effect.)	LITTLE DANGER Maximum danger of false sense of security.				INCREASING DANGER Danger from freezing of exposed flesh within one minute.			GREAT DANGER Flesh may freeze within 30 seconds.				
	Trench foot and immersion foot may occur at any point on this chart.											

[This chart was developed by the U.S. Army Research Institute of Environmental Medicine, Natick, MA (Source: ACGIH Threshold Limit Values for Chemical Substances and Physical Agents)].

Local injury resulting from cold is included in the generic term frostbite. There are several degrees of tissue damage associated with frostbite. Frostbite of the extremities can be categorized into:

- *Frost Nip or Incipient Frostbite* - characterized by sudden blanching or whitening of skin.
- *Superficial Frostbite* - skin has a waxy or white appearance and is firm to the touch, but tissue beneath is resilient.
- *Deep Frostbite* - tissues are cold, pale, and solid; extremely serious injury.

Systemic hypothermia is caused by exposure to freezing or rapidly dropping temperature. It can be fatal. Its symptoms are usually exhibited in five stages: 1) shivering; 2) apathy, listlessness, sleepiness, and (sometimes) rapid cooling of the body to less than 95°F; 3) unconsciousness, glassy stare, slow pulse, and slow respiratory rate; 4) freezing of the extremities; and 5) death. Trauma sustained in freezing or sub-zero conditions requires special attention because an injured worker is predisposed to secondary cold injury. Special provisions must be made to prevent hypothermia and secondary freezing of damaged tissues in addition to providing for first aid treatment. To avoid cold stress, site personnel must wear protective clothing appropriate for the level of cold and physical activity. In addition to protective clothing, preventive safe work practices, additional training, and warming regimens may be utilized to prevent cold stress.

8.6 Safety Precautions for Cold Stress Prevention

For air temperature of 0°F or less, mittens should be used to protect the hands. For exposed skin, continuous exposure should not be permitted when air speed and temperature results in a wind chill temperature of -25°F.

At air temperatures of 36°F or less, field personnel who become immersed in water or whose clothing becomes wet must be immediately provided with a change of clothing and be treated for hypothermia.

If work is done at normal temperature or in a hot environment before entering the cold, the field personnel must ensure that their clothing is not wet as a consequence of sweating. Wet field personnel must change into dry clothes prior to entering the cold area.

If the available clothing does not give adequate protection to prevent hypothermia or frostbite, work must be modified or suspended until adequate clothing is made available or until weather conditions improve.

Field personnel handling evaporative liquid (e.g., gasoline, alcohol, or cleaning fluids) at air temperatures below 40°F must take special precaution to avoid soaking of clothing or gloves with the liquids because of the added danger of cold injury due to evaporative cooling.

8.7 Safe Work Practices

Direct contact between bare skin and cold surfaces (< 20°F) should be avoided. Metal tool handles and/or equipment controls should be covered by thermal insulating material.

For work performed in a wind chill temperature at or below 10°F, workers should be under constant protective observation (buddy system). The work rate should be established to prevent heavy sweating that will result in wet clothing. For heavy work, rest periods must be taken in heated shelters and workers should be provided with an opportunity to change into dry clothing if needed.

Field personnel should be provided the opportunity to become accustomed to cold-weather working conditions and required protective clothing. Work should be arranged in such a way that sitting or standing still for long periods is minimized.

During the warming regimen (rest period), field personnel should be encouraged to remove outer clothing to permit sweat evaporation or to change into dry work clothing. Dehydration, or loss of body fluids, occurs insidiously in the cold environment and may increase susceptibility to cold injury due to a significant change in blood flow to the extremities. Fluid replacement with warm, sweet drinks and soups is recommended. The intake of coffee should be limited because of diuretic and circulatory effects.

8.8 Biological Hazards

Biological hazards may include poison ivy, snakes, thorny bushes and trees, ticks, mosquitoes, spiders, and other pests.

8.8.1 Tick Borne Diseases

Lyme Disease - The disease commonly occurs in summer and is transmitted by the bite of infected ticks. "Hot spots" in the United States include New York, New Jersey, Pennsylvania, Massachusetts, Connecticut, Rhode Island, Minnesota, and Wisconsin.

Erlchiosis - The disease also commonly occurs in summer and is transmitted by the bite of infected ticks. "Hot spots" in the United States include New York, Massachusetts, Connecticut, Rhode Island, Minnesota, and Wisconsin.

These diseases are transmitted primarily by the deer tick, which is smaller and redder than the common wood tick. The disease may be transmitted by immature ticks, which are small and hard to see. The tick may be as small as a period on this page.

Symptoms of Lyme disease include a rash or a peculiar red spot, like a bull's eye, which expands outward in a circular manner. The victim may have headache, weakness, fever, a stiff neck, and swelling and pain in the joints, and eventually, arthritis. Symptoms of erlichiosis include muscle and joint aches, flu-like symptoms, but there is typically no skin rash.

Rocky Mountain Spotted Fever (RMSF) - This disease is transmitted via the bite of an infected tick. The tick must be attached 4 to 6 hours before the disease-causing organism (*Rickettsia rickettsii*) becomes reactivated and can infect humans. The primary symptom of RMSF is the sudden appearance of a moderate-to-high fever. The fever may persist for two to three weeks. The victim may also have a headache, deep muscle pain, and chills. A rash appears on the hands and feet on about the third day and eventually spreads to all parts of the body. For this reason, RMSF may be confused with measles or meningitis. The disease may cause death, if untreated, but if identified and treated promptly, death is uncommon.

Control - Tick repellant containing diethyltoluamide (DEET) should be used when working in tick-infested areas, and pant legs should be tucked into boots. In addition, workers should search the entire body every three or four hours for attached ticks. Ticks should be removed promptly and carefully without crushing, since crushing can squeeze the disease-causing organism into the skin. A gentle and steady pulling action should be used to avoid leaving the head or mouth parts in the skin. Hands should be protected with surgical gloves when removing ticks.

8.8.2 Poisonous Plants

Poisonous plants may be present in the work area. Personnel should be alerted to its presence and instructed on methods to prevent exposure.

Control - The main control is to avoid contact with the plant, cover arms and hands, and frequently wash potentially exposed skin. Particular attention must be given to avoiding skin contact with objects or protective clothing that have touched the plants. Treat every surface that may have touched the plant as contaminated, and practice contamination avoidance. If skin contact is made, the area should be washed immediately with soap and water and observed for signs of reddening.

8.8.3 Snakes

The possibility of encountering snakes exists, specifically for personnel working in wooded/vegetated areas. Snake venoms are complex and include proteins, some of which have enzymatic activity. The effects produced by venoms include neurotoxic effects with sensory, motor, cardiac, and respiratory difficulties; cytotoxic effects on red blood cells, blood vessels, heart muscle, kidneys, and lungs; defects in coagulation; and effects from local release of substances by enzymatic actions. Other noticeable effects of venomous snakebites include swelling, edema, and pain around the bite, and the development of ecchymosis (the escape of blood into tissues from ruptured blood vessels).

Control - To minimize the threat of snakebites, all personnel walking through vegetated areas must be aware of the potential for encountering snakes, and the need to avoid actions potentiating encounters, such as turning over logs, etc. If a snakebite occurs, an attempt should be made to safely identify the snake via size and markings. The victim must be transported to the nearest hospital within 30 minutes; first aid consists of applying a constriction band and washing the area around the wound to remove any unabsorbed venom.

8.8.4 Spiders

Personnel may encounter spiders during work activities.

Two spiders are of concern, the black widow and the brown recluse. Both prefer dark sheltered areas such as basements, equipment sheds and enclosures, and around woodpiles or other scattered debris. The black widow is shiny black, approximately one inch long, and found throughout the United States. There is a distinctive red hourglass marking on the underside of the black widows body. The bite of a black widow is seldom fatal to healthy adults, but effects include respiratory distress, nausea, vomiting, and muscle spasms. The brown recluse is smaller than the black widow and gets its name from its brown coloring and behavior. The brown recluse is more prevalent in the southern United States. The brown recluse has a distinctive violin shape on the top of its body. The bite of the brown recluse is painful and the bite site ulcerates and takes many weeks to heal completely.

