MALCOLM PIRNIE

Operation, Monitoring and Maintenance Work Plan

APPENDIX

B

MALCOLM PIRNIE

OPERATION, MONITORING AND MAINTENANCE WORK PLAN
FOR THE
FORMER AMES/HILLS PLAZA SITE

CITY OF JAMESTOWN, NEW YORK

DECEMBER 2006

MALCOLM PIRNIE, INC.

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OPERATION, MONITORING, AND MAINTENANCE WORK PLAN
THE FORMER AMES/HILLS PLAZA SITE

CITY OF JAMESTOWN, NY

TABLE OF CONTENTS

LIST OF FIGURES

MALCOLM PIRNIE

Operation, Monitoring and Maintenance Work Plan

APPENDIX

B

B.1 Introduction

This Operation, Monitoring and Maintenance (OM&M) Work Plan has been prepared for the former Ames/Hills Plaza Site in Jamestown, New York (the Site). The Site is the subject of a cleanup agreement in accordance with New York State Department of Environmental Conservation (NYSDEC) Brownfields Cleanup Program guidance. The Agreement requires that the Site owner maintain the institutional and physical components that shall comprise the completed cleanup. This OM&M Work Plan describes the conditions and procedures for maintaining the physical components of the completed Site voluntary cleanup, and a part of The Site Management Plan (SMP), it shall be an enforceable part of the agreement.

The owner (Owner) of the Site (or any portion thereof) should evaluate the criteria presented in this plan and should recommend changes to the NYSDEC, as appropriate, depending on actual post-closure site conditions. As a minimum, this plan should be reviewed annually during the post-closure period and updated when necessary.

Prior to initiation of the OM&M Work Plan, the Owner shall prepare and submit appropriate organizational documents to the NYSDEC for review and approval. The organizational documents shall include:

- An organizational chart outlining the responsible parties personnel (with qualifications) who will be responsible for implementing the post-closure operation, maintenance and monitoring program.
- A health and safety plan.
- Example inspection report forms.
- A schedule for the annual inspections and reporting.

B.2 Background

The Site is a former department store plaza situated on approximately seven acres of land centrally located in the City of Jamestown, Chautauqua County, New York. The geography of the site is characterized as bounded to the north and east by the Chadakoin River and on the south and western sides by developed properties that presently include restaurants, light retail businesses and associated parking lots.

The renovated former department store building now occupies the easternmost portion of the property/site. Historic development of the easternmost portion of the site included: furniture manufacturing and storage facilities (i.e., Jamestown Chair Company, Watson Manufacturing Co., A.P. Olsen & Co. Modern Cabinet Co., and Diamond Furniture Co.) mills including the Brooklyn Mills, and Pearl City Mills, and a tire service center and gasoline filling station.

Historic use of the westernmost potion of the site included businesses associated with metal working, (i.e., Jamestown Iron Works, the Manor Iron Works, Cast Iron Welding and Brazing Co.) associated foundries and machine shops. A furniture factory, shock absorber company, gasoline filling station and a tire and battery service center were also located on the property. Over time, the former mills and iron works building structures were demolished and the properties redeveloped. As an element of the City of Jamestown's urban renewal efforts during the 1970's, surficial fill material was reportedly placed on the property.

Currently, the site is occupied by a recently renovated, formerly vacant, 77,000 square feet single-story brick and steel framed former department store building. The building is now used as a medical office complex. The majority of the site consists of an asphalt paved parking lot

that extends from the west facing building front to the western property boundary. The east side of the building consists of an asphalt paved truck entrance and loading docks. A public access river walk adjoining the Chadakoin River is located immediately to the north of the parking lot extends to the eastern side of the site along the river. The riverbank along the easternmost side of the site is wooded. A restaurant is located adjacent to the northwest corner of the site, and a pharmacy is located adjacent to the southwest corner of the site.

B.3 Remedial Work Plan

The Remedial Work Plan (RWP) for the site was prepared in October 2005 to be implemented during the cleanup of the Former Ames/Hills Plaza Site.

