Remedial Action Work Plan (RAWP)

Jamestown Brewery Site
BCP Site No. C907047
Jamestown, New York

January 2022 0598-021-001

Prepared For:

GPatti Development LLC
Jamestown, New York

Prepared By:

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Prepared for:

GPatti Development LLC
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Jamestown, NY 14701

Prepared by:

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Certification

I, Lori E. Riker, certify that I am currently a NYS registered professional engineer and that this January 2022 Remedial Action Work Plan (RAWP) for the Jamestown Brewery Site (C907047) 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).

01/12/2022
Date

Stamp:

BENCHMARK

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1.0 INTRODUCTION

Benchmark Civil/Environmental Engineering & Geology, PLLC (Benchmark) has prepared this Remedial Action Work Plan (RAWP) on behalf of GPatti Development LLC to present the proposed scope of work and implementation procedures for completion of remedial activities at the Jamestown Brewery Site, Brownfield Cleanup Program (BCP) Site C907047, located in the City of Jamestown, Chautauqua County, New York.

Benchmark will oversee all remedial activities and subcontract the necessary remedial contractors on behalf of GPatti Development LLC. The work will be completed in accordance with 6NYCRR Part 375, New York State Department of Environmental Conservation (NYSDEC) DER-10 guidelines (Ref. 1), and the NYSDEC-approved RAWP.

1.1 Background and History

The BCP property is located at the southeast corner of West Third Street and Washington Street (Tax ID No. 387.40-3-8) situated in a commercial zoned area of the City of Jamestown, Chautauqua County, New York (see Figures 1 and 2). The Site is currently developed with one, three-story 16,147 square foot commercial building with paved asphalt parking lot to the south and east.

Based on LaBella's Phase I findings, a photo facility was present in the northwest corning of the Site from at least 1886 to at least 1891. From at least 1930 to at least 1949, a gasoline underground storage tank (UST) was located to the west of the parking garage within the Washington Street right-of-way proximate the southwest corner of the Site. No information is available regarding tank closure. One 3,000-gallon #2 fuel oil UST was also closed-in-place under NYSDEC direction within the Washington Street right-of-way proximate the west exterior of the Site Building in 2003. A photography studio was located on the north portion of the Site historically addressed as 117 West Third Street and Jamestown Furniture Co., historically addressed as 121 West Third Street, was located at the northwest corner of the Site from at least 1946 to at least 1949. The area immediately southwest exterior of the Site Building historically addressed as 214 Washington Street was occupied by a dry cleaner from at least 1965 to at least 1994. The south portion of the Site historically addressed as 208 Washington Street was occupied by taxi company garages from at least 1926 to at least 1930. The south portion of the Site historically addressed as 210 Washington Street was occupied by automotive repair facilities from at least 1930 to at least 1939. The portion of the

Site historically addressed as 212-214 Washington Street was occupied by parking garages from at least 1922 to at least 1981.

1.2 Summary of Environmental Conditions

On July 22, 2020, LaBella completed and submitted to the Department a Draft Interim Remedial Measures & Remedial Investigation (IRM/RI) Report (Ref. 3). In a letter to LaBella dated October 22, 2020, the NYSDEC and New York State Department of Health (NYSDOH) indicated the draft Report failed to provide adequate information on the remedial work and remedy performed at the Site and was therefore rejected. Specifically, the Department indicated:

1. The report fails to properly demonstrate that the Interim Remedial Measure (IRM) was successful in achieving the remedial goals of the project and Brownfield Cleanup Program (BCPs) requirements. For instance, the data demonstrates the source of groundwater contamination (elevated soil concentrations) was not addressed by the IRM, the IRM did not prevent the off-site migration of contaminants via groundwater and there is insufficient data to confirm the IRM will restore groundwater quality.
2. The report does not provide adequate evidence that the primary contaminants of concern and contaminant source areas have been adequately delineated to determine the full nature and extent of contamination.
3. The report fails to provide an adequate exposure assessment for the site, based on source removal and downgradient concentrations observed within soil and groundwater.

In November 2020, Benchmark was retained by The Slater Law Firm, on behalf of the Applicant, to perform a supplemental investigation. Benchmark completed investigation activities at the Site in March and April 2021 which included soil boring advancement; subsurface soil sampling; monitoring well installation; and groundwater quality sample collection. Benchmark submitted to NYSDEC a Remedial Investigation/Interim Remedial Measure/Alternatives Analysis (RI/IRM/AA) Report, revised October 2021 (Ref. 4), on behalf of GPatti Development LLC. The Report addressed investigative failures outlined in the Department's October 2020 IRM/RI rejection letter. NYSDEC and NYSDOH approved the RI/IRM/AA Report on October 26, 2021. The Decision Document was issued on January 4, 2022 (Ref. 5). The RI/IRM/AA Report included a detailed review of previous studies and RI results completed by others. Supplemental investigation (SI) activities were completed by

Benchmark in accordance with the approved Supplemental RI Work Plan dated February 2021 (Ref. 6).

Based on the data and analyses obtained during the Phase II and RI (by others) and the SI, the following sections describe the environmental conditions at the Site.

1.2.1 Geology

The underlying overburden geology is generally described as gravel sub-base mixed with brown clay silts from approximately 1 to 2 feet below ground surface (fbgs). Apparent native soils beyond 2 fbgs across the Site consist of glacial till comprised of gravel, silt, clay, and fine sands. According to LaBella's boring logs, clay is no longer present in the overburden in southern wells PMW-4 and PMW-8. Subsurface investigations extended from ground surface to approximately 36 fbgs.

The SI further investigated the overburden at the Site. Findings include the following:

- Northern Portion of the Site: Generally, fill was identified from 0 to 1 fbgs underlain by brown/gray clay or fine sand and clay from 1 to 18 fbgs; sand and gravel from 18 to 20-26 fbgs; and another layer of gray clay beginning at 20-26 fbgs.
- Southern Portion of the Site: Generally, fill was identified from 0 to 8 fbgs underlain by sand and/or gravel from 8 to 37 fbgs.

The cVOC contamination was primarily observed within the sandy lean clay. Soil samples collected from beneath the building that contained elevated chlorinated volatile organic compounds (cVOCs) was described as silty sand and clay with gravel material

1.2.2 Hydrogeology

As described in the RI/IRM/AA Report (Ref. 3), the Site is located within the Allegheny River major drainage basin, which is typified by high topographic relief. In the Allegheny River Basin, the major areas of groundwater are within coarser overburden deposits. The Site is located within a mixed deposit area, which includes surficial deposits formed as moraines, sand, gravel, lake-laid silt, and clay, and till that all occur as irregular masses and layers in addition to sand and gravel that are generally of minor importance. Permeability is variable (low to high). Site infiltration was classified as low to moderate, with an infiltration rate ranging from 0.6 to 2.0 inches per hour. Regional groundwater is anticipated to flow south/southwesterly toward the Allegheny River and Chautauqua Lake. This is supported by the isopotential map prepared by Benchmark using groundwater elevation data collected April

28, 2021 as part of the SI. LaBella prepared a groundwater contour figure as part of the July 2020 Draft RI & IRM Report (Ref. 6) submission using depth to water measurements. Labella's figure also supports the south/southwesterly groundwater flow direction.

Well fields were historically used to pump water from the Allegheny River major drainage basin to provide potable public water. These wells were historically operated northeast of the Site. In response to the historical pumping, groundwater from the Site likely flowed to the east and north. This is supported by contamination identified in wells located on the eastern portion of the Site. The current pumping and draw down conditions in the aquifer are not known but the Cassadaga Well field (eight artesian wells approx. 3.5 miles to the northeast) and Conewango Well Field (four wells approx. 7 miles to the east-northeast) are currently being used.

The groundwater in the uppermost water bearing zone on the Site flows to the south/ southwest toward the Chadakoin River. The horizontal hydraulic gradient varies between 0.4 in the southern portion of the Site to less than 0.02 in the northern portion of the Site. This large difference in horizontal gradient can partially be explained by the absence of the clay layer in the southern portion of the Site that serves to retard the vertical movement of the water. Sand and/or gravel layered between brown clay was identified from boring SB-39 as far south as boring PMW-6. The most southern portion of the Site, based on boring logs from SB-39 and PMW-8, appears to be mostly sand and/or gravel overlaid with fill. Local groundwater flow may be influenced by subsurface features, such as excavations, utilities, and localized fill conditions.

1.2.3 Contamination

1.2.3.1 Subsurface Soil/Fill

Tetrachloroethene (PCE), trichloroethene (TCE), and cis-1,2-dichloroethene (cis-1,2-DCE) were the only VOCs detected above Protection of Groundwater (PGW) Soil Cleanup Objectives (SCOs) in subsurface soil/fill during the SI. Exceedances were identified beneath the southern portion of the building at borings SB-37, TMW-1, and TMW-2 at depths ranging from 9.5-17 fbgs (0.5-8 feet below basement floor). This area is upgradient of the IRM excavation area/presumed former source area. PCE results obtained from soil borings completed within the presumed source area by LaBella prior to the IRM excavation ranged from 1.6 mg/kg to 240 mg/kg compared to the SI results beneath the building ranged from

2.6 mg/kg at TMW-2 (9.5-11 fbgs) to 17 mg/kg at SB-37 (15-17 fbgs). IRM excavation confirmatory sample PCE concentrations along the north excavation boundary ranged from 0.16 mg/kg to 16 mg/kg. The order of magnitude lower concentrations beneath the building confirms the source area was generally within the IRM excavation extents.

Soil borings SB-38, SB-44, and MW-1 are located within the asphalt area immediately south and southeast of the IRM excavation area; exceedances were identified from 18-37.5 fbgs, which is below the depth excavated by LaBella during the IRM. LaBella's post-excavation confirmatory Floor A (19.2 fbgs), Floor B (18.5 fbgs), and Floor C (18 fbgs) samples collected beneath the IRM excavation area, identified cVOCs an order of magnitude above PGW/ Unrestricted Soil Cleanup Objectives (USCOs).

The SI results confirm soil contamination remains beneath the building and below the IRM excavation extents. The cVOCs in this saturated soil/fill will continue to contribute to groundwater contamination if not remediated. VOCs were not detected above Commercial Soil Cleanup Objectives (CSCOs) at RI locations remaining after IRM activities or at SI locations.

IRM post-excavation samples Wall A through Wall H, collected from the north, south, east, and west boundary of the excavation, all had at least one cVOC above PGW SCOs. The highest PCE concentration of 98 mg/kg was detected at Wall D (14.5 fbgs), located on the southern excavation boundary. This is an order of magnitude lower than the highest PCE concentration observed during the RI at SB-30 (240 mg/kg), located near the center of the presumed source area. During the SI, SB-38 and MW-1 borings were completed immediately downgradient from the IRM excavation area. PCE was detected at MW-1 (18-20 fbgs) at 6.7 mg/kg and at SB-38 (36-37.5 fbgs) at 130 mg/kg. Results indicate deep contamination still present on-site downgradient from the presumed source area. SI locations SB-42, SB-43 and SB-44 were completed east and southeast of the excavation area. The cVOC results at SB-43 (28-30 fbgs) and SB-42 (28-29.5 fbgs) were non-detect. PCE was detected above PGW/USCOs at SB-44 (18-20 fbgs) and SB-44 (33.5-34.5 fbgs) but was not detected at SB-44 (36-37 fbgs).

No benzene, toluene, ethylbenzene, or xylene (BTEX) compounds were noted in soil samples above PGW/USCO values during the SI. RI soil borings SB-6 (14-15 fbgs) and SB-7 (14-15 fbgs) and IRM post-excavation confirmatory sample locations Wall A, Wall D, Floor

A, and Floor C contained several petroleum-related VOCs at concentrations exceeding PGW SCOs. Soil boring SB-6 and SB-7 locations were removed during IRM excavation activities.

1.2.3.2 Groundwater

Continued cVOC groundwater contamination was noted at all on-site except for PMW-5, which is in the northeast portion of the Site upgradient of the source area. The following cVOCs were detected at concentrations exceeding their respective Groundwater Quality Standards/Guidance Values (GWQS/GVs) by three orders of magnitude:

- PCE: TMW-1, TMW-2, MW-1, PMW-4, PMW-6, and PWM-8
- TCE: TMW-1 and TMW-2
- Cis-1,2-DCE: TMW-1 and MW-1
- Vinyl Chloride (VC): MW-1

Groundwater contamination in wells TMW-1 and TMW-2 confirms a continued source of contamination beneath the southern portion of the building. During the 2021 groundwater sampling events, well TMW-1, located immediately upgradient from the presumed source area, observed a PCE concentration of 5,000 ug/L, which is more than two times the PCE concentrations at any downgradient well. Well TMW-2, located upgradient but farther east of TMW-1, contained a PCE concentration on par with downgradient wells. The TCE concentration in wells TMW-1 (4,300 ug/L) and TMW-2 (3,300 ug/L) were an order of magnitude greater than concentrations observed in downgradient wells MW-1 (980 ug/L), PMW-6 (380 ug/L), and PMW-8 (460 ug/L). The new well (MW-1) installed immediately downgradient of the IRM excavation area observed elevated concentrations of cis-1,2-DCE (4,000 ug/L) and VC (1,500 ug/L), which indicates a breakdown of PCE and TCE possibly from the Daramend reagent applied by LaBella following excavation. However, elevated cVOCs are still present in downgradient wells MW-1, PMW-4, PMW-6, PMW-7, and PMW-8.

Groundwater collected from PMW-1R, located within the former IRM excavation area, shows a significant decrease in concentrations of cis-1,2-DCE and trans-1,2-DCE to below GWQS/GVs; the VC concentration (3.5 ug/L) remains slightly above its GWQS/GV of 2 ug/L). Downgradient wells PMW-4, PMW-6, and PMW-8 have experienced an overall reduction in cVOC concentrations between the October 2019 and March 2021 groundwater sampling events. Specifically, PCE concentrations in wells PMW-4 and PMW-8 were reduced

by over 70% and well PMW-6 decreased by 36%. Cis-1,2-DCE decreased a minimum of 92% at all three wells. VC decreased by over 95% at PMW-6 and is now non-detect in wells PMW-4 and PMW-8.

During LaBella's Phase II Investigation in August 2017, PCE was detected in former source area well MW-2 at a concentration of 27,100 ug/L. PCE concentrations observed during the SI were non-detect at well PMW-1R (within the IRM excavation area) and 2,000 ug/L at well MW-1 (immediately downgradient of the IRM excavation area) indicating significant reduction. Petroleum contamination was noted in monitoring wells located along the western boundary of the Site (MW-1 and PMW-1R), approximate to the historic petroleum UST still presumed to be in the Washington Street right-of-way.

The SI results compared to RI groundwater results indicates improvements in groundwater quality attributable to IRM activities; however, remaining contamination requires additional remedial action to address migration of the groundwater contaminant plume.

Per- and Polyfluoroalkyl substances (PFAS) were identified during the RI completed by LaBella, specifically, perfluorooctanoic acid (PFOA) in wells PMW-1R (248 ng/L), PMW-3 (14.5 ng/L), and PMW-8 (68 ng/L) as well as perfluorooctanesulfonic acid (PFOS) at wells PMW-1R (33.4 ng/L), PMW-3 (44.9 ng/L), and PMW-8 (12.8 ng/L). Individual PFOA and PFOS results at PMW-1R, PMW-3, and PMW-8 exceed the NYSDEC June 2021 Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (Ref. 7) guidance value of 10 ng/L (10 ppt). Further monitoring of PFAS will be completed following implementation of the remedy.

1.2.3.3 Soil Vapor Intrusion

Mitigation Tech completed the installation of seven suction points attached to a single fan in December 2018. An oil-filled U-tube style manometer was installed on the riser pipe located within the utility room. The vacuum indicator is marked at the level observed on March 28, 2019. Performance testing of the system was conducted approximately 48 hours after the SSDS installation. Four indoor air samples (ID1 through ID4) within the Site building basement, and one outdoor ambient air sample (OD2) were collected. Results indicated that cVOCs were at concentrations exceeding NYSDOH Guidance Matrices within ID1 and ID2, both located within the southern portion of the Site building basement. Additional indoor air samples (ID1-A through ID4-A) were collected within the Site building basement and one outdoor ambient air sample (OD2-A) was collected in June 2019. The 2019 indoor air

sampling locations were consistent with the indoor air sample locations collected in December 2018. Based on the laboratory results of the June 2019 indoor air sampling, no analytes were detected at concentrations exceeding NYSDOH Guidance Matrices within the indoor air samples collected. NYSDEC approved the change of use at the Site on July 8, 2019, with the understanding the SSDS would remain fully functional and operational at all times and the interim cover would remain in place. Indoor samples (ID1-B through ID4-B) and outdoor ambient air sample (OD-B) were collected in May 2020 to correspond with heating season. The building heating systems were operating during the indoor air sampling on May 13, 2020, as the ambient outdoor air temperature was 30°F and weather conditions prior to and during the May 13 indoor air sampling were unseasonably cold. The May 13, 2020 indoor sample locations were consistent with previous indoor air sample locations. Based on the laboratory results, no analytes were detected at concentrations exceeding NYSDOH Guidance Matrices within the indoor air samples collected. Based on the June 2019 and May 2020 indoor air sampling results, the SSDS has successfully mitigated cVOC impacts within the Site building.

On August 30, 2021, Ms. Lori Riker, P.E., of Benchmark evaluated the SSDS and determined it to be installed as presented in the 2019 CCR and operating as intended.

1.2.3.4 Contamination Summary/Areas of Concern

The remaining plume contamination is the primary area of concern (AOC) on-site, impacting groundwater, soil, and soil vapor. The plume extents have been approximately identified with five areas designated for treatment.

- Beneath Southern Portion of Building (Area A) – Treatment will target remaining contamination in the proximity of temporary wells TMW-1 and TMW-2. Both wells identified PCE and TCE in groundwater at concentrations greater than or on par with downgradient wells. The treatment zone will cover an approximately 600 square foot area with a treatment depth of 14 to 23 fbgs (5 to 14 feet below basement finished floor).
- Between IRM Excavation Area and Building (Area B) – Results from historic and SI work identified some of the highest groundwater and soil cVOC concentrations immediately north of the IRM excavation area. IRM post-excavation Wall C (15 fbgs) and Wall E (15 fbgs) along the northern wall of the excavation exceeded the PGW SCO for TCE. Treatment will address impacted soils not removed due to building foundation proximity. The treatment zone will cover an approximately 400 square foot area with treatment depths of 10 to 35 fbgs.

- Beneath Presumed Former Source Area (Area C) – IRM post-excavation bottom samples Floor A (19.2 fbgs), Floor B (18.5 fbgs), and Floor C (18 fbgs) soil results all exceeded PGW SCO for PCE. The treatment zone will encompass the previous IRM excavation area with a treatment depth from 20 to 35 fbgs.
- South of Presumed Former Source Area (Area D) – Groundwater at well MW-1 identified cis-1,2-DCE, PCE, TCE, and VC exceeding GWQSs. Soil results from boring SB-38 (36-37.5 fbgs) identified cis-1,2-DCE, PCE, and TCE exceeding PGW SCOs. The treatment zone will cover an approximately 1,800 square foot area with treatment depths of 18 to 35 fbgs. The treatment area does not extend to the area around well PMW-7 since the concentration of PCE is one order of magnitude lower and TCE is two orders of magnitude lower than upgradient, cross-gradient, and downgradient concentrations. The residual groundwater concentrations at well PMW-7 will be addressed with the downgradient PlumeStop barrier as the primary direction of groundwater flow is toward the southwest.
- Downgradient Property Boundary (Area E) – The treatment zone will cover an approximately 1,270 square foot portion of the southern boundary of the Site, from the western property boundary to well PMW-4. Cis-1,2-DCE, PCE, and TCE were all identified exceeding GWQSs at wells PMW-4 and PMW-8 along the southern boundary. Treatment depth will be from 18 to 35 fbgs.

1.3 Primary Constituents of Concern (COCs)

Based on findings to date, the COCs are presented below:

- **Soil: c**VOCs
- **Groundwater:** cVOCs, PFAS
- **Soil Vapor:** cVOCs

1.4 Remedial Action Objectives

The remedial actions for the Jamestown Brewery Site must satisfy Remedial Action Objectives (RAOs). RAOs are site-specific statements that convey the goals for minimizing substantial risks to public health and the environment. RAOs have been defined for the Site as follows:

Soil/Fill:

RAOs for Public Health Protection

- Prevent inhalation of or exposure to contaminants volatilizing from soil/fill.
- Prevent ingestion/direct contact with contaminated soil/fill.

RAOs for Environmental Protection

- Prevent migration of contaminants that may result in groundwater contamination.

Soil Vapor:

RAOs for Public Health Protection

- Mitigate impacts to public health resulting from soil vapor intrusion into buildings at the Site.

Groundwater:

RAOs for Public Health Protection

- Prevent ingestion of groundwater containing contaminant levels exceeding NYSDEC Class GA GWQS/GVs or nuisance characteristics.
- Prevent contact with, or inhalation of volatile compounds, from contaminated groundwater.

RAOs for Environmental Protection

- Remove or treat the groundwater contamination plume.

  Prevent further degradation of off-site water quality

1.5 Project Organization and Responsibilities

The remedial actions will be completed by remedial construction specialty contractors under contract to Benchmark on behalf of GPatti Development LLC. The certifying professional engineer will monitor the activities to verify that the work is performed in accordance with the Brownfield Cleanup Agreement (BCA), the approved RAWP, 6NYCRR Part 375, and NYSDEC DER-10 guidance.

2.0 PRE-REMEDIATION/PREPARATION TASKS

The following tasks will be completed in preparation of remedial action activities:

2.1 Pre-Construction Activities

2.1.1 Utility Clearance

Prior to intrusive activities, Dig Safely New York (Call 811) will be contacted by the Site contractor at a minimum of three business days in advance of the work and informed of the intent to perform intrusive work at the Site.

2.1.2 Permits/Notifications

Prior to injection activities, an Underground Injection Control (UIC) application will be submitted to the United States Environmental Protection Agency (USEPA) Region 2 Drinking Water & Groundwater Protection Section. The application will describe the planned beneficial use remediation wells, amendment product details, quantity of each amendment to be applied, and locations of planned injections. The USEPA will issue an authorize by rule once approved. Appendix B includes the UIC application and proof of transmittal to USEPA. The UIC application was emailed to USEPA on October 28, 2021. Benchmark received approval via email on November 17, 2021 and provided the approval to NYSDEC.

A portion of the injection activities will require the use of potable water obtained from public hydrants. A hydrant permit will be acquired from the City of Jamestown prior to remedial activities.

2.1.3 Site Access

Access to the Site during remedial activities will be restricted with use of construction cones and caution tape around remedial action areas.

2.2 Health and Safety Plan Development

A Health and Safety Plan (HASP) has been prepared and will be enforced by Benchmark in accordance with the requirements of 29CFR 1910.120. The Benchmark HASP covers on-site remedial activities. Benchmark will be responsible for site control and for the health and safety of its authorized site workers. Appendix A includes Benchmark's HASP. All

contractors and subcontractors and other parties involved in on-site remedial activities will be required to develop a HASP as or more stringent as Benchmark's HASP.

2.2.1 Dust Monitoring and Controls

A Community Air Monitoring Plan (CAMP), which is included within the HASP in Appendix A, will be implemented during intrusive activities. Although unlikely, if community air monitoring indicates the need for dust suppression, the contractor will halt work and adjust drilling/ injection activities to minimize dust formation. A water spray application may be used to mitigate airborne dust formation and migration. Potable water will either be obtained from a public hydrant, provided by an off-site water service, or provided via a water truck with water from an off-site source.

2.3 Waste Characterization

Excess soil is not anticipated to be generated during injection activities. In the event material is generated, waste characterization samples will be collected in accordance with landfill analytical disposal requirements. Based on the results of the waste characterization sampling, impacted soil will be managed according to all federal, state, and local waste disposal regulations.

2.4 Imported Backfill/Cover Soil Characterization

Any imported soil/fill material used for backfill or cover soil will be subject to characterization requirements in accordance with DER-10 Table 5.4(e)10, or as otherwise approved by NYSDEC prior to import to the Site.

3.0 REMEDIAL ACTION ACTIVITIES

The NYSDEC will be notified at least 5 business days in advance of any planned remedial activities. Remedial work will be performed in accordance with this Work Plan and documented by an experienced Benchmark professional, which will generally include:

- Completing remedial injection activities to address cVOC and PFAS groundwater/ saturated soil contamination on-site and mitigate off-site migration. Amendments will be applied to break down cVOC and PFAS compounds and achieve NYSDEC guidance levels.

Additional details relative to the amendment application is provided below.

3.1 Remedial Injection Activities

3.1.1 USEPA Approvals

Prior to injection activities, Benchmark will provide NYSDEC with proof of approval by the USEPA Region 2 Drinking Water & Groundwater Protection Section to complete the beneficial use injections.

3.1.2 Injection Activities

The groundwater remedial program will involve injecting approximately 3,600 lbs. of 3-D Microemulsion (3-DME), 4,000 lbs. S-Micro Zero-Valent Iron (S-MicroZVI), 41 liters Bio-Dechlor INOCULUM Plus (BDI Plus), and 3,200 lbs. PlumeStop™ into groundwater/ saturated soils in the southern portion of the Site via 51 injection points (see Figure 3). Appendix C includes injection amendment product safety data sheets (SDS), specification sheets, and manufacturer documents.

Treatment areas are further described below and in Section 1.2.3.4. If the injection rate for any of the mixtures described below is limited due to subsurface capacity and infiltration rates, the quantity of product or injection method may be adjusted accordingly.

- Area A: 400 lbs. of 3DME, 300 lbs. S-MicroZVI, and 4 liters of BDI Plus will be diluted with approximately 883 gallons of water and applied across 6 injection points (~155 gallons per point) covering 600 square feet. The injections will be completed in the basement of the on-site building and in a grid like pattern with two rows of three injection points per row spaced 10-feet apart. The amendments will be injected from 14 to 23 fbgs (5 to 14 feet below finished basement floor). Injections will address remaining cVOC contamination beneath the building. Prior

to injection beneath the building, the SSDS will be shut off. Pressure field extension testing will be completed after the basement floor has been repaired to confirm the SSDS remains effective.

- Area B: 600 lbs. 3DME, 500 lbs. S-MZVI, and 5 liters BDI Plus will be diluted with approximately 1,316.7 gallons of water and applied across 3 injection points (~464 gallons per point) covering 320 square feet. The injections will be completed in a single row of three injection points spaced 10-feet apart. The amendments will be injected from 10 to 35 feet below ground surface (fbgs). Injections will address cVOC contamination that could not be removed during the IRM excavation.
- Area C: 1,600 lbs. 3DME, 1,200 lbs. S-MZVI, and 14 liters BDI Plus will be diluted with approximately 3,509 gallons of water and applied across 16 injection points (~232 gallons per point) covering 1,600 square feet. The injections will be completed in a grid like pattern with four rows of four injection points per row spaced 10-feet apart. The amendments will be injected from 20 to 35 fbgs. Injections will address cVOC contamination remaining beneath the IRM excavation area.
- Area D: 1,000 lbs. 3DME, 1,000 lbs. S-MZVI, and 9 liters BDI Plus will be diluted with approximately 2,212.6 gallons of water and applied across 9 injection points (~260 gallons per point) covering 855 square feet. The injections will be completed in two rows, with five injection points in one row and four injection points in the second row spaced 10-feet apart. The amendments will be injected from 18 to 35 fbgs. Injections will address the remaining contamination south of the IRM excavation area.
- Area E: 3,200 lbs. PlumeStop, 1,000 lbs. S-MZVI, and 9 liters BDI Plus will be diluted with approximately 7,314 gallons of water and applied across 21 injection points (~369 gallons per point) covering 85 linear feet perpendicular to flow. The injections will be completed in two rows, with 10 injection points in the one row and 11 injection points in the second row spaced 8-feet apart. The amendment will be injected from 18 to 35 fbgs. Once complete the injection area will act as a barrier, treating cVOC and PFAS-impacted groundwater before it migrates off-site.

In the event daylighting of product occurs or if a point becomes compromised, the injection team will first attempt to further seal up around the injection rods with either granular bentonite or bentonite chips. If unsuccessful, the injection rod will be retracted, the injection point will be filled with bentonite chips, and the surface will be sealed with quick asphalt if needed to minimize amendment lost at the surface. Absorbent material (e.g., Speedy Dry or spill pads) may be used to clean up amendment that daylights to the surface. Absorbent material will be containerized and disposed as municipal waste.

Following injection activities, injection points will be sealed with bentonite and the asphalt parking lot/basement floor repaired in-kind.

3.2 Post-Injection Performance Groundwater Monitoring

Following injection activities, two rounds of performance groundwater monitoring will be completed. Sampling events will occur one- and three-weeks following completion of injection activities. Monitoring wells PMW-1R, PMW-4, PMW-6, PMW-7, PMW-8, and MW-1 will be sampled.

All future groundwater monitoring events beyond the performance monitoring will be addressed in the SMP.

3.2.1 Analysis

Wells PMW-1R, PMW-4, PMW-6, PMW-7, PMW-8, and MW-1 will be sampled for dissolved iron, total iron, sulfate, nitrate, total organic carbon (TOC), and target compound list (TCL) plus NYSDEC Commissioner Policy 51 (CP-51) VOCs during both performance monitoring events. Dissolved gases (CO_2, methane, ethane, and ethene) via method ASTM D1745 will only be analyzed during the second sampling event at all six wells to monitor biodegradation progress.