Control - To minimize the threat of spider bites, all personnel walking through vegetated areas must be aware of the potential for encountering these arachnids. Personnel need to avoid actions that may result in encounters, such as turning over logs, and placing hands in dark places such as behind equipment or in corners of equipment sheds or enclosures. If a spider bite occurs, the victim must be transported to the nearest hospital as soon as possible; first aid consists of applying ice packs and washing the area around the wound to remove any unabsorbed venom.

8.9 Noise

Exposure to noise over the OSHA action level can cause temporary impairment of hearing; prolonged and repeated exposure can cause permanent damage to hearing. The risk and severity of hearing loss increases with the intensity and duration of exposure to noise. In addition to damaging hearing, noise can impair voice communication, thereby increasing the risk of accidents on site.

Control - All personnel must wear hearing protection, with a Noise Reduction Rating (NRR) of at least 20, when noise levels exceed 85 dBA. When it is difficult to hear a co-worker at normal conversation distance, the noise level is approaching or exceeding 85 dBA, and hearing protection is necessary. All site personnel who may be exposed to noise must also receive baseline and annual audiograms and training as to the causes and prevention of hearing loss. Noise monitoring is discussed in Section 5.2, Noise Monitoring.

Whenever possible, equipment that does not generate excessive noise levels will be selected for this project. If the use of noisy equipment is unavoidable, barriers or increased distance will be used to minimize worker exposure to noise, if feasible.

8.10 Spill Control

All personnel must take every precaution to minimize the potential for spills during site operations. All on-site personnel shall immediately report any discharge, no matter how small, to the FS.

Spill control equipment and materials will be located on the site at locations that present the potential for discharge. All sorbent materials used for the cleanup of spills will be containerized and labeled appropriately. In the event of a spill, the FS will follow the provisions in Section 10.0, Emergency Procedures, to contain and control released materials and to prevent their spread to off-site areas.

8.11 Sanitation

Site sanitation will be maintained according to OSHA requirements.

8.11.1 Break Area

Breaks must be taken in the SZ, away from the active work area after site personnel go through decontamination procedures. There will be no smoking, eating, drinking, or chewing gum or tobacco in any area other than the SZ.

8.11.2 Potable Water

The following rules apply to all field operations:

- An adequate supply of potable water will be provided at each project site. Potable water must be kept away from hazardous materials or media, and contaminated clothing or equipment.
- Portable containers used to dispense drinking water must be capable of being tightly closed and must be equipped with a tap dispenser. Water must not be consumed directly from the container (drinking from the tap is prohibited) nor may it be removed from the container by dipping.
- Containers used for drinking water must be clearly marked and shall not be used for any other purpose.
- Disposable drinking cups must be provided. A sanitary container for dispensing cups and a receptacle for disposing of used cups is required.

8.11.3 Sanitary Facilities

Access to facilities for washing before eating, drinking, or smoking, or alternate methods such as waterless hand-cleaner and paper towels will be provided.

8.11.4 Lavatory

If permanent toilet facilities are not available, an appropriate number of portable chemical toilets will be provided. This requirement does not apply to mobile crews or to normally unattended site locations so long as employees at these locations have transportation immediately available to nearby toilet facilities.

8.12 Emergency Equipment

Adequate emergency equipment for the activities being conducted on site and as required by applicable sections of 29 CFR 1910 and 29 CFR 1926 will be on site prior to the commencement of project activities. Personnel will be provided with access to emergency equipment, including, but not limited to, the following:

- Fire extinguishers of adequate size, class, number, and location as required by applicable sections of 29 CFR 1910 and 1926;
- Industrial first aid kits of adequate size for the number of personnel on site; and
- Emergency eyewash and/or shower if required by operations being conducted on site.

8.13 Lockout/Tagout Procedures

Only fully qualified and trained personnel will perform maintenance procedures. Before maintenance begins, lockout/tagout procedures per OSHA 29 CFR 1910.147 will be followed.

Lockout is the placement of a device that uses a positive means, such as lock, to hold an energy or material-isolating device such that the equipment cannot be operated until the lockout device is removed. If a device cannot be locked out, a tagout system shall be used. Tagout is the placement of a warning tag on an energy or material isolating device indicating that the equipment controls may not be operated until the personnel who attached the tag remove the tag.

8.14 Electrical Safety

Electricity may pose a particular hazard to site workers due to the use of portable electrical equipment. If wiring or other electrical work is needed, a qualified electrician must perform it.

General electrical safety requirements include:

- All electrical wiring and equipment must be a type listed by Underwriters Laboratories (UL), Factory Mutual Engineering Corporation (FM), or other recognized testing or listing agency.
- All installations must comply with the National Electrical Safety Code (NESC), the National Electrical Code (NEC), or USCG regulations.
- Portable and semi-portable tools and equipment must be grounded by a multi-conductor cord having an identified grounding conductor and a multi-contact polarized plug-in receptacle.
- Tools protected by an approved system of double insulation, or its equivalent, need not be grounded. Double insulated tools must be distinctly marked and listed by UL or FM.
- Live parts of wiring or equipment must be guarded to prevent persons or objects from touching them.
- Electric wire or flexible cord passing through work areas must be covered or elevated to protect it from damage by foot traffic, vehicles, sharp corners, projections, or pinching.
- All circuits must be protected from overload.
- Temporary power lines, switchboxes, receptacle boxes, metal cabinets, and enclosures around equipment must be marked to indicate the maximum operating voltage.
- Plugs and receptacles must be kept out of water unless of an approved submersible construction.
- All extension cord outlets must be equipped with ground fault circuit interrupters (GFCI).
- Attachment plugs or other connectors must be equipped with a cord grip and be constructed to endure rough treatment.
- Extension cords or cables must be inspected prior to each use and replaced if worn or damaged. Cords and cables must not be fastened with staples, hung from nails, or suspended by bare wire.

- Flexible cords must be used only in continuous lengths without splice, with the exception of molded or vulcanized splices made by a qualified electrician.

8.15 Lifting Safety

Using proper lifting techniques may prevent back strain or injury. The fundamentals of proper lifting include:

- Consider the size, shape, and weight of the object to be lifted. A mechanical lifting device or additional persons must be used to lift an object if it cannot be lifted safely alone.
- The hands and the object should be free of dirt or grease that could prevent a firm grip.
- Gloves must be used, and the object inspected for metal slivers, jagged edges, burrs, or rough or slippery surfaces.
- Fingers must be kept away from points that could crush or pinch them, especially when putting an object down.
- Feet must be placed far enough apart for balance. The footing should be solid and the intended pathway should be clear.
- The load should be kept as low as possible, close to the body with the knees bent.
- To lift the load, grip firmly and lift with the legs, keeping the back as straight as possible.
- A worker should not carry a load that he or she cannot see around or over.
- When putting an object down, the stance and position are identical to that for lifting; the legs are bent at the knees, and the back is straight as the object is lowered.

8.16 Ladder Safety

When portable ladders are used for access to an upper landing surface, the ladder side rails shall extend at least 3 feet (9 m) above the upper landing surface to which the ladder is used to gain access; or, when such an extension is not possible because of the ladder's length, then the ladder shall be secured at its top to a rigid support that will not deflect, and a grasping device, such as a grabrail, shall be provided to assist employees in mounting and dismounting the ladder. In no case shall the extension be such that ladder deflection under a load would, by itself, cause the ladder to slip off its support.

- Ladders shall be maintained free of oil, grease, and other slipping hazards.
- Ladders shall not be loaded beyond the maximum intended load for which they were built, or beyond their manufacturer's rated capacity.
- Ladders shall be used only for the purpose for which they were designed.
- Non-self-supporting ladders shall 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).
- Wood job-made ladders with spliced side rails shall be used at an angle such that the horizontal distance is one-eighth the working length of the ladder.
- Fixed ladders shall be used at a pitch no greater than 90 degrees from the horizontal, as measured to the back side of the ladder.
- Ladders shall be used only on stable and level surfaces unless secured to prevent accidental displacement.