According to the RWP, in order to eliminate potential exposure risks associated with direct contact with site fill material, the entire site will be covered as part of site redevelopment. Where not paved or covered by the site building, the site will be covered with either pavement (asphalt or concrete) a minimum of two feet of documented clean soil cover material, or in areas of mature trees, 6-inches of mulch. Excavation of the soil/fill, if necessary to attain proper grade, was performed in accordance with the Soil/Fill Management Plan (Appendix A) of the SMP. Surface coverage over the entire redeveloped parcel or subparcel was required by the site owner or developer as a pre-condition of occupancy.

The proposed cover system was designed to be protective of human health and the environment. The primary exposure pathway for contaminants at the site (metals and polycyclic aromatic hydrocarbons) in soil is via direct contact. Covering the on-site fill material will eliminate the potential for direct contact with soil and is therefore protective of human health.

The Qualitative Risk Assessment performed as part of the Remedial Investigation (Malcolm Pirnie, 2005) evaluated the risk posed by chemicals of potential concern ("COPCs") to human health and wildlife. The Risk Assessment also evaluated the adequacy of the cover system and determined that the above-described cover system would protect human health and wildlife from these COPCs.

B.4 Summary of the Remedial Closure Design

B.4.1 Preparation of Site Surface

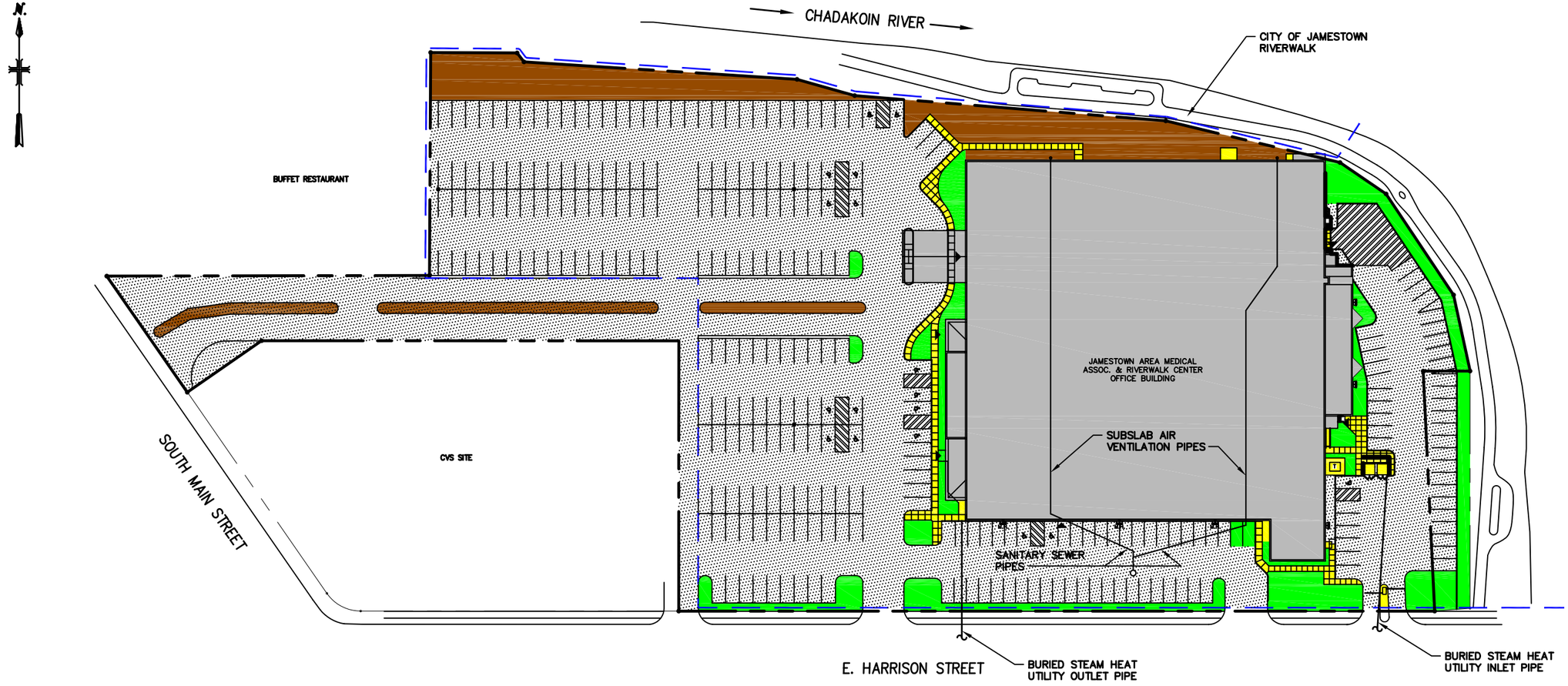
The Site was graded prior to cover placement activities, in accordance with the Remedial Work Plan (RWP) and appended Soil/Fill Management Plan (SFMP). Fill material was graded to a regular topographic surface as planned for redevelopment. All trees, shrubs, roots, brush, masonry, rubbish, scrap, debris, pavement, curbs, fences and miscellaneous structures were either removed or disposed of off-site at a permitted disposal facility. Prior to placement of the cover system, all protruding material was removed from the ground surface.