Wells PMW-1R, PMW-4, PMW-6, and PMW-8 will be sampled for PFAS via Modified EPA Method 537 during both performance monitoring events.

3.3 Groundwater Management

Water generated during groundwater sampling will be stored/settled in clean 55-gallon drums. Drummed groundwater will be sampled prior to discharge. Results must meet applicable NYS groundwater and/or City of Jamestown discharge standards prior to discharge to on-site surface or the municipal sewer. If results fail to meet the discharge requirements, the groundwater may be further treated on-site or transported off-site for disposal.

If it is decided that drummed groundwater will be treated prior to discharge to the sanitary sewer than the water will be run through a granular activated carbon (GAC) unit. If treated groundwater requires additional filtering, it will be pumped through a bag or cartridge filter. Spent GAC will be characterized and regenerated off-site, or disposed at a permitted disposal facility in accordance with applicable federal and state regulations. Settled solids remaining in the drum and spent filter bags will be disposed off-site. The drum will be

decontaminated via pressure washing. Water from pressure washing will be run through the GAC unit and added to the stored treated groundwater. Treated water will be resampled and results verified to meet either NYS groundwater and/or City of Jamestown discharge standards. Benchmark or the Site owner will coordinate with the municipal sanitary sewer authority to obtain any necessary temporary discharge permits.

If water is instead containerized and transported off-site for disposal than no pre-treatment of purged groundwater will be required. The drums containing water generated during groundwater sampling will be picked up by an authorized hauler and transported off-site to an approved disposal facility.

3.4 Cover System

The Site is currently improved with the commercial building, asphalt parking lot, and minimal greenspace areas. Materials within the greenspace areas will be subject to analysis per DER-10 and NYSDEC approval to remain as Site cover material. The soil cover sampling plan is further described in Section 3.4.1.

The existing asphalt parking lot will be inspected and repaired as necessary to ensure it properly functions as a part of the Site-wide cover system, specifically within injection Areas B through E and beneath the stairs leading into the building. Certification of the asphalt cover will be included with the FER. Figure 4 includes the final planned cover system layout. Where soil cover system transitions to hardscape, and/or at the limits of the BCP property, the cover will be keyed-in as necessary to achieve the minimum 12-inches of approved backfill material without tapering as shown on Cover System Details provided in Figure 4.

3.4.1 Soil Cover Sampling Plan

The volunteer will collect discrete samples from 0-2" (0-6" for VOCs) and 2"-12" (6"-12" for VOCs) at five separate locations. Table 1 outlines the cover soil verification soil sampling program and Figure 4 shows the planned surface soil sampling locations.

If concentrations at any of the locations exceed CSCOs then the cover soil will be excavated, a demarcation layer will be placed at the bottom of the excavation and 12-inches of new approved cover material will be added. Waste characterization samples would need to be collected from the material to be removed and analyzed in accordance with the landfill analytical disposal requirements. Imported topsoil would also need to be sampled per DER-10 Table 5.4(e)10. There is approximately 1,900 square feet of greenspace on-site equating to

70 cubic yards of required cover material. Per DER-10 Table 5.4(e)10, the following analysis would be required to be performed on the imported material: two discrete samples analyzed for VOCs and one composite sample analyzed for SVOCs, metals, PCBs, pesticides, and PFAS. A soil import request will be submitted to Department and import will not occur until approval is granted. Removal of existing material and placement of approved cover material would be completed in accordance with an approved supplemental work plan.

4.0 REMEDIAL ACTIVITIES SUPPORT DOCUMENTS

4.1 Health and Safety Protocols

Benchmark has prepared a HASP for use by our employees in accordance with 40CFR 300.150 of the NCP and 29CFR 1910.120. The HASP, provided in Appendix A, includes the following site-specific information:

- A hazard assessment.
- Training requirements.
- Definition of exclusion, contaminant reduction, and other work zones.
- Monitoring procedures for Site operations.
- Safety procedures.
- Personal protective clothing and equipment requirements for various field operations.
- Disposal and decontamination procedures.

The HASP also includes a contingency plan that addresses potential site-specific emergencies, and a CAMP as described above.

Health and safety activities will be monitored throughout the remedial field activities. A member of the field team will be designated to serve as the Site Safety and Health Officer (SSHO). The SSHO will report directly to the Project Manager and the Corporate Health and Safety Coordinator. The HASP will be subject to revision as necessary, based on new information that is discovered during the field investigation and/or remedial activities.

4.1.1 Community Air Monitoring

Real-time community air monitoring will be performed during remedial activities at the Site. A CAMP is included with Benchmark's HASP. Particulate and VOC monitoring will be performed along the upwind and downwind perimeter of the work area during injection activities in accordance with the CAMP. The CAMP is consistent with the requirements for community air monitoring at remediation sites as established by the NYSDOH and NYSDEC. Accordingly, it follows procedures and practices outlined under DER-10 Appendix 1A (NYSDOH's Generic Community Air Monitoring Plan) and Appendix 1B (Fugitive Dust and Particulate Monitoring).

4.2 Citizen Participation Activities and Fact Sheets

NYSDEC will coordinate and lead community relations throughout the course of the project with support from Benchmark as requested. The RI/IRM/AA Report received no public comments during the review period.

The NYSDEC, with input from Benchmark and GPatti Development LLC, will issue project-related fact sheets to keep the public informed of BCP activities.

5.0 REPORTING AND SCHEDULE

Benchmark will be on-site full-time during all remedial activities to monitor and document injection location stake-out; record drawings; daily reports of remediation activities; community air monitoring results; post-injection groundwater sampling and analysis; and progress photographs and sketches. The remedial activities are planned as follows:

- **November 22-December 2021**: Mobilize equipment, complete injection activities, sample soil within greenspace.
- **January and March 2022:** Complete post-injection groundwater performance monitoring sampling.
- **April 2022:** Repair asphalt cover and complete greenspace soil cover placement, if needed.

Benchmark will provide NYSDEC with email updates on the remedial progress. Full details of the remedial activities will be included in the Final Engineering Report (FER).

Work will commence upon NYSDEC approval of the RAWP.

6.0 REMEDIAL ACTIVITIES REPORTING

6.1 Construction Monitoring

A Benchmark scientist or engineer will be on-site on a full-time basis to document remedial activities. Such documentation will include, at minimum, daily reports of remedial activities, community air monitoring results, sampling locations, and photographs. CAMP summary tables will be provided to the NYSDOH project manager on a weekly basis. Both the NYSDEC and NYSDOH project managers will be notified of any CAMP exceedances that require corrective actions or shut down of work within one business day. CAMP monitoring will be summarized on the daily reports. Appendix D contains sample project documentation forms.

The completed reports will be available on-site and submitted to the NYSDEC as part of the FER. The NYSDEC will be promptly notified of problems requiring modifications to this Work Plan prior to proceeding or completion of the construction item.

Photo documentation of the remedial activities will be prepared by a field representative throughout the duration of the project as necessary to convey typical work activities, changed conditions, and/or special circumstances. If determined to be necessary, periodic on-site construction progress meetings will be held to which NYSDEC will receive an invitation.

6.2 Final Engineering Report

Following completion of the remedial measures, an FER will be submitted to the NYSDEC. The FER will include the following information and documentation, consistent with the NYSDEC regulations contained in 6NYCRR Part 375-1.6(c):

- Background and Site description.
- Summary of the Site remedy that satisfied the RAOs for the Site.
- Certification by a Professional Engineer to satisfy the requirements outlined in 6NYCRR Part 375-1.6(c)(4).
- Description of engineering and institutional controls at the Site.
- Site map showing the areas remediated.
- Documentation of materials disposed off-site.

- Documentation of imported materials.
- Copies of daily inspection reports and, if applicable, problem identification and corrective measure reports.
- Analytical data packages and DUSRs.
- CAMP data and reports.
- Photo documentation of remedial activities.
- Text describing the remedial activities performed; a description of any deviations from the Work Plan and associated corrective measures taken; and other pertinent information necessary to document that the site activities were carried out in accordance with this Work Plan.

The post-injection groundwater sampling data will be reviewed by a qualified, independent data validation expert. Specifically, a Data Usability Summary Report (DUSR) will be prepared, with appropriate data qualifiers added to the results. The DUSR format will follow the NYSDEC's September 1997 DUSR guidelines and draft DER-10 guidance. The DUSR and any necessary qualifications to the data will be appended to the FER

6.3 Site Management Plan

For any BCP site not cleaned up to NYSDEC Part 375 USCOs, preparation of a SMP that describes site-specific Institutional Controls and/or Engineering Controls (IC/EC) is a required component of the final remedy. Therefore, as part of the final remedy, a SMP will be prepared. Consistent with NYSDEC BCP requirements, the SMP will include the following components:

- **Engineering and Institutional Controls Plan**. Engineering controls include any physical barrier or method employed to actively or passively contain, stabilize, or monitor contaminants; restrict the movement of contaminants; or eliminate potential exposure pathways to contaminants (i.e., cover system, SSDS). Verification and certification that the SSDS is operating properly will be included as part of the FER. Institutional controls at the Site will include an environmental easement that will restrict the use of groundwater and limit Site use to commercial or industrial purposes.
- **Operation and Maintenance Plan** that describes the measures necessary to operate, monitor, and maintain the cover system and SSDS.
- **Excavation Work Plan** to assure that post-remediation intrusive activities are completed in a manner that prevents/mitigates exposures to remaining impact in all media.

- **Site Monitoring Plan** that includes provisions for a groundwater monitoring plan and a Site-wide inspection program to assure that the IC/ECs remain effective. Prior to re-occupancy, a post-remedial SSDS evaluation via pressure field extension testing, indoor air sampling, and stack testing will be performed.
- **Environmental Easement** filed with Chautauqua County on November 4, 2021. Appendix E contains the Environmental Easement.

6.4 Corrective Measures Plan

The reagents being applied will be effective for multiple years; therefore, additional applications are not anticipated to be needed. The PlumeStop barrier will address any residual contamination as a final line of defense. If groundwater monitoring in all on-site wells does not show reductions in cVOCs and/or if PFAS continues to migrate off-site at detections above screening values (10 ppt) then additional remediation action may be considered and a Corrective Measures Plan will be submitted to the NYSDEC for approval. This Plan will propose additional monitoring and/or remedial actions with a schedule for performing work. Unless an emergency condition exists, no work will be performed pursuant to the Corrective Measures Plan until it is approved by the NYSDEC.

7.0 REFERENCES

1. New York State Department of Environmental Conservation. *DER-10; Technical Guidance for Site Investigation and Remediation.* May 2010.
2. New York State Department of Environmental Conservation. *6 NYCRR Part 375 Environmental Remediation Programs* December 2006.
3. LaBella. *Draft Interim Remedial Measures & Remedial Investigation Report, Jamestown Brewery, 115-121 West Third Street, Jamestown, New York, NYSDEC BCP No. C907047.* July 2020
4. Benchmark Civil/Environmental Engineering & Geology, PLLC. *Remedial Investigation/Interim Remedial Measures/Alternatives Analysis Report, Jamestown Brewery Site, BCP Site No. C907047, Jamestown, New York.* October 2021.
5. New York State Department of Environmental Conservation. *Decision Document.* January 4, 2022.
6. Benchmark Environmental Engineering & Science, PLLC. *Supplemental Investigation Work Plan, Jamestown Brewery Site, Jamestown, New York, BCP Site No. C907047.* February 2021.
7. New York State Department of Environmental Conservation. *Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) under NYSDEC's Part 375 Remedial Programs.* June 2021.

TABLES

BENCHMARK

TABLE 1

COVER SOIL VERIFICATION SOIL SAMPLING PROGRAM

REMEDIAL ACTION WORK PLAN

JAMESTOWN BREWERY SITE
JAMESTOWN, NEW YORK

Investigation Location and Depth		TCL+CP-51 VOCs + TICs [1,2]	TCL SVOCs + TICs [2,3]	TAL Metals	PCBs	Pesticides	Herbicides	PFAS
1	0-6"	--	1 [4]	--	--	--	--	--
3		--	1 [4]	--	--	--	--	--
5		--	1 [4]	--	--	--	--	--
1	0-2"	--	--	1	1	1	1	1
	0-6"	1	--	--	--	--	--	--
	2-12"	--	1	1	1	1	1	1
	6-12"	1	--	--	--	--	--	--
2	0-2"	--	1	1	1	1	1	1
	0-6"	1	--	--	--	--	--	--
	2-12"	--	1	1	1	1	1	1
	6-12"	1	--	--	--	--	--	--
3	0-2"	--	--	1	1	1	1	1
	0-6"	1	--	--	--	--	--	--
	2-12"	--	1	1	1	1	1	1
	6-12"	1	--	--	--	--	--	--
4	0-2"	--	1	1	1	1	1	1
	0-6"	1	--	--	--	--	--	--
	2-12"	--	1	1	1	1	1	1
	6-12"	1	--	--	--	--	--	--
5	0-2"	--	--	1	1	1	1	1
	0-6"	1	--	--	--	--	--	--
	2-12"	--	1	1	1	1	1	1
	6-12"	1	--	--	--	--	--	--
TOTAL SAMPLES:		**10**	**7**	**10**	**10**	**10**	**10**	**10**

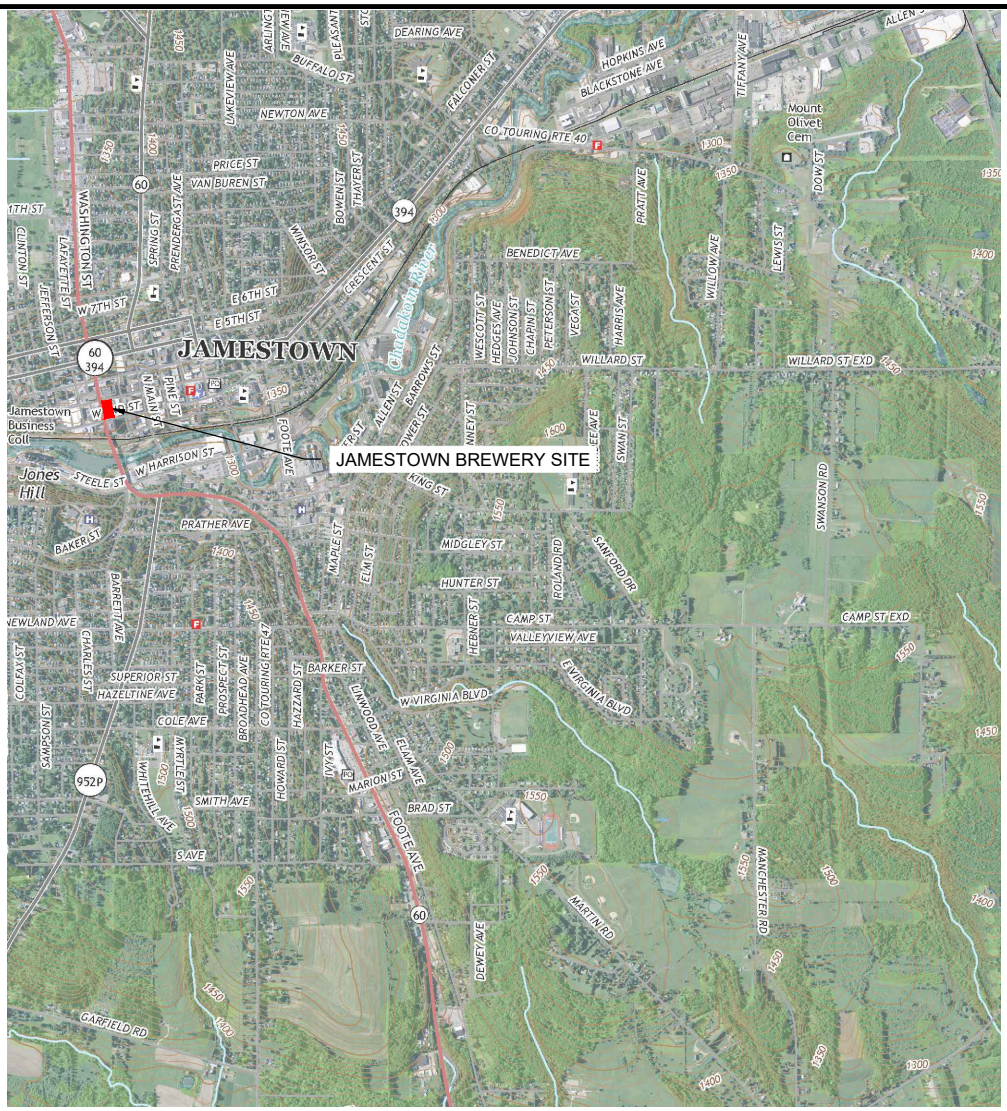
Notes:

1. Full List VOCs = TCL + CP-51 List VOCs via Method 8260.
2. Tentatively Identified Compounds (TICs) will be analyzed per DER-10.
3. 1,4-Dioxane will be analyzed using Method 8270 SIM per NYSDEC guidelines.
4. SVOCs were collected from Samples 1, 3, 5 on December 2, 2021.

PFAS = Perfluoroalkyl Acids
SVOCs = Semi-Volatile Organic Compounds
TCL = Target Compound List
TICs = Tentatively Identified Compounds.
TAL = Target Analyte List
PCBs = Polychlorinated Biphenyls

FIGURES

FIGURE 1

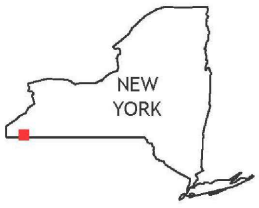


BASEMAP: USGS JAMESTOWN 2016 QUADRANGLE

3,000' 0' 3,000' 6,000'

SCALE: 1 INCH = 3,000 FEET
SCALE IN FEET
(approximate)

N



BENCHMARK
2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218, (716) 856-0599

PROJECT NO.: 0598-021-001

DATE: MAY 2021

DRAFTED BY: RFL-CMC

SITE LOCATION & VICINITY MAP

REMEDIAL ACTION WORK PLAN

JAMESTOWN BREWERY SITE (BCP SITE NO. C907047)
115-121 WEST THIRD STREET
JAMESTOWN, NEW YORK

PREPARED FOR

GPATTI DEVELOPMENT LLC

F:\CAD\Benchmark\Slater Law\Jamestown Brewery Site\RAWP\Figure 2; Site Plan Aerial.dwg, 10/29/2021 3:25:11 PM

FIGURE 2

50' 0' 50' 100'

SCALE: 1 INCH = 50 FEET
SCALE IN FEET
(approximate)

N

LEGEND:

BCP SITE BOUNDARY

BENCHMARK

2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218, (716) 856-0599

PROJECT NO.: 0598-021-001

DATE: MAY 2021

DRAFTED BY: RFL

SITE PLAN (AERIAL)

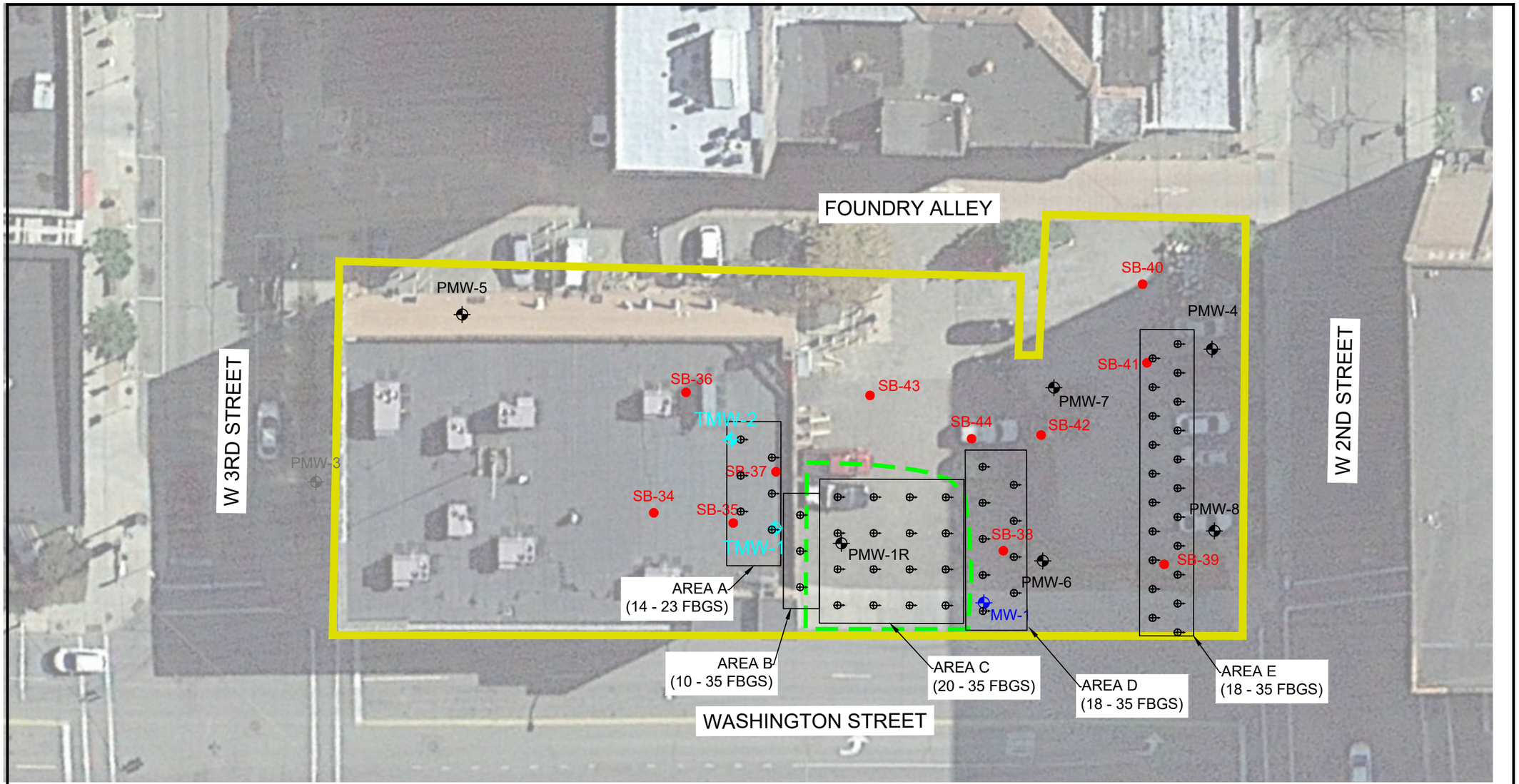
REMEDIAL ACTION WORK PLAN

JAMESTOWN BREWERY SITE (BCP SITE NO. C907047)
115-121 WEST THIRD STREET
JAMESTOWN, NEW YORK

PREPARED FOR

GPATTI DEVELOPMENT LLC

F:\CAD\Benchmark\Slater Law\Jamestown Brewery Site\RAWP\Figure 3; Remedial Action (Injection Locations) (Track 4).dwg, 11/18/2021 11:25:34 AM



LEGEND:

- BCP SITE BOUNDARY
- IRM EXCAVATION EXTENTS (2018)
- PMW-3 — HISTORIC MW (10-29-2017)
- PMW-5 — RI MW (LABELLA, OCTOBER 2019)
- MW-1 — SI MONITORING WELL (2-INCH)
- TW-2 — SI TEMPORARY MONITORING WELL (1-INCH)
- SB-44 — SI SOIL BORING
- PLANNED INJECTION POINT

N

30' 0' 30' 60'

SCALE: 1 INCH = 30 FEET
SCALE IN FEET
(approximate)

AERIAL FROM GOOGLE EARTH 2019

DATE: MAY 2021
DRAFTED BY: RFL

BENCHMARK

2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218.
(716) 856-0599

JOB NO.: 0598-021-001

PLANNED REMEDIAL ACTION TO ACHIEVE CSCOs (TRACK 4)

REMEDIAL ACTION WORK PLAN

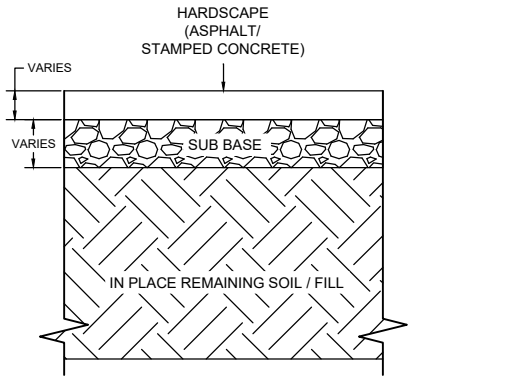
JAMESTOWN BREWERY SITE (BCP SITE NO. C907047)
115-121 WEST THIRD STREET
JAMESTOWN, NEW YORK

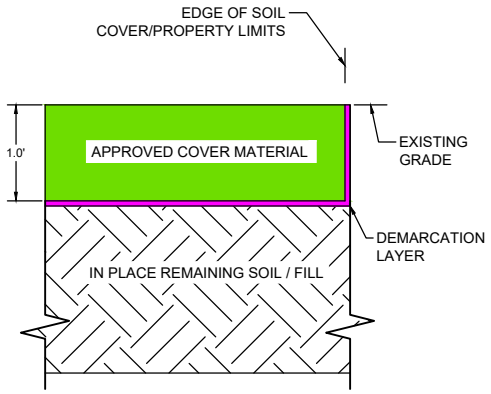
PREPARED FOR

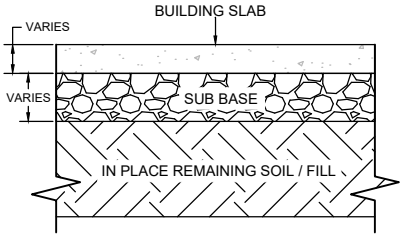
GPATTI DEVELOPMENT LLC

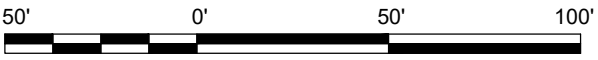
FIGURE 3

FIGURE 4









SCALE: 1 INCH = 50 FEET
SCALE IN FEET
(approximate)

LEGEND:

- BCP SITE BOUNDARY
- PARCEL BOUNDARY
- GREENSPACE COVER
- ASPHALT COVER
- STAMPED CONCRETE COVER
- BUILDING SLAB
- × CONFIRMATORY COVER SOIL SAMPLE

BENCHMARK

2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218, (716) 856-0599

PROJECT NO.: B0598-021-001

DATE: JANUARY 2022

DRAFTED BY: CMC

SITE COVER SYSTEM AND DETAILS

REMEDIAL ACTION WORK PLAN

JAMESTOWN BREWERY SITE (BCP SITE NO. C907047)
115-121 WEST THIRD STREET
JAMESTOWN, NEW YORK

PREPARED FOR

GPATTI DEVELOPMENT LLC

APPENDIX A

HEALTH AND SAFETY PLAN (INCLUDING CAMP)

SITE HEALTH AND SAFETY PLAN
for
BROWNFIELD CLEANUP PROGRAM
REMEDIAL ACTIVITIES

JAMESTOWN BREWERY SITE

JAMESTOWN, NEW YORK

November 2021 B0598-021-003

Prepared for:

GPatti Development, LLC

Prepared By:

Benchmark Civil/Environmental Engineering & Geology, PLLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716) 856-0599

JAMESTOWN BREWERY SITE
HEALTH AND SAFETY PLAN FOR REMEDIAL ACTIVITIES

ACKNOWLEDGEMENT

Plan Reviewed by (initial):

Corporate Health and Safety Director: Thomas H. Forbes, P.E.

Project Manager: Lori E. Riker

Designated Site Safety and Health Officer: Lori E. Riker

Acknowledgement:
I acknowledge that I have reviewed the information contained in this site-specific Health and Safety Plan, and understand the hazards associated with performance of the field activities described herein. I agree to comply with the requirements of this plan.

NAME (PRINT)	SIGNATURE	DATE

JAMESTOWN BREWERY SITE
HEALTH AND SAFETY PLAN FOR REMEDIAL ACTIVITIES

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JAMESTOWN BREWERY SITE
HEALTH AND SAFETY PLAN FOR REMEDIAL ACTIVITIES

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JAMESTOWN BREWERY SITE
HEALTH AND SAFETY PLAN FOR REMEDIAL ACTIVITIES

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1.0 INTRODUCTION

1.1 General

In accordance with OSHA requirements contained in 29CFR 1910.120, this Health and Safety Plan (HASP) describes the specific health and safety practices and procedures to be employed by Benchmark Civil/Environmental Engineering & Geology, PLLC (Benchmark) employees during remedial action activities at the Jamestown Brewery Site (Site) located in Jamestown, Chautauqua County, New York. This HASP presents procedures for Benchmark employees who will be involved with remedial action field activities; it does not cover the activities of other contractors, subcontractors, or other individuals on the Site. These firms will be required to develop and enforce their own HASPs as discussed in Section 2.0. Benchmark accepts no responsibility for the health and safety of contractor, subcontractor, or other personnel.

This HASP presents information on known Site health and safety hazards using available historical information, and identifies the equipment, materials and procedures that will be used to eliminate or control these hazards. Environmental monitoring will be performed during the field activities to provide real-time data for on-going assessment of potential hazards.

1.2 Background

The Site consists of one parcel, located at the southeast corner of West Third Street and Washington Street (Tax ID No. 387.40-3-8), totaling approximately +/- 0.58 acres, located in the City of Jamestown, Chautauqua County, New York. The Site is currently developed with one, three-story 16,147 square foot commercial building on the north portion of the Site and an asphalt-paved parking lot on the south portion of the Site. The commercial building is currently vacant.