- Ladders shall not be used on slippery surfaces unless secured or provided with slip-resistant feet to prevent accidental displacement. Slip-resistant feet shall not be used as a substitute for care in placing, lashing, or holding a ladder that is used upon slippery surfaces, including, but not limited to, flat metal or concrete surfaces that are constructed so they cannot be prevented from becoming slippery.
- Ladders placed in any location where they can be displaced by workplace activities or traffic, such as in passageways, doorways, or driveways, shall be secured to prevent accidental displacement, or a barricade shall be used to keep the activities or traffic away from the ladder.
- The area around the top and bottom of ladders shall be kept clear.
- The top of a non-self-supporting ladder shall be placed with the two rails supported equally unless it is equipped with a single support attachment.
- Ladders shall not be moved, shifted, or extended while occupied.
- Ladders shall have non-conductive side rails if they are used where the employee or the ladder could contact exposed energized electrical equipment.
- The top, top step, or the step labeled that it or any step above it should not be used as a step.
- Cross-bracing on the rear section of stepladders shall not be used for climbing unless the ladders are designed and provided with steps for climbing on both front and rear sections.
- Ladders shall be inspected by the HSM for visible defects on a daily basis and after any occurrence that could affect their safe use.
- Portable ladders with structural defects, such as, but not limited to, broken or missing rungs, cleats, or steps; broken or split rails; corroded components; or other faulty or defective components shall either be immediately marked in a manner that readily identifies them as defective or be tagged with "Do Not Use" or similar language and shall be withdrawn from service.
- Fixed ladders with structural defects, such as, but not limited to, broken or missing rungs, cleats, or steps; broken or split rails; or corroded components; shall be withdrawn from service.
- Ladder repairs shall restore the ladder to a condition meeting its original design criteria, before the ladder is returned to use.
- Single-rail ladders shall not be used.
- When ascending or descending a ladder, the user shall face the ladder.
- Each employee shall use at least one hand to grasp the ladder when progressing up and/or down the ladder.
- An employee shall not carry any object or load that could cause the employee to lose balance and fall.

8.17 Traffic Safety

The project site may be located adjacent to a public roadway where exposure to vehicular traffic is likely. Traffic may also be encountered as vehicles enter and exit the area. To minimize the likelihood of project personnel and activities being affected by traffic, the following procedures will be implemented.

Cones must be placed along the shoulder of the roadway starting 100 feet from the work area to alert passing motorists to the presence of personnel and equipment. A "Slow" or "Men Working" sign must be placed at the first cone. Barricades with flashing lights should be placed between the roadway and the work area.

During activities along a roadway, equipment will be aligned parallel to the roadway to the extent feasible, facing into the oncoming traffic so as to place a barrier between the work crew and the oncoming traffic. All crewmembers must remain behind the equipment and the traffic barrier.

All site personnel who are potentially exposed to vehicular traffic must wear an outer layer of orange warning garments, such as vests, jackets, or shirts. If work is performed in hours of dusk or darkness, workers will be outfitted with reflective garments either orange, white (including silver-coated reflective coatings or elements that reflect white light), yellow, fluorescent red-orange, or fluorescent yellow-orange.

The flow of traffic into and out of the adjacent business must be assessed, and precautions taken to warn motorists of the presence of workers and equipment. Where possible, vehicles should be aligned to provide physical protection of people and equipment.

9.0 SITE-SPECIFIC HAZARDS AND CONTROL MEASURES

9.1 Evaluation of Hazards

The evaluation of hazards is provided as a quick reference as to the known conditions for the Site, wherein the level of detail for each of the subsections is identified.

9.1.1 Hazard Characteristics

Existing information for Site:

☒ Detailed ☐ Preliminary ☐ None

Hazardous/Contaminated Material Form(s):

☒ Solid ☒ Liquid ☐ Sludge ☐ Gas ☒ Vapor

Containment Type(s):

☐ Drum ☒ Tank ☐ Pit ☐ Debris
☐ Pond ☐ Lagoon Other: _____

Hazardous Material Characteristics:

☒ Volatile ☐ Corrosive ☐ Reactive ☐ Radioactive
☐ Ignitable ☒ Toxic ☐ Unknown

Routes of Exposure:

☒ Oral ☒ Dermal ☒ Eye ☒ Respiratory

9.1.2 Potential Health and Safety Hazards

<input checked="" type="checkbox"/> Heat	<input type="checkbox"/> Congested areas
<input checked="" type="checkbox"/> Cold	<input checked="" type="checkbox"/> General Construction
<input type="checkbox"/> Confined space entry	<input checked="" type="checkbox"/> Physical injury
<input type="checkbox"/> Oxygen depletion	<input checked="" type="checkbox"/> Electrical hazards
<input type="checkbox"/> Asphyxiation	<input checked="" type="checkbox"/> Handling and product transfer
<input checked="" type="checkbox"/> Excavation	<input checked="" type="checkbox"/> Fire
<input checked="" type="checkbox"/> Cave-ins	<input checked="" type="checkbox"/> Explosion

<input checked="" type="checkbox"/> Falls, slippage	<input checked="" type="checkbox"/> Biological Hazards
	<input checked="" type="checkbox"/> Plants – Poison Ivy, Poison Oak
	<input checked="" type="checkbox"/> Insects – Ticks
	<input checked="" type="checkbox"/> Insects – Mosquitoes
	<input checked="" type="checkbox"/> Insects – Bees and Wasps
	<input checked="" type="checkbox"/> Rats and Mice
<input checked="" type="checkbox"/> Heavy equipment	<input type="checkbox"/> Non-ionizing Radiation (i.e. UV, IR, etc.)
<input type="checkbox"/> Other: Potential Ignition Hazard.	

9.2 Field Activities, Hazards, and Control Procedures

The following task-specific safety analyses identify potential health, safety, and environmental hazards associated with each type of field activity. Because of the complex and changing nature of field projects, supervisors must continually inspect the site to identify hazards that may affect on-site personnel, the community, or the environment. The FS must be aware of these changing conditions and discuss them with the PM whenever these changes impact employee health, safety, the environment, or performance of the project. The FS will keep on-site personnel informed of the changing conditions, and the PM will write and/or approve addenda or revisions to this HASP as necessary.

9.2.1 Mobilization/Construction Stakeout

Description of Tasks

Site mobilization will include establishing excavation locations, determining the location of utilities and other installations, and establishing work areas. Mobilization will also include setting up equipment and establishing a temporary site office. A break area will be set up outside of regulated work areas. Mobilization may involve clearing areas for the SZ and CRZ. During this initial phase, project personnel will walk the site to confirm the existence of anticipated hazards and identify safety and health issues that may have arisen since the writing of this plan.

Hazard Identification

The hazards of this phase of activity are associated with heavy equipment operation, manual materials handling, installation of temporary on-site facilities, and manual site preparation.

Manual materials handling and manual site preparation may cause blisters, sore muscles, and joint and skeletal injuries; and may present eye, contusion, and laceration hazards. Installation of temporary field office and support facilities may expose personnel to electrical hazards, underground and overhead utilities, and physical injury due to the manual lifting and moving of materials. The work area presents slip, trip, and fall hazards from scattered debris and irregular walking surfaces. Rainy weather may cause wet, muddy, slick walking surfaces, and unstable soil. Freezing weather hazards include frozen, slick, and irregular walking surfaces.

Environmental hazards include plants, such as poison ivy and poison oak; aggressive fauna, such as ticks, fleas, mosquitoes, wasps, spiders, and snakes; weather, such as sunburn, lightning, rain, and heat- or cold-related illnesses; and pathogens, such as rabies, Lyme disease, and blood-borne pathogens.

Controls

Control procedures for these hazards are discussed in Section 8.0, General Safety Practices.

9.2.2 Demolition/Site Clearing

Description of Tasks

Site clearance will involve manual or mechanical removal of objects impeding access to the construction footprint. These obstructions are both natural and man-made items and will include, but not be limited to, fabricated metal and concrete structures, trees, vegetation, rubble, and miscellaneous trash/debris.

Hazard Identification

Hazards associated with demolition and site clearance include personnel working in and around potentially unstable structures, or locations of potential contact with hazardous chemicals, utilities, and/or falling objects. This task will involve manual, as well as mechanical demolition/clearance efforts so exertion and equipment hazards exist.

Controls

PPE – Personnel shall be protected from hazards of irritant and toxic plants and suitably instructed in the first aid treatment available.