B.4.2 Cover System

The entire Site was covered to isolate the underlying soil/fill material using one of several cover types depending on planned Site use. The cover types include:

- Asphalt - in areas of paved parking lots and Site driveways.
- Concrete slab foundation – beneath the Site building.
- Concrete - at walkways.
- Two-feet thick layer of clean soil - in low use green space areas where mature trees were not present.
- Six inches of wood mulch - in green space areas where mature trees are present.

Each cover option was designed to provide adequate barrier from chemicals of potential concern (COPCS) present in the Site soil/fill as outlined in the Human Health Evaluation and the Remedial Action Work Plan. Figure 4-1 illustrates the locations of the various cover types used at the site.



= ASPHALT PAVEMENT

= CONCRETE SLAB FOUNDATION

= 6" WOOD MULCH COVER

= 2' CLEAN SOIL COVER

= CONCRETE WALKWAY

= TEMPORARY SAFETY FENCE

= SITE BOUNDARY

80' 0' 80' 160'

SCALE: 1 INCH = 80 FEET

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07/06 3198F001

FORMER AMES HILLS PLAZA SITE

SITE MANAGEMENT PLAN
JAMESTOWN, NEW YORK

FIGURE 4-1

SITE COVER SYSTEMS

B.4.2.1 Soil

In areas that will not receive significant equipment or vehicular use, the cover system was composed of soil fill from a NYSDEC-approved borrow source and tested in accordance with the Soil/Fill Management Plan and found to contain constituent concentrations less than those specified in NYSDEC TAGM 4046. The soil cover was be placed in accordance with the RWP.

In the two areas along the northern site boundary where mature trees are present a minimum of 6-inches of wood mulch was placed as cover. This mulch cover extends around the base of each tree a distance not less than the height of the tree.

It will be the responsibility of the Owner to annually verify that the soil (and mulch) cover has remained in good condition (e.g., grass or other vegetation is maintained) and sufficiently covers the soil/fill material at the Site (i.e., eroded areas are repaired and the soil cover is maintained). Certification as to this verification is included on the site inspection form on Attachment A.

B.4.2.2 Asphalt

The cover system in areas that will remain as or become roads, sidewalks, and parking lots consists of a minimum of two inches of asphalt that was placed over the soil/fill material at the site. The asphalt was placed on a minimum four-inch gravel subbase to provide stability for construction and to limit subsidence, in accordance with the RWP. Prior to placement of the subbase, any protruding material was removed from the ground surface and the area re-graded to a regular surface.

It will be the responsibility of the Owner to annually verify that the asphalt has remained in good condition and sufficiently covers the soil/fill material.

B.4.2.3 Concrete

The cover system in areas that remained as or became structures consists of a minimum of two inches of concrete that was placed above the soil/fill material. The concrete was placed on a minimum four-inch gravel subbase to provide stability for construction and to limit subsidence. Concrete was also used instead of asphalt for roads, sidewalks, and parking lots. Prior to placement of the subbase, any protruding material was removed from the ground surface and the area re-graded to a sufficient regular surface.