The Site has historically operated as a photography studio from at least 1965 to at least 1949 at the historical address 121 West Third Street, a dry cleaner from at least 1965 to at least 1994 at the historical address 214 Washington Street, a taxi garage from at east 1926 to at least 1930 at the historic address 208 Washington Street, a parking garage from at least 1922 to at least 1981 at historic address 212-214 Washington Street, and automotive repair facilities from at least 1930 to at least 1939 at the historic address 210 Washington Street.

A gasoline underground storage tank (UST) was located west of the parking garage within the Washington Street right-of-way proximate the southwest corner of the Site from at least 1930 to at least 1949. There is no information available regarding tank closure. One 3,000-gallon #2 fuel oil UST was also closed-in-place under New York State Department of Environmental Conservation (NYSDEC) direction within the Washington Street right-of-way proximate the west exterior of the Site building in 2003.

1.3 Known and Suspected Environmental Conditions

Previous investigations have confirmed that historic operation as a dry cleaner has impacted that Site, which will require remediation prior to redevelopment. Previous investigation findings include:

- Historic on-Site soil/fill materials were impacted with cVOCs exceeding Part 375 Commercial Soil Cleanup Objectives (CSCOs). This material was removed as part of the IRM. Remaining soil and Supplemental Investigation results are all below Part 375 CSCOs. Several locations remain exceeding Protection of Groundwater (PGW) SCOs. Groundwater within the southern portion of the Site continues to detect cVOCs above GWQSs/GVs. Per- and polyfluoroalkyl substances (PFAS) were identified on-site at wells PMW-1R, PMW-3 and PMW-8 above NYSDEC guidance values.

The RI and Supplemental RI was performed in support of the BCP to determine the nature and extent of impacts from these known and suspect environmental conditions on this parcel. Findings of the RI and Supplemental RI include:

Soil/Fill

The RI and Supplemental RI results confirm soil contamination remains beneath the building and below the IRM excavation extents. The cVOCs in this saturated soil/fill will continue to contribute to groundwater contamination if not remediated. VOCs were not detected above CSCOs at RI locations remaining after IRM activities or at Supplemental Investigation locations.

Groundwater

Historic groundwater sampling detected perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) individually above the NYSDEC guidance value of 10 ng/L (ppt) at wells PMW-1R, PMW-3, and PMW-8.

During the Supplemental Investigation, continued cVOC groundwater contamination was noted at all on-site wells except for PMW-5, which is in the northeast portion of

the Site upgradient of the source area. The following cVOCs were detected at concentrations exceeding their respective GWQS/GVs by three orders of magnitude:

- PCE: TMW-1, TMW-2, MW-1, PMW-4, PMW-6, and PMW-8
- TCE: TMW-1 and TMW-2
- Cis-1,2-DCE: TMW-1 and MW-1
- Vinyl Chloride: MW-1

1.4 Parameters of Interest

Based on the previous investigations, previous Site uses, and RI activities, constituents of potential concern (COPCs) in soil and groundwater at the Site include:

- **Subsurface Soil/Fill –** cVOCs.
- **Groundwater –** cVOCs and PFAS.

1.5 Overview of Remedial Activities

Benchmark personnel will be on-site to observe and perform remedial activities. The field activities to be completed as part of the remediation are described below.

1. In-situ injection at five separate areas across the southern portion of the Site.
2. Waste characterization sampling.
3. Post-injection performance groundwater monitoring sampling.
4. Repairing the asphalt hardscape cover and verifying that the upper 12 inches of soil in landscaped areas meet CSCOs or replace with suitable soil or hardscape cover.

2.0 ORGANIZATIONAL STRUCTURE

This section of the HASP describes the lines of authority, responsibility, and communication as they pertain to health and safety functions at the Site. The purpose of this chapter is to identify the personnel who impact the development and implementation of the HASP and to describe their roles and responsibilities. This chapter also identifies other contractors and subcontractors involved in work operations and establish the lines of communications among them for health and safety matters. The organizational structure described in this chapter is consistent with the requirements of 29CFR 1910.120(b)(2). This section will be reviewed by the Project Manager and updated as necessary to reflect the current organizational structure at this Site.

2.1 Roles and Responsibilities

Benchmark personnel on the Site must comply with the minimum requirements of this HASP. The specific responsibilities and authority of management, safety and health, and other personnel on this Site are detailed in the following paragraphs.

2.1.1 Corporate Health and Safety Director

The Benchmark Corporate Health and Safety Director is ***Mr. Thomas H. Forbes, P.E.*** The Corporate Health and Safety Director responsible for developing and implementing the Health and Safety program and policies for Benchmark and consulting with corporate management to ensure adequate resources are available to properly implement these programs and policies. The Corporate Health and Safety Director coordinates Benchmark's Health and Safety training and medical monitoring programs and assists project management and field staff in developing site-specific health and safety plans.

2.1.2 Project Manager

The Project Manager for this Site is ***Ms. Lori E. Riker.*** The Project Manager has the responsibility and authority to direct all Benchmark work operations at the Site. The Project Manager coordinates safety and health functions with the Site Safety and Health Officer, and bears ultimate responsibility for proper implementation of this HASP. They may delegate authority to expedite and facilitate any application of the program, including modifications to the overall project approach as necessary to circumvent unsafe work conditions. Specific duties of the Project Manager include:

- Preparing and coordinating the Site work plan.
- Providing Benchmark workers with work assignments and overseeing their performance.
- Coordinating health and safety efforts with the Site Safety and Health Officer (SSHO).
- Reviewing the emergency response coordination plan to assure its effectiveness.
- Serving as the primary liaison with Site contractors and the property owner.

2.1.3 Site Safety and Health Officer

The SSHO for this Site is ***Ms. Lori E. Riker***. The SSHO reports to the Project Manager. The SSHO is on-site or readily accessible to the Site during work operations and has the authority to halt Site work if unsafe conditions are detected. The specific responsibilities of the SSHO are:

- Managing the safety and health functions for Benchmark personnel on the Site.
- Serving as the point of contact for safety and health matters.
- Ensuring that Benchmark field personnel working on the Site have received proper training (per 29CFR Part 1910.120(e)), that they have obtained medical clearance to wear respiratory protection (per 29CFR Part 1910.134), and that they are properly trained in the selection, use and maintenance of personal protective equipment, including qualitative respirator fit testing.
- Performing or overseeing Site monitoring as required by the HASP.
- Assisting in the preparation and review of the HASP.
- Maintaining site-specific safety and health records as described in this HASP.
- Coordinating with the Project Manager, Site Workers, and Contractor's SSHO as necessary for safety and health efforts.

2.1.4 Site Workers

Site workers are responsible for: complying with this HASP or a more stringent HASP, if appropriate (i.e., Contractor and Subcontractor's HASP); using proper PPE; reporting unsafe acts and conditions to the SSHO; and following the safety and health instructions of the Project Manager and SSHO.

2.1.5 Other Site Personnel

Other Site personnel who will have health and safety responsibilities will include the Drilling Contractor, who will be responsible for developing, implementing, and enforcing a HASP equally stringent or more stringent than Benchmark's HASP. Benchmark assumes no responsibility for the health and safety of anyone outside its direct employ. Each Contractor's HASP shall cover all non-Benchmark Site personnel. Each Contractor shall assign a SSHO who will coordinate with Benchmark's SSHO as necessary to ensure effective lines of communication and consistency between contingency plans.

In addition to Benchmark and Contractor personnel, other individuals who may have responsibilities in the work zone include subcontractors and governmental agencies performing Site inspection work (i.e., NYSDEC). The Contractor shall be responsible for ensuring that these individuals have received OSHA-required training (29CFR 1910.120(e)), including initial, refresher and site-specific training, and shall be responsible for the safety and health of these individuals while they are on-site.

3.0 HAZARD EVALUATION

Due to the presence of certain contaminants at the Site, the possibility exists that workers will be exposed to hazardous substances during field activities. The principal points of exposure would be through direct contact with groundwater. Other points of exposure may include incidental ingestion of soil, and through the inhalation of contaminated particles or vapors. In addition, the use of drilling equipment will also present conditions for potential physical injury to workers. Further, since work will be performed outdoors, the potential exists for heat/cold stress to impact workers, especially those wearing protective equipment and clothing. Adherence to the medical evaluations, worker training relative to chemical hazards, safe work practices, proper personal protection, environmental monitoring, establishment work zones and Site control, appropriate decontamination procedures and contingency planning outlined herein will reduce the potential for chemical exposures and physical injuries.

3.1 Chemical Hazards

As discussed in Section 1.3, historic activities have potentially resulted in impacts to Site soils and groundwater. Table 1 lists exposure limits for airborne concentrations of the COPCs identified in Section 1.4 of this HASP. Brief descriptions of the toxicology of the prevalent COPCs and related health and safety guidance and criteria are provided below.

1. **Chlorinated Volatile Organic Compound:**
    - **Trichloroethene (CAS #79-01-6)** is a chlorinated hydrocarbon with a sweet smell. Also known as TCE, it was commonly used in degreasing operations. Acute (short-term) and chronic (long-term) inhalation exposure to trichloroethene (TCE) can affect the human central nervous system (CNS), with symptoms such as dizziness, headaches, confusion, euphoria, facial numbness, and weakness.
    - **Tetrachloroethene (CAS #127-18-4)** was formerly widely used in dry cleaning operations as a solvent. Tetrachloroethene (PCE) is harmful by ingestion inhalation and skin absorption. Exposure can cause dermatitis, dizziness, nausea, liver, and kidney damage. This compound is a suspected carcinogen.
    - **Cis-1,2-Dichloroethene (CAS #156-59-2)** is a highly flammable organochloride with a sharp odor. Also known as cis-1,2-DCE, it is a breakdown product of the anaerobic reduction of trichloroethene or TCE,

which effects the central nervous system.

- **Vinyl Chloride (CAS #75-01-4)** is a breakdown product of TCE and is classified by EPA as a human carcinogen. Acute (short-term) exposure to high levels of vinyl chloride (VC) in air has resulted in CNS effects, such as dizziness, drowsiness, and headaches in humans. Chronic (long-term) exposure to vinyl chloride through inhalation and oral exposure in humans has resulted in liver damage.

2. **Per- and Polyfluoroalkyl Substances (PFAS)** are a family of human-made chemicals that are found in a wide range of products used by consumers and industry. PFAS have been used in a variety of applications including stain- and water-resistant fabrics and carpeting, cleaning products, paints, and fire-fighting foams. While the science surrounding potential health effects of PFAS is developing, current evidence suggests that the bioaccumulation of certain PFAS may cause serious health conditions.

With respect to the anticipated remedial activities discussed in Section 1.5, possible routes of exposure to the above-mentioned contaminants are presented in Table 2. The use of proper respiratory equipment, as outlined in Section 7.0 of this HASP, will minimize the potential for exposure to airborne contamination. Exposure to contaminants through dermal and other routes will also be minimized by using protective clothing (Section 7.0), safe work practices (Section 6.0), and proper decontamination procedures (Section 12.0).

3.2 Physical Hazards

Remedial field activities at the Jamestown Brewery Site may present the following physical hazards:

- Physical injury during use of heavy construction equipment such as backhoes, excavators, and drilling equipment.
- Heat/cold stress to employees during the summer/winter months (see Section 10).
- Slip and fall injuries due to rough, uneven terrain and/or open excavations.

These hazards represent only some of the possible means of injury that may be present during remedial operations and sampling activities at the Site. Since it is impossible to list all potential sources of injury, it shall be the responsibility of the individual to exercise proper care and caution during all phases of the work.

4.0 TRAINING

4.1 Site Workers

Personnel performing remedial activities at the Site (such as, but not limited to, equipment operators and general laborers) and who may be exposed to hazardous substances, health hazards, or safety hazards and their supervisors/managers responsible for the Site shall receive training in accordance with 29CFR 1910.120(e) before they are permitted to engage in operations in the exclusion zone or contaminant reduction zone. This training includes an initial 40-hour Hazardous Waste Site Worker Protection Course, an 8-hour Annual Refresher Course after the initial 40-hour training, and 3 days of actual field experience under the direct supervision of a trained, experienced supervisor. Additional site-specific training shall also be provided by the SSHO prior to the start of field activities. A description of topics to be covered by this training is provided below.

4.1.1 Initial and Refresher Training

Initial and refresher training is conducted by a qualified instructor as specified under OSHA 29CFR 1910.120(e)(5), and is specifically designed to meet the requirements of OSHA 29CFR 1910.120(e)(3) and 1910.120(e)(8). The training covers, as a minimum, the following topics:

- OSHA HAZWOPER regulations.
- Site safety and hazard recognition, including chemical and physical hazards.
- Medical monitoring requirements.
- Air monitoring, permissible exposure limits, and respiratory protection level classifications.
- Appropriate use of personal protective equipment (PPE), including chemical compatibility and respiratory equipment selection and use.
- Work practices to minimize risk.
- Work zones and Site control.
- Safe use of engineering controls and equipment.
- Decontamination procedures.
- Emergency response and escape.

- Confined space entry procedures.
- Heat and cold stress monitoring.
- Elements of a Health and Safety Plan.
- Spill containment.

Initial training also incorporates workshops for PPE and respiratory equipment use (Levels A, B and C), and respirator fit testing. Records and certification received from the course instructor documenting each employee's successful completion of the training identified above are maintained on file at Benchmark's Buffalo, NY office. Contractors and Subcontractors are required to provide similar documentation of training for all their personnel who will be involved in on-site work activities.

Any employee who has not been certified as having received health and safety training in conformance with 29CFR 1910.120(e) is prohibited from working in the exclusion and contamination reduction zones, or to engage in any on-site work activities that may involve exposure to hazardous substances or wastes.

4.1.2 Site Training

Site workers are given a copy of the HASP and provided a site-specific briefing prior to the commencement of work to ensure that employees are familiar with the HASP and the information and requirements it contains. The Site briefing shall be provided by the SSHO prior to initiating field activities and shall include:

- Names of personnel and alternates responsible for Site safety and health.
- Safety, health, and other hazards present on the Site.
- The site lay-out including work zones and places of refuge.
- The emergency communications system and emergency evacuation procedures.
- Use of PPE.
- Work practices by which the employee can minimize risks from hazards.
- Safe use of engineering controls and equipment on the site.
- Medical surveillance, including recognition of symptoms and signs of over-exposure as described in Chapter 5 of this HASP.
- Decontamination procedures as detailed in Chapter 12 of this HASP.
- The emergency response plan as detailed in Chapter 15 of this HASP.

- Confined space entry procedures, if required, as detailed in Chapter 13 of this HASP.
- The spill containment program as detailed in Chapter 9 of this HASP.
- Site control as detailed in Chapter 11 of this HASP.

Supplemental health and safety briefings will also be conducted by the SSHO on an as-needed basis during the work. Supplemental briefings are provided as necessary to notify employees of any changes to this HASP due to information gathered during ongoing Site characterization and analysis. Conditions for which the SSHO may schedule additional briefings include, but are not limited to a change in Site conditions (e.g., based on monitoring results); changes in the work schedule/plan; newly discovered hazards; and safety incidents occurring during Site work.

4.2 Supervisor Training

On-site safety and health personnel who are directly responsible for or who supervise the safety and health of workers engaged in hazardous waste operations (i.e., SSHO) shall receive, in addition to the appropriate level of worker training described in Section 4.1, above, 8 additional hours of specialized supervisory training, in compliance with 29CFR 1910.120(e)(4).

4.3 Emergency Response Training

Emergency response training is addressed in Appendix A of this HASP, Emergency Response Plan.

4.4 Site Visitors

Each Contractor's SSHO will provide a site-specific briefing to Site visitors and other non-Benchmark personnel who enter the Site beyond the Site entry point. The site-specific briefing will provide information about Site hazards, the Site layout including work zones and places of refuge, the emergency communications system and emergency evacuation procedures, and other pertinent safety and health requirements as appropriate.

Site visitors will not be permitted to enter the exclusion zone or contaminant reduction zones unless they have received the level of training required for Site workers as described in Section 4.1.

5.0 MEDICAL MONITORING

Medical monitoring examinations are provided to Benchmark employees as stipulated under 29CFR Part 1910.120(f). These exams include initial employment, annual and employment termination physicals for Benchmark employees involved in hazardous waste site field operations. Post-exposure examinations are also provided for employees who may have been injured, received a health impairment, or developed signs or symptoms of over-exposure to hazardous substances or were accidentally exposed to substances at concentrations above the permissible exposure limits without necessary personal protective equipment. Such exams are performed as soon as possible following development of symptoms or the known exposure event.

Medical evaluations are performed by Health Works, an occupational health care provider under contract with Benchmark. Health Works is in the Seneca Square Plaza, 1900 Ridge Road, West Seneca, New York 14224. The facility can be reached at (716) 823-5050 to schedule routine appointments or post-exposure examinations.

Medical evaluations are conducted according to the Benchmark Medical Monitoring Program and include an evaluation of the workers' ability to use respiratory protective equipment. The examinations include:

- Occupational/medical history review.
- Physical exam, including vital sign measurement.
- Spirometry testing.
- Eyesight testing.
- Audio testing (minimum baseline and exit, annual for employees routinely exposed to greater than 85db).
- EKG (for employees >40 years age or as medical conditions dictate).
- Chest X-ray (baseline and exit, and every 5 years).
- Blood biochemistry (including blood count, white cell differential count, serum multiplastic screening).
- Medical certification of physical requirements (i.e., sight, musculoskeletal, cardiovascular) for safe job performance and to wear respiratory protection equipment.

The purpose of the medical evaluation is to determine an employee's fitness for duty on hazardous waste sites; and to establish baseline medical data.

In conformance with OSHA regulations, Benchmark will maintain and preserve medical records for a period of 30 years following termination of employment. Employees are provided a copy of the physician's post-exam report, and have access to their medical records and analyses.

6.0 SAFE WORK PRACTICES

Benchmark employees shall conform to the following safe work practices during on-site work activities conducted within the exclusion and contamination reduction zones:

- Eating, drinking, chewing gum or tobacco, smoking, or any practice that increases the probability of hand-to-mouth contact is strictly prohibited.
- The hands and face must be thoroughly washed upon leaving the work area and prior to engaging in any activity indicated above.
- Respiratory protective equipment and clothing must be worn by all personnel entering the Site as required by the HASP or as modified by the Site safety officer. Excessive facial hair (i.e., beards, long mustaches, or sideburns) that interferes with the satisfactory respirator-to-face seal is prohibited.
- Contact with surfaces/materials either suspected or known to be contaminated will be avoided to minimize the potential for transfer to personnel, cross contamination and need for decontamination.
- Medicine and alcohol can synergize the effects of exposure to toxic chemicals. Due to possible contraindications, use of prescribed drugs should be reviewed with the Benchmark occupational physician. Alcoholic beverage and illegal drug intake are strictly forbidden during the workday.
- Personnel shall be familiar with standard operating safety procedures and additional instructions contained in this Health and Safety Plan.
- On-site personnel shall use the "buddy" system. No one may work alone (i.e., out of earshot or visual contact with other workers) in the exclusion zone.
- Personnel and equipment in the contaminated area shall be minimized, consistent with effective Site operations.
- Employees have the obligation to immediately report and if possible, correct unsafe work conditions.
- Use of contact lenses on-site will not be permitted. Spectacle kits for insertion into full-face respirators will be provided for Benchmark employees, as requested, and required.

The recommended specific safety practices for working around the contractor's equipment (e.g., backhoes, bulldozers, excavators, drill rigs etc.) are as follows:

- Although the Contractor and subcontractors are responsible for their equipment and safe operation of the Site, Benchmark personnel are also responsible for their own safety.

- Subsurface work will not be initiated without first clearing underground utility services.
- Heavy equipment should not be operated within 20 feet of overhead wires. This distance may be increased if windy conditions are anticipated or if lines carry high voltage. The Site should also be sufficiently clear to ensure the project staff can move around the heavy machinery safely.
- Care should be taken to avoid overhead wires when moving heavy-equipment from location to location.
- Hard hats, safety boots and safety glasses should be worn in the vicinity of heavy equipment. Hearing protection is also recommended.
- The work Site should be kept neat. This will prevent personnel from tripping and will allow for fast emergency exit from the Site.
- Proper lighting must be provided when working at night.
- Construction activities should be discontinued during an electrical storm or severe weather conditions.
- The presence of combustible gases should be checked before igniting any open flame.
- Personnel shall stand upwind of any construction operation when not immediately involved in sampling/logging/observing activities.
- Personnel will not approach the edge of an unsecured trench/excavation closer than two feet.

7.0 PERSONAL PROTECTIVE EQUIPMENT

7.1 Equipment Selection

Personal protective equipment (PPE) will be donned when work activities may result in exposure to physical or chemical hazards beyond acceptable limits, and when such exposure can be mitigated through appropriate PPE. The selection of PPE will be based on an evaluation of the performance characteristics of the PPE relative to the requirements and limitations of the Site, the task-specific conditions and duration, and the hazards and potential hazards identified at the Site.

Equipment designed to protect the body against contact with known or suspect chemical hazards are grouped into four categories according to the degree of protection afforded. These categories designated A through D consistent with United States Environmental Protection Agency (USEPA) Level of Protection designation, are:

- **Level A:** Should be selected when the highest level of respiratory, skin and eye protection is needed.
- **Level B:** Should be selected when the highest level of respiratory protection is needed, but a lesser level of skin protection is required. Level B protection is the minimum level recommended on initial Site entries until the hazards have been further defined by on-site studies. Level B (or Level A) is also necessary for oxygen-deficient atmospheres.
- **Level C:** Should be selected when the types of airborne substances are known, the concentrations have been measured and the criteria for using air-purifying respirators are met. In atmospheres where no airborne contaminants are present, Level C provides dermal protection only.
- **Level D:** Should not be worn on any Site with elevated respiratory or skin hazards. This is generally a work uniform providing minimal protection.

OSHA requires the use of certain PPE under conditions where an immediate danger to life and health (IDLH) may be present. Specifically, OSHA 29CFR 1910.120(g)(3)(iii) requires use of a positive pressure self-contained breathing apparatus, or positive pressure air-line respirator equipped with an escape air supply when chemical exposure levels present a substantial possibility of immediate serious injury, illness, or death, or impair the ability to escape. Similarly, OSHA 29CFR 1910.120(g)(3)(iv) requires donning totally-encapsulating chemical protective suits (with a protection level equivalent to Level A protection) in

conditions where skin absorption of a hazardous substance may result in a substantial possibility of immediate serious illness, injury, or death, or impair the ability to escape.

In situations where the types of chemicals, concentrations, and possibilities of contact are unknown, the appropriate level of protection must be selected based on professional experience and judgment until the hazards can be further characterized. The individual components of clothing and equipment must be assembled into a full protective ensemble to protect the worker from site-specific hazards, while at the same time minimizing hazards and drawbacks of the personal protective gear itself. Ensemble components are detailed below for levels A/B, C, and D protection.

7.2 Protection Ensembles

7.2.1 Level A/B Protection Ensemble

Level A/B ensembles include similar respiratory protection; however, Level A provides a higher degree of dermal protection than Level B. Use of Level A over Level B is determined by: comparing the concentrations of identified substances in the air with skin toxicity data, and assessing the effect of the substance (by its measured air concentrations or splash potential) on the small area of the head and neck unprotected by Level B clothing. The recommended PPE for level A/B is:

- Pressure-demand, full-face piece self-contained breathing apparatus (MSHA/NIOSH approved) or pressure-demand supplied-air respirator with escape self-contained breathing apparatus (SCBA).
- Chemical-resistant clothing. For Level A, clothing consists of totally-encapsulating chemical resistant suit. Level B incorporates hooded one-or two-piece chemical splash suit.
- Inner and outer chemical resistant gloves.
- Chemical-resistant safety boots/shoes.
- Hardhat.

7.2.2 Level C Protection Ensemble

Level C protection is distinguished from Level B by the equipment used to protect the respiratory system, assuming the same type of chemical-resistant clothing is used. The main selection criterion for Level C is that conditions permit wearing an air-purifying device.

The device (when required) must be an air-purifying respirator (MSHA/NIOSH approved) equipped with filter cartridges. Cartridges must be able to remove the substances encountered. Respiratory protection will be used only with proper fitting, training, and the approval of a qualified individual. In addition, an air-purifying respirator can be used only if oxygen content of the atmosphere is at least 19.5% in volume; substances are identified and concentrations measured; substances have adequate warning properties; the individual passes a qualitative fit-test for the mask; and an appropriate cartridge/canister is used, and its service limit concentration is not exceeded. Recommended PPE for Level C conditions includes:

- Full-face piece, air-purifying respirator equipped with MSHA/NIOSH-approved organic vapor/acid gas/dust/mist combination cartridges or as designated by the SSHO.
- Chemical-resistant clothing (hooded, one or two-piece chemical splash suit or disposable chemical-resistant one-piece suit).
- Inner and outer chemical-resistant gloves.
- Chemical-resistant safety boots/shoes.
- Hardhat.

An air-monitoring program is part of all response operations when atmospheric contamination is known or suspected. It is particularly important that the air be monitored thoroughly when personnel are wearing air-purifying respirators. Continual surveillance using direct-reading instruments is needed to detect any changes in air quality necessitating a higher level of respiratory protection.

7.2.3 Level D Protection Ensemble

As indicated above, Level D protection is primarily a work uniform. It can be worn in areas where only boots can be contaminated, where there are no inhalable toxic substances and where the atmospheric contains at least 19.5% oxygen. Recommended PPE for Level D includes:

- Coveralls.
- Safety boots/shoes.
- Safety glasses or chemical splash goggles.
- Hardhat.

- Optional gloves; escape mask; face shield.

7.2.4 Recommended Level of Protection for Site Tasks

Based on current information regarding both the contaminants suspected to be present at the Site and the various tasks that are included in the remedial activities, the minimum required levels of protection for these tasks shall be as identified in Table 3.

8.0 EXPOSURE MONITORING

8.1 General

Based on the results of historic sample analysis and the nature of the proposed work activities at the Site, the possibility exists that organic vapors and/or particulates may be released to the air during intrusive construction activities. Ambient breathing zone concentrations may at times, exceed the permissible exposure limits (PELs) established by OSHA for the individual compounds (see Table 1), in which case respiratory protection will be required. Respiratory and dermal protection may be modified (upgraded or downgraded) by the SSHO based upon real-time field monitoring data. Weekly CAMP summary tables will be provided to the NYSDOH project manager on a weekly basis. Both the Department and NYSDOH project managers will be notified of any CAMP exceedances that required corrections actions or shut down of work within one business day.

8.1.1 On-Site Work Zone Monitoring

Benchmark personnel will conduct routine, real-time air monitoring during intrusive construction phases such as excavation, backfilling, drilling, etc. The work area will be monitored at regular intervals using a photoionization detector (PID) and a particulate meter. Observed values will be recorded and maintained as part of the permanent field record.

Additional air monitoring measurements may be made by Benchmark personnel to verify field conditions during subcontractor oversight activities. Monitoring instruments will be protected from surface contamination during use. Additional monitoring instruments may be added if the situations or conditions change. Monitoring instruments will be calibrated in accordance with manufacturer's instructions before use.

8.1.2 Off-Site Community Air Monitoring

In addition to on-Site monitoring within the work zone(s), continuous monitoring at the upwind and downwind portion of the Site perimeter will be conducted for volatile organic compounds and particulates. This will provide a real-time method for determination of vapor and/or particulate releases to the surrounding community from ground intrusive investigation work.

Ground intrusive activities are defined in the Generic Community Air Monitoring Plan and attached as Appendix C. Ground intrusive activities include drilling proposed injection points. Non-intrusive activities include the collection of groundwater samples from existing wells or the collection of soil and sediment samples. Continuous monitoring is required for ground intrusive activities and periodic monitoring is required for non-intrusive activities. Periodic monitoring consists of taking a reading upon arrival at a sample location, monitoring while opening a well cap or overturning soil, monitoring while bailing a well, and taking a reading prior to leaving a sampling location. This may be upgraded to continuous if the sampling location is near individuals not involved in the Site activity (i.e., on a curb of a busy street). The action levels below will be used during periodic monitoring.

8.2 Monitoring Action Levels

8.2.1 On-Site Work Zone Action Levels

The PID, or other appropriate instrument(s), will be used by Benchmark personnel to monitor organic vapor concentrations as specified in this HASP. In addition, fugitive dust/particulate concentrations will be monitored during major soil intrusion (i.e., well/boring installation) using a real-time particulate monitor as specified in this plan. In the absence of such monitoring, appropriate respiratory protection for particulates shall be donned. Sustained readings obtained in the breathing zone may be interpreted (compared to other Site conditions) as follows for Benchmark personnel:

- Total atmospheric concentrations of unidentified vapors or gases ranging from 0 to 1 ppm above background on the PID) - Continue operations under Level D (see Appendix A).
- Total atmospheric concentrations of unidentified vapors or gases yielding sustained readings from >1 ppm to 5 ppm above background on the PID (vapors not suspected of containing high levels of chemicals toxic to the skin) - Continue operations under Level C (see Appendix A).
- Total atmospheric concentrations of unidentified vapors or gases yielding sustained readings of >5 ppm to 50 ppm above background on the PID - Continue operations under Level B (see Attachment 1), re-evaluate and alter (if possible) construction methods to achieve lower vapor concentrations.
- Total atmospheric concentrations of unidentified vapors or gases above 50 ppm on the PID - Discontinue operations and exit the work zone immediately.

The particulate monitor will be used to monitor respirable dust concentrations during intrusive activities and during handling of Site soil/fill. Action levels based on the instrument readings shall be as follows:

- Less than 50 mg/m3 - Continue field operations.
- 50-150 mg/m3 - Don dust/particulate mask or equivalent
- Greater than 150 mg/m3 - Don dust/particulate mask or equivalent. Initiate engineering controls to reduce respirable dust concentration (viz., wetting of excavated soils or tools at discretion of Site Health and Safety Officer).