Preparatory Operations – Prior to permitting employees to start demolition operations, an engineering survey shall be made, by a licensed Professional Engineer, of the structure to determine the stability of the structure. Any adjacent structure shall where personnel may be exposed shall also be similarly checked. The PO shall have in writing evidence that such a survey has been performed. All structural instabilities shall be shored or braced, under the supervision of a licensed Professional Engineer, prior to access by an FP.

Utilities – All electric, gas, water, steam, sewer, and other service lines shall be shut off, capped, or otherwise controlled, outside the building line before demolition work is started. In each case, any utility company that is involved shall be notified in advance. If it is necessary to maintain any power, water or other utilities during demolition, such lines shall be temporarily relocated, as necessary.

Hazardous Substances – It shall also be determined if any type of hazardous chemicals, gases, explosives, flammable materials, or similarly dangerous substances have been used in any pipes, tanks, or other equipment on the property. When the presence of any such substances is apparent or suspected, testing and purging shall be performed and the hazard eliminated before demolition is started.

Falling Debris/Objects – No material shall be dropped to any point lying outside the exterior walls of the structure unless the area is effectively protected. Access to the area where falling objects/debris may be encountered must be gated and controlled.

Structural Collapse – Structural or load supporting members on any floor shall not be cut or removed until all stories above such a floor have been demolished and removed. Walls, which are to serve as retaining walls against which debris will be piled, shall not be so used unless capable of safely supporting the imposed load. Mechanical equipment shall not be

used on floors or working surfaces unless such floors or surfaces are not of sufficient strength to support the imposed load.

Rollover Guards – All equipment used in site clearing operations shall be equipped with rollover guards meeting the applicable requirements. In addition, rider-operated equipment shall be equipped with an overhead and rear canopy guard meeting the applicable requirements.

Inspections – During demolition, continuing inspections by a licensed Professional Engineer shall be made as the work progresses to detect hazards resulting from weakened or deteriorated floors, walls, or loosened material. No FP shall be permitted to work where such hazards exist until they are corrected by shoring, bracing, or other effective means.

9.2.3 Excavation and Cut/Fill Operations

9.2.3.1 Excavation/Trenching

Description of Tasks

This task includes the excavation of contaminated soils and superficial debris. Excavation depths vary across the site.

Hazard Identification

The hazards of this activity are associated with heavy equipment operation, subsurface intrusion, manual materials handling, stockpiling, and disposal. Subsurface intrusion presents hazards associated with negotiating buried utilities, cave-ins of the excavated areas, and regress methods for personnel working inside the excavated areas. Disruption of contaminated soil also presents a health hazard.

Controls

Underground Utilities – The estimated locations of utility installations, such as sewer, telephone, fuel, electric, water lines, or any other underground installations that reasonably may be expected to be encountered during the excavation work, shall be determined prior to opening an excavation. Utility companies or owners shall be contacted (“Call Before You Dig”) within established or customary local response times, advised of the proposed work, and asked to establish the location of the utility underground installations prior to the start of actual excavation.

When excavation operations approach the estimated location of underground installations, the exact location of the installations shall be determined by safe and acceptable means. While the excavation is open, underground installations shall be protected, supported, or removed, as necessary, to safeguard site personnel.

Cave-Ins – Project personnel in an excavation shall be protected from cave-ins by an adequate protective system, except when:

- Excavations are made entirely in stable rock or excavations are less than five feet in depth and examination of the ground by the SSO provides no indication of a potential cave-in.

- Protective systems shall have the capacity to resist, without failure, all loads that are intended or could reasonably be expected to be applied or transmitted to the system.

Project personnel shall be protected from excavated or other materials or equipment that could pose a hazard by falling or rolling into excavations. Protection shall be provided by placing and keeping such materials or equipment at least two feet from the edge of excavations, or by the use of retaining devices that are sufficient to prevent materials or equipment from falling or rolling into excavations, or by a combination of both if necessary.

Daily inspections of excavations, the adjacent areas, and protective systems shall be made by the SSO for evidence of a situation that could result in possible cave-ins, indications of failure of protective systems, hazardous atmospheres, or other hazardous conditions. An inspection shall be conducted by the SSO prior to the start of work and as needed throughout operations. Inspections shall also be made after every rainstorm or other hazard-increasing occurrence. These inspections are only required when project personnel exposure can be reasonably anticipated.

Where the SSO finds evidence of a situation that could result in a possible cave-in, indications of failure of protective systems, hazardous atmospheres, or other hazardous conditions, exposed personnel shall be removed from the hazardous area until the necessary precautions have been taken to ensure their safety.

Excavation Egress – A stairway, ladder, ramp, or other safe means of egress shall be located in trench excavations that are four feet or more in depth so as to require no more than 25 feet or lateral travel for project personnel.

9.2.3.2 Heavy Equipment Operation

Description of Tasks

Heavy equipment to be used for this task include, but are not limited to, excavators, dozers, dump trucks, and water sprayers (if required).

Hazard Identification

The most common type of accident that occurs in material handling operations is the “caught between” situation when a load is being handled and an object gets caught between two moving parts of the equipment. Operation of the heavy construction equipment may produce harmful noise.

Controls

Equipment Inspection – All vehicles in use shall be checked prior to operation to ensure that all parts, equipment, and accessories that affect safe operations are in proper operating condition and free from defects. All defects shall be corrected before the vehicle is placed in service.

Ground Guides – No personnel shall use any motor vehicle, earthmoving, or compacting equipment having an obstructed view to the rear, unless:

- The vehicle has a reverse signal alarm distinguishable from the surrounding noise level; or

- The vehicle is backed up only when an observer signals that it is safe to do so.

Blocking – Heavy machinery, equipment, or parts thereof that are suspended or held aloft shall be substantially blocked to prevent falling or shifting before employees are permitted to work under or between them.

Noise – Control measures for noise are addressed in Section 4.9.

Traffic – Control measures for traffic are addressed in Section 8.17.

9.2.3.3 Disturbance/Handling of Contaminated Material

Description of Tasks

After the contaminated soil is excavated from below the Site's surface, the material will be stockpiled, dried, and either transported offsite or relocated and backfilled on site.

Hazard Identification

The hazards associated with materials handling include contact of the contaminated material with project personnel, or cross contamination with other site soil.

Controls

Cross Contamination – Following excavation, contaminated soil stockpiles will be placed on a structure constructed to separate the material from the site soil and collect any groundwater leachate. The material shall be covered to prevent storm water erosion or migration of contaminants through storm water.

Air Monitoring – Air and particulate monitoring will be conducted during soil excavation activities to assess the potential for exposure to airborne COCs. If the results of air monitoring indicate the presence of organic vapors or particulates in a concentration causing concern, personnel will upgrade to Level C protection. Refer to Section 5.1, Air Monitoring, for a description of air monitoring requirements and action levels. A description of each level of personal protection is included in Section 4.0, Personal Protective Equipment.

Traffic – Control measures for traffic are addressed in Section 8.17.

9.2.4 Drilling/Subsurface Intrusion Activities

Description of Tasks

Site mobilization will include establishing excavation locations, determining the location of utilities and other installations, and establishing work areas. Mobilization will also include setting up equipment and establishing a temporary site office. A break area will be set up outside of regulated work areas. Mobilization may involve clearing areas for the SZ and CRZ. During this initial phase, project personnel will walk the site to confirm the existence of anticipated hazards and identify safety and health issues that may have arisen since the writing of this plan.

Hazard Identification

The primary physical hazards for this activity are associated with the use of soil boring and grouting equipment. The equipment is hydraulically powered and uses static force and dynamic percussion force to advance sampling and penetrating tubes.

Accidents can occur as a result of improperly placing the equipment on uneven or unstable terrain or failing to adequately secure the equipment prior to the start of operations. Overhead utility lines can create hazardous conditions if contacted by the equipment. Underground installations such as electrical lines, conduit, and product lines pose a significant hazard if contacted.

Controls

Geoprobe and Drill Rig Safety Procedures - The operator of the equipment must possess required state or local licenses to perform such work. All members of the crew shall receive site-specific training prior to beginning work.