It will be the responsibility of the Owner to annually verify that outdoor concrete has remained in good condition and sufficiently covers the soil/fill material at the Site as per Attachment A.

B.4.3 Erosion Control Measures

In accordance with the SFMP, design and permanent construction features shall be incorporated into the site construction plans to control erosion. It will be the responsibility of the Owner to annually certify that storm water channel slopes, vegetation and any synthetic erosion control fabrics placed in such channels remain in good condition.

B.4.4 Environmental Monitoring

Monitoring of the river bank.

On an annual basis, the southwestern bank of the Chadakoin River will be inspected for visual evidence of petroleum contamination emitting from the subsurface. The entire length of the southwestern bank that is adjacent to the site will be traversed for the annual inspection. The inspection will be performed at a time when snow is not present along the bank to be inspected. If visual evidence of petroleum contamination is observed, the evidence will be noted on the inspection form, photo documented, and reported to the NYSDEC.

B.5 Inspection Procedures

The physical components of the cover system shall be inspected annually by a representative of Owner (or its delegated agent) qualified to carry out such inspections. The inspector should be, at minimum, a certified industrial hygienist or a person with a four-year college degree in environmental sciences. The inspection will be coordinated with facility personnel at least one week prior to ensure that most, if not all, of the paved areas will be accessible for inspection. Arrangements to repair those areas that the inspector requires to be maintained, if any, will be initiated as may be required by the inspector.

The annual inspection shall include, but not be limited to, those matters set forth on the Environmental Inspection Form, attached hereto as Attachment A. These inspection reports, which shall include a map that shows areas of damage or required maintenance, shall be kept on file by the Owner. If the inspections reveal that maintenance is necessary, then the Owner shall notify the NYSDEC, and arrange to complete the repairs. The NYSDEC shall be informed by Owner when repairs are complete.

B.6 Final Cover System Condition

The final cover system shall be observed by traversing the cover on foot and making appropriate observations, notes and photographic records as necessary, for inclusion with the report. It is anticipated that some maintenance activities will be necessary during the closure period. The following characteristics shall be looked for during the observation of the cover system, fencing and signs, and erosion control features including:

- Sloughing.
- Cracks.
- Settlement (depression and puddles).
- Erosion features.
- Distressed vegetation/turf.
- Damaged fencing, gates and signs.

The following paragraphs describe actions that should be taken to address the conditions described above. Maintenance and repairs that are typically necessary during the closure period are also described.

B.6.1 Sloughing

Sloughing of the soil cover may occur. Areas where sloughing has occurred shall be repaired. Cover soil shall be placed in accordance with the requirements of the Remedial Work Plan (RWP), and of the Soil/Fill Management Plan (SFMP).

B.6.2 Cracks

The locations of any cracks in the soil, asphalt or concrete cover should be noted on the inspection log and site map, including width, length and depth of the crack. The appropriate maintenance procedure will be determined by the inspector. Small willow cracks in the soil cover can be repaired by minor re-grading of the cracked area and re-seeding the area. Larger cracks that appear to extend into the fill material shall be filled with soil similar to that used for construction of the cover soil layer prior to re-seeding, in accordance with the RWP. Repairs to the asphalt and/or concrete will be completed when and in the fashion deemed necessary by the inspector.

B.6.3 Settlement

Settlement features such as depressions or areas of ponding water shall be re-graded by placing additional soil cover so that surface water drains in the appropriate direction.

B.6.4 Erosion Features

Erosion features shall be repaired by backfilling to the original grade with soil and re-seeding.

B.6.5 Distressed Vegetation/Turf

Areas of distressed turf shall be re-seeded and a starter fertilizer applied. Large-root growth may also compromise the integrity of the soil cover and shall be discouraged with regular mowing. Reasonable efforts shall be taken to avoid damage to the turf from traffic and other unintended uses.

B.7 Inspection Reporting

Annual inspection reports shall be forwarded by the Owner to the NYSDEC. If the inspection finds that corrective action is required, a followup inspection will be made after the repairs have been completed. If the inspector determines that corrective action is required, the Corrective Action Form (Attachment B) will be included with the inspection report, confirming that the repairs were completed, and in accordance with the Remedial Work Plan.