Readings from the field equipment will be recorded and documented on the appropriate Project Field Forms. Instruments will be calibrated daily before use and the procedure will be documented on the appropriate Project Field Forms.

8.2.2 Community Air Monitoring Action Levels

In addition to the action levels prescribed in Section 8.2.1 for Benchmark personnel on-site, the following criteria shall also be adhered to for the protection of downwind receptors consistent with NYSDOH requirements (Appendix C):

- **ORGANIC VAPOR PERIMETER MONITORING:**
  - If the sustained ambient air concentration of organic vapors at the downwind perimeter of the exclusion zone exceeds 5 ppm above background for the 15-minute average, work activities will be temporarily halted and monitoring continued. If the sustained organic vapor decreases below 5 ppm over background, work activities can resume with continued monitoring.
  - If the sustained ambient air concentration of organic vapors at the downwind perimeter of the exclusion zone are greater than 5 ppm over background but less than 25 ppm for the 15-minute average, activities can resume provided that: the organic vapor level 200 feet downwind of the working site or half the distance to the nearest off-site residential or commercial structure, whichever is less, but in no case less than 20 feet, is below 5 ppm over background; and more frequent intervals of monitoring, as directed by the Site Health and Safety Officer, are conducted.
  - If the sustained organic vapor level is above 25 ppm at the perimeter of the exclusion zone for the 15-minute average, the Site Health and Safety Officer must be notified, and work activities shut down. The Site Health and Safety Officer will determine when re-entry of the exclusion zone is possible and will implement downwind air

monitoring to ensure vapor emissions do not impact the nearest off-site residential or commercial structure at levels exceeding those specified in the ***Organic Vapor Contingency Monitoring Plan*** below. All readings will be recorded and will be available for NYSDEC and New York State Department of Health (NYSDOH) personnel to review.

- **ORGANIC VAPOR CONTINGENCY MONITORING PLAN:**
  - If the sustained organic vapor level is greater than 5 ppm over background 200 feet downwind from the work area or half the distance to the nearest off-site residential or commercial property, whichever is less, all work activities must be halted.
  - If, following the cessation of the work activities or as the result of an emergency, sustained organic levels persist above 5 ppm above background 200 feet downwind or half the distance to the nearest off-site residential or commercial property from the work area, then the air quality must be monitored within 20 feet of the perimeter of the nearest off-site residential or commercial structure (20-foot zone).
  - If efforts to abate the emission source are unsuccessful and if sustained organic vapor levels approach or exceed 5 ppm above background within the 20-foot zone for more than 30 minutes, or are sustained at levels greater than 10 ppm above background for longer than one minute, then the ***Major Vapor Emission Response Plan*** (see below) will automatically be placed into effect.

- **MAJOR VAPOR EMISSION RESPONSE PLAN:**

  Upon activation, the following activities will be undertaken:

  1. All Emergency Response Contacts as listed in this Health and Safety Plan and the Emergency Response Plan (Appendix A) will be advised.
  2. The local police authorities will immediately be contacted by the Site Health and Safety Officer and advised of the situation.
  3. Frequent air monitoring will be conducted at 30-minute intervals within the 20-foot zone. If two sustained successive readings below action levels are measured, air monitoring may be halted or modified by the Site Health and Safety Officer.

The following personnel are to be notified in the listed sequence if the Major Vapor Emission Plan is activated:

Responsible Person	Contact	Phone Number
SSHO	Police	911
SSHO	State Emergency Response Hotline	(800) 457-7362

Additional emergency numbers are listed in the Emergency Response Plan included as Appendix A.

- **EXPLOSIVE VAPORS:**
  - Sustained atmospheric concentrations of greater than 10% LEL in the work area - Initiate combustible gas monitoring at the downwind portion of the Site perimeter.
  - Sustained atmospheric concentrations of greater than 10% LEL at the downwind Site perimeter – Halt work and contact local Fire Department.

- **AIRBORNE PARTICULATE COMMUNITY AIR MONITORING**
  - Respirable (PM-10) particulate monitoring will be performed on a continuous basis at the upwind and downwind perimeter of the exclusion zone. The monitoring will be performed using real-time monitoring equipment capable of measuring PM-10 and integrating over a period of 15-minutes for comparison to the airborne particulate action levels. The equipment will be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration will be visually assessed during all work activities. All readings will be recorded and will be available for NYSDEC and NYSDOH review. Readings will be interpreted as follows:
  - If the downwind PM-10 particulate level is 100 micrograms per cubic meter (ug/m^3) greater than the background (upwind perimeter) reading 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 provided that the downwind PM-10 particulate levels do not exceed 150 ug/m^3 above the upwind level and that visible dust is not migrating from the work area.
  - If, after implementation of dust suppression techniques downwind PM-10 levels are greater than 150 ug/m^3 above the upwind level, work activities must be stopped, and dust suppression controls re-evaluated. Work can resume provided that supplemental dust suppression measures and/or other controls are successful in reducing the

downwind PM-10 particulate concentration to within 150 ug/m^3 of the upwind level and in preventing visible dust migration.

Pertinent emergency response information including the telephone number of the Fire Department is included in the Emergency Response Plan (Appendix A).

9.0 SPILL RELEASE/RESPONSE

This chapter of the HASP describes the potential for and procedures related to spills or releases of known or suspected petroleum and/or hazardous substances on the Site. The purpose of this Section of the HASP is to plan appropriate response, control, counter-measures, and reporting, consistent with OSHA requirements in 29CFR 1910.120(b)(4)(ii)(J) and (j)(1)(viii). The spill containment program addresses the following elements:

- Potential hazardous material spills and available controls.
- Initial notification and evaluation.
- Spill response.
- Post-spill evaluation.

9.1 Potential Spills and Available Controls

An evaluation was conducted to determine the potential for hazardous material and oil/petroleum spills at this Site. For this evaluation, hazardous materials posing a significant spill potential are:

- CERCLA Hazardous Substances as identified in 40CFR Part 302, where such materials pose the potential for release above their corresponding Reportable Quantity (RQ).
- Extremely Hazardous Substances as identified in 40CFR Part 355, Appendix A, where such materials pose the potential for release above their corresponding Reportable Quantity (RQ).
- Hazardous Chemicals as defined under Section 311(e) of the Emergency Planning and Community Right-To-Know Act of 1986, where such chemicals are present or will be stored above 10,000 lbs.
- Toxic Chemicals as defined in 40CFR Part 372, where such chemicals are present or will be stored above 10,000 lbs.
- Chemicals regulated under 6NYCRR Part 597, where such materials pose the potential for release above their corresponding Reportable Quantity (RQ).

Oil/petroleum products are considered to pose a significant spill potential whenever the following situations occur:

- The potential for a "harmful quantity" of oil (including petroleum and non-petroleum-based fuels and lubricants) to reach navigable waters of the U.S. exists (40CFR Part 112.4). Harmful quantities are considered by USEPA to be volumes

that could form a visible sheen on the water or violate applicable water quality standards.

- The potential for any amount of petroleum to reach any waters of NY State, including groundwater, exists. Petroleum, as defined by NY State in 6NYCRR Part 612, is a petroleum-based heat source, energy source, or engine lubricant/ maintenance fluid.
- The potential for any release, to soil or water, of petroleum from a bulk storage facility regulated under 6NYCRR Part 612. A regulated petroleum storage facility is defined by NY State as a site having stationary tank(s) and intra-facility piping, fixtures, and related equipment with an aggregate storage volume of 1,100 gallons or greater.

9.2 Initial Spill Notification and Evaluation

Any worker who discovers a hazardous substance or oil/petroleum spill will immediately notify the Project Manager and SSHO. The worker will, to the best of his/her ability, report the material involved, the location of the spill, the estimated quantity of material spilled, the direction/flow of the spill material, related fire/explosion incidents, if any, and any associated injuries. The Emergency Response Plan presented in Attachment H2 of this HASP will immediately be implemented if an emergency release has occurred.

Following initial report of a spill, the Project Manager will make an evaluation as to whether the release exceeds RQ levels. If an RQ level is exceeded, the Project Manager will notify the Site owner and NYSDEC at 1-800-457-7362 within 2 hours of spill discovery. The Project Manager will also determine what additional agencies (e.g., USEPA) are to be contacted regarding the release, and will follow-up with written reports as required by the applicable regulations.

9.3 Spill Response

For spill situations, the following general response guidelines will apply:

- Only those personnel involved in overseeing or performing containment operations will be allowed within the spill area. If necessary, the area will be roped, ribboned, or otherwise blocked off to prevent unauthorized access.
- Appropriate PPE, as specified by the SSHO, will be donned before entering the spill area.
- Ignition points will be extinguished/removed if fire or explosion hazards exist.
- Surrounding reactive materials will be removed.

- Drains or drainage in the spill area will be blocked to prevent inflow of spilled materials or applied materials.

For minor spills, the Contractor will maintain a Spill Control and Containment Kit in the Field Office or other readily accessible storage location. The kit will consist of, at a minimum, a 50 lb. bag of "speedy dry" granular absorbent material, absorbent pads, shovels, empty 5-gallon pails and an empty open-top 55-gallon drum. Spilled materials will be absorbed, and shoveled into a 55-gallon drum for proper disposal (NYSDEC approval will be secured for on-site treatment of the impacted soils/absorbent materials, if applicable). Impacted soils will be hand-excavated to the point that no visible signs of contamination remain and drummed with the absorbent.

In the event of a major release or a release that threatens surface water, a spill response contractor will be called to the Site. The response contractor may use heavy equipment (e.g., excavator, backhoe, etc.) to berm the soils surrounding the spill Site or create diversion trenching to mitigate overland migration or release to navigable waters. Where feasible, pumps will be used to transfer free liquid to storage containers. Spill control/cleanup contractors in the Western New York area that may be contacted for assistance include:

- The Environmental Service Group of NY, Inc.: (716) 695-6720
- Environmental Products and Services, Inc.: (716) 447-4700

9.4 Post-Spill Evaluation

If a reportable quantity of hazardous material or oil/petroleum is spilled as determined by the Project Manager, a written report will be prepared as indicated in Section 9.2. The report will identify the root cause of the spill, type and amount of material released, date/time of release, response actions, agencies notified and/or involved in cleanup, and procedures to be implemented to avoid repeat incidents. In addition, all re-useable spill cleanup and containment materials will be decontaminated, and spill kit supplies/disposable items will be replenished.

10.0 HEAT/COLD STRESS MONITORING

Depending on when remedial work activities will be completed at the Site, measures will be taken to minimize heat/cold stress to Benchmark employees. The SSHO and/or his or her designee will be responsible for monitoring Benchmark field personnel for symptoms of heat/cold stress.

10.1 Heat Stress Monitoring

Personal protective equipment may place an employee at risk of developing heat stress, a common and potentially serious illnesses often encountered at construction, landfill, waste disposal, industrial or other unsheltered sites. The potential for heat stress is dependent on several factors, including environmental conditions, clothing, workload, physical conditioning, and age. PPE may severely reduce the body's normal ability to maintain temperature equilibrium (via evaporation and convection), and require increased energy expenditure due to its bulk and weight.

Proper training and preventive measures will mitigate the potential for serious illness. Heat stress prevention is particularly important because once a person suffers from heat stroke or heat exhaustion, that person may be predisposed to additional heat related illness. To avoid heat stress, the following steps should be taken:

- Adjust work schedules.
- Modify work/rest schedules according to monitoring requirements.
- Mandate work slowdowns as needed.
- Perform work during cooler hours of the day if possible or at night if adequate lighting can be provided.
- Provide shelter (air-conditioned, if possible) or shaded areas to protect personnel during rest periods.
- Maintain worker's body fluids at normal levels. This is necessary to ensure that the cardiovascular system functions adequately. Daily fluid intake must approximately equal the amount of water lost in sweat (i.e., eight fluid ounces must be ingested for approximately every 1 lb of weight lost). The normal thirst mechanism is not sensitive enough to ensure that enough water will be consumed to replace lost perspiration. When heavy sweating occurs, workers should be encouraged to drink more.
- Train workers to recognize the symptoms of heat related illness.

Heat-Related Illness - Symptoms:

- Heat rash may result from continuous exposure to heat or humid air.
- Heat cramps are caused by heavy sweating with inadequate electrolyte replacement. Signs and symptoms include muscle spasms and pain in the hands, feet, and abdomen.
- Heat exhaustion occurs from increased stress on various body organs including inadequate blood circulation due to cardiovascular insufficiency or dehydration. Signs and symptoms include pale, cool, moist skin; heavy sweating; dizziness; nausea; fainting.
- Heat stroke is the most serious form of heat stress. Temperature regulation fails and the body temperature rises to critical levels. Immediate action must be taken to cool the body before serious injury and death occur. Competent medical help must be obtained. Signs and symptoms are red, hot, usually dry skin; lack of or reduced perspiration; nausea; dizziness and confusion; strong, rapid pulse; coma.

The monitoring of personnel wearing protective clothing should commence when the ambient temperature is 70 degrees Fahrenheit or above. For monitoring the body's recuperative ability to excess heat, one or more of the following techniques should be used as a screening mechanism.

- Heart rate may be measured by the radial pulse for 30 seconds as early as possible in the resting period. The rate at the beginning of the rest period should not exceed 100 beats per minute. If the rate is higher, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest periods stay the same, If the pulse rate is 100 beats per minute at the beginning of the nest rest period, the following work cycle should be further shortened by 33%.
- Body temperature may be measured orally with a clinical thermometer as early as possible in the resting period. Oral temperature at the beginning of the rest period should not exceed 99.6 degrees Fahrenheit. If it does, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest period remains the same. However, if the oral temperature exceeds 99.6 degrees Fahrenheit at the beginning of the next period, the work cycle may be further shortened by 33%. Oral temperature should be measured at the end of the rest period to make sure that it has dropped below 99.6 degrees Fahrenheit. No Benchmark employee will be permitted to continue wearing semi-permeable or impermeable garments when his/her oral temperature exceeds 100.6 degrees Fahrenheit.

10.2 Cold Stress Monitoring

Exposure to cold conditions may result in frostbite or hypothermia, each of which progresses in stages as shown below.

- **Frostbite** occurs when body tissue (usually on the extremities) begins to freeze. The three states of frostbite are:

    1. **Frost nip** - This is the first stage of the freezing process. It is characterized by a whitened area of skin, along with a slight burning or painful sensation. Treatment consists of removing the victim from the cold conditions, removal of boots and gloves, soaking the injured part in warm water (102 to 108 degrees Fahrenheit) and drinking a warm beverage. Do not rub skin to generate friction/ heat.
    2. **Superficial Frostbite** - This is the second stage of the freezing process. It is characterized by a whitish gray area of tissue, which will be firm to the touch but will yield little pain. The treatment is identical for Frost nip.
    3. **Deep Frostbite** - In this final stage of the freezing process the affected tissue will be cold, numb and hard and will yield little to no pain. Treatment is identical to that for Frost nip.

- **Hypothermia** is a serious cold stress condition occurring when the body loses heat at a rate faster than it is produced. If untreated, hypothermia may be fatal. The stages of hypothermia may not be clearly defined or visible at first, but generally include:

    1. Shivering
    2. Apathy (i.e., a change to an indifferent or uncaring mood)
    3. Unconsciousness
    4. Bodily freezing

    Employees exhibiting signs of hypothermia should be treated by medical professionals. Steps that can be taken while awaiting help include:

    1. Remove the victim from the cold environment and remove wet or frozen clothing. (Do this carefully as frostbite may have started.)
    2. Perform active re-warming with hot liquids for drinking (Note: do not give the victim any liquid containing alcohol or caffeine) and a warm water bath (102 to 108 degrees Fahrenheit).
    3. Perform passive re-warming with a blanket or jacket wrapped around the victim.

In any potential cold stress situation, it is the responsibility of the Site Health and Safety Officer to encourage the following:

- Education of workers to recognize the symptoms of frostbite and hypothermia.
- Workers should dress warmly, with more layers of thin clothing as opposed to one thick layer.
- Personnel should remain active and keep moving.
- Personnel should be allowed to take shelter in a heated area, as necessary.
- Personnel should drink warm liquids (no caffeine or alcohol if hypothermia has set in).
- For monitoring the body's recuperation from excess cold, oral temperature recordings should occur:
  - At the Site Safety Technicians discretion when suspicion is based on changes in a worker's performance or mental status.
  - At a worker's request.
  - As a screening measure, two times per shift, under unusually hazardous conditions (e.g., wind chill less than 20 degrees Fahrenheit or wind chill less than 30 degrees Fahrenheit with precipitation).
  - As a screening measure, whenever anyone worker on-site develops hypothermia.

Any person developing moderate hypothermia (a core body temperature of 92 degrees Fahrenheit) will not be allowed to return to work for 48 hours without the recommendation of a qualified medical doctor.

11.0 WORK ZONES AND SITE CONTROL

Work zones around the areas designated for construction activities will be established daily and communicated to employees and other Site users by the SSHO. It shall be each Contractor's Site Safety and Health Officer's responsibility to ensure that Site workers are aware of the work zone boundaries and to enforce proper procedures in each area. The zones will include:

- Exclusion Zone ("Hot Zone"): The area where contaminated materials may be exposed, excavated, or handled and all areas where contaminated equipment or personnel may travel. Flagging tape will delineate the zone. Personnel entering the Exclusion Zone must wear the prescribed level of personal protective equipment identified in Section 7.
- Contamination Reduction Zone: The zone where decontamination of personnel and equipment takes place. Any potentially contaminated clothing, equipment and samples must remain in the Contamination Reduction Zone until decontaminated.
- Support Zone: The part of the site that is considered non-contaminated or "clean." Support equipment will be in this zone, and personnel may wear normal work clothes within this zone.

In the absence of other task-specific work zone boundaries established by the SSHO, the following boundaries will apply to investigation and construction activities involving disruption or handling of Site soils or groundwater:

- Exclusion Zone: 50 foot radius from the outer limit of the sampling/construction activity.
- Contaminant Reduction Zone: 100 foot radius from the outer limit of the sampling/construction activity.
- Support Zone: Areas outside the Contaminant Reduction Zone.

Access of non-essential personnel to the Exclusion and Contamination Reduction Zones will be strictly controlled by the SSHO. Only personnel who are essential to the completion of the task will be allowed access to these areas and only if they are wearing the prescribed level of protection. Entrance of personnel must be approved by the SSHO.

The SSHO will maintain a Health and Safety Logbook containing the names of Benchmark workers and their level of protection. The zone boundaries may be changed by

the SSHO as environmental conditions warrant, and to respond to the necessary changes in work locations on-site.

12.0 DECONTAMINATION

12.1 Decontamination for Benchmark Employees

The degree of decontamination required is a function of a particular task and the environment within which it occurs. The following decontamination procedure will remain flexible, thereby allowing the decontamination crew to respond appropriately to the changing environmental conditions that may arise at the Site. Benchmark personnel on-site shall follow the procedure below, or the Contractor's procedure (if applicable), whichever is more stringent.

Station 1 - Equipment Drop: Deposit visibly contaminated (if any) re-useable equipment used in the contamination reduction and exclusion zones (tools, containers, monitoring instruments, radios, clipboards, etc.) on plastic sheeting.

Station 2 - Boots and Gloves Wash and Rinse: Scrub outer boots and outer gloves. Deposit tape and gloves in waste disposal container.

Station 3 - Tape, Outer Boot and Glove Removal: Remove tape, outer boots and gloves. Deposit tape and gloves in waste disposal container.

Station 4 - Canister or Mask Change: If worker leaves exclusive zone to change canister (or mask), this is the last step in the decontamination procedure. Worker's canister is exchanged, new outer gloves and boot cover donned, and worker returns to duty.

Station 5 - Outer Garment/Face Piece Removal: Protective suit removed and deposited in separate container provided by Contractor. Face piece or goggles are removed if used. Avoid touching face with fingers. Face piece and/or goggles deposited on plastic sheet. Hard hat removed and placed on plastic sheet.

Station 6 - Inner Glove Removal: Inner gloves are the last personal protective equipment to be removed. Avoid touching the outside of the gloves with bare fingers. Dispose of these gloves in waste disposal container.

Following PPE removal, personnel shall wash hands, face and forearms with absorbent wipes. If field activities proceed for duration of 6 consecutive months or longer, shower facilities will be provided for worker use in accordance with OSHA 29CFR 1910.120(n).

12.2 Decontamination for Medical Emergencies

In the event of a minor, non-life-threatening injury, personnel should follow the decontamination procedures as defined, and then administer first-aid.

In the event of a major injury or other serious medical concern (e.g., heat stroke), immediate first-aid is to be administered and the victim transported to the hospital in lieu of further decontamination efforts unless exposure to a Site contaminant would be considered "Immediately Dangerous to Life or Health."

12.3 Decontamination of Field Equipment

The Contractor in accordance with this approved Health and Safety Plan in the Contamination Reduction Zone will conduct decontamination of heavy equipment. As a minimum, this will include manually removing heavy soil contamination, followed by steam cleaning on an impermeable pad.

Benchmark personnel will conduct decontamination of tools used for sample collection purposes. It is expected that tools will be constructed of nonporous, nonabsorbent materials (i.e., metal), which will aid in the decontamination effort. Any tool or part of a tool made of porous, absorbent material (i.e., wood) will be placed into suitable containers and prepared for disposal.

Decontamination of bailers, split-spoons, spatula knives, and other tools used for environmental sampling and examination shall be as follows:

- Disassemble the equipment
- Water wash to remove visible foreign matter.
- Wash with detergent.
- Rinse parts with distilled-deionized water.
- Allow to air dry.
- Wrap parts in aluminum foil or polyethylene.

13.0 CONFINED SPACE ENTRY

OSHA 29CFR 1910.146 identifies a confined space as a space that is large enough and so configured that an employee can physically enter and do assigned work, has limited or restricted means for entry and exit, and is not intended for continuous employee occupancy. Confined spaces include, but are not limited to, trenches, storage tanks, process vessels, pits, sewers, tunnels, underground utility vaults, pipelines, sumps, wells, and excavations.

Confined space entry by Benchmark employees is not anticipated to be necessary to complete the remedial activities identified in Section 2.0. If the scope of work changes or confined space entry appears necessary, the Project Manager will be consulted to determine if feasible engineering alternatives to confined space entry can be implemented. If confined space entry by Benchmark employees cannot be avoided through reasonable engineering measures, task-specific confined space entry procedures will be developed, and a confined-space entry permit will be issued through Benchmark's corporate Health and Safety Director. Benchmark employees shall not enter a confined space without these procedures and permits in place.

14.0 FIRE PREVENTION AND PROTECTION

14.1 General Approach

Recommended practices and standards of the National Fire Protection Association (NFPA) and other applicable regulations will be followed in the development and application of Project Fire Protection Programs. When required by regulatory authorities, the project management will prepare and submit a Fire Protection Plan for the approval of the contracting officers, authorized representative, or other designated official. Essential considerations for the Fire Protection Plan will include:

- Proper Site preparation and safe storage of combustible and flammable materials.
- Availability of coordination with private and public fire authorities.
- Adequate job-site fire protection and inspections for fire prevention.
- Adequate indoctrination and training of employees.

14.2 Equipment and Requirements

Fire extinguishers will be provided by each Contractor and are required on heavy equipment and in each field trailer. Fire extinguishers will be inspected, serviced, and maintained in accordance with the manufacturer's instructions. As a minimum, extinguishers shall be checked monthly and weighed semi-annually, and recharged if necessary. Recharge or replacement shall be mandatory immediately after each use.

14.3 Flammable and Combustible Substances

Storage, handling or use of flammable and combustible substances will be under the supervision of qualified persons. Tanks, containers and pumping equipment, whether portable or stationary, used for the storage and handling of flammable and combustible liquids, will meet the recommendations of the National Fire Protection Association.

14.4 Hot Work

If the scope of work necessitates welding or blowtorch operation, the hot work permit presented in Appendix B will be completed by the SSHO and reviewed/issued by the Project Manager.

15.0 EMERGENCY INFORMATION

In accordance with OSHA 29CFR Part 1910, an Emergency Response Plan is attached to this HASP as Appendix A. The hospital route map is presented within Appendix A as Figure 1.

16.0 REFERENCE

1. New York State Department of Environmental Conservation. *DER-10; Technical Guidance for Site Investigation and Remediation.* May 2010.

TABLES

BENCHMARK

TABLE 1
TOXICITY DATA FOR CONSTITUENTS OF POTENTIAL CONCERN

JAMESTOWN BREWERY SITE
JAMESTOWN, NEW YORK

Parameter	Synonyms	CAS No.	Code	Concentration Limits [1]		
				PEL	TLV	IDLH
Volatile Organic Compounds (VOCs): ppm						
Cis-1,2-Dichloroethene	Cis-1,2-DCE	156-59-2	*none*	200	200	1000
Tetrachloroethene	Perc, PCE	127-18-4	Ca	100	25	150
Trichloroethene	TCE	79-01-6	Ca	100	50	1000
Vinyl Chloride	VC	75-01-4	Ca	1	1	ND
Emergent Contaminants: mg/m ^{3}						
Per- & Polyfluoroalkyl Substances (PFAS)	*none*	NA	*none*	--	--	--

Notes:

1. Concentration limits as reported by NIOSH Pocket Guide to Chemical Hazards, February 2004 (NIOSH Publication No. 97-140, fourth printing with changes and updates).
2. " -- " = concentration limit not available; exposure should be minimized to the extent feasible through appropriate engineering controls & PPE.

Explanation:

Ca = NIOSH considers constituent to be a potential occupational carcinogen.
C-## = Ceiling Level equals the maximum exposure concentration allowable during the work day.
IDLH = Immediately Dangerous to Life or Health.
ND indicates that an IDLH has not been determined.

TLV = Threshold Limit Value, established by American Conference of Industrial Hygienists (ACGIH), equals the maximum exposure concentration allowable for 8 hours/day @ 40 hours/week.

TLVs are the amounts of chemicals in the air that almost all healthy adult workers are predicted to be able to tolerate without adverse effects. There are three types.
TLV-TWA (TLV-Time-Weighted Average) which is averaged over the normal eight-hour day/forty-hour work week. (Most TLVs.)
TLV-STEL or Short Term Exposure Limits are 15 minute exposures that should not be exceeded for even an instant. It is not a stand alone value but is accompanied by the TLV-TWA. It indicates a higher exposure that can be tolerated for a short time without adverse effect as long as the total time weighted average is not exceded.
TLV-C or Ceiling limits are the concentration that should not be exceeded during any part of the working exposure.
Unless the initials "STEL" or "C" appear in the Code column, the TLV value should be considered to be the eight-hour TLV-TWA.