The operator is responsible for the safe operation of the rig, as well as the crew's adherence to the requirements of this HASP. The operator must ensure that all safety equipment is in proper condition and is properly used. The members of the crew must follow all instructions of the operator, wear all personal protective equipment, and be aware of all hazards and control procedures. The operator and crew must participate in the Daily Safety Meetings and be aware of all emergency procedures.

Equipment Inspection - Each day, prior to the start of work, the rig and associated equipment must be inspected by the operator. The following items must be inspected:

- Vehicle condition;
- Proper storage of equipment;
- Condition of all hydraulic lines;
- Fire extinguisher; and
- First aid kit.

Equipment Set Up - The drill rig must be properly blocked and leveled prior to raising the derrick. The wheels which remain on the ground must be chocked. The leveling jacks shall not be raised until the derrick is lowered. The rig shall be moved only after the derrick has been lowered.

All well sites will be inspected by the driller prior to the location of the rig to verify a stable surface exists. This is especially important in areas where soft, unstable terrain is common.

The drill rig must be properly blocked and leveled prior to raising the derrick. Blocking provides a more stable drilling structure by evenly distributing the weight of the rig. Proper blocking ensures that differential settling of the rig does not occur.

When the ground surface is soft or otherwise unstable, wooden blocks, at least 24" by 24" and 4" to 8" thick shall be placed between the jack swivels and the ground. The emergency brake shall be engaged, and the wheels that are on the ground shall be chocked.

Rules for Intrusive Activity - Before beginning any intrusive activity, the existence and location of underground pipe, conduit, electrical equipment, and other installations will be determined. This will be done, if possible, by contacting the appropriate client representative to mark the location of the lines. "Call Before You Dig" will verify the potential for encountering subsurface utilities. If the client's knowledge of the area is incomplete, an appropriate device, such as a magnetometer, will be used to locate the line.

Combustible gas readings of the general work area will be made regularly in areas where and/or during operations when the presence of flammable vapors or gases is suspected, such as during intrusive activities (see Section 5.1). Operations must be suspended and corrective action taken if the airborne flammable concentration reaches 10% of the LEL in the immediate area (a one-foot radius) of the point of drilling, or near any other ignition sources.

Overhead Electrical Clearances - If equipment is operated in the vicinity of overhead power lines, the power to the lines must be shut off or the equipment must be positioned and blocked such that no part, including cables, can come within the minimum clearances as follows:

Nominal Voltage	System	Minimum Clearance	Required
0-50kV		10 feet	
51-100kV		12 feet	
101-200kV		15 feet	
201-300kV		20 feet	
301-500kV		25 feet	
501-750kV		35 feet	
751-1,000kV		45 feet	

When the drill rig is in transit, with the boom lowered and no load, the equipment clearance must be at least 4 feet for voltages less than 50kV, 10 feet for voltages of 50 kV to 345 kV, and 16 feet for voltages above 345 kV.

Hoisting Operations - Drillers should never engage the rotary clutch without watching the rotary table, and ensuring it is clear of personnel and equipment.

Unless the drawworks is equipped with an automatic feed control, the brake should not be left unattended without first being tied down.

Drill pipe, auger strings or casing should be picked up slowly. Drill pipe should not be hoisted until the driller is sure that the pipe is latched in the elevator, or the derrickman has signaled that he may safely hoist the pipe.

During instances of unusual loading of the derrick or mast, such as when making an unusually hard pull, only the driller should be on the rig floor; no one else should be on the rig or derrick.

The brakes on the drawworks of the drill rig should be tested by the driller each day. The brakes should be thoroughly inspected by a competent individual each week.

A hoisting line with a load imposed should not be permitted to be in direct contact with any derrick member or stationary equipment, unless it has been specifically designed for line contact.

Workers should never stand near the borehole whenever any wire line device is being run.

Hoisting control stations should be kept clean and controls labeled as to their functions.

Catline Operations - Only experienced workers will be allowed to operate the cathead controls. The kill switch must be clearly labeled and operational prior to operation of the catline. The cathead area must be kept free of obstructions and entanglements.

The operator should not use more wraps than necessary to pick up the load. More than one layer of wrapping is not permitted.

Personnel should not stand near, step over, or go under a cable or catline which is under tension.

Employees rigging loads on catlines shall:

- Keep out from under the load;
- Keep fingers and feet where they will not be crushed;
- Be sure to signal clearly when the load is being picked;
- Use standard visual signals only and not depend on shouting to coworkers; and
- Make sure the load is properly rigged, since a sudden jerk in the catline will shift or drop the load.

Wire Rope - When two wires are broken or rust or corrosion is found adjacent to a socket or end fitting, the wire rope shall be removed from service or re-socketed. Special attention shall be given to the inspection of end fittings on boom support, pendants, and guy ropes.

Wire rope removed from service due to defects shall be cut up or plainly marked as being unfit for further use as rigging.

Wire rope clips attached with U-bolts shall have the U-bolts on the dead or short end of the rope; the clip nuts shall be re-tightened immediately after initial load carrying use and at frequent intervals thereafter.

When a wedge socket fastening is used, the dead or short end of the wire rope shall have a clip attached to it or looped back and secured to itself by a clip; the clip shall not be attached directly to the live end.

Protruding ends of strands in splices on slings and bridles shall be covered or blunted.

Except for eye splices in the ends of wires and for endless wire rope slings, wire rope used in hoisting, lowering, or pulling loads, shall consist of one continuous piece without knot or splice.

An eye splice made in any wire rope shall have not less than five full tucks.

Wire rope shall not be secured by knots. Wire rope clips shall not be used to splice rope.

Eyes in wire rope bridles, slings, or bull wires shall not be formed by wire clips or knots.

Pipe/Auger Handling - Pipe and auger sections shall be transported by cart or carried by two persons. Individuals should not carry auger or pipe sections without assistance.

Workers should not be permitted on top of the load during loading, unloading, or transferring of pipe or rolling stock.

Employees should be instructed never to try to stop rolling pipe or casing; they should be instructed to stand clear of rolling pipe.

Slip handles should be used to lift and move slips. Employees are not permitted to kick slips into position.

When pipe is being hoisted, personnel should not stand where the bottom end of the pipe could whip and strike them.

Pipe and augers stored in racks, catwalks or on flatbed trucks should be secured to prevent rolling.

9.2.5 Subsurface Chemical Sample Collection/Analysis

Description of Tasks

This sub-task consists of the collection of soil samples for subsequent field and laboratory analysis. The physical hazards of soil sampling are primarily associated with the sample collection methods, procedures utilized, and the environment itself.

Hazard Identification

Incidental contact with COCs is the primary hazard associated with sampling the stabilized material. This contact may occur through the manipulation of sample media and equipment, manual transfer of media into sample containers, and proximity of operations to the breathing zone. The primary hazards associated with these sampling procedures are not potentially serious; however, other operations in the area, or the conditions under which samples must be collected, may present chemical and physical hazards. The hazards directly associated with sampling procedures are generally limited to strains/sprains and potential eye hazards. Potential chemical hazards may include contact with media containing site COCs and potential contact with chemicals used for equipment decontamination.

Controls

PPE – To control dermal exposure during sampling activities, a minimum of Level D protection will be worn. If necessary, based on field observations and site conditions, air monitoring may be conducted during sediment sampling activities. If the results of air

monitoring indicate the presence of airborne contaminants in a concentration causing concern, personnel will upgrade to Level C protection. Refer to Section 5.1, Air Monitoring, for a description of air monitoring requirements and action levels. A description of each level of personal protection is included in Section 4.0, Personal Protective Equipment.

9.2.6 UST Closure

9.2.6.1 Working in Confined Spaces

Description of Tasks

Working in confined spaces is not anticipated for this project.

Hazard Identification

Hazard identification such as the entrance into confined spaces will be evaluated if necessary.

Controls

All personnel required to enter into confined or enclosed spaces must be instructed as to the nature of the hazards involved, the necessary precautions to be taken, and in the use of required protective and emergency equipment. The PO shall comply with all specific regulations that apply to work in dangerous or potentially dangerous areas.

9.2.6.2 Working with Compressed Air

Description of Tasks

The proposed method of purging the USTs includes the injection of compressed gas into the tank and attached piping network.

Hazard Identification

Uncontrolled release of the highly pressured air can cause injury to FP during this task. Cylinders must also be properly managed to ensure they are not compromised during storage and/or use.