Any analytical data that may be gathered during the course of the inspection or corrective action shall also be included with the inspection report and submitted to the NYSDEC within 21 days of the inspection. The inspection reports will be submitted by the Site Owner with an attached Annual Certification form, Attachment C signed and notarized by the Site Owner, certifying that the specified engineering and institutional controls are in place and functioning.

ATTACHMENT A

ENVIRONMENTAL INSPECTION FORM

Former Ames/Hills Plaza Site, Jamestown, New York

Property Name: Jamestown Area Medical Associates Inspection Date: _____

Property Address: 15 South Main Street

City: Jamestown State: NY Zip Code: 14701

Property ID: (Tax Assessment Map)

Section: 387.49 Block: 1 Lot(s): 4.1 and 6

Total Acreage: 7-5.8

Weather (during inspection): Temperature: _____ Conditions:

SIGNATURE:

The findings of this inspection were discussed with appropriate personnel, corrective actions were identified and implementation was mutually agreed upon:

Inspector: _____ Date: _____

Next Scheduled Inspection Date: _____

COVER & VEGETATION

	Yes	No
1. Final cover in acceptable condition?	_____	_____
Is there evidence of sloughing, erosion, ponding or settlement?	_____	_____
Is there evidence of unintended traffic; rutting?	_____	_____
Is there evidence of distressed vegetation/turf?	_____	_____
2. Final cover sufficiently covers soil/fill material?	_____	_____
Are there cracks visible in the soil, mulch or pavement?	_____	_____
Where required, is the mulch at least six inches thick?	_____	_____
Is there evidence of erosion in the storm water channels or swales?	_____	_____

ACTIVITY ON SITE

3. Any activity on site that mechanically disturbed soil or mulch cover?	_____	_____

ENVIRONMENTAL MONITORING

4. Is there evidence of petroleum contamination emanating from the Southwestern bank of the Chadakoin River. _____ _____

ADDITIONAL FACILITY INFORMATION

Development on or near the site? (Specify size and type: e.g., residential, 40 acres, well and septic)

COMMENTS

Item #

ATTACHMENTS

1. Site Sketch
2. Photographs
3. Laboratory Report (s)

ATTACHMENT B

CORRECTIVE ACTION FORM

Former Ames/Hills Plaza Site

Property Name: Jamestown Area Medical Associates

Property Address: 15 South Main Street

City: Jamestown State: NY Zip Code: 14701

Property ID: (Tax Assessment Map) 060800

Section: 387.49 Block: 1 Lot(s): 4.1 and 6

Total Acreage: 5.80

Weather (during inspection): Temperature: _____ Conditions:

An inspection of the subject property on (date) identified the need for corrective action.

CORRECTIVE ACTION TAKEN

Description: (attach site sketch and photographs)

Date Completed:

SIGNATURE:

The corrective action described above was completed in accordance with all relevant requirements of the Remedial Action Work Plan.

Inspector: _____Date: _____

ATTACHMENTS

1. Site Sketch
2. Photographs
3. Laboratory Report (s)

ATTACHMENT C

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
INSTITUTIONAL AND ENGINEERING CONTROLS CERTIFICATION FORM

SITE DETAILS

SITE NO.	**C9-07-029**		
SITE NAME	**Former Ames/Hills Plaza Site**		
SITE ADDRESS:	15 South Main Street	ZIP CODE:	14701
CITY/TOWN:	Jamestown		
COUNTY:	Chautauqua		
CURRENT USE:	Medical Office Building		

CURRENT CERTIFICATION FREQUENCY: EVERY 1 YEAR(S)

VERIFICATION OF SITE DETAILS

		YES	NO
1.	Are the SITE DETAILS above, correct?	?	?
	If NO, are changes handwritten above or included on a separate sheet?	?	?
2.	Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment since the initial/last certification?	?	?
	If YES, is documentation or evidence that documentation has been previously submitted included with this certification?	?	?
3.	Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property since the initial/last certification?	?	?
	If YES, is documentation or evidence that documentation has been previously submitted included with this certification?	?	?