PEL = Permissible Exposure Limit, established by OSHA, equals the maximium exposure conconcentration allowable for 8 hours per day @ 40 hours per week

BENCHMARK

TABLE 2
POTENTIAL ROUTES OF EXPOSURE TO THE CONSTITUENTS OF POTENTIAL CONCERN

JAMESTOWN BREWERY SITE
JAMESTOWN, NEW YORK

Activity [1]	Direct Contact with Soil/Fill	Inhalation of Vapors or Dust	Direct Contact with Water
Remedial Action Tasks			
1. Remedial Injection Activities		x	x
2. Post-Injection Performance Groundwater Monitoring		x	x
3. Waste Characterization/Confimatory Soil Sampling	x	x	

Notes:

1. Activity as described in Section 1.5 of the Health and Safety Plan.

BENCHMARK

TABLE 3
REQUIRED LEVELS OF PROTECTION FOR REMEDIAL TASKS

JAMESTOWN BREWERY SITE
JAMESTOWN, NEW YORK

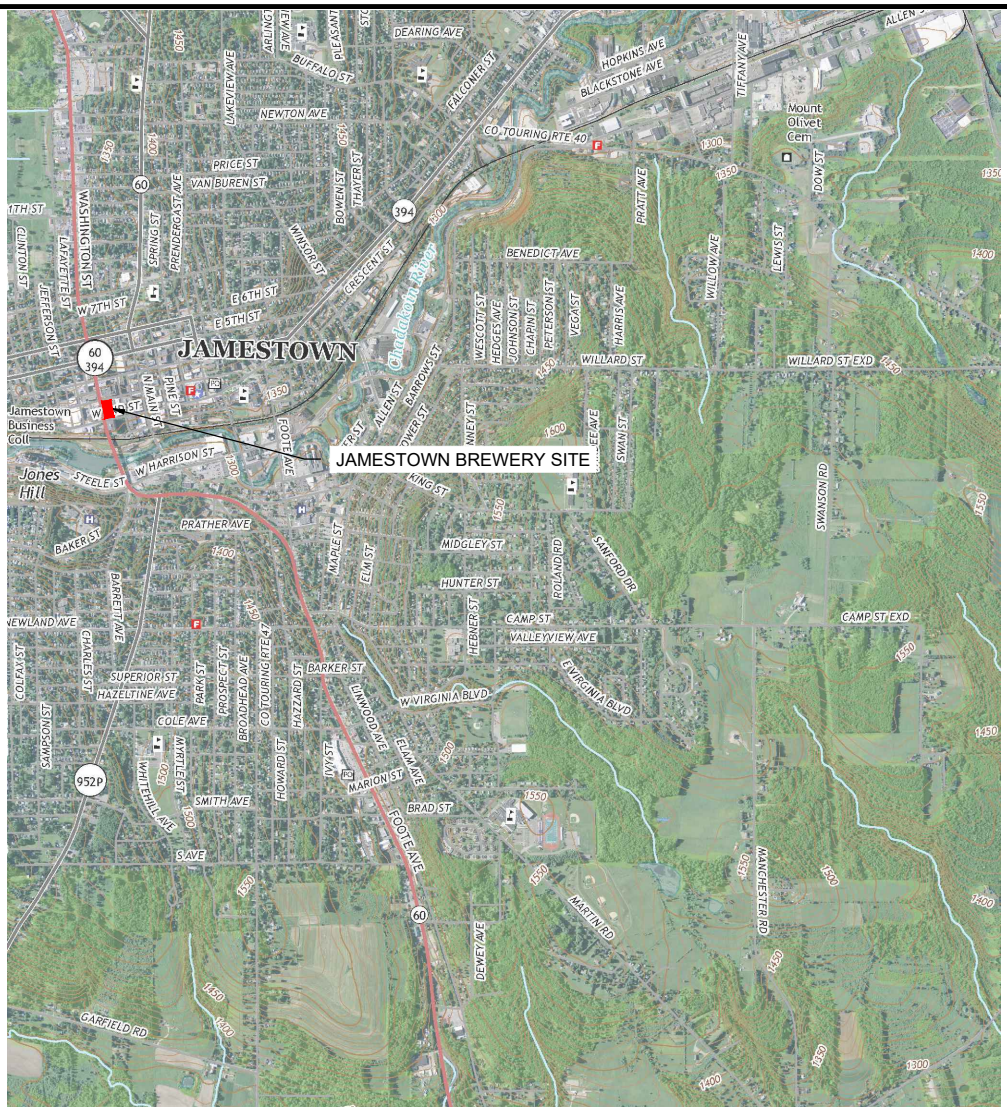
Activity	Respiratory Protection [1]	Clothing	Gloves [2]	Boots [2, 3]	Other Required PPE/ Modifications [2, 4]
Remedial Action Tasks					
1. Remedial Injection Activities	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	HH SGSS
2. Post-Injection Performance Groundwater Monitoring	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	SGSS
3. Waste Characterization/Confirmatory Soil Sampling	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	SGSS

Notes:
1. Respiratory equipment shall conform to guidelines presented in Section 7.0 of this HASP. The Level C requirement is an air-purifying respirator equiped with organic compound/acid gas/dust cartridge.
2. HH = hardhat; L= Latex; L/N = latex inner glove, nitrile outer glove; N = Nitrile; S = Saranex; SG = safety glasses; SGSS = safety glasses with sideshields; STSS = steel toe safety shoes.
3. Latex outer boot (or approved overboot) required whenever contact with contaminated materials may occur. SSHO may downgrade to STSS (steel-toed safety shoes) if contact will be limited to cover/replacement soils.
4. Dust masks shall be donned as directed by the SSHO (site safety and health officer) or site safety technician whenever potentially contaminated airborne particulates (i.e., dust) are present

FIGURES

F:\CAD\Benchmark\Slater Law\Jamestown Brewery Site\HASP\Figure 1; Site Location & Vicinity Map.dwg, 10/29/2021 3:29:36 PM

FIGURE 1

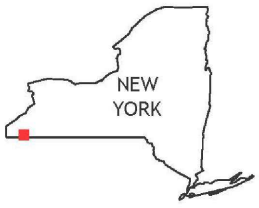


BASEMAP: USGS JAMESTOWN 2016 QUADRANGLE

3,000' 0' 3,000' 6,000'

SCALE: 1 INCH = 3,000 FEET
SCALE IN FEET
(approximate)

N



BENCHMARK

2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218, (716) 856-0599

PROJECT NO.: 0598-021-001

DATE: MAY 2021

DRAFTED BY: RFL-CMC

SITE LOCATION & VICINITY MAP

HEALTH AND SAFETY PLAN

JAMESTOWN BREWERY SITE (BCP SITE NO. C907047)
115-121 WEST THIRD STREET
JAMESTOWN, NEW YORK

PREPARED FOR

GPATTI DEVELOPMENT LLC

ATTACHMENT A

EMERGENCY RESPONSE PLAN

BENCHMARK

EMERGENCY RESPONSE PLAN
for
BROWNFIELD CLEANUP PROGRAM
REMEDIAL ACTIVITIES

JAMESTOWN BREWERY SITE
JAMESTOWN, NEW YORK

November 2021 0598-021-001

Prepared for:

GPatti Development, LLC

Prepared By:

Benchmark Civil/Environmental Engineering & Geology, PLLC
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Buffalo, NY 14218
(716) 856-0599

JAMESTOWN BREWERY SITE
HEALTH AND SAFETY PLAN FOR REMEDIAL ACTIVITIES
ATTACHMENT A: EMERGENCY RESPONSE PLAN

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LIST OF FIGURES

1.0 GENERAL

This report presents the site-specific Emergency Response Plan (ERP) referenced in the Site Health and Safety Plan (HASP) prepared for Remedial activities at the Jamestown Brewery Site, located at 115-121 West Third Street, Jamestown, New York. This attachment of the HASP describes potential emergencies that may occur at the Site; procedures for responding to those emergencies; roles and responsibilities during emergency response; and training all workers must receive to follow emergency procedures. This ERP also describes the provisions this Site has made to coordinate its emergency response planning with other contractors on-site and with off-site emergency response organizations.

This ERP is consistent with the requirements of 29CFR 1910.120(l) and provides the following site-specific information:

- Pre-emergency planning.
- Personnel roles, lines of authority, and communication.
- Emergency recognition and prevention.
- Safe distances and places of refuge.
- Evacuation routes and procedures.
- Decontamination procedures.
- Emergency medical treatment and first aid.
- Emergency alerting and response procedures.
- Critique of response and follow-up.
- Emergency personal protective equipment (PPE) and equipment.

2.0 PRE-EMERGENCY PLANNING

This Site has been evaluated for potential emergency occurrences, based on site hazards, the required work tasks, the site topography, and prevailing weather conditions. The results of that evaluation indicate the potential for the following site emergencies to occur at the locations indicated.

Type of Emergency:

1. Medical, due to physical injury

Source of Emergency:

1. Slip/trip/fall

Location of Source:

1. Non-specific

3.0 ON-SITE EMERGENCY RESPONSE EQUIPMENT

Emergency procedures may require specialized equipment to facilitate worker rescue, contamination control and reduction, or post-emergency clean up. Emergency response equipment available on the Site is listed below. The equipment inventory and storage locations are based on the potential emergencies described above. This equipment inventory is designed to meet on-site emergency response needs and any specialized equipment needs off-site responders might require because of the hazards at this Site but not ordinarily stocked.

Any additional PPE required and stocked for emergency response is also listed below. During an emergency, the Emergency Response Coordinator (ERC) is responsible for specifying the level of PPE required for emergency response. At a minimum, PPE used by emergency responders will comply with Section 7.0, Personal Protective Equipment, of this HASP. Emergency response equipment is inspected at regular intervals and maintained in good working order. The equipment inventory is replenished as necessary to maintain response capabilities.

Emergency Equipment	Quantity	Location
First Aid Kit	1	Site Vehicle
Chemical Fire Extinguisher	2 (minimum)	Heavy equipment and Site Vehicle

Emergency PPE	Quantity	Location
Full-face respirator	1 for each worker	Site Vehicle
Eye Wash Solution	2 (minimum)	Site Vehicle
Chemical-resistant suits	4 (minimum)	Site Vehicle

4.0 EMERGENCY PLANNING MAPS

An area-specific map of the Site will be developed daily during performance of field activities. The map will be marked to identify critical on-site emergency planning information, including emergency evacuation routes, a place of refuge, an assembly point, and the locations of key site emergency equipment. Site zone boundaries will be shown to alert responders to known areas of contamination. There are no major topographical features, however the direction of prevailing winds/weather conditions that could affect emergency response planning are also marked on the map. The map will be posted at site-designated place of refuge and inside the Benchmark personnel field vehicle.

5.0 EMERGENCY CONTACTS

The following identifies the emergency contacts for this ERP.

Emergency Telephone Numbers:

Project Manager: *Lori Riker*
Work: (716) 856-0599
Mobile: (716) 474-7510

Corporate Health and Safety Director: *Thomas Forbes*
Work: (716) 856-0599
Mobile: (716) 864-1730

Site Safety and Health Officer (SSHO): *Lori Riker*
Work: (716) 856-0599
Mobile: (716) 474-7510

Alternate SSHO: *Charlotte Clark*
Work: (716) 856-0635
Mobile: (716) 220-1201

UPMC CHAUTAUQUA EMERGENCY DEPARTMENT:	(716) 664-8120
FIRE:	911
AMBULANCE:	911
JAMESTOWN POLICE:	911
STATE EMERGENCY RESPONSE HOTLINE:	(800) 457-7362
NATIONAL RESPONSE HOTLINE:	(800) 424-8802
NYSDOH:	(716) 847-4385
NYSDEC:	(716) 851-7220
NYSDEC 24-HOUR SPILL HOTLINE:	(800) 457-7252

The Site location is:

115-121 West Third Street
Jamestown, New York 14701
Site Phone Number: (Insert Cell Phone or Field Trailer): _____

6.0 EMERGENCY ALERTING & EVACUATION

Internal emergency communication systems are used to alert workers to danger, convey safety information, and maintain site control. Any effective system can be employed. Two-way radio headsets or field telephones are often used when work teams are far from the command post. Hand signals and air-horn blasts are also commonly used. Every system must have a backup. It shall be the responsibility of each contractor's SSHO to ensure personnel entering the site understand an adequate method of internal communication. Unless personnel are otherwise informed, the following signals shall be used.

1. Emergency signals by portable air horn, siren, or whistle: two short blasts, personal injury; continuous blast, emergency requiring site excavation.
2. Visual signals: hand gripping throat, out of air/cannot breathe; hands on top of head, need assistance; thumbs up, affirmative/ everything is OK; thumbs down, no/ negative; grip partner's wrist or waist, leave area immediately.

If evacuation notice is given, site workers leave the worksite with their respective buddies, if possible, by way of the nearest exit. Emergency decontamination procedures detailed in Section 12.0 of the HASP are followed to the extent practical without compromising the safety and health of site personnel. The evacuation routes and assembly area will be determined by conditions at the time of the evacuation based on wind direction, the location of the hazard source, and other factors as determined by rehearsals and inputs from emergency response organizations. Wind direction indicators are located so that workers can determine a safe up wind or cross wind evacuation route and assembly area if not informed by the emergency response coordinator at the time the evacuation alarm sounds. Since work conditions and work zones within the site may be changing on daily basis, it shall be the responsibility of the construction SSHO to review evacuation routes and procedures as necessary and to inform all Benchmark workers of any changes.

Personnel exiting the site will gather at a designated assembly point. To determine that everyone has successfully exited the site, personnel will be accounted for at the assembly site. If any worker cannot be accounted for, notification is given to the SSHO (***Lori Riker*** or ***Charlotte Clark***) so that appropriate action can be initiated. Contractors and subcontractors on this site have coordinated their emergency response plans to ensure that these plans are compatible, and that source(s) of potential emergencies are recognized, alarm

systems are clearly understood, and evacuation routes are accessible to all personnel relying upon them.

7.0 EXTREME WEATHER CONDITIONS

In the event of adverse weather conditions, the SSHO in conjunction with the Contractor's SSHO will determine if engineering operations can continue without sacrificing the health and safety of site personnel. Items to be considered prior to determining if work should continue include but are not limited to:

- Potential for heat/cold stress.
- Weather-related construction hazards (e.g., flooding or wet conditions producing undermining of structures or sheeting, high wind threats, etc.).
- Limited visibility.
- Potential for electrical storms.
- Limited site access/egress (e.g., due to heavy snow)

8.0 EMERGENCY MEDICAL TREATMENT & FIRST AID

Personnel Exposure:

The following general guidelines will be employed in instances where health impacts threaten to occur acute exposure is realized:

- Skin Contact: Use copious amounts of soap and water. Wash/rinse affected area for at least 15 minutes. Decontaminate and provide medical attention. Eyewash stations will be provided on site. If necessary, transport to Hospital.
- Inhalation: Move to fresh air and, if necessary, transport to Hospital.
- Ingestion: Decontaminate and transport to Hospital.

Personal Injury:

Minor first-aid will be applied on-site as deemed necessary. In the event of a life threatening injury, the individual should be transported to Hospital via ambulance. The SSHO will supply available chemical specific information to appropriate medical personnel as requested.

First aid kits will conform to Red Cross and other applicable good health standards, and shall consist of a weatherproof container with individually sealed packages for each type of item. First aid kits will be fully equipped before being sent out on each job and will be checked weekly by the SSHO to ensure that the expended items are replaced.

Directions to UPMC Chautauqua Emergency Department (see Figure 1):

The following directions describe the best route from the Site to Erie County Medical Center located 1.2 miles away:

- Head **north** on either **Washington Street** or **Foundry Alley**
- Turn **right** onto **West 3rd Street**
- Turn **right** onto **North Main Street**
- Slight **left** on **Foote Avenue**
- Turn **left** onto **Prather Avenue**
- UPMC Chautauqua Emergency Department is located on the left at **207 Foote Avenue, Jamestown, New York**

9.0 EMERGENCY RESPONSE CRITIQUE & RECORD KEEPING

Following an emergency, the SSHO and Project Manager shall review the effectiveness of this Emergency Response Plan (ERP) in addressing notification, control, and evacuation requirements. Updates and modifications to this ERP shall be made accordingly. It shall be the responsibility of each contractor to establish and assure adequate records of the following:

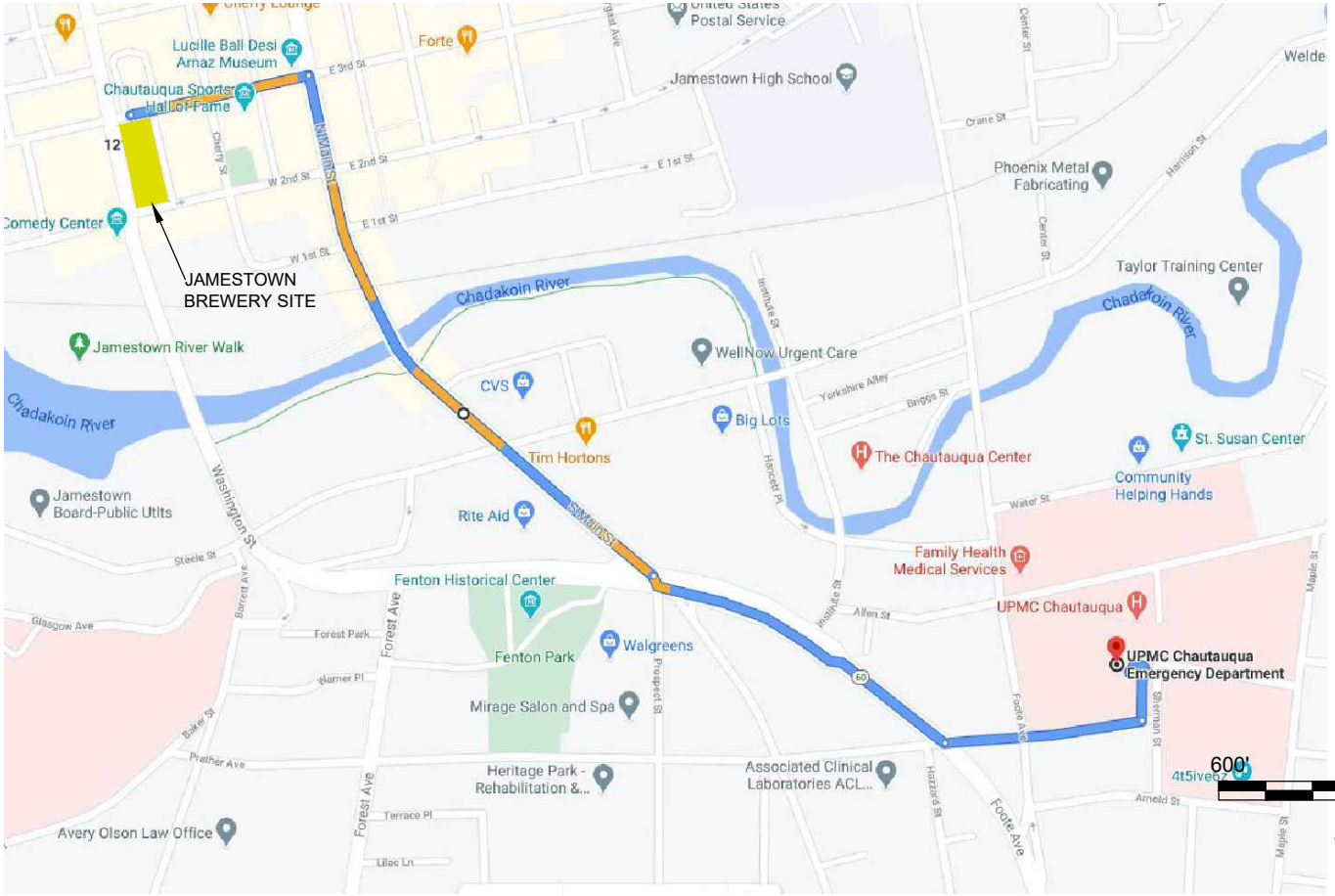
- Occupational injuries and illnesses.
- Accident investigations.
- Reports to insurance carrier or State compensation agencies.
- Reports required by the client.
- Records and reports required by local, state, federal and/or international agencies.
- Property or equipment damage.
- Third party injury or damage claims.
- Environmental testing logs.
- Explosive and hazardous substances inventories and records.
- Records of inspections and citations.
- Safety training.

10.0 EMERGENCY RESPONSE TRAINING

Persons who enter the worksite, including visitors, shall receive a site-specific briefing about anticipated emergency situations and the emergency procedures by the SSHO. Where this site relies on off-site organizations for emergency response, the training of personnel in those off-site organizations has been evaluated and is deemed adequate for response to this site.

FIGURES

F:\CAD\Benchmark\Slater Law\Jamestown Brewery Site\HASP\Figure 1; Hospital Route Map.dwg, 10/29/2021 3:28:56 PM



DIRECTIONS:

1. HEAD NORTH ON EITHER WASHINGTON STREET OR FOUNDRY ALLEY TOWARD W. 3RD STREET
2. TURN RIGHT ONTO W 3RD STREET.
3. TURN RIGHT ONTO N MAIN STREET (0.4 MILES)
4. SLIGHT LEFT ONTO FOOTE AVENUE (0.2 MILES)
5. TURN LEFT ONTO PRATHER AVENUE (0.1 MILES)
6. TURN LEFT INTO UPMC CHAUTAUQUA EMERGENCY ROOM ENTRANCE

N

600' 0' 600' 1,200'

SCALE: 1 INCH = 600 FEET
SCALE IN FEET
(approximate)

BENCHMARK

2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218, (716) 856-0599

PROJECT NO.: 0598-021-001

DATE: JANUARY 2021

DRAFTED BY: CMC

HOSPITAL ROUTE MAP

HEALTH AND SAFETY PLAN

JAMESTOWN BREWERY SITE
115-121 WEST THIRD STREET
JAMESTOWN, NEW YORK

PREPARED FOR
GPATTI DEVELOPMENT LLC

FIGURE 1

ATTACHMENT B

HOT WORK PERMIT FORM

BENCHMARK

BENCHMARK

HOT WORK PERMIT

PART 1 - INFORMATION

Issue Date:	
Date Work to be Performed: Start:	Finish (permit terminated):
Performed By:	
Work Area:	
Object to be Worked On:	

PART 2 - APPROVAL

(for 1, 2 or 3: mark Yes, No or NA)*

Will working be on or in:	Finish (permit terminated):	
1. Metal partition, wall, ceiling covered by combustible material?	yes	no
2. Pipes, in contact with combustible material?	yes	no
3. Explosive area?	yes	no

* = If any of these conditions exist (marked "yes"), a permit will not be issued without being reviewed and approved by Thomas H. Forbes (Corporate Health and Safety Director). Required Signature below.

PART 3 - REQUIRED CONDITIONS**

(Check all conditions that must be met)

	PROTECTIVE ACTION		PROTECTIVE EQUIPMENT
	Specific Risk Assessment Required		Goggles/visor/welding screen
	Fire or spark barrier		Apron/fireproof clothing
	Cover hot surfaces		Welding gloves/gauntlets/other:
	Move movable fire hazards, specifically		Wellintons/Knee pads
	Erect screen on barrier		Ear protection: Ear muffs/Ear plugs
	Restrict Access		B.A.: SCBA/Long Breather
	Wet the ground		Respirator: Type:
	Ensure adequate ventilation		Cartridge:
	Provide adequate supports		Local Exhaust Ventilation
	Cover exposed drain/floor or wall cracks		Extinguisher/Fire blanket
	Fire watch (must remain on duty during duration of permit)		Personal flammable gas monitor
	Issue additional permit(s):		

Other precautions:

** Permit will not be issued until these conditions are met.

SIGNATURES

Orginating Employee:	Date:
Project Manager:	Date:
Part 2 Approval:	Date:

ATTACHMENT C

NYSDOH GENERIC COMMUNITY AIR MONITORING PLAN

BENCHMARK

Appendix C1
New York State Department of Health
Generic Community Air Monitoring Plan

Overview

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

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

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

Community Air Monitoring Plan

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

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

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

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

VOC Monitoring, Response Levels, and Actions

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

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

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

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

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

Particulate Monitoring, Response Levels, and Actions

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

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.

2. If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m^3 above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m^3 of the upwind level and in preventing visible dust migration.

3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

December 2009

Appendix C2
Fugitive Dust and Particulate Monitoring

A program for suppressing fugitive dust and particulate matter monitoring at hazardous waste sites is a responsibility on the remedial party performing the work. These procedures must be incorporated into appropriate intrusive work plans. The following fugitive dust suppression and particulate monitoring program should be employed at sites during construction and other intrusive activities which warrant its use:

1. Reasonable fugitive dust suppression techniques must be employed during all site activities which may generate fugitive dust.

2. Particulate monitoring must be employed during the handling of waste or contaminated soil or when activities on site may generate fugitive dust from exposed waste or contaminated soil. Remedial activities may also include the excavation, grading, or placement of clean fill. These control measures should not be considered necessary for these activities.

3. Particulate monitoring must be performed using real-time particulate monitors and shall monitor particulate matter less than ten microns (PM10) with the following minimum performance standards:

(a) Objects to be measured: Dust, mists or aerosols;
(b) Measurement Ranges: 0.001 to 400 mg/m3 (1 to 400,000 :ug/m3);
(c) Precision (2-sigma) at constant temperature: +/- 10 :g/m3 for one second averaging; and +/- 1.5 g/m3 for sixty second averaging;
(d) Accuracy: +/- 5% of reading +/- precision (Referred to gravimetric calibration with SAE fine test dust (mmd= 2 to 3 :m, g= 2.5, as aerosolized);
(e) Resolution: 0.1% of reading or 1g/m3, whichever is larger;
(f) Particle Size Range of Maximum Response: 0.1-10;
(g) Total Number of Data Points in Memory: 10,000;
(h) Logged Data: Each data point with average concentration, time/date and data point number
(i) Run Summary: overall average, maximum concentrations, time/date of maximum, total number of logged points, start time/date, total elapsed time (run duration), STEL concentration and time/date occurrence, averaging (logging) period, calibration factor, and tag number;
(j) Alarm Averaging Time (user selectable): real-time (1-60 seconds) or STEL (15 minutes), alarms required;
(k) Operating Time: 48 hours (fully charged NiCd battery); continuously with charger;
(l) Operating Temperature: -10 to 50^{o} C (14 to 122^{o} F);
(m) Particulate levels will be monitored upwind and immediately downwind at the working site and integrated over a period not to exceed 15 minutes.

4. In order to ensure the validity of the fugitive dust measurements performed, there must be appropriate Quality Assurance/Quality Control (QA/QC). It is the responsibility of the remedial party to adequately supplement QA/QC Plans to include the following critical features: periodic instrument calibration, operator training, daily instrument performance (span) checks, and a record keeping plan.

5. The action level will be established at 150 ug/m3 (15 minutes average). While conservative,

this short-term interval will provide a real-time assessment of on-site air quality to assure both health and safety. If particulate levels are detected in excess of 150 ug/m3, the upwind background level must be confirmed immediately. If the working site particulate measurement is greater than 100 ug/m3 above the background level, additional dust suppression techniques must be implemented to reduce the generation of fugitive dust and corrective action taken to protect site personnel and reduce the potential for contaminant migration. Corrective measures may include increasing the level of personal protection for on-site personnel and implementing additional dust suppression techniques (see paragraph 7). Should the action level of 150 ug/m3 continue to be exceeded work must stop and DER must be notified as provided in the site design or remedial work plan. The notification shall include a description of the control measures implemented to prevent further exceedances.

6. It must be recognized that the generation of dust from waste or contaminated soil that migrates off-site, has the potential for transporting contaminants off-site. There may be situations when dust is being generated and leaving the site and the monitoring equipment does not measure PM10 at or above the action level. Since this situation has the potential to allow for the migration of contaminants off-site, it is unacceptable. While it is not practical to quantify total suspended particulates on a real-time basis, it is appropriate to rely on visual observation. If dust is observed leaving the working site, additional dust suppression techniques must be employed. Activities that have a high dusting potential--such as solidification and treatment involving materials like kiln dust and lime--will require the need for special measures to be considered.

7. The following techniques have been shown to be effective for the controlling of the generation and migration of dust during construction activities:

(a) Applying water on haul roads;
(b) Wetting equipment and excavation faces;
(c) Spraying water on buckets during excavation and dumping;
(d) Hauling materials in properly tarped or watertight containers;
(e) Restricting vehicle speeds to 10 mph;
(f) Covering excavated areas and material after excavation activity ceases; and
(g) Reducing the excavation size and/or number of excavations.

Experience has shown that the chance of exceeding the 150ug/m3 action level is remote when the above-mentioned techniques are used. When techniques involving water application are used, care must be taken not to use excess water, which can result in unacceptably wet conditions. Using atomizing sprays will prevent overly wet conditions, conserve water, and provide an effective means of suppressing the fugitive dust.

8. The evaluation of weather conditions is necessary for proper fugitive dust control. When extreme wind conditions make dust control ineffective, as a last resort remedial actions may need to be suspended. There may be situations that require fugitive dust suppression and particulate monitoring requirements with action levels more stringent than those provided above. Under some circumstances, the contaminant concentration and/or toxicity may require additional monitoring to protect site personnel and the public. Additional integrated sampling and chemical analysis of the dust may also be in order. This must be evaluated when a health and safety plan is developed and when appropriate suppression and monitoring requirements are established for protection of health and the environment.

APPENDIX B

UIC PERMIT APPLICATION

October 28, 2021

Chief, Drinking Water and Groundwater Protection Section
United States Environmental Protection Agency, Region 2
290 Broadway, 24th Floor
New York, New York 10007-1866

Re: Underground Injection Control (UIC) Permit Application
Jamestown Brewery Project Site
NYS BCP C907047
Jamestown, New York

To UIC Case Handler:

Benchmark Civil/Environmental Engineering & Geology, PLLC (Benchmark) is submitting this UIC Permit Application form for the above-referenced Brownfield Cleanup Program (BCP) site on behalf of GPatti Development, LLC.

The remedial work described herein is to address chlorinated volatile organic compounds (cVOCs) in groundwater at the Site. Elevated concentrations of cis-1,2-dichloroethene (cis-1,2-DCE), trans-1,2-dichloroethene (trans-1,2-DCE), tetrachloroethylene (PCE), trichloroethylene (TCE), and vinyl chloride (VC) contamination.

The Site is currently unoccupied (SIC Code 6519 and NAICS Code 531190) with plans to redevelop and renovate the existing building into mixed-use apartments and commercial space.

Background

There are several historic addresses associated with the Site. A review of historical records identified the following past land uses for the Site: photography studio, dry cleaner, taxi garage, and automotive repair facilities. There are also historic records of fuel oil underground storage tanks (USTs) located on and adjacent to Site.

Benchmark completed a Supplemental Remedial Investigation (RI) at the Site in March and April 2021 and documented the findings in a report submitted to the New York State Department of Environmental Conservation (NYSDEC) dated October 2021. Based on the findings, Benchmark drafted a Remedial Action Work Plan (RAWP) that details planned injection remedial activities. NYSDEC approval of the RAWP will be provided to the USEPA Chief Drinking Water and Groundwater Protection Section once received. Injection activities included in the Work Plan are detailed below.

Site Description

The overburden lithology includes gravel subbase mixed with brown clay silts from approximately 1 to 2 feet below ground surface (fbgs), apparent native soils beyond 2 fbgs across the Site consisting of glacial till comprised of gravel, silt, clay, and fine sands. During the Supplemental Investigation, the overburden at the Site was further broken down to the following:

- Northern Portion of the Site: Generally, fill was identified from 0 to 1 fbgs underlain by brown/gray clay or fine sand and clay from 1 to 18 fbgs; sand and gravel from 18 to 20-26 fbgs; and another layer of gray clay beginning at 20-26 fbgs.
- Southern Portion of the Site: Generally, fill was identified from 0 to 8 fbgs underlain by sand and/or gravel from 8 to 37 fbgs.

The cVOC contamination was primarily observed within the sandy lean clay. Soil samples collected from beneath the building that contained elevated cVOCs were described as silty sand and clay with gravel material.

Groundwater was encountered in eight monitoring wells installed across the Site as part of the RI and Supplemental Investigation at depths between 14 to 32 fbgs. Groundwater at the Site generally flows in a south/southwest direction toward the Chadakoin River.