Controls

Pressure Regulation – Compressed air used for cleaning purposes shall be reduced to less than 30 pounds per square inch and then only with effective chip guarding and personal protective equipment.

Cylinder Storage – Valve protection caps shall be in place and secured when compressed gas cylinders are transported, moved, or stored. Cylinder valves shall be closed when work is finished and when cylinders are empty or are moved. Compressed gas cylinders shall be secured in an upright position at all times, except if necessary for short periods of time when cylinders are actually being hoisted or carried. Cylinders shall be placed in a location where they cannot become part of an electrical circuit.

9.2.7 Decontamination

All equipment will be decontaminated before leaving the site. Personnel involved in decontamination activities may be inadvertently exposed to skin contact with contaminated materials and chemicals brought from the EZ. Personnel involved in decontamination activities must wear PPE that is, at a minimum, one level below the level worn by personnel working in the EZ.

9.2.8 Demobilization

Demobilization involves the removal of all tools, equipment, supplies, and vehicles brought to the site. The hazards of this phase of activity are associated with heavy equipment operation and manual materials handling.

Manual materials handling may cause blisters, sore muscles, and joint and skeletal injuries; and may present eye, contusion, and laceration hazards. Heavy equipment operation presents noise and vibration hazards, and hot surfaces, to operators. Personnel in the vicinity of heavy equipment operation may be exposed to physical hazards resulting in fractures, contusions, and lacerations and may be exposed to high noise levels. The work area presents slip, trip, and fall hazards from scattered debris and irregular walking surfaces. Rainy weather may cause wet, muddy, slick walking surfaces, and unstable soil. Freezing weather hazards include frozen, slick, and irregular walking surfaces.

Environmental hazards include plants, such as poison ivy and poison oak; aggressive fauna, such as ticks, fleas, mosquitoes, wasps, spiders, and snakes; weather, such as sunburn, lightning, rain, and heat-or cold-related illnesses; and pathogens, such as rabies, Lyme disease, and blood-borne pathogens.

Control procedures for these hazards are discussed in Section 8.0, General Safety Practices.

9.3 Chemical Hazards

The chemical hazards associated with site operations are related to inhalation, ingestion, and skin exposure to site COCs. Concentrations of airborne COCs during site tasks may be measurable and will require air monitoring during certain operations. Air monitoring requirements for site tasks are outlined in Section 5.1. COCs at the site include VOCs, SVOCs, metals, PCBs, pesticides, and PFAS.

The potential for inhalation of site COCs is low. The potential for dermal contact with soils containing site COCs during remedial operations is moderate. Table 6 lists the primary contaminants that have been identified at the Site and the media in which they are present.

Table 6 – List of Primary Contaminants

Media: Soil		
VOCs	Maximum Concentration (mg/kg)	Applicable Monitoring Instrument
Acetone	360	PID
Ethylbenzene	66	PID
Xylenes, total	200	PID
SVOCs	Maximum Concentration (mg/kg)	Applicable Monitoring Instrument
Acenaphthene	150	PID
Fluoranthene	940	PID
Naphthalene	120	PID
Benzo(a)anthracene	350	PID
Benzo(a)pyrene	350	PID
Benzo(b)fluoranthene	390	PID
Benzo(k)fluoranthene	150	PID
Chrysene	320	PID
Anthracene	260	PID
Benzo(ghi)perylene	190	PID
Fluorene	130	PID
Phenanthrene	800	PID
Dibenz(a,h)anthracene	0.45	PID
Indeno(1,2,3-cd)pyrene	220	PID
Pyrene	750	PID
Dibenzofuran	79	PID
Metals	Maximum Concentration (mg/kg)	Applicable Monitoring Instrument
Chromium, Total	65.9	Not Applicable
Copper, Total	179	Not Applicable
Lead, Total	524	Not Applicable
Mercury, Total	0.394	Not Applicable
Nickel, Total	61.9	Not Applicable
Zinc, Total	360	Not Applicable
Pesticides	Maximum Concentration (mg/kg)	Applicable Monitoring Instrument
4,4'-DDE	0.0175	Not Applicable
4,4'-DDD	0.0354	Not Applicable
4,4'-DDT	0.0394	Not Applicable

Pesticides	Maximum Concentration (mg/kg)	Applicable Monitoring Instrument
cis-Chlordane	0.223	Not Applicable
PFAS	Maximum Concentration (mg/kg)	Applicable Monitoring Instrument
PFOS	0.1.39	Not Applicable
PCBs	Maximum Concentration (mg/kg)	Applicable Monitoring Instrument
PCBs, Total	0.178	Not Applicable

[illegible]

Media: Soil Vapor		
VOCs	Maximum Concentration (ug/m3)	Applicable Monitoring Instrument
cis-1,2-Dichloroethene	85.2	PID
Carbon Tetrachloride	34.9	PID
Trichloroethene	8.55	PID

10.0 EMERGENCY PROCEDURES

10.1 General

Prior to the start of operations, the work area will be evaluated for the potential for fire, contaminant release, or other catastrophic event. Unusual conditions or events, activities, chemicals, and conditions will be reported to the FS/SSO immediately.

The FS/SSO will establish evacuation routes and assembly areas for the site. All personnel entering the site will be informed of this route and the assembly area.

10.2 Emergency Response

If an incident occurs, the following steps will be taken:

- The FS/SSO will evaluate the incident and assess the need for assistance and/or evacuation;
- The FS/SSO will call for outside assistance as needed;
- The FS/SSO will ensure the PM is notified promptly of the incident; and
- The FS/SSO will take appropriate measures to stabilize the incident scene.

10.2.1 Fire

In the case of a fire at the site, the FS/SSO will assess the situation and direct fire-fighting activities. The FS/SSO will ensure that the PM is immediately notified of any fires. Site personnel will attempt to extinguish the fire with available extinguishers, if safe to do so. In the event of a fire that site personnel are unable to safely extinguish with one fire extinguisher, the local fire department will be summoned.

10.2.2 Contaminant Release

In the event of a contaminant release, the following steps will be taken:

- Notify FS/SSO immediately;
- Evacuate immediate area of release;
- Conduct air monitoring to determine needed level of PPE; and
- Don required level of PPE and prepare to implement control procedures.

The FS/SSO has the authority to commit resources as needed to contain and control released material and to prevent its spread to off-site areas.

10.3 Medical Emergency

All employee injuries must be promptly reported to the SSO/FS, who will:

- Ensure that the injured employee receives prompt first aid and medical attention;
- In emergency situations, the worker is to be transported by appropriate means to the nearest urgent care facility (normally a hospital emergency room); and
- If the injured person is a SESI employee, notify SESI at 973-808-9050.

10.3.1 Emergency Care Steps

Survey the scene. Determine if it is safe to proceed. Try to determine if the conditions that caused the incident are still a threat. Protect yourself from exposure before attempting to rescue the victim.

- Do a primary survey of the victim. Check for airway obstruction, breathing, and pulse. Assess likely routes of chemical exposure by examining the eyes, mouth, nose, and skin of the victim for symptoms.
- Phone Emergency Medical Services (EMS). Give the location, telephone number used, caller's name, what happened, number of victims, victim's condition, and help being given.
- Maintain airway and perform rescue breathing as necessary.
- Perform CPR as necessary.
- Do a secondary survey of the victim. Check vital signs and do a head-to-toe exam.

Treat other conditions as necessary. If the victim can be moved, take him/her to a location away from the work area where EMS can gain access.

10.4 First Aid - General

All persons must report any injury or illness to their immediate supervisor or the FS. Trained personnel will provide first aid. Injuries and illnesses requiring medical treatment must be documented. The FS and SSO must fill out an accident/incident report as soon as emergency conditions no longer exist and first aid and/or medical treatment has been ensured. The report must be completed and submitted to the PM within 24 hours after the incident.

If first-aid treatment is required, first aid kits are kept at the CRZ. If treatment beyond first aid is required, the injured person(s) should be transported to the medical facility. If the injured person is not ambulatory or shows any sign of not being in a comfortable and stable condition for transport, then an ambulance/paramedics should be summoned. If there is any doubt as to the injured worker's condition, it is best to let the local paramedic or ambulance service examine and transport the worker.