		YES	NO
4.	Has a change-of-use occurred since the initial/last certification?	?	?
	If YES, is documentation or evidence that documentation has been previously submitted included with this certification?	?	?
5.	Has any new information come to your attention to indicate that assumptions made in the qualitative exposure assessment for offsite contamination are no longer valid (applies to non-significant threat sites subject to ECL 27-1415.7(c))?	?	?
	If YES, is the new information or evidence that new information has been previously submitted included with this certification?	?	?
6.	Are the assumptions in the qualitative exposure assessment still valid (must be certified every five years for non-significant threat sites subject to ECL 27-1415.7(c))?	?	?
	If NO, are changes in the assessment included with this certification?	?	?

SITE NO. 9-07-029

Description of Institutional/Engineering Control	Control Certification	
	YES	NO
ENVIRONMENTAL EASEMENT	?	?
Implementation of the Site Management Plan	?	?

CONTROL CERTIFICATION STATEMENT

For each institutional or engineering control listed above, I certify by checking "Yes" that all of the following statements are true:

(a) the institutional control and/or engineering control employed at this site is unchanged from the date the control was put in-place, or last approved by the Department;

(b) nothing has occurred that would impair the ability of such control to protect public health and the environment;

(c) nothing has occurred that would constitute a violation or failure to comply with any Site Management Plan for this control; and

(d) access to the site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of this control.

(e) if a financial assurance mechanism is required under the remedial work plan for the site, the mechanism remains valid and sufficient for their intended purpose under the work plan.

CONTROL CERTIFICATION
SITE NO. 9-07-029

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in this Institutional and Engineering Controls Certification form are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I _____(print name),_____

(print business address), am certifying as _____ (Owner or Owner's Designated Site Representative (if the site consists of multiple properties, I have been authorized and designated by all site owners to sign this certification) for the Site named in the Site Details section of this form.

_____ _____
Signature of Site Owner or Representative Rendering Certification Date

QUALIFIED ENVIRONMENTAL PROFESSIONAL (QEP) SIGNATURE

I certify that all information and statements in this Institutional and Engineering Controls Certification form are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I _____(print name), _____

(print business address), am certifying as a Qualified Environmental Professional for the_____

_____ (Owner or Owner's Representative) for the Site named in the Site Details section of this form.

_____ _____ _____
Signature of Qualified Environmental Professional, for the Owner or the Owner's Representative, Rendering Certification Stamp (if Required) Date

IV. Definitions:

"Engineering Control" (EC), means any physical barrier or method employed to actively or passively contain, stabilize, or monitor any hazardous waste or petroleum waste to ensure the long-term effectiveness of an inactive site remedial program or brownfield site remedial program or environmental restoration project, or to eliminate potential exposure pathways to any such hazardous waste or petroleum waste. Engineering Controls include, but are not limited to: pavement, caps, covers, subsurface barriers and slurry walls; building ventilation systems; fences, other barriers and access controls; and provision of alternative water supplies via connection to an existing public water supply, addition of treatment technologies to an existing public water supply, and installation of filtration devices on an existing private water supply.

"Institutional Control" (IC), means any non-physical means of enforcing a restriction on the use of real property, that limits human or environmental exposure to any hazardous waste or petroleum waste, restricts the use of groundwater; provides notice to potential owners, operators, or members of the public; or prevents actions that would interfere with the effectiveness of an inactive site remedial program or brownfield site remedial program or environmental restoration project, or with the effectiveness and/or integrity of Site Management activities at or pertaining to any site.

"Professional Engineer" means a person, including a firm headed by such a person, who holds a current New York State Professional Engineering license or registration, and has the equivalent of three (3) years of full-time relevant experience in site investigation and remediation of the type detailed in this Control Certification.

"Property Owner" means, for purposes of an IC/EC certification, the actual owner of a property. If the site has multiple properties with different owners, the Department requires that the owners be represented by a single representative to sign the certification.