Groundwater analytical results for wells MW-1, TMW-1, TMW-2, PMW-4, PMW-6, PMW-7, and PMW-8 during the two most recent groundwater sampling events revealed the presence of primarily PCE and TCE at concentrations greater than their respective groundwater quality standards (GWQSs). Cis-1,2-DCE, trans-1,2-DCE, and VC were also identified at varying wells across the Site exceeding their respective GWQSs. Source contamination was excavated and transported off-site during the interim remedial measures. Residual soil and groundwater contamination requires remedial injection to protect public health and the environment downgradient of the Site.

Remedial Injection Activities

A Site-specific remedial program was developed using design support provided by Regenesis®. Benchmark/Regenesis determined in-situ injection of a mix of 3-D Micro Emulsion (3DME), Sulfidated, colloidal zero-valent iron (S-MicroZVI), Bio-Dechlor INOCULUM Plus (BDI Plus®) Plus, and PlumeStop would be the most efficient and cost-effective remedial measure to treat groundwater contaminated by cVOCs. Products are further described below:

- S-MicroZVI: promotes the destruction of contaminants through a direct chemical reaction and stimulates anaerobic biological degradation by rapidly creating a reducing environment that is favorable.
- 3DME: coats pore surfaces and results in a staged release of electron donors to enhance degradation.
- BDI Plus: contains species of Dehalococcoides sp. (DHC), the bacteria responsible for complete dichlorination of cVOCs to non-toxic end products.
- PlumeStop: consists of very fine particles of activated carbon that behave as a colloidal biomatrix, binding to the aquifer matrix, rapidly removing contaminants from groundwater, and expediting permanent contaminant biodegradation.

The overall goal of the remediation project is to reduce the above contaminants concentrations in on-site groundwater to acceptable levels, determined in consultation with the NYSDEC.

Attachment 1 includes the data sheets for S-MicroZVI, 3DME, BDI Plus, and PlumeStop. Additional application information is provided below.

Scope of Work

Benchmark's recommended scope of work includes the following:

Pre-Injection Activities

- A fire hydrant permit will be obtained for access to water for solution mixing during injection activities.

Injection Activities

- The groundwater remedial program will involve injecting approximately 3,600 lbs. of 3-DME, 4,000 lbs. S-MicroZVI, 41 liters BDI Plus, and 3,200 lbs. PlumeStop™ into groundwater/saturated soils in the southern portion of the Site via 51 injection points (see Figure 1). Treatment areas are further described below. Note that in the event the injection rate for any of the mixtures described below is limited due to subsurface capacity and infiltration rates, the quantity of product or injection method may be adjusted accordingly. Each amendment will be diluted in the field with water from the municipally supplied potable water supplier (Water Division of Jamestown's Board of Public Utilities).
    - Area A: 400 lbs. of 3DME, 300 lbs. S-MZVI, and 4 liters of BDI Plus will be diluted with approximately 883 gallons of water and applied across 6 injection points (~155 gallons per point) covering 600 square feet. The injections will be completed in the basement of the on-site building and in a grid like pattern with two rows of three injection points per row spaced 10-feet apart. The amendments will be injected from 14-23 fbgs (5 to 14 feet below finished basement floor).
    - Area B: 600 lbs. 3DME, 500 lbs. S-MZVI, and 5 liters BDI Plus will be diluted with approximately 1,316.7 gallons of water and applied across 3 injection points (~464 gallons per point) covering 320 square feet. The injections will be completed in a single row of three injection points spaced 10-feet apart. The amendments will be injected from 10 to 35 fbgs.
    - Area C: 1,600 lbs. 3DME, 1,200 lbs. S-MZVI, and 14 liters BDI Plus will be diluted with approximately 3,509 gallons of water and applied across 16 injection points (~232 gallons per point) covering 1,600 square feet. The injections will be completed in a grid like pattern with four rows of four injection points per row spaced 10-feet apart. The amendments will be injected from 20 to 35 fbgs.
    - Area D: 1,000 lbs. 3DME, 1,000 lbs. S-MZVI, and 9 liters BDI Plus will be diluted with approximately 2,212.6 gallons of water and applied across 9 injection points (~260 gallons per point) covering 855 square feet. The injections will be completed in two rows, with five injection points in one row and four injection points in the second row spaced 10-feet apart. The amendments will be injected from 18 to 35 fbgs.

- Area E: 3,200 lbs. PlumeStop, 1,000 lbs. S-MZVI, and 9 liters BDI Plus will be diluted with approximately 7,314 gallons of water and applied across 21 injection points (~369 gallons per point) covering 85 linear feet perpendicular to flow. The injections will be completed in two rows, with 10 injection points in the one row and 11 injection points in the second row spaced 8-feet apart. The amendment will be injection from 18 to 35 fbgs.

  Note: All injection points/wells are temporary and will be closed immediately after injection.

Post-Injection Activities

- Benchmark will complete groundwater sampling at wells PMW-1R, PMW-4, PMW-6, PMW-7, PMW-8, and MW-1 following completion of injection activities to evaluate the effectiveness of the in-situ groundwater treatment.
- The monitoring wells will be sampled for Target Compound List (TCL) plus Commissioner Policy CP-51 VOCs via EPA Method 8260, dissolved iron, total iron, sulfate, nitrate, total organic carbon (TOC), and dissolved gases (CO_2) one- and three-weeks following injection activities. Methane, ethane, and ethene will be sampled at all six wells but only during the second monitoring event (three-weeks following injection activities). Post-injection groundwater sampling will be completed to monitor short-term effectiveness of the in-situ treatment.

Please contact me if you have any questions or concerns.

Sincerely,
Benchmark Civil/Environmental Engineering & Geology, PLLC

Lori E. Riker, P.E.
Sr. Project Manager

ec: George Patti III (GPatti Enterprises, LLC)
Tom Forbes (Benchmark)
Charlotte Clark (Benchmark)

File: B0598-021-001

Type or print all information. See reverse for instructions. OMB No. 2040-0042 Approval Expires 4/30/2022

INVENTORY OF INJECTION WELLS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

(This information is collected under the authority of the Safe Drinking Water Act)

1. DATE PREPARED *(Year, Month, Day)*: 21-10-27

2. FACILITY ID NUMBER (To be completed by the permitting authority):

3. FACILITY INFORMATION

NAME, ADDRESS, PHONE NUMBER AND/OR EMAIL

Jamestown Brewery Project Site (BCP C907047)
115-121 West Third Street
Jamestown, NY 14701
716-665-9425
Contact - George Patti email: george@signaturepaving.us

INDIAN COUNTRY ☐ Yes ☒ No

4. LEGAL CONTACT INFORMATION

NAME, ADDRESS, ORGANIZATION, PHONE NUMBER AND/OR EMAIL

GPatti Development, LLC
2-12 E 3rd Street
Jamestown, NY 14701
716-665-7031
Contact - George Patti email: george@signaturepaving.us

TYPE ☒ Owner ☐ Operator

5. LOCATIONAL INFORMATION

Surface Location

1/4 of ____ 1/4 of ____ Section ____ Township ____ Range ____

____ ft. from (N/S) ____ Line of quarter section

____ ft. from (E/W) ____ Line of quarter section.

Latitude 42.0953979

Longitude -79.243287

6. WELL INFORMATION:

A. CLASS AND TYPE		B. NUMBER OF WELLS		C. TOTAL NUMBER OF WELLS	D. WELL OPERATION STATUS				
		COMM	NON-COMM		UC	AC	TA	PA	AN
V	B 6		51	51		51			

KEY: AC = Active; UC = Under Construction; TA = Temporarily Abandoned; PA = Permanently Abandoned and Approved by State; AN = Permanently Abandoned and not Approved by State

COMMENTS *(Optional)*:

A total of 3,600 lbs. of Regenesis's 3-D Microemulsion (3-DME), 4,000 lbs. S-Micro Zero-Valent Iron (S-MicroZVI), 41 liters Bio-Dechlor INOCULUM Plus (BDI Plus), and 3,200 lbs. PlumeStop into groundwater/saturated soils in the southern portion of the Site via 51 injection points (see attached injection work plan and Figure 1).

Injection points are temporary and will be filled in at grade and abandoned following injection activities.

NYSDEC BCP Site No. C907047 (Jamestown Brewery Site)

Name and Official Title *(Please type or print)*: George Patti, Owner

Date Submitted: 10/28/2021

Charlotte M. Clark

From: Aliu, Dorina <Aliu.Dorina@epa.gov>
Sent: Wednesday, November 17, 2021 7:31 AM
To: george@signaturepaving.us
Cc: Charlotte M. Clark; Lori E. Riker; Stanfield, Harper; Region2 UIC
Subject: (UIC ID 22NY01309605) Jamestown Brewery Project Site; 115-121 West Third Street, Jamestown, NY 14701; ABR Subsurface Environmental Remediation Well

VIA EMAIL

George Patti
GPatti Development, LLC
2-12 E 3rd Street
Jamestown, NY 14701
george@signaturepaving.us

Re: Underground Injection Control (UIC) Program Regulation
Jamestown Brewery Project Site (UIC ID 22NY01309605)
115-121 West Third Street
Jamestown, NY 14701
Chautauqua County
Authorization by Rule—Beneficial Use- Subsurface environmental remediation well

Dear George Patti:

The U.S. Environmental Protection Agency (USEPA) Region 2 Drinking Water & Groundwater Protection Section is in receipt of the Underground Injection Control (UIC) inventory information submitted on your behalf by Charlotte Clark addressing Class V UIC wells authorized by rule located at the above-referenced facility in accordance with 40 Code of Federal Regulations (CFR) §144.26.

The operation of the following Underground Injection Control wells is authorized by rule, pursuant to 40 CFR §144.24: **51 temporary 5B6 Beneficial Use - Subsurface environmental remediation wells** to remediate cis-1,2-dichloroethene (cis-1,2-DCE), trans-1,2-dichloroethene (trans-1,2-DCE), tetrachloroethylene (PCE), trichloroethylene (TCE), and vinyl chloride (VC) contamination of groundwater. New York State Department of Environmental Conservation (NYSDEC) approval of the Remedial Action Work Plan is pending; injection may commence once NYSDEC approval is issued. The NYSDEC Brownfields Cleanup Program Site No. is C907047.

Please inform EPA Region 2 when the wells are permanently closed, via e-mail to: region2_uic@epa.gov. On the subject line include the UIC ID Number; Facility/Site Name; Facility Address; Subject of the e-mail. Also cc the Case Handler.

Please note that all information submitted by you may be used in an administrative, civil judicial, or criminal action. In addition, making a knowing submission of materially false information to the U.S. Government may be a criminal offense.

If you have any questions, please contact Harper Stanfield of my staff at (212) 637-3728 or stanfield.harper@epa.gov.

Sincerely,

Dorina

Dorina Aliu, P.E.
Chief, Drinking Water and Ground Water Protection Section
EPA Region 2
290 Broadway, New York, NY 10007
aliu.dorina@epa.gov
(212) 637-3959

cc:

Charlotte Clark
Benchmark Civil/Environmental Engineering & Geology, PLLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
cclark@bm-tk.com

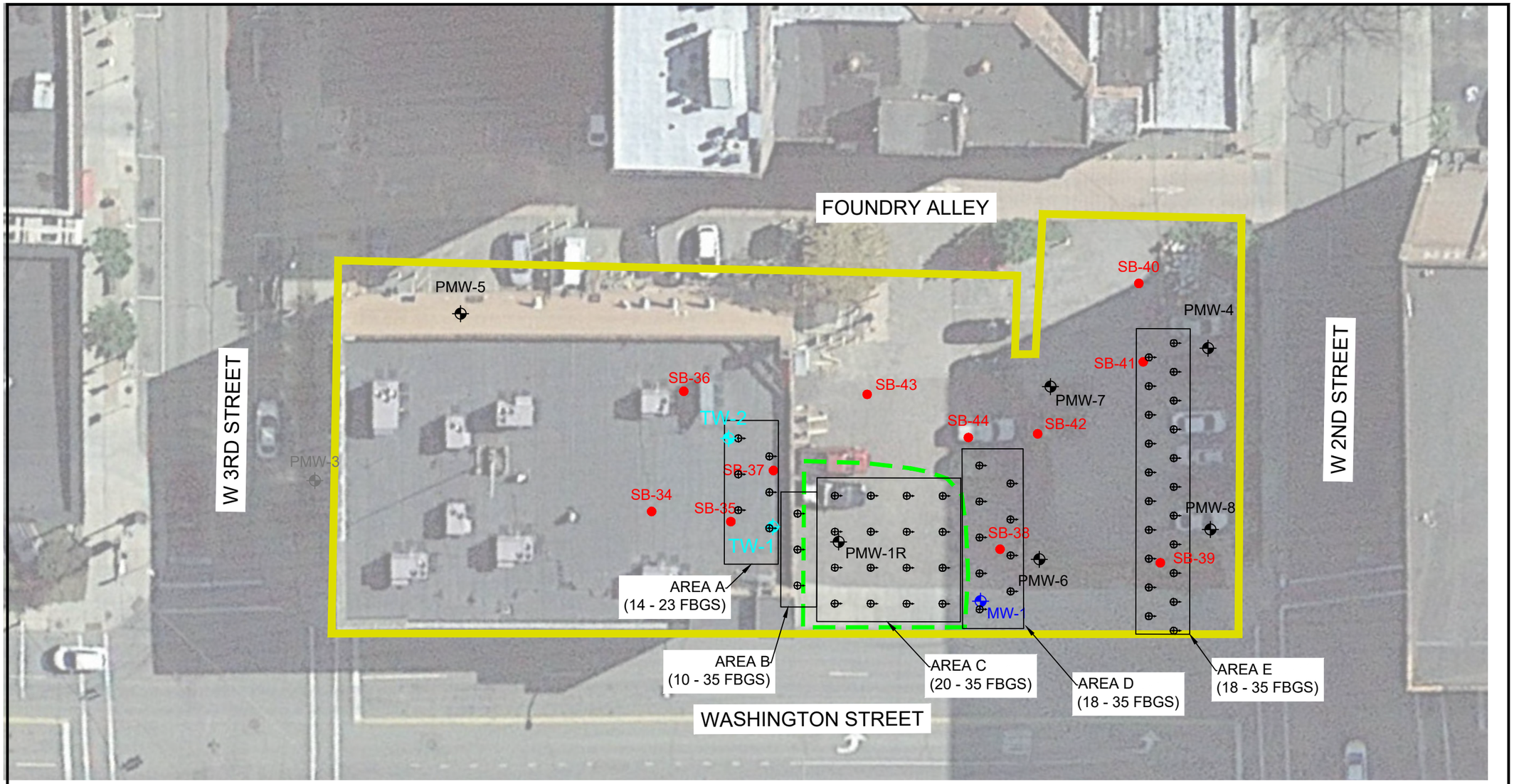
Lori Riker
Benchmark Civil/Environmental Engineering & Geology, PLLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
lriker@bm-tk.com

Harper Stanfield, EPA R2 Case Handler
stanfield.harper@epa.gov

Region2_UIC@epa.gov

FIGURES

F:\CAD\Benchmark\Slater Law\Jamestown Brewery Site\RAWP\Figure 3: Remedial Action (Injection Locations) (Track 4).dwg, 10/28/2021 4:21:21 PM



LEGEND:

- BCP SITE BOUNDARY
- IRM EXCAVATION EXTENTS (2018)
- PMW-3 — HISTORIC MW (10-29-2017)
- PMW-5 — RI MW (LABELLA, OCTOBER 2019)
- MW-1 — SI MONITORING WELL (2-INCH)
- TW-2 — SI TEMPORARY MONITORING WELL (1-INCH)
- SB-44 — SI SOIL BORING
- PLANNED INJECTION POINT

N

30' 0' 30' 60'

SCALE: 1 INCH = 30 FEET
SCALE IN FEET
(approximate)

AERIAL FROM GOOGLE EARTH 2019

DATE: MAY 2021
DRAFTED BY: RFL

PLANNED REMEDIAL ACTION TO ACHIEVE CSCOs (TRACK 4)

UIC PERMIT APPLICATION

JAMESTOWN BREWERY SITE (BCP SITE NO. C907047)
115-121 WEST THIRD STREET
JAMESTOWN, NEW YORK

PREPARED FOR
GPATTI DEVELOPMENT, LLC

BENCHMARK
2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218.
(716) 856-0599

JOB NO.: 0598-021-001

FIGURE 1

ATTACHMENT 1

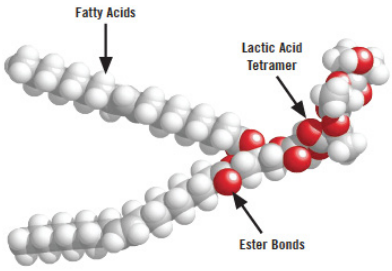
AMENDMENT PRODUCT INFORMATION

3-D Microemulsion® Factory Emulsified Technical Description

3-D Microemulsion (3DME®) is comprised of a patented molecular structure containing oleic acids (i.e., oil component) and lactates/polylactates, which are molecularly bound to one another (figure 1). The 3DME molecule contains both a soluble (hydrophilic) and insoluble (lipophilic) region. These two regions of the molecule are designed to be balanced in size and relative strength. The balanced hydrophilic/lipophilic regions of 3DME result in an electron donor with physical properties allowing it to initially adsorb to the aquifer material in the area of application, then slowly redistribute via very small 3DME "bundles" called micelles. These 3DME micelles spontaneously form within sections of the aquifer where concentrations of 3DME reach several hundred parts per million. The micelles' small size and mobility allow it to move with groundwater flow through the aquifer matrix, passing easily through the pore throats in between soil grains resulting in the further redistribution of 3DME within the aquifer. This allows for advective distribution of the oleic acids which are otherwise insoluble and unable to distribute in this manner, allowing for increased persistence of the lactate/polylactates component due to their initial attachment to the oleic acids.

Example of 3-D Microemulsion

FIGURE 1: THE 3-D MICROEMULSION MOLECULAR STRUCTURE



Due to its patented molecular structure, 3DME offers far greater transport when compared to blended emulsified vegetable oil (EVO) products, which fail to distribute beyond the limits of pumping. 3DME also provides greater persistence when compared to soluble substrates such as lactates or simple sugars. The 3DME molecular structures capitalize on the best features of the two electron-donor types while at the same time, minimize their limitations. 3DME is delivered to the site as a ready-to-apply emulsion that is simply diluted with water to generate a large volume of a 3DME colloidal suspension.

Suspension of 3DME generated by this mixing range from micelles on the order of .02 microns to .05 microns in diameter, to "swollen" micelles, (termed "microemulsions") which are on the order of .05 to 5 microns in diameter. Once injected into the subsurface in high volumes, the colloidal suspension mixes and dilutes in existing pore waters. The micelles/microemulsions on the injection front will then begin to sorb onto the surfaces of soils as a result of zeta potential attraction and organic matter within the soils themselves. As the sorption continues, the 3DME will "coat" pore surfaces developing a layer of molecules and in some cases a bilayer. This sorption process continues as the micelles/microemulsion moves outward and disassociates into their hydrophilic/hydrophobic components. The specialized chemistry of 3DME results in a staged release of electron donors: free lactate (immediate); polylactate esters (mid-range) and free fatty acids & fatty acid esters (long-term). Material longevity of three years or greater has been seen at most sites as determined from biogeochemical analyses.

For a list of treatable contaminants with the use of 3DME, view the Range of Treatable Contaminants Guide.

3-D Microemulsion® Factory Emulsified Technical Description

Chemical Composition

- Fatty acid esters
- Water
- Lactate oligomers
- Sodium lactate
- Proprietary surfactants

Properties

- Density – Approximately 1.0 grams per cubic centimeter (relative to water)
- pH – Neutral (approximately 6.5 to 7.5 standard units)
- Solubility – Soluble in Water
- Appearance – White emulsion
- Odor – Not detectable
- Vapor Pressure – None
- Non-hazardous

Storage and Handling Guidelines

Storage
Store in original tightly closed container
Store in a cool, dry, well-ventilated place
Store away from incompatible materials
Recommended storage containers: plastic-lined steel, plastic, glass, aluminum, stainless steel, or reinforced fiberglass

Handling
Avoid contact with eyes, skin, and clothing
Provide adequate ventilation
Wear appropriate personal protective equipment
Observe good industrial hygiene practices

Applications

- 3DME is diluted with water prior to application. Resulting emulsion has viscosity similar to water.
- Easily injects into formation through direct push injection points, injection wells or other injection delivery systems.

Application instructions for this product are contained in the 3DME FE Application Instructions.

Health and Safety

Material is food grade and relatively safe to handle. We recommend avoiding contact with eyes and prolonged contact with skin. OSHA Level D personal protection equipment including vinyl or rubber gloves, and eye protection are recommended when handling this product. Please review the 3DME FE Material Safety Data Sheet for additional storage, usage, and handling requirements.

REGENESIS®

www.regenesis.com
1011 Calle Sombra, San Clemente CA 92673
949.366.8000

REGENESIS
Technology-Based Solutions for the Environment

SAFETY DATA SHEET

1. Identification

Product identifier **3-D Microemulsion® Factory Emulsified**

Other means of identification None.

Recommended use Remediation of soils and groundwater.

Recommended restrictions None known.

Manufacturer/Importer/Supplier/Distributor information

Company Name Regenesis

Address 1011 Calle Sombra
San Clemente, CA 92673

Telephone 949-366-8000

E-mail CustomerService@regenesis.com

Emergency phone number CHEMTREC® at 1-800-424-9300 (International)

2. Hazard(s) identification

Physical hazards Not classified.

Health hazards

Skin corrosion/irritation	Category 2
Serious eye damage/eye irritation	Category 1

OSHA defined hazards Not classified.

Label elements

Signal word Danger

Hazard statement Causes skin irritation. Causes serious eye damage.

Precautionary statement

Prevention Wash thoroughly after handling. Wear protective gloves. Wear eye/face protection.

Response If on skin: Wash with plenty of water. If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a poison center/doctor. If skin irritation occurs: Get medical advice/attention. Take off contaminated clothing and wash before reuse.

Storage Store away from incompatible materials.

Disposal Dispose of waste and residues in accordance with local authority requirements.

Hazard(s) not otherwise classified (HNOC) None known.

3. Composition/information on ingredients

Mixtures

Chemical name	CAS number	%
HRC-PED	823190-10-9	50-51
Water	7732-18-5	35-36
Sodium lactate	72-17-3	13-14

Composition comments All concentrations are in percent by weight unless otherwise indicated.

4. First-aid measures

Inhalation Move to fresh air. Call a physician if symptoms develop or persist.

Skin contact	Remove contaminated clothing. Wash with plenty of soap and water. If skin irritation occurs: Get medical advice/attention. Wash contaminated clothing before reuse.
Eye contact	Immediately flush eyes with plenty of water for at least 15 minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Get medical attention immediately.
Ingestion	Rinse mouth. Never give anything by mouth to a victim who is unconscious or is having convulsions. Do not induce vomiting without advice from poison control center. Get medical attention if symptoms occur.
Most important symptoms/effects, acute and delayed	Severe eye irritation. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. Permanent eye damage including blindness could result. Skin irritation. May cause redness and pain.
Indication of immediate medical attention and special treatment needed	Provide general supportive measures and treat symptomatically. Keep victim under observation. Symptoms may be delayed.
General information	Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves.

5. Fire-fighting measures

Suitable extinguishing media	Water spray. Carbon dioxide (CO2). Dry chemical powder. Foam.
Unsuitable extinguishing media	Do not use water jet as an extinguisher, as this will spread the fire.
Specific hazards arising from the chemical	During fire, gases hazardous to health may be formed. Combustion products may include: carbon oxides, phosphorus compounds and metal oxides.
Special protective equipment and precautions for firefighters	Self-contained breathing apparatus and full protective clothing must be worn in case of fire.
Fire fighting equipment/instructions	Move containers from fire area if you can do so without risk. Water spray should be used to cool containers.
Specific methods	Use standard firefighting procedures and consider the hazards of other involved materials.
General fire hazards	No unusual fire or explosion hazards noted.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures	Keep unnecessary personnel away. Keep people away from and upwind of spill/leak. Surfaces may become slippery after spillage. Wear appropriate protective equipment and clothing during clean-up. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Ensure adequate ventilation. Local authorities should be advised if significant spillages cannot be contained. For personal protection, see section 8 of the SDS.
Methods and materials for containment and cleaning up	Spilled product may create a slipping hazard. Large Spills: Stop the flow of material, if this is without risk. Use water spray to reduce vapors or divert vapor cloud drift. Dike the spilled material, where this is possible. Cover with plastic sheet to prevent spreading. Absorb in vermiculite, dry sand or earth and place into containers. Following product recovery, flush area with water. Flush area clean with lots of water. Be aware of potential for surfaces to become slippery. Small Spills: Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination. Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS.
Environmental precautions	Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling	Do not get this material in contact with eyes. Avoid contact with eyes, skin, and clothing. Provide adequate ventilation. Wear appropriate personal protective equipment. Observe good industrial hygiene practices.
Conditions for safe storage, including any incompatibilities	Store in original tightly closed container. Store in a cool, dry, well-ventilated place. Store away from incompatible materials (see Section 10 of the SDS). Recommended storage containers: plastic lined steel, plastic, glass, aluminum, stainless steel, or reinforced fiberglass.

8. Exposure controls/personal protection

Occupational exposure limits	No exposure limits noted for ingredient(s).
Biological limit values	No biological exposure limits noted for the ingredient(s).

Appropriate engineering controls	Good general ventilation (typically 10 air changes per hour) should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level. Eye wash facilities and emergency shower must be available when handling this product.

Individual protection measures, such as personal protective equipment

Eye/face protection	Wear approved, tight fitting indirect vented or non-vented safety goggles where splashing is probable. Face shield is recommended.
Skin protection	
Hand protection	Wear appropriate chemical resistant gloves. Rubber or vinyl-coated gloves are recommended.
Other	Wear appropriate chemical resistant clothing.
Respiratory protection	If engineering controls do not maintain airborne concentrations below recommended exposure limits (where applicable) or to an acceptable level (in countries where exposure limits have not been established), an approved respirator must be worn.
Thermal hazards	Wear appropriate thermal protective clothing, when necessary.
General hygiene considerations	Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance	
Physical state	Liquid.
Form	Emulsion.
Color	White.
Odor	Odorless.
Odor threshold	Not available.
pH	Not available.
Melting point/freezing point	Not available.
Initial boiling point and boiling range	212 °F (100 °C)
Flash point	> 199.9 °F (> 93.3 °C) Closed Cup
Evaporation rate	Not available.
Flammability (solid, gas)	Not applicable.
Upper/lower flammability or explosive limits	
Flammability limit - lower (%)	Not available.
Flammability limit - upper (%)	Not available.
Explosive limit - lower (%)	Not available.
Explosive limit - upper (%)	Not available.
Vapor pressure	Not available.
Vapor density	Not available.
Relative density	1 - 1.2
Solubility(ies)	
Solubility (water)	Soluble.
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
Viscosity	Not available.

10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
Chemical stability	Undergoes hydrolysis in water to form lactic acid and soybean oil.

Possibility of hazardous reactions	No dangerous reaction known under conditions of normal use.
Conditions to avoid	Avoid temperatures exceeding the flash point. Contact with incompatible materials.
Incompatible materials	Strong oxidizing agents. Bases. Acids.
Hazardous decomposition products	Thermal decomposition or combustion may produce: carbon oxides, phosphorus compounds, metal oxides.

11. Toxicological information

Information on likely routes of exposure

Inhalation	May cause irritation to the respiratory system.
Skin contact	Causes skin irritation.
Eye contact	Causes serious eye damage.
Ingestion	Ingestion may cause irritation and malaise.
Symptoms related to the physical, chemical and toxicological characteristics	Severe eye irritation. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. Permanent eye damage including blindness could result. Skin irritation. May cause redness and pain.

Information on toxicological effects

Acute toxicity	Not available.
Skin corrosion/irritation	Causes skin irritation.
Serious eye damage/eye irritation	Causes serious eye damage.
Respiratory or skin sensitization	
Respiratory sensitization	Not a respiratory sensitizer.
Skin sensitization	This product is not expected to cause skin sensitization.
Germ cell mutagenicity	No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.
Carcinogenicity	This product is not considered to be a carcinogen by IARC, ACGIH, NTP, or OSHA.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

Reproductive toxicity	This product is not expected to cause reproductive or developmental effects.
Specific target organ toxicity - single exposure	Not classified.
Specific target organ toxicity - repeated exposure	Not classified.
Aspiration hazard	Not an aspiration hazard.

12. Ecological information

Ecotoxicity	The product is not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.
Persistence and degradability	Material is readily degradable and undergoes hydrolysis in several hours.
Bioaccumulative potential	No data available.
Mobility in soil	Not available.
Other adverse effects	None known.

13. Disposal considerations

Disposal instructions	Collect and reclaim or dispose in sealed containers at licensed waste disposal site. Dispose of contents/container in accordance with local/regional/national/international regulations.
Local disposal regulations	Dispose in accordance with all applicable regulations.
Hazardous waste code	The waste code should be assigned in discussion between the user, the producer and the waste disposal company.
Waste from residues / unused products	Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).
Contaminated packaging	Empty containers should be taken to an approved waste handling site for recycling or disposal. Since emptied containers may retain product residue, follow label warnings even after container is emptied.

14. Transport information

DOT

Not regulated as dangerous goods.

IATA

Not regulated as dangerous goods.

IMDG

Not regulated as dangerous goods.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code Not established.

15. Regulatory information

US federal regulations This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.
One or more components are not listed on TSCA.