10.4.1 First Aid - Inhalation

Any employee complaining of symptoms of chemical overexposure as described in Section 4, General Site Safety Procedures, will be removed from the work area and transported to the designated medical facility for examination and treatment.

10.4.2 First Aid - Ingestion

Call EMS and consult a poison control center for advice. If available, refer to the MSDS for treatment information. If the victim is unconscious, keep them on their side and clear the airway if vomiting occurs.

10.4.3 First Aid - Skin Contact

Project personnel who have had skin contact with contaminants will, unless the contact is severe, proceed through the CRZ, to the wash area. Personnel will remove any contaminated clothing, and then flush the affected area with water for at least 15 minutes. The worker should be transported to the medical facility if he/she shows any sign of skin reddening, irritation, or if he/she requests a medical examination.

10.4.4 First Aid - Eye Contact

Project personnel who have had contaminants splashed in their eyes or who have experienced eye irritation while in the EZ, must immediately proceed to the eyewash station in the CRZ. Do not decontaminate prior to using the eyewash. Remove whatever protective clothing is necessary to use the eyewash. Flush the eye with clean running water for at least 15 minutes. Arrange prompt transport to the designated medical facility.

10.5 Reporting Injuries, Illnesses, and Safety Incidents

Injuries and illnesses, however minor, will be reported to the FS immediately. The FS will complete an injury report and submit it to the HSM, and the PM by end of shift.

10.6 Emergency Information

The means to summon local public response agencies such as police, fire, and ambulance will be reviewed in the daily safety meeting. These agencies are identified in **Table 7** below.

Table 7 – Emergency Contacts

Local Emergency Contacts	Telephone No.
EMERGENCY	911
St. John's Riverside Hospital	(914) 773-2110
Police Emergency	911
Fire Emergency	911
Rescue Squad	911
Ambulance	911
Miscellaneous Contacts	Telephone No.
N.Y. Poison Control Center	(800) 222-1222
National Response Center and Terrorist Hotline	(800) 424-8802
Center for Disease Control	(800) 311-3435
Utility Mark-Out	(800) 962-7962

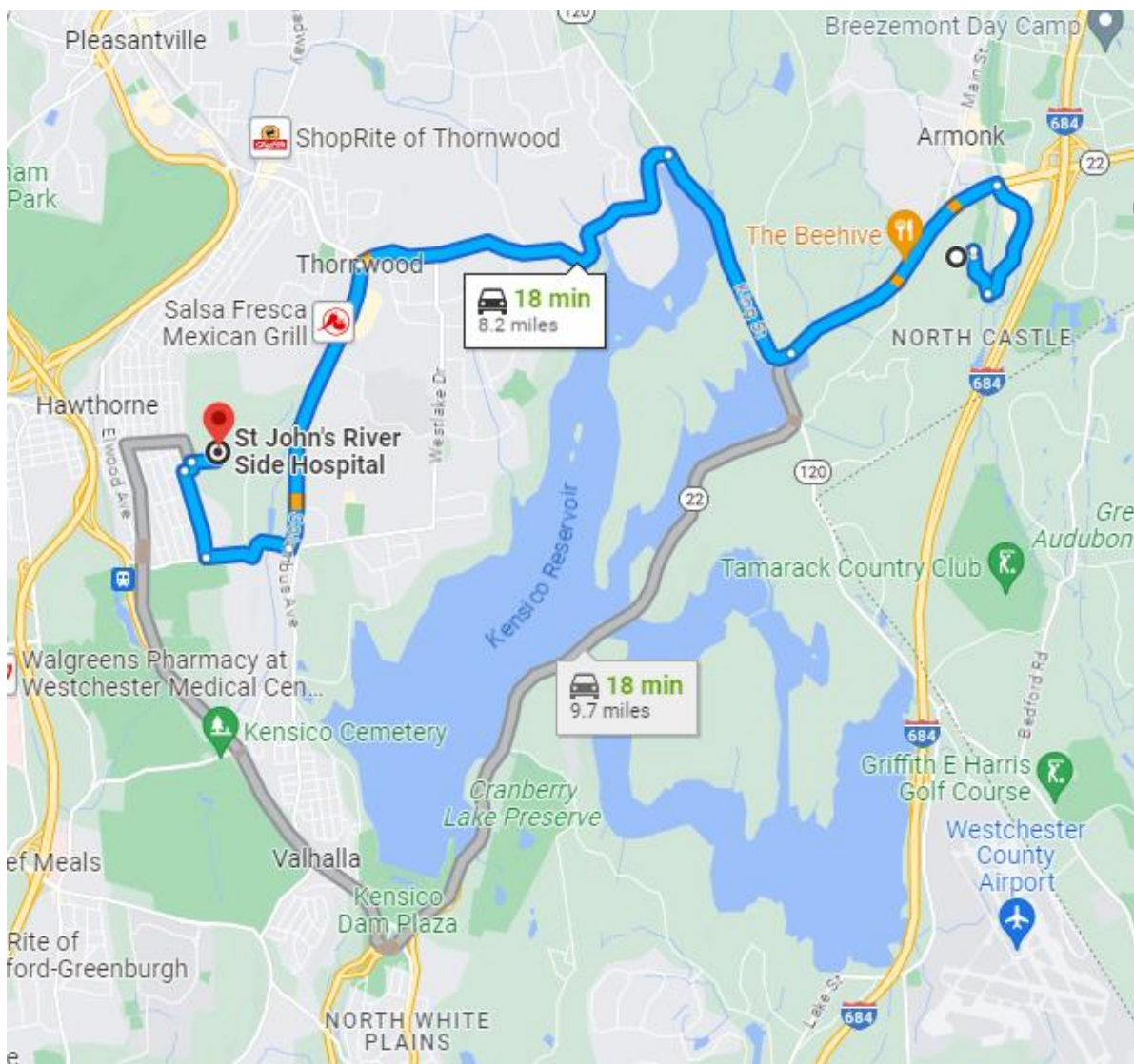
10.6.1 Directions to Hospital

St. John's Riverside Hospital
226 Linda Ave, Hawthorne, NY 10532
(914) 773-2110

- Follow Business Park Dr to Armonk Bedford Rd
3 min (0.9 mi)
- Continue on Armonk Bedford Rd. Take Nanny Hagen Rd and 64/Columbus Ave to Warren Ave in Hawthorne
12 min (6.6 mi)
- Continue on Warren Ave. Drive to Linda Ave
3 min (0.7 mi)

St John's River Side Hospital
226 Linda Ave, Hawthorne, NY 10532

Fig-1: Direction to Hospital



11.0 LOGS, REPORTS, AND RECORD KEEPING

The following is a summary of required health and safety logs, reports, and record keeping for the operations at the subject site.

11.1 HASP Field Change Request

To be completed for initiating a change to the HASP. PM approval is required. The original will be kept in the project file (See Attachment 3).

11.2 Medical and Training Records

The HSM must obtain and keep a log of personnel meeting appropriate training and medical qualifications for the site work. The log will be kept in the project file. Each company's Human Resources Department will maintain medical records, in accordance with 29 CFR 1910.1020.

11.3 Exposure Records

Any personnel monitoring results, laboratory reports, calculations, and air sampling data sheets are part of an employee exposure record. These records will be kept in accordance with 29 CFR 1910.1020. For SESI employees, the originals will be sent to the Human Resources Manager. For subcontractor employees, the original file will be sent to the subcontractor employer with a copy maintained in the SESI project file.

11.4 Accident/Incident Report

Any accident/incident reports must be completed following procedures given in Section 10.5 of this HASP. The originals will be sent to the HSM for maintenance. A copy of the forms will be kept in the project file. (See Attachment 4)

11.5 OSHA Form 200

An OSHA Form 200 (Log of Occupational Injuries and Illnesses) will be kept at the project site. All recordable injuries or illnesses will be recorded on this form. At the end of the project, the original will be sent to the Human Resources Manager for maintenance. Subcontractor employees must also meet the requirements of maintaining an OSHA 200 Form. The accident/incident report meets the requirements of the OSHA Form 101 (Supplemental Record), which must be maintained with the OSHA Form 200 for all recordable injuries or illnesses.