"Oversight Document" means any document the Department issues pursuant to each Remedial Program (see below) to define the role of a person participating in the investigation and/or remediation of a site or area(s) of concern. Examples for the various programs are as follows:

BCP (after approval of the BCP application by DEC) - Brownfield Site Cleanup Agreement.
ERP (after approval of the ERP application by DEC) - State Assistance Contract.
Federal Superfund Sites - Federal Consent Decrees, Administrative Orders on Consent or Unilateral Orders issued pursuant to CERCLA.
Oil Spill Program - Order on Consent, or Stipulation pursuant to Article 12 of the Navigation Law (and the New York Environmental Conservation Law).
State Superfund Program - Administrative Consent Order.
VCP (after approval of the VCP application by DEC) - Voluntary Cleanup Agreement.
RCRA Corrective Action Sites - Federal Consent Decrees, Administrative Orders on Consent or permit conditions issued pursuant to RCRA.

"Qualified Environmental Professional" (QEP), means a person, including a firm headed by such a person, who possesses sufficient specific education, training, and experience necessary to exercise professional judgment, to develop opinions and conclusions regarding the presence of releases or threatened releases to the surface or subsurface of a property or off-site areas, sufficient to meet the objectives and performance factors for the areas of practice identified by this guidance (DER10 Technical Guide).

1. Such a person must:
   - i. Hold a current Professional Engineering or a Professional Geologist license or registration, and have the equivalent of three (3) years of full-time relevant experience in site investigation and remediation of the type detailed in this guidance; or
   - ii. Be a site remediation professional licensed or certified by the federal government, a state; or a recognized, accrediting agency, to perform investigation or remediation tasks identified

by this guidance, and have the equivalent of three (3) years of full-time relevant experience. Examples of such license or certification include, but are not limited to, the following titles:

- Licensed Site Professional, by the State of Massachusetts
- Licensed Environmental Professional, by the State of Connecticut
- Qualified Environmental Professional, by the Institute of Professional Environmental Practice
- Certified Hazardous Materials Manager, by the Institute of Hazardous Materials Management

2. The definition of QEP provided above does not preempt State Professional licensing or registration requirements such as those for a Professional Geologist, Engineer, or Site Remediation Professional. Before commencing work, a person should determine the applicability of State professional licensing or registration laws to the activities to be undertaken pursuant to section 1.5 (DER10 Technical Guide).

3. A person who does not meet the above definition of a QEP under the foregoing definition may assist in the conduct of all appropriate investigation or remediation activities in accordance with this document if such person is under the supervision or responsible charge of a person meeting the definition provided above.

"Qualitative Exposure Assessment" means a qualitative assessment to determine the route, intensity, frequency, and duration of actual or potential exposures of humans and/or fish and wildlife to contaminants.

"Remedial Party" means any person or persons, as defined in 6NYCRR 375, who executes, or is otherwise subject to, an oversight document (State Superfund, BCP, ERP or VCP Program). For purposes of this guidance, remedial party also includes:

1. Any person or persons who is performing the investigation and/or remediation, or has control over the person (for example, contractor or consultant) who is performing the investigation and/or remediation, including, without limitation, an owner, operator or volunteer; and

2. The DER for State-funded investigation and/or remediation activities.

"Site Management" (SM) means the activities included in the last phase of the remediation of a site, in accordance with a Site Management Plan, which continue until the remedial action objectives for the project are met and the site can be closed-out. Site Management includes the management of the institutional and engineering controls required for a site, as well as the implementation of any necessary long-term monitoring and/or operation and maintenance of the remedy. (Formerly referred to as Operation and Maintenance (O&M)).

"Site Management Plan" (SMP) means a document which details the steps necessary to assure that the institutional and engineering controls required for a site are in-place, and any physical components of the remedy are operated, maintained and monitored to assure their continued effectiveness, developed pursuant to Section 6 (DER10 Technical Guide).

"Site Owner" means the actual owner of a site. If the site has multiple owners of multiple properties with ICs and/or ECs, the Department requires that the owners designate a single representative for IC/EC Certification activities.

"Site Owner's Designated Representative" means a person, including a firm headed by such a person, who has been designated in writing by the Site Owner(s) to complete and sign the Institutional and Engineering Controls Certification Form.