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

CERCLA Hazardous Substance List (40 CFR 302.4)

Not listed.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

Hazard categories Immediate Hazard - Yes
Delayed Hazard - No
Fire Hazard - No
Pressure Hazard - No
Reactivity Hazard - No

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous chemical Yes

SARA 313 (TRI reporting)

Not regulated.

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA) Not regulated.

US state regulations

US. Massachusetts RTK - Substance List

Not regulated.

US. New Jersey Worker and Community Right-to-Know Act

Not listed.

US. Pennsylvania Worker and Community Right-to-Know Law

Not listed.

US. Rhode Island RTK

Not regulated.

US. California Proposition 65

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): This material is not known to contain any chemicals currently listed as carcinogens or reproductive toxins.

International Inventories

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	Yes

Country(s) or region	Inventory name	On inventory (yes/no)*
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	Yes
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	Yes
Korea	Existing Chemicals List (ECL)	Yes
New Zealand	New Zealand Inventory	Yes
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	Yes
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

*A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).
A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date 09-April-2015

Revision date -

Version # 01

Further information HMIS® is a registered trade and service mark of the American Coatings Association (ACA).

HMIS® ratings Health: 3
Flammability: 1
Physical hazard: 0

NFPA ratings

Disclaimer Regenesis cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

S-MicroZVI Specification Sheet

S-MicroZVI Technical Description

S-MicroZVI® is an *In Situ* Chemical Reduction (ISCR) reagent that promotes the destruction of many organic pollutants and is most commonly used with chlorinated hydrocarbons. It is engineered to provide an optimal source of micro-scale zero valent iron (ZVI) that is both easy to use and delivers enhanced reactivity with the target contaminants via multiple pathways. S-MicroZVI can destroy many chlorinated contaminants through a direct chemical reaction (**see Figure 1**). S-MicroZVI will also stimulate anaerobic biological degradation by rapidly creating a reducing environment that is favorable for reductive dechlorination.

Sulfidated ZVI

S-MicroZVI is composed of colloidal, sulfidated zero-valent iron particles suspended in glycerol using proprietary environmentally acceptable dispersants. The passivation technique of sulfidation, completed using proprietary processing methods, provides unparalleled reactivity with chlorinated hydrocarbons like PCE and TCE and increases its stability and longevity by minimizing undesirable side reactions.

S-MicroZVI is Best in Class For

- ☑ Longevity
- ☑ Reactivity
- ☑ Transport

In addition to superior reactivity, S-MicroZVI is designed for easy handling that is unmatched by any ZVI product on the market. Shipped as a liquid suspension, S-MicroZVI requires no powder feeders, no thickening with guar, and pneumatic or hydraulic fracturing is not mandatory. When diluted with water prior to application, the resulting suspension is easy to inject using either direct push or permanent injection wells.

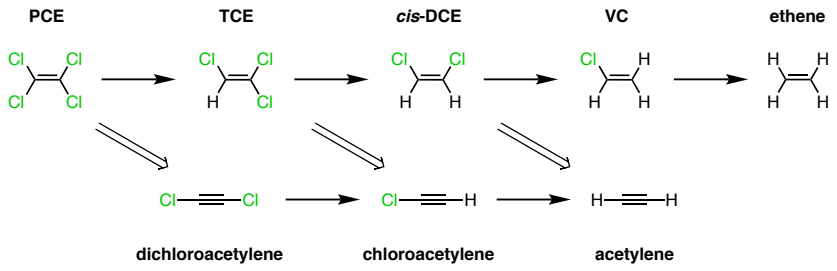


Figure 1: *Chlorinated ethene degradation pathways and products. The top pathway with single line arrows represent the reductive dechlorination (hydrogenolysis) pathway. The lower pathway with downward facing double line arrows represent the beta-elimination pathway.*

To see a list of treatable contaminants, view the S-MicroZVI treatable contaminants guide.

S-Micro ZVI®
Sulfidated Zero-Valent Iron

S-MicroZVI Specification Sheet

Chemical Composition

Iron, powders CAS 7439-89-6
Iron (II) sulfide CAS 1317-37-9
Glycerol CAS 56-81-8

Properties

Physical State: Liquid
Form: Viscous metallic suspension
Color: Dark gray
Odor: Slight
pH: Typically 7-9 as applied
Density: 15 lb/gal

Storage and Handling Guidelines

Storage:

- Use within four weeks of delivery
- Store in original containers
- Store at temperatures below 95F°
- Store away from incompatible materials

Handling:

- Never mix with oxidants or acids
- Wear appropriate personal protective equipment
- Do not taste or swallow
- Observe good industrial hygiene practices

Applications

S-MicroZVI is diluted with water on site and easily applied into the subsurface through low-pressure injections. S-MicroZVI can also be mixed with products like 3-D Microemulsion® or PlumeStop® prior to injection.

Health and Safety

The material is relatively safe to handle; however, avoid contact with eyes, skin and clothing. OSHA Level D personal protection equipment including: vinyl or rubber gloves and eye protection are recommended when handling this product. Please review the Safety Data Sheet for additional storage, and handling requirements here: S-MicroZVI SDS.

REGENESIS®

www.regenesis.com

Corporate Headquarters
1011 Calle Sombra, San Clemente CA 92673 USA
Tel: +1 949.366.8000

European Offices (UK, Ireland, Belgium and Italy)
Email: europe@regenesis.com
Tel: +44 (0)1225 61 81 61

REGENESIS
Technology-Based Solutions for the Environment

SAFETY DATA SHEET

1. Identification

Product identifier	**S-MicroZVI or S-MZVI**
Other means of identification	None.
Recommended use	Remediation of contaminants in soil and groundwater.
Recommended restrictions	None known.

Manufacturer/Importer/Supplier/Distributor information

Company Name	Regenesis
Address	1011 Calle Sombra San Clemente, CA 92673 USA
General information	949-366-8000
E-mail	CustomerService@regenesis.com

Emergency phone number	For Hazardous Materials Incidents ONLY (spill, leak, fire, exposure or accident), call CHEMTREC 24/7 at:
USA, Canada, Mexico	1-800-424-9300
International	1-703-527-3887

2. Hazard(s) identification

Physical hazards	Not classified.
Health hazards	Not classified.
OSHA defined hazards	Not classified.

Label elements

Hazard symbol	None.
Signal word	None.
Hazard statement	The mixture does not meet the criteria for classification.
Precautionary statement	
Prevention	Observe good industrial hygiene practices.
Response	Wash hands after handling.
Storage	Store away from incompatible materials.
Disposal	Dispose of waste and residues in accordance with local authority requirements.
Hazard(s) not otherwise classified (HNOC)	None known.
Supplemental information	Contact with acids liberates very toxic gas.

3. Composition/information on ingredients

Mixtures

Chemical name	CAS number	%
Glycerol	56-81-5	40 - 50
Zero valent iron	7439-89-6	30 - 50
Iron(II) sulfide	1317-37-9	1 - 4

Composition comments All concentrations are in percent by weight unless otherwise indicated.
Components not listed are either non-hazardous or are below reportable limits.

4. First-aid measures

Inhalation	Move to fresh air. Call a physician if symptoms develop or persist.
Skin contact	Wash off with soap and water. Get medical attention if irritation develops and persists.

Eye contact	Rinse with water. Get medical attention if irritation develops and persists.
Ingestion	Rinse mouth. Get medical attention if symptoms occur.
Most important symptoms/effects, acute and delayed	Direct contact with eyes may cause temporary irritation.
Indication of immediate medical attention and special treatment needed	Treat symptomatically.
General information	Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves.

5. Fire-fighting measures

Suitable extinguishing media	Water fog. Foam. Dry chemical powder. Carbon dioxide (CO2).
Unsuitable extinguishing media	None known.
Specific hazards arising from the chemical	During fire, gases hazardous to health may be formed. Combustion products may include: carbon oxides, iron oxides.
Special protective equipment and precautions for firefighters	Self-contained breathing apparatus and full protective clothing must be worn in case of fire.
Fire fighting equipment/instructions	Move containers from fire area if you can do so without risk.
Specific methods	Use standard firefighting procedures and consider the hazards of other involved materials.
General fire hazards	This material will not burn until the water has evaporated. Residue can burn. When dry may form combustible dust concentrations in air.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures	Keep unnecessary personnel away. For personal protection, see section 8 of the SDS.
Methods and materials for containment and cleaning up	Large Spills: Stop the flow of material, if this is without risk. Dike the spilled material, where this is possible. Absorb in vermiculite, dry sand or earth and place into containers. Following product recovery, flush area with water. Small Spills: Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination. Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS.
Environmental precautions	Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling	Avoid prolonged exposure. Observe good industrial hygiene practices.
Conditions for safe storage, including any incompatibilities	Store in original tightly closed container. Store away from incompatible materials (see Section 10 of the SDS).

8. Exposure controls/personal protection

Occupational exposure limits

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Components	Type	Value	Form
Glycerol (CAS 56-81-5)	PEL	5 mg/m3	Respirable fraction.
		15 mg/m3	Total dust.

Biological limit values	No biological exposure limits noted for the ingredient(s).
Appropriate engineering controls	Good general ventilation should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level.

Individual protection measures, such as personal protective equipment

Eye/face protection	Wear safety glasses with side shields (or goggles).

Skin protection	
Hand protection	Wear appropriate chemical resistant gloves. Suitable gloves can be recommended by the glove supplier.
Skin protection	
Other	Wear suitable protective clothing.
Respiratory protection	In case of insufficient ventilation, wear suitable respiratory equipment.
Thermal hazards	Wear appropriate thermal protective clothing, when necessary.
General hygiene considerations	Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance	
Physical state	Liquid.
Form	Viscous metallic suspension.
Color	Dark gray
Odor	Slight.
Odor threshold	Not available.
pH	7 - 8 (When mixed with water) 10 (As shipped)
Melting point/freezing point	Not available.
Initial boiling point and boiling range	Not available.
Flash point	Not available.
Evaporation rate	Not available.
Flammability (solid, gas)	Not applicable.
Upper/lower flammability or explosive limits	
Flammability limit - lower (%)	Not available.
Flammability limit - upper (%)	Not available.
Vapor pressure	Not available.
Vapor density	Not available.
Relative density	Not available.
Solubility(ies)	
Solubility (water)	Not available.
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
Viscosity	3000 cP (77 °F (25 °C))
Other information	
Explosive properties	Not explosive.
Oxidizing properties	Not oxidizing.

10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
Chemical stability	Material is stable under normal conditions.
Possibility of hazardous reactions	Contact with acids will release highly flammable and highly toxic hydrogen sulfide gas. Can react with some acids with the evolution of hydrogen.
Conditions to avoid	Contact with incompatible materials. Avoid drying out product. May generate combustible dust if material dries.
Incompatible materials	Strong oxidizing agents. Acids.

Hazardous decomposition products No hazardous decomposition products are known.

11. Toxicological information

Information on likely routes of exposure

Inhalation Spray mist may irritate the respiratory system. For dry material: Dust may irritate respiratory system.

Skin contact Prolonged or repeated exposure may cause minor irritation.

Eye contact Direct contact with eyes may cause temporary irritation.

Ingestion May cause discomfort if swallowed.

Symptoms related to the physical, chemical and toxicological characteristics Direct contact with eyes may cause temporary irritation.

Information on toxicological effects

Acute toxicity Not expected to be acutely toxic.

Components	Species	Test Results
Glycerol (CAS 56-81-5)		
Acute		
Dermal		
LD50	Rabbit	> 18700 mg/kg
Oral		
LD50	Rat	27200 mg/kg

Skin corrosion/irritation Prolonged skin contact may cause temporary irritation.

Serious eye damage/eye irritation Direct contact with eyes may cause temporary irritation.

Respiratory or skin sensitization

Respiratory sensitization Not a respiratory sensitizer.

Skin sensitization This product is not expected to cause skin sensitization.

Germ cell mutagenicity No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.

Carcinogenicity Not classifiable as to carcinogenicity to humans.

IARC Monographs. Overall Evaluation of Carcinogenicity

Not listed.

NTP Report on Carcinogens

Not listed.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1053)

Not regulated.

Reproductive toxicity This product is not expected to cause reproductive or developmental effects.

Specific target organ toxicity - single exposure Not classified.

Specific target organ toxicity - repeated exposure Not classified.

Aspiration hazard Not an aspiration hazard.

Further information Contains an ingredient known to produce adverse effects in a small percentage of hypersensitive individuals exhibited as respiratory distress and allergic skin reactions.

12. Ecological information

Ecotoxicity The product is not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.

Components		Species	Test Results
Glycerol (CAS 56-81-5)			
Aquatic			
Acute			
Crustacea	EC50	Daphnia magna	> 10000 mg/l, 24 Hours

Persistence and degradability No data is available on the degradability of this product.

Bioaccumulative potential No data available.

Partition coefficient n-octanol / water (log Kow)

Glycerol (CAS 56-81-5)	-1.76

Mobility in soil No data available.

Other adverse effects None known.

13. Disposal considerations

Disposal instructions Collect and reclaim or dispose in sealed containers at licensed waste disposal site.

Local disposal regulations Dispose in accordance with all applicable regulations.

Hazardous waste code The waste code should be assigned in discussion between the user, the producer and the waste disposal company.

Waste from residues / unused products Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).

Contaminated packaging Since emptied containers may retain product residue, follow label warnings even after container is emptied. Empty containers should be taken to an approved waste handling site for recycling or disposal.

14. Transport information

DOT

Not regulated as dangerous goods.

IATA

Not regulated as dangerous goods.

IMDG

Not regulated as dangerous goods.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code Not established.

15. Regulatory information

US federal regulations This product is not known to be a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

CERCLA Hazardous Substance List (40 CFR 302.4)

Not listed.

SARA 304 Emergency release notification

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1053)

Not regulated.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous chemical No

SARA 313 (TRI reporting)

Not regulated.

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA) Not regulated.

FEMA Priority Substances Respiratory Health and Safety in the Flavor Manufacturing Workplace

Glycerol (CAS 56-81-5)	Other Flavoring Substances with OSHA PEL's

US state regulations

US. Massachusetts RTK - Substance List

Glycerol (CAS 56-81-5)

US. New Jersey Worker and Community Right-to-Know Act

Glycerol (CAS 56-81-5)

US. Pennsylvania Worker and Community Right-to-Know Law

Glycerol (CAS 56-81-5)

US. Rhode Island RTK

Glycerol (CAS 56-81-5)

California Proposition 65

California Safe Drinking Water and Toxic Enforcement Act of 2016 (Proposition 65): This material is not known to contain any chemicals currently listed as carcinogens or reproductive toxins. For more information go to www.P65Warnings.ca.gov.

US. California. Candidate Chemicals List. Safer Consumer Products Regulations (Cal. Code Regs, tit. 22, 69502.3, subd. (a))

Zero valent iron (CAS 7439-89-6)

International Inventories

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	Yes
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	Yes
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Existing Chemicals List (ECL)	Yes
New Zealand	New Zealand Inventory	Yes
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	Yes
Taiwan	Taiwan Chemical Substance Inventory (TCSI)	Yes
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

*A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).
A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date 27-December-2018

Revision date -

Version # 01

HMIS® ratings Health: 1
Flammability: 1
Physical hazard: 0

NFPA ratings

Disclaimer Regenesis cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

BDI PLUS® Technical Description

Bio-Dechlor INOCULUM Plus (BDI PLUS®) is an enriched natural consortium containing species of Dehalococcoides sp. (DHC). BDI PLUS has been shown to simulate the rapid and complete dechlorination of chlorinated solvents such as tetrachloroethene (PCE), trichloroethene (TCE), dichloroethene (DCE) and vinyl chloride (VC) to non-toxic end products, ethene, carbon dioxide and water.

The culture also contains microbes capable of dehalogenating halomethanes (e.g., carbon tetrachloride and chloroform) and haloethanes (e.g., 1,1,1-TCA and 1,1-DCA) as well as mixtures of these contaminants.

Species of Dehalococcoides sp. (DHC)

For a list of treatable contaminants with the use of BDI PLUS, view the Range of Treatable Contaminants Guide

Chemical Composition

- Non-hazardous, naturally-occurring, non-altered anaerobic microbes and enzymes in a water-based medium.

Properties

- Appearance – Murky, yellow to grey water
- Odor – Musty
- pH 6.0 to 8.0
- Density – Approximately 1.0 grams per cubic centimeter (0.9 to 1.1 g/cc)
- Solubility – Soluble in Water
- Vapor Pressure – None
- Non-hazardous

Storage and Handling Guidelines

Storage
Store in original tightly closed container
Store away from incompatible materials
Recommended storage containers: plastic lined steel, plastic, glass, aluminum, stainless steel, or reinforced fiberglass
Store in a cool, dry area at 4-5°C (39 - 41°F)
Material may be stored for up to 3 weeks at 2-4°C without aeration

Handling
Avoid prolonged exposure
Observe good industrial hygiene practices
Wear appropriate personal protective equipment

BDI PLUS® Technical Description

Applications

- BDI PLUS is delivered to the site in liquid form and is designed to be injected directly into the saturated zone requiring treatment.
- Most often diluted with de-oxygenated water prior to injection into either hydraulic push injection points or properly constructed injection wells.
- The typical dilution rate of the injected culture is 10 gallons of deoxygenated water to 1 liter of standard BDI PLUS culture.

Application instructions for this product are contained here BDI PLUS Application Instructions.

Health and Safety

Material is non-hazardous and relatively safe to handle; however avoid contact with eyes and prolonged contact with skin. OSHA Level D personal protection equipment including: vinyl or rubber gloves and safety goggles or a splash shield are recommended when handling this product. An eyewash station is recommended. Please review the Material Safety Data Sheet for additional storage, usage, and handling requirements here: BDI PLUS SDS.

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SAFETY DATA SHEET

1. Identification

Product identifier	**Bio-Dechlor INOCULUM® Plus**
Other means of identification	DHC microbial consortium (SDC-9).
Recommended use	Soil and Groundwater Remediation.
Recommended restrictions	None known.

Manufacturer/Importer/Supplier/Distributor information

Company Name	Regenesis
Address	1011 Calle Sombra San Clemente, CA 92673
Telephone	949-366-8000
E-mail	CustomerService@regenesis.com
Emergency phone number	CHEMTREC® at 1-800-424-9300 (International)

2. Hazard(s) identification

Physical hazards	Not classified.
Health hazards	Not classified.
OSHA defined hazards	Not classified.

Label elements

Hazard symbol	None.
Signal word	None.
Hazard statement	The mixture does not meet the criteria for classification.
Precautionary statement	
Prevention	Observe good industrial hygiene practices.
Response	Wash hands after handling.
Storage	Store away from incompatible materials.
Disposal	Dispose of waste and residues in accordance with local authority requirements.
Hazard(s) not otherwise classified (HNOC)	None known.

3. Composition/information on ingredients

Mixtures

The manufacturer lists no ingredients as hazardous according to OSHA 29 CFR 1910.1200.

Chemical name	CAS number	%
DHC microbial consortium comprised of microorganisms of the genus Dehalococcoides	Not Applicable	100

Composition comments All concentrations are in percent by weight unless otherwise indicated.

4. First-aid measures

Inhalation	Move to fresh air. Call a physician if symptoms develop or persist.
Skin contact	Wash off with soap and water. Get medical attention if irritation develops and persists.
Eye contact	Rinse with water. Get medical attention if irritation develops and persists.
Ingestion	Rinse mouth. Get medical attention if symptoms occur.
Most important symptoms/effects, acute and delayed	Direct contact with eyes may cause temporary irritation.
Indication of immediate medical attention and special treatment needed	Treat symptomatically.

General information	If you feel unwell, seek medical advice (show the label where possible). Show this safety data sheet to the doctor in attendance.

5. Fire-fighting measures

Suitable extinguishing media	Carbon dioxide (CO2). Water. Foam.
Unsuitable extinguishing media	None known.
Specific hazards arising from the chemical	During fire, gases hazardous to health may be formed.
Special protective equipment and precautions for firefighters	Self-contained breathing apparatus and full protective clothing must be worn in case of fire.
Fire fighting equipment/instructions	Move containers from fire area if you can do so without risk.
Specific methods	Use standard firefighting procedures and consider the hazards of other involved materials. Use water spray to keep fire-exposed containers cool.
General fire hazards	No unusual fire or explosion hazards noted. The product itself does not burn.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures	Keep unnecessary personnel away. Avoid contact with spilled material. For personal protection, see section 8 of the SDS.
Methods and materials for containment and cleaning up	This product is miscible in water. Disinfect the spill area with 5% bleach solution after clean-up. Large Spills: Stop the flow of material, if this is without risk. Dike the spilled material, where this is possible. Cover with plastic sheet to prevent spreading. Absorb in vermiculite, dry sand or earth and place into containers. Following product recovery, flush area with water. Small Spills: Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination. Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS.
Environmental precautions	Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling	Avoid prolonged exposure. Observe good industrial hygiene practices. Wear appropriate personal protective equipment (See Section 8).
Conditions for safe storage, including any incompatibilities	Store in original tightly closed container. Recommended storage containers: plastic lined steel, plastic, glass, aluminum, stainless steel, or reinforced fiberglass. Store away from incompatible materials (see Section 10 of the SDS). Store in a cool, dry area at 4 - 5°C (39 - 41°F).

8. Exposure controls/personal protection

Occupational exposure limits	No exposure limits noted for ingredient(s).
Biological limit values	No biological exposure limits noted for the ingredient(s).
Appropriate engineering controls	General ventilation normally adequate. Provide eyewash station.

Individual protection measures, such as personal protective equipment

Eye/face protection	Tightly fitting safety goggles.
Skin protection	
Hand protection	The following glove materials are recommended: vinyl or rubber.
Other	Wear suitable protective clothing.
Respiratory protection	Not normally needed. In case of insufficient ventilation, wear suitable respiratory equipment. If engineering controls do not maintain airborne concentrations below recommended exposure limits (where applicable) or to an acceptable level (in countries where exposure limits have not been established), an approved respirator must be worn.
Thermal hazards	Wear appropriate thermal protective clothing, when necessary.
General hygiene considerations	Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance	
Physical state	Liquid.
Form	Liquid.
Color	Murky yellow.
Odor	Musty.
Odor threshold	Not available.
pH	Not available.
Melting point/freezing point	Not available.
Initial boiling point and boiling range	212 °F (100 °C)
Flash point	Not flammable.
Evaporation rate	Not available.
Flammability (solid, gas)	Not applicable.
Upper/lower flammability or explosive limits	
Flammability limit - lower (%)	Not available.
Flammability limit - upper (%)	Not available.
Explosive limit - lower (%)	Not available.
Explosive limit - upper (%)	Not available.
Vapor pressure	Not available.
Vapor density	Not available.
Relative density	0.9 - 1.1
Solubility(ies)	
Solubility (water)	Soluble.
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
Viscosity	Not available.

10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
Chemical stability	Material is stable under normal conditions.
Possibility of hazardous reactions	No dangerous reaction known under conditions of normal use.
Conditions to avoid	Contact with incompatible materials. Keep from freezing.
Incompatible materials	Strong oxidizing agents. Bases. Acids.
Hazardous decomposition products	No hazardous decomposition products are known.

11. Toxicological information

Information on likely routes of exposure

Inhalation	Prolonged inhalation may be harmful.
Skin contact	Prolonged or repeated skin contact may result in minor irritation.
Eye contact	Direct contact with eyes may cause temporary irritation.
Ingestion	Ingestion may cause irritation and stomach discomfort.
Symptoms related to the physical, chemical and toxicological characteristics	Direct contact with eyes may cause temporary irritation.

Information on toxicological effects

Acute toxicity	Not expected to be acutely toxic.
Skin corrosion/irritation	Prolonged skin contact may cause temporary irritation.
Serious eye damage/eye irritation	Direct contact with eyes may cause temporary irritation.
Respiratory or skin sensitization	
Respiratory sensitization	Not a respiratory sensitizer.
Skin sensitization	This product is not expected to cause skin sensitization.
Germ cell mutagenicity	No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.
Carcinogenicity	This product is not considered to be a carcinogen by IARC, ACGIH, NTP, or OSHA.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

Reproductive toxicity	This product is not expected to cause reproductive or developmental effects.
Specific target organ toxicity - single exposure	Not classified.
Specific target organ toxicity - repeated exposure	Not classified.
Aspiration hazard	Not an aspiration hazard.
Chronic effects	Prolonged inhalation may be harmful.
Further information	May be harmful by inhalation, ingestion, or skin absorption via bacterial action.

12. Ecological information

Ecotoxicity	The product is not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.
Persistence and degradability	This material will degrade in the environment. Material is readily degradable and undergoes hydrolysis in several hours.
Bioaccumulative potential	No data available.
Mobility in soil	Expected to be highly mobile in soil.
Other adverse effects	None known.

13. Disposal considerations

Disposal instructions	Collect and reclaim or dispose in sealed containers at licensed waste disposal site.
Local disposal regulations	Dispose in accordance with all applicable regulations.
Hazardous waste code	The waste code should be assigned in discussion between the user, the producer and the waste disposal company.
Waste from residues / unused products	Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).
Contaminated packaging	Empty containers should be taken to an approved waste handling site for recycling or disposal. Since emptied containers may retain product residue, follow label warnings even after container is emptied.

14. Transport information

DOT

Not regulated as dangerous goods.

IATA

Not regulated as dangerous goods.

IMDG

Not regulated as dangerous goods.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code	Not available.

15. Regulatory information

US federal regulations

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

CERCLA Hazardous Substance List (40 CFR 302.4)

Not listed.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

Hazard categories

Immediate Hazard - No
Delayed Hazard - No
Fire Hazard - No
Pressure Hazard - No
Reactivity Hazard - No

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous chemical No

SARA 313 (TRI reporting)

Not regulated.

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA) Not regulated.

US state regulations

US. Massachusetts RTK - Substance List

Not regulated.

US. New Jersey Worker and Community Right-to-Know Act

Not listed.

US. Pennsylvania Worker and Community Right-to-Know Law

Not listed.

US. Rhode Island RTK

Not regulated.

US. California Proposition 65

Not Listed.

International Inventories

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	No
Canada	Domestic Substances List (DSL)	No
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	No
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Existing Chemicals List (ECL)	No
New Zealand	New Zealand Inventory	No
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	No

Country(s) or region	Inventory name	On inventory (yes/no)*
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	No

*A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).
A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date 12-February-2015

Revision date -

Version # 01

Further information HMIS® is a registered trade and service mark of the American Coatings Association (ACA).

HMIS® ratings Health: 0
Flammability: 0
Physical hazard: 0

NFPA ratings

Disclaimer Regenesis cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

PlumeStop® Liquid Activated Carbon™ Technical Description

PlumeStop Liquid Activated Carbon is an innovative groundwater remediation technology designed to rapidly remove and permanently degrade groundwater contaminants. PlumeStop is composed of very fine particles of activated carbon (1-2µm) suspended in water through the use of unique organic polymer dispersion chemistry. Once in the subsurface, the material behaves as a colloidal biomatrix, binding to the aquifer matrix, rapidly removing contaminants from groundwater, and expediting permanent contaminant biodegradation.

This unique remediation technology accomplishes treatment with the use of highly dispersible, fast-acting, sorption-based technology, capturing and concentrating dissolved-phase contaminants within its matrix-like structure. Once contaminants are sorbed onto the regenerative matrix, biodegradation processes achieve complete remediation at an accelerated rate.

Distribution of PlumeStop in water

To see a list of treatable contaminants with the use of PlumeStop, view the Range of Treatable Contaminants Guide.

Chemical Composition

- Water - CAS# 7732-18-5
- Colloidal Activated Carbon ≤2.5 - CAS# µm 7440-44-0
- Proprietary Additives

Properties

- Physical state: Liquid
- Form: Aqueous suspension
- Color: Black
- Odor: Odorless
- pH: 8 - 10

Storage and Handling Guidelines

Storage
Store in original tightly closed container
Store away from incompatible materials
Protect from freezing

Handling
Avoid contact with skin and eyes
Avoid prolonged exposure
Observe good industrial hygiene practices
Wash thoroughly after handling
Wear appropriate personal protective equipment

PlumeStop® Liquid Activated Carbon™ Technical Description

Applications

PlumeStop is easily applied into the subsurface through gravity-feed or low-pressure injection.

Health and Safety

Wash hands after handling. Dispose of waste and residues in accordance with local authority requirements. Please review the Material Safety Data Sheet for additional storage, usage, and handling requirements here: PlumeStop SDS.

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949.366.8000

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SAFETY DATA SHEET

1. Identification

Product identifier **PlumeSTOP®**

Other means of identification None.

Recommended use Soil and Groundwater Remediation.

Recommended restrictions None known.

Manufacturer/Importer/Supplier/Distributor information

Company Name Regenesis

Address 1011 Calle Sombra
San Clemente, CA 92673

Telephone 949-366-8000

E-mail CustomerService@regenesis.com

Emergency phone number CHEMTREC® at 1-800-424-9300 (International)

2. Hazard(s) identification

Physical hazards Not classified.

Health hazards Not classified.

OSHA defined hazards Not classified.

Label elements

Hazard symbol None.

Signal word None.

Hazard statement The mixture does not meet the criteria for classification.

Precautionary statement

Prevention Observe good industrial hygiene practices.

Response Wash hands after handling.

Storage Store away from incompatible materials.

Disposal Dispose of waste and residues in accordance with local authority requirements.

Hazard(s) not otherwise classified (HNOC) None known.

3. Composition/information on ingredients

Mixtures

Chemical name	CAS number	%
Water	7732-18-5	>75
Colloidal activated carbon ≤2.5 µm	7440-44-0	<25
Proprietary additives		≤2

Composition comments All concentrations are in percent by weight unless otherwise indicated.