11.6 On-Site Health and Safety Field Logbooks

The HSM or designee will maintain an on-site health and safety log book in which daily Site conditions, activities, personnel, and significant events will be recorded. Calibration records and personnel monitoring results, if available, will also be recorded in the field logbook. The original logbook will be kept in the project file.

Whenever any personnel monitoring is conducted onsite, the monitoring results will be noted in the filed logbook. These will become part of the exposure records file and will be maintained by the HSM.

A signatory page is included (See Attachment 5) and is to be signed by those working on and/or visiting the site.

11.7 Safety Data Sheets

Safety Data Sheets (SDS) will be obtained and kept on file at the project site for each hazardous chemical brought to, use, or stored at the Site (See Attachment 6).

12.0 COVID-19 RESPONSE ACTION PLAN

SESI is concerned with the safety and well-being of its employees, vendors, subcontractors, and others with access to its offices and job sites, with particular emphasis on the unique challenges posed by COVID-19.

SESI has established the following protocols in keeping with the recommendations of the CDC and other sources including State Governor Executive Orders for work taking place on construction sites.

We request that all SESI employees, vendors, and subcontractors help with our prevention efforts while at work.

In order to minimize the spread of COVID-19, we must all cooperate in doing the following:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol. Always wash hands that are visibly soiled.
- Cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow.
- Discourage handshaking, avoid touching your eyes, nose, or mouth with unwashed hands.
- Limit the sharing of tools, machinery, equipment, phones, desks, and computers.
- Wear cloth face coverings on all construction sites.
- Avoid close contact with people who are sick.
- Employees who have symptoms (i.e., fever, cough, or shortness of breath) should notify their supervisor and stay home—DO NOT GO TO WORK.
- Sick employees should follow CDC-recommended steps. Employees should not return to work until the criteria to discontinue home isolation are met, in consultation with healthcare providers and state and local health departments.

The following are the specific jobsite protocols and response actions to be taken in the event someone on site has been in contact with, or has themselves, the COVID-19 virus:

OFFICE/JOBSITE PROTOCOL

- If an employee/worker exhibits COVID-19 symptoms, the employee/worker must remain at home until he or she is symptom free for 72 hours (3 full days) without the use of fever-reducing or other symptom-altering medicines (e.g. acetaminophen, cough suppressants). SESI will similarly require an employee or worker that reports to work with symptoms to return home until they are symptom free for 72 hours (3 full days).

- Limit person to person contact, and when unavoidable, maintain CDC distancing guidelines.
- Avoid eating lunch in groups.
- Avoid in-person meetings if possible. If an in-person meeting is necessary, conduct it in a well-ventilated area with enough space for attendees to distance themselves from one another. Field jobsite meetings should be conducted in smaller group meetings (no more than 5 persons when possible) versus one large meeting.
- Only workers necessary to the execution of the work should be at the jobsites. No non-essential visitors should be permitted at the worksite.

RESPONSE ACTION TRIGGER EVENTS:

- an employee/worker at work has tested positive for COVID-19
- an employee/worker at work has suspected, but unconfirmed, case of COVID-19
- an employee/worker self-reported that they came in contact with someone who had a presumptive positive case of COVID-19
- an employee/worker has been exposed to the virus but only found out after they have interacted with others

RESPONSE ACTIONS:

- Upon occurrence of any of the Trigger Events above, employees/subcontractors shall notify SESI Management about the suspected employee/worker infected with, or exposed to, COVID-19.
- SESI Management will investigate the incident to confirm the report is valid.
- Employees/Subcontractors shall investigate their respective infected employee(s) and report the following to SESI Management and HR:
 - Identify all individuals who worked in proximity (six feet) of the infected employee/worker,
 - Employee(s)/Worker(s) infected with the COVID-19 virus, and employee(s)/worker(s) that came in contact with the infected employee/worker shall be sent home for a period of 14 days,
 - Do not identify the infected employee/worker by name to avoid violation of privacy/confidentiality laws, and,
 - Keep SESI Management informed of progress and updates.
- If an infected person was in the office, SESI will clean and disinfect common areas and surfaces, in accordance with CDC recommendations.
- SESI Management will notify affected employees/workers of the Trigger Event and instruct them to take the response actions above.
- SESI Management policy requires written documentation from a health care professional, that confirmed infected employees can return to work.

Except for circumstances in which SESI is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When required, the number of persons who will be informed of an employee's/worker's condition will be kept at the minimum needed to appropriately notify other potentially affected employees/workers of Trigger Events and to attempt to minimize the potential for transmission of the virus.

Appendix E: Community Air Monitoring Plan

1 North Castle Drive

NORTH CASTLE, NEW YORK

SESI PROJECT NO. 12456A

COMMUNITY AIR MONITORING PROGRAM

Prepared for:

Armonk Development, LLC

15 Verbena Ave

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Prepared by:

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FEBRUARY 2024

1.0 INTRODUCTION

This document presents a Community Air Monitoring Plan (CAMP) for the Remedial Investigation Workplan (RIWP) for the proposed development of the property located at 3 North Castle Drive, North Castle, Westchester County, New York (the Site). The Site consists of a 32.55-acre area parcel and is identified as 108.3-1-62.1 on the Westchester County tax map. The Site is bound to the north by undeveloped land and Route 22, and commercial properties beyond; to the west by North Castle Road, undeveloped land, and Route 22 beyond; to the south by an IBM building and parking lots; and to the east by Armonk Indoor and sport fields.

The Site is currently vacant except for an asphalt roadway providing access to adjacent athletic fields located east of the Site. Historically, The Site was undeveloped land until 1971, when the asphalt roadway that borders the Site to the west, and an access road on the central and southern portions of the Site were constructed. A review of historic aerial images identified that the Site was historically utilized for agricultural purposes. The former IBM North Castle facility and associated parking areas are situated south of the Site and was constructed between 1960 and 1964. Undeveloped land and the North Castle Community Park are located east of the Site. Undeveloped land is located immediately north and west of the Site, beyond which lies Armonk Bedford Road and commercial properties beyond.

2.0 OBJECTIVES

The objective of the CAMP is to provide a measure of protection for the downwind community from potential airborne contaminant releases that may arise during all ground intrusive activities, and potentially contaminated soil and material handling and staging. In addition, the CAMP is intended to ensure that dust and contaminants are not leaving the work zone.

3.0 METHODS

The CAMP will include continuous monitoring for particulate matter (e.g., airborne “dust”) and volatile organic compounds (VOCs) during the planned demolition and remediation activities. Any CAMP exceedances will be reported to the NYSDEC and NYSDOH on

the same business day and as soon as possible. Notification of the exceedance will be sent via email along with the reason for the exceedance, the measure(s) taken to address the exceedance, and if the exceedance was resolved. In addition, the following NYSDEC and NYSDOH personnel will be provided weekly CAMP data summaries for review.

Name	Contact Information
NYSDEC Project Manager	TBD
NYSDOH Project Manager	TBD

3.1 CONTINUOUS MONITORING

Continuous monitoring for particulates and VOCs will be conducted during all ground intrusive activities including soil borings, monitoring well installations, and soil vapor probe installations.

3.2 PERIODIC MONITORING

Periodic monitoring for VOCs will be conducted 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 consists 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.

4.0 VOC MONITORING, RESPONSE LEVELS, AND ACTIONS

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. The monitoring work will be performed using a photoionization detector (PID) equipped with a 10.6 eV lamp. The equipment will 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.

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

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

5.0 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.

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m³) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m³ above the upwind level and provided that no visible dust is migrating from the work area.
- If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m³ above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m³ of the upwind level and in preventing visible dust migration.

All readings must be recorded and be available for State (DEC and DOH) personnel to review.

6.0 SPECIAL REQUIREMENTS FOR WORK WITHIN 20 FEET OF POTENTIALLY EXPOSED INDIVIDUAL STRUCTURES

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.

- 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 pre-determined). 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.
- 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 150 mcg/m³ or less at the monitoring point.
- Depending upon the nature of contamination and remedial activities, other parameters (e.g., explosivity, oxygen, hydrogen sulfide, carbon monoxide) may also need to be monitored. Response levels and actions should be pre-determined, as necessary, for each site.

Appendix F: Citizen Participation Plan