4. First-aid measures

Inhalation Move to fresh air. Call a physician if symptoms develop or persist.

Skin contact Wash off with soap and water. Get medical attention if irritation develops and persists.

Eye contact Rinse with water. Get medical attention if irritation develops and persists.

Ingestion Rinse mouth. Get medical attention if symptoms occur.

Most important symptoms/effects, acute and delayed Direct contact with eyes may cause temporary irritation.

Indication of immediate medical attention and special treatment needed	Treat symptomatically.
General information	If you feel unwell, seek medical advice (show the label where possible). Show this safety data sheet to the doctor in attendance.

5. Fire-fighting measures

Suitable extinguishing media	Carbon dioxide, alcohol-resistant foam, dry chemical, water spray, or water fog.
Unsuitable extinguishing media	None known.
Specific hazards arising from the chemical	During fire, gases hazardous to health may be formed. Combustion products may include: carbon monoxide, carbon dioxide, sodium oxides, metal oxides.
Special protective equipment and precautions for firefighters	Use protective equipment appropriate for surrounding materials.
Fire fighting equipment/instructions	Move containers from fire area if you can do so without risk.
Specific methods	Use standard firefighting procedures and consider the hazards of other involved materials. Use water spray to keep fire-exposed containers cool.
General fire hazards	This material will not burn until the water has evaporated. Residue can burn. When dry may form combustible dust concentrations in air.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures	Keep unnecessary personnel away. Avoid contact with spilled material. For personal protection, see section 8 of the SDS.
Methods and materials for containment and cleaning up	This product is miscible in water. Large Spills: Stop the flow of material, if this is without risk. Dike the spilled material, where this is possible. Cover with plastic sheet to prevent spreading. Absorb in vermiculite, dry sand or earth and place into containers. Following product recovery, flush area with water. Small Spills: Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination. Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS.
Environmental precautions	Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling	Avoid contact with skin and eyes. Avoid prolonged exposure. Observe good industrial hygiene practices. Wash thoroughly after handling. Wear appropriate personal protective equipment (See Section 8).
Conditions for safe storage, including any incompatibilities	Store in original tightly closed container. Store away from incompatible materials (see Section 10 of the SDS). Protect from freezing.

8. Exposure controls/personal protection

Occupational exposure limits

US. OSHA Table Z-3 (29 CFR 1910.1000)

Components	Type	Value	Form
Colloidal activated carbon ≤2.5 µm (CAS 7440-44-0)	TWA	5 mg/m3	Respirable fraction.
		15 mg/m3	Total dust.

US. NIOSH: Pocket Guide to Chemical Hazards

Components	Type	Value	Form
Colloidal activated carbon ≤2.5 µm (CAS 7440-44-0)	TWA	2.5 mg/m3	Respirable.

Biological limit values	No biological exposure limits noted for the ingredient(s).
Appropriate engineering controls	Good general ventilation (typically 10 air changes per hour) should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level.

Individual protection measures, such as personal protective equipment

Eye/face protection	Wear approved chemical safety goggles.
Skin protection	
Hand protection	Rubber, neoprene or PVC gloves are recommended. Wash hands after handling.
Other	Avoid contact with the skin. Wear suitable protective clothing.
Respiratory protection	Not normally needed. In case of insufficient ventilation, wear suitable respiratory equipment. If engineering controls do not maintain airborne concentrations below recommended exposure limits (where applicable) or to an acceptable level (in countries where exposure limits have not been established), an approved respirator must be worn.
Thermal hazards	Wear appropriate thermal protective clothing, when necessary.
General hygiene considerations	Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance	
Physical state	Liquid.
Form	Aqueous suspension.
Color	Black.
Odor	Odorless.
Odor threshold	Not available.
pH	8 - 10
Melting point/freezing point	Not available.
Initial boiling point and boiling range	Not available.
Flash point	Not flammable.
Evaporation rate	Not available.
Flammability (solid, gas)	Not applicable.
Upper/lower flammability or explosive limits	
Flammability limit - lower (%)	Not available.
Flammability limit - upper (%)	Not available.
Explosive limit - lower (%)	Not available.
Explosive limit - upper (%)	Not available.
Vapor pressure	Not available.
Vapor density	Not available.
Relative density	1 - 1.2
Solubility(ies)	
Solubility (water)	Miscible
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
Viscosity	Not available.

10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
Chemical stability	Material is stable under normal conditions.
Possibility of hazardous reactions	No dangerous reaction known under conditions of normal use.
Conditions to avoid	Contact with incompatible materials. Keep from freezing.
Incompatible materials	Strong oxidizing agents. Water reactive materials.

Hazardous decomposition products	Combustion may produce: carbon oxides.

11. Toxicological information

Information on likely routes of exposure

Inhalation	Prolonged inhalation may be harmful.
Skin contact	Prolonged or repeated skin contact may result in minor irritation.
Eye contact	Direct contact with eyes may cause temporary irritation.
Ingestion	Expected to be a low ingestion hazard.
Symptoms related to the physical, chemical and toxicological characteristics	Direct contact with eyes may cause temporary irritation.

Information on toxicological effects

Acute toxicity Not expected to be acutely toxic.

Components	Species	Test Results
Colloidal activated carbon ≤2.5 µm (CAS 7440-44-0)		
Acute		
Inhalation		
LC50	Rat	> 8500 mg/m³, air
Oral		
LD50	Rat	> 2000 mg/kg, (Female)

Skin corrosion/irritation	Prolonged skin contact may cause temporary irritation.
Serious eye damage/eye irritation	Direct contact with eyes may cause temporary irritation.
Respiratory or skin sensitization	
Respiratory sensitization	Not a respiratory sensitizer.
Skin sensitization	This product is not expected to cause skin sensitization.
Germ cell mutagenicity	No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.
Carcinogenicity	This product is not considered to be a carcinogen by IARC, ACGIH, NTP, or OSHA.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

Reproductive toxicity	This product is not expected to cause reproductive or developmental effects.
Specific target organ toxicity - single exposure	Not classified.
Specific target organ toxicity - repeated exposure	Not classified.
Aspiration hazard	Not an aspiration hazard.
Chronic effects	Prolonged inhalation may be harmful.

12. Ecological information

Ecotoxicity	The product is not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.
Persistence and degradability	No data is available on the degradability of this product.
Bioaccumulative potential	No data available.
Mobility in soil	Expected to be temporarily highly mobile in soil.
Other adverse effects	None known.

13. Disposal considerations

Disposal instructions	Collect and reclaim or dispose in sealed containers at licensed waste disposal site.
Local disposal regulations	Dispose in accordance with all applicable regulations.
Hazardous waste code	The waste code should be assigned in discussion between the user, the producer and the waste disposal company.

Waste from residues / unused products	Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).
Contaminated packaging	Empty containers should be taken to an approved waste handling site for recycling or disposal. Since emptied containers may retain product residue, follow label warnings even after container is emptied.

14. Transport information

DOT

Not regulated as dangerous goods.

IATA

Not regulated as dangerous goods.

IMDG

Not regulated as dangerous goods.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code	Not established.

15. Regulatory information

US federal regulations

All components are listed on or exempt from the U.S. EPA TSCA Inventory List.
This product is not known to be a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

CERCLA Hazardous Substance List (40 CFR 302.4)

Not listed.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

Hazard categories

Immediate Hazard - No
Delayed Hazard - No
Fire Hazard - No
Pressure Hazard - No
Reactivity Hazard - No

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous chemical	No

SARA 313 (TRI reporting)

Not regulated.

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA)	Not regulated.

US state regulations

US. Massachusetts RTK - Substance List

Not regulated.

US. New Jersey Worker and Community Right-to-Know Act

Colloidal activated carbon ≤2.5 µm (CAS 7440-44-0)

US. Pennsylvania Worker and Community Right-to-Know Law

Not listed.

US. Rhode Island RTK

Not regulated.

US. California Proposition 65

Not Listed.

International Inventories

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	Yes
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	Yes
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Existing Chemicals List (ECL)	Yes
New Zealand	New Zealand Inventory	Yes
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	Yes
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

*A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).
A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date 26-February-2015

Revision date -

Version # 01

Further information HMIS® is a registered trade and service mark of the American Coatings Association (ACA).

HMIS® ratings Health: 0
Flammability: 0
Physical hazard: 0

NFPA ratings

Disclaimer Regenesis cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

REGENESIS
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SAFETY DATA SHEET

1. Identification

Product identifier	**PlumeSTOP® Nutrients**
Other means of identification	None.
Recommended use	Soil and Groundwater Remediation.
Recommended restrictions	None known.

Manufacturer/Importer/Supplier/Distributor information

Company Name	Regenesis
Address	1011 Calle Sombra San Clemente, CA 92673
Telephone	949-366-8000
E-mail	CustomerService@regenesis.com
Emergency phone number	CHEMTREC® at 1-800-424-9300 (International)

2. Hazard(s) identification

Physical hazards	Not classified.
Health hazards	Not classified.
OSHA defined hazards	Not classified.

Label elements

Hazard symbol	None.
Signal word	None.
Hazard statement	The mixture does not meet the criteria for classification.
Precautionary statement	
Prevention	Observe good industrial hygiene practices.
Response	Wash hands after handling.
Storage	Store away from incompatible materials.
Disposal	Dispose of waste and residues in accordance with local authority requirements.
Hazard(s) not otherwise classified (HNOC)	None known.
Supplemental information	None.

3. Composition/information on ingredients

Mixtures

The manufacturer lists no ingredients as hazardous according to OSHA 29 CFR 1910.1200.

4. First-aid measures

Inhalation	Move to fresh air. Call a physician if symptoms develop or persist.
Skin contact	Wash off with soap and water. Get medical attention if irritation develops and persists.
Eye contact	Do not rub eyes. Rinse with water. Get medical attention if irritation develops and persists.
Ingestion	Rinse mouth. Get medical attention if symptoms occur.
Most important symptoms/effects, acute and delayed	Dusts may irritate the respiratory tract, skin and eyes.
Indication of immediate medical attention and special treatment needed	Treat symptomatically.
General information	Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves.

5. Fire-fighting measures

Suitable extinguishing media	Water fog. Foam. Dry chemical powder. Carbon dioxide (CO2). Apply extinguishing media carefully to avoid creating airborne dust.
Unsuitable extinguishing media	None known.
Specific hazards arising from the chemical	During fire, gases hazardous to health may be formed.
Special protective equipment and precautions for firefighters	Self-contained breathing apparatus and full protective clothing must be worn in case of fire.
Fire fighting equipment/instructions	Use water spray to cool unopened containers. Avoid dust formation.
Specific methods	Use standard firefighting procedures and consider the hazards of other involved materials.
General fire hazards	No unusual fire or explosion hazards noted.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures	Keep unnecessary personnel away. Wear appropriate protective equipment and clothing during clean-up. Use a NIOSH/MSHA approved respirator if there is a risk of exposure to dust/fume at levels exceeding the exposure limits. For personal protection, see section 8 of the SDS.
Methods and materials for containment and cleaning up	Avoid the generation of dusts during clean-up. Collect dust using a vacuum cleaner equipped with HEPA filter. This product is miscible in water. Stop the flow of material, if this is without risk. Large Spills: Wet down with water and dike for later disposal. Shovel the material into waste container. Following product recovery, flush area with water. Small Spills: Sweep up or vacuum up spillage and collect in suitable container for disposal. For waste disposal, see section 13 of the SDS.
Environmental precautions	Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling	Minimize dust generation and accumulation. Provide appropriate exhaust ventilation at places where dust is formed. Practice good housekeeping.
Conditions for safe storage, including any incompatibilities	Store in original tightly closed container. Store in a well-ventilated place. Store away from incompatible materials (see Section 10 of the SDS).

8. Exposure controls/personal protection

Occupational exposure limits

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Components	Type	Value	Form
PlumeSTOP® Nutrients (as dust)	PEL	5 mg/m3	Respirable fraction.
		15 mg/m3	Total dust.

US. OSHA Table Z-3 (29 CFR 1910.1000)

Components	Type	Value	Form
PlumeSTOP® Nutrients (as dust)	TWA	5 mg/m3	Respirable fraction.
		15 mg/m3	Total dust.
		50 mppcf	Total dust.
		15 mppcf	Respirable fraction.

US. ACGIH Threshold Limit Values

Components	Type	Value	Form
PlumeSTOP® Nutrients (as dust)	TWA	3 mg/m3	Respirable particles.
		10 mg/m3	Inhalable particles.

Biological limit values	No biological exposure limits noted for the ingredient(s).
Appropriate engineering controls	Ensure adequate ventilation, especially in confined areas. Local exhaust is suggested for use, where possible, in enclosed or confined spaces.

Individual protection measures, such as personal protective equipment

Eye/face protection	Wear safety glasses with side shields (or goggles). Unvented, tight fitting goggles should be worn in dusty areas.
Skin protection	
Hand protection	Wear appropriate chemical resistant gloves. Suitable gloves can be recommended by the glove supplier.
Skin protection	
Other	Wear suitable protective clothing.
Respiratory protection	In case of inadequate ventilation, use MSHA/NIOSH approved dust respirator.
Thermal hazards	Wear appropriate thermal protective clothing, when necessary.
General hygiene considerations	Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance	
Physical state	Solid.
Form	Powder.
Color	White.
Odor	Odorless.
Odor threshold	Not available.
pH	Not available.
Melting point/freezing point	Not available.
Initial boiling point and boiling range	Not available.
Flash point	Not available.
Evaporation rate	Not available.
Flammability (solid, gas)	The product is non-combustible.
Upper/lower flammability or explosive limits	
Flammability limit - lower (%)	Not available.
Flammability limit - upper (%)	Not available.
Explosive limit - lower (%)	Not available.
Explosive limit - upper (%)	Not available.
Vapor pressure	Not available.
Vapor density	Not available.
Relative density	Not available.
Solubility(ies)	
Solubility (water)	Completely soluble.
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
Viscosity	Not available.
Other information	
Explosive properties	Not explosive.
Oxidizing properties	Not oxidizing.

10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
Chemical stability	Material is stable under normal conditions.

Possibility of hazardous reactions	No dangerous reaction known under conditions of normal use. Ammonia fumes may be released upon heating.
Conditions to avoid	Contact with incompatible materials. Excessive heat.
Incompatible materials	Strong oxidizing agents. Bases.
Hazardous decomposition products	Ammonia fumes may be released upon heating.

11. Toxicological information

Information on likely routes of exposure

Inhalation	Dust may irritate respiratory system.
Skin contact	Dust or powder may irritate the skin.
Eye contact	Dust may irritate the eyes.
Ingestion	Expected to be a low ingestion hazard.
Symptoms related to the physical, chemical and toxicological characteristics	Dusts may irritate the respiratory tract, skin and eyes.

Information on toxicological effects

Acute toxicity	Not expected to be acutely toxic.
Skin corrosion/irritation	Prolonged skin contact may cause temporary irritation.
Serious eye damage/eye irritation	Direct contact with eyes may cause temporary irritation.

Respiratory or skin sensitization

Respiratory sensitization	Not a respiratory sensitizer.
Skin sensitization	This product is not expected to cause skin sensitization.
Germ cell mutagenicity	No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.
Carcinogenicity	This product is not considered to be a carcinogen by IARC, ACGIH, NTP, or OSHA.

IARC Monographs. Overall Evaluation of Carcinogenicity

Not listed.

NTP Report on Carcinogens

Not listed.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not regulated.

Reproductive toxicity	This product is not expected to cause reproductive or developmental effects.
Specific target organ toxicity - single exposure	Not classified.
Specific target organ toxicity - repeated exposure	Not classified.
Aspiration hazard	Not an aspiration hazard.

12. Ecological information

Ecotoxicity	The product is not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.
Persistence and degradability	No data is available on the degradability of this product.
Bioaccumulative potential	No data available.
Mobility in soil	This product is completely water soluble and will disperse in soil.
Other adverse effects	No other adverse environmental effects (e.g. ozone depletion, photochemical ozone creation potential, endocrine disruption, global warming potential) are expected from this component.

13. Disposal considerations

Disposal instructions	Collect and reclaim or dispose in sealed containers at licensed waste disposal site.
Local disposal regulations	Dispose in accordance with all applicable regulations.
Hazardous waste code	The waste code should be assigned in discussion between the user, the producer and the waste disposal company.

Waste from residues / unused products	Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).
Contaminated packaging	Since emptied containers may retain product residue, follow label warnings even after container is emptied. Empty containers should be taken to an approved waste handling site for recycling or disposal.

14. Transport information

DOT

Not regulated as dangerous goods.

IATA

Not regulated as dangerous goods.

IMDG

Not regulated as dangerous goods.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code	Not applicable.

15. Regulatory information

US federal regulations

This product is not known to be a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not regulated.

CERCLA Hazardous Substance List (40 CFR 302.4)

Not listed.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

Hazard categories

Immediate Hazard - No
Delayed Hazard - No
Fire Hazard - No
Pressure Hazard - No
Reactivity Hazard - No

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous chemical	No

SARA 313 (TRI reporting)

Chemical name	CAS number	% by wt.
Ammonium sulfate	7783-20-2	40-50

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA)	Not regulated.

US state regulations

US. Massachusetts RTK - Substance List

Ammonium sulfate (CAS 7783-20-2)

US. New Jersey Worker and Community Right-to-Know Act

Not listed.

US. Pennsylvania Worker and Community Right-to-Know Law

Ammonium sulfate (CAS 7783-20-2)

US. Rhode Island RTK

Not regulated.

US. California Proposition 65

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): This material is not known to contain any chemicals currently listed as carcinogens or reproductive toxins.

International Inventories

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	No
Canada	Domestic Substances List (DSL)	No
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	No
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Existing Chemicals List (ECL)	No
New Zealand	New Zealand Inventory	No
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	No
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	No

*A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).
A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date 07-January-2016

Revision date -

Version # 01

HMIS® ratings Health: 1
Flammability: 0
Physical hazard: 0

NFPA ratings

Disclaimer Regenesis cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

From:	Charlotte M. Clark
To:	Region2 UIC
Cc:	Lori E. Riker
Subject:	Jamestown Brewery Project Site; 115-121 West 3rd Street, Jamestown NY 14208 - UIC Permit Application
Date:	Thursday, October 28, 2021 4:44:08 PM
Attachments:	Submittal Package Jamestown Brewery Site Injection Work Plan.pdf

USEPA Region 2 UIC Team,

Please find attached the UIC permit application for Jamestown Brewery Site (BCP Site No. C907047) located at 115-121 West Third Street, Jamestown NY. The application includes a letter of transmittal with a work plan summary, site figure, injection material data information, and UIC Inventory of Injection Wells (form 7520-16). If you require any additional information please do not hesitate to let me know.

Regards,

Charlotte Clark

Project Engineer

cclark@bm-tk.com

Benchmark Civil/Environmental Engineering & Geology, PLLC

www.benchmarkturnkey.com

2558 Hamburg Turnpike, Suite 300, Buffalo, NY 14218

Phone: (716) 856-0599*, Mobile:* (716) 220-1201

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APPENDIX C

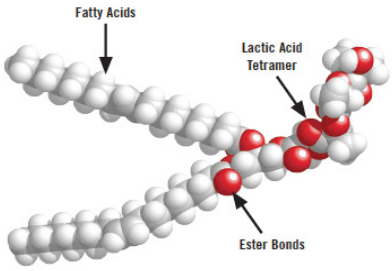
INJECTION AMENDMENT PRODUCTS
SDS & MANUFACTURERS DOCUMENTS

3-D Microemulsion® Factory Emulsified Technical Description

3-D Microemulsion (3DME®) is comprised of a patented molecular structure containing oleic acids (i.e., oil component) and lactates/polylactates, which are molecularly bound to one another (figure 1). The 3DME molecule contains both a soluble (hydrophilic) and insoluble (lipophilic) region. These two regions of the molecule are designed to be balanced in size and relative strength. The balanced hydrophilic/lipophilic regions of 3DME result in an electron donor with physical properties allowing it to initially adsorb to the aquifer material in the area of application, then slowly redistribute via very small 3DME "bundles" called micelles. These 3DME micelles spontaneously form within sections of the aquifer where concentrations of 3DME reach several hundred parts per million. The micelles' small size and mobility allow it to move with groundwater flow through the aquifer matrix, passing easily through the pore throats in between soil grains resulting in the further redistribution of 3DME within the aquifer. This allows for advective distribution of the oleic acids which are otherwise insoluble and unable to distribute in this manner, allowing for increased persistence of the lactate/polylactates component due to their initial attachment to the oleic acids.

Example of 3-D Microemulsion

FIGURE 1: THE 3-D MICROEMULSION MOLECULAR STRUCTURE



Due to its patented molecular structure, 3DME offers far greater transport when compared to blended emulsified vegetable oil (EVO) products, which fail to distribute beyond the limits of pumping. 3DME also provides greater persistence when compared to soluble substrates such as lactates or simple sugars. The 3DME molecular structures capitalize on the best features of the two electron-donor types while at the same time, minimize their limitations. 3DME is delivered to the site as a ready-to-apply emulsion that is simply diluted with water to generate a large volume of a 3DME colloidal suspension.

Suspension of 3DME generated by this mixing range from micelles on the order of .02 microns to .05 microns in diameter, to "swollen" micelles, (termed "microemulsions") which are on the order of .05 to 5 microns in diameter. Once injected into the subsurface in high volumes, the colloidal suspension mixes and dilutes in existing pore waters. The micelles/microemulsions on the injection front will then begin to sorb onto the surfaces of soils as a result of zeta potential attraction and organic matter within the soils themselves. As the sorption continues, the 3DME will "coat" pore surfaces developing a layer of molecules and in some cases a bilayer. This sorption process continues as the micelles/microemulsion moves outward and disassociates into their hydrophilic/hydrophobic components. The specialized chemistry of 3DME results in a staged release of electron donors: free lactate (immediate); polylactate esters (mid-range) and free fatty acids & fatty acid esters (long-term). Material longevity of three years or greater has been seen at most sites as determined from biogeochemical analyses.

For a list of treatable contaminants with the use of 3DME, view the Range of Treatable Contaminants Guide.

3-D Microemulsion® Factory Emulsified Technical Description

Chemical Composition

- Fatty acid esters
- Water
- Lactate oligomers
- Sodium lactate
- Proprietary surfactants

Properties

- Density – Approximately 1.0 grams per cubic centimeter (relative to water)
- pH – Neutral (approximately 6.5 to 7.5 standard units)
- Solubility – Soluble in Water
- Appearance – White emulsion
- Odor – Not detectable
- Vapor Pressure – None
- Non-hazardous

Storage and Handling Guidelines

Storage
Store in original tightly closed container
Store in a cool, dry, well-ventilated place
Store away from incompatible materials
Recommended storage containers: plastic-lined steel, plastic, glass, aluminum, stainless steel, or reinforced fiberglass

Handling
Avoid contact with eyes, skin, and clothing
Provide adequate ventilation
Wear appropriate personal protective equipment
Observe good industrial hygiene practices

Applications

- 3DME is diluted with water prior to application. Resulting emulsion has viscosity similar to water.
- Easily injects into formation through direct push injection points, injection wells or other injection delivery systems.

Application instructions for this product are contained in the 3DME FE Application Instructions.

Health and Safety

Material is food grade and relatively safe to handle. We recommend avoiding contact with eyes and prolonged contact with skin. OSHA Level D personal protection equipment including vinyl or rubber gloves, and eye protection are recommended when handling this product. Please review the 3DME FE Material Safety Data Sheet for additional storage, usage, and handling requirements.

REGENESIS®

www.regenesis.com
1011 Calle Sombra, San Clemente CA 92673
949.366.8000

REGENESIS
Technology-Based Solutions for the Environment

SAFETY DATA SHEET

1. Identification

Product identifier **3-D Microemulsion® Factory Emulsified**

Other means of identification None.

Recommended use Remediation of soils and groundwater.

Recommended restrictions None known.

Manufacturer/Importer/Supplier/Distributor information

Company Name Regenesis

Address 1011 Calle Sombra
San Clemente, CA 92673

Telephone 949-366-8000

E-mail CustomerService@regenesis.com

Emergency phone number CHEMTREC® at 1-800-424-9300 (International)

2. Hazard(s) identification

Physical hazards Not classified.

Health hazards

Skin corrosion/irritation	Category 2
Serious eye damage/eye irritation	Category 1

OSHA defined hazards Not classified.

Label elements

Signal word Danger

Hazard statement Causes skin irritation. Causes serious eye damage.

Precautionary statement

Prevention Wash thoroughly after handling. Wear protective gloves. Wear eye/face protection.

Response If on skin: Wash with plenty of water. If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a poison center/doctor. If skin irritation occurs: Get medical advice/attention. Take off contaminated clothing and wash before reuse.

Storage Store away from incompatible materials.

Disposal Dispose of waste and residues in accordance with local authority requirements.

Hazard(s) not otherwise classified (HNOC) None known.

3. Composition/information on ingredients

Mixtures

Chemical name	CAS number	%
HRC-PED	823190-10-9	50-51
Water	7732-18-5	35-36
Sodium lactate	72-17-3	13-14

Composition comments All concentrations are in percent by weight unless otherwise indicated.

4. First-aid measures

Inhalation Move to fresh air. Call a physician if symptoms develop or persist.

Skin contact	Remove contaminated clothing. Wash with plenty of soap and water. If skin irritation occurs: Get medical advice/attention. Wash contaminated clothing before reuse.
Eye contact	Immediately flush eyes with plenty of water for at least 15 minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Get medical attention immediately.
Ingestion	Rinse mouth. Never give anything by mouth to a victim who is unconscious or is having convulsions. Do not induce vomiting without advice from poison control center. Get medical attention if symptoms occur.
Most important symptoms/effects, acute and delayed	Severe eye irritation. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. Permanent eye damage including blindness could result. Skin irritation. May cause redness and pain.
Indication of immediate medical attention and special treatment needed	Provide general supportive measures and treat symptomatically. Keep victim under observation. Symptoms may be delayed.
General information	Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves.

5. Fire-fighting measures

Suitable extinguishing media	Water spray. Carbon dioxide (CO2). Dry chemical powder. Foam.
Unsuitable extinguishing media	Do not use water jet as an extinguisher, as this will spread the fire.
Specific hazards arising from the chemical	During fire, gases hazardous to health may be formed. Combustion products may include: carbon oxides, phosphorus compounds and metal oxides.
Special protective equipment and precautions for firefighters	Self-contained breathing apparatus and full protective clothing must be worn in case of fire.
Fire fighting equipment/instructions	Move containers from fire area if you can do so without risk. Water spray should be used to cool containers.
Specific methods	Use standard firefighting procedures and consider the hazards of other involved materials.
General fire hazards	No unusual fire or explosion hazards noted.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures	Keep unnecessary personnel away. Keep people away from and upwind of spill/leak. Surfaces may become slippery after spillage. Wear appropriate protective equipment and clothing during clean-up. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Ensure adequate ventilation. Local authorities should be advised if significant spillages cannot be contained. For personal protection, see section 8 of the SDS.
Methods and materials for containment and cleaning up	Spilled product may create a slipping hazard. Large Spills: Stop the flow of material, if this is without risk. Use water spray to reduce vapors or divert vapor cloud drift. Dike the spilled material, where this is possible. Cover with plastic sheet to prevent spreading. Absorb in vermiculite, dry sand or earth and place into containers. Following product recovery, flush area with water. Flush area clean with lots of water. Be aware of potential for surfaces to become slippery. Small Spills: Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination. Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS.
Environmental precautions	Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling	Do not get this material in contact with eyes. Avoid contact with eyes, skin, and clothing. Provide adequate ventilation. Wear appropriate personal protective equipment. Observe good industrial hygiene practices.
Conditions for safe storage, including any incompatibilities	Store in original tightly closed container. Store in a cool, dry, well-ventilated place. Store away from incompatible materials (see Section 10 of the SDS). Recommended storage containers: plastic lined steel, plastic, glass, aluminum, stainless steel, or reinforced fiberglass.

8. Exposure controls/personal protection

Occupational exposure limits	No exposure limits noted for ingredient(s).
Biological limit values	No biological exposure limits noted for the ingredient(s).

Appropriate engineering controls	Good general ventilation (typically 10 air changes per hour) should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level. Eye wash facilities and emergency shower must be available when handling this product.

Individual protection measures, such as personal protective equipment

Eye/face protection	Wear approved, tight fitting indirect vented or non-vented safety goggles where splashing is probable. Face shield is recommended.
Skin protection	
Hand protection	Wear appropriate chemical resistant gloves. Rubber or vinyl-coated gloves are recommended.
Other	Wear appropriate chemical resistant clothing.
Respiratory protection	If engineering controls do not maintain airborne concentrations below recommended exposure limits (where applicable) or to an acceptable level (in countries where exposure limits have not been established), an approved respirator must be worn.
Thermal hazards	Wear appropriate thermal protective clothing, when necessary.
General hygiene considerations	Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance	
Physical state	Liquid.
Form	Emulsion.
Color	White.
Odor	Odorless.
Odor threshold	Not available.
pH	Not available.
Melting point/freezing point	Not available.
Initial boiling point and boiling range	212 °F (100 °C)
Flash point	> 199.9 °F (> 93.3 °C) Closed Cup
Evaporation rate	Not available.
Flammability (solid, gas)	Not applicable.
Upper/lower flammability or explosive limits	
Flammability limit - lower (%)	Not available.
Flammability limit - upper (%)	Not available.
Explosive limit - lower (%)	Not available.
Explosive limit - upper (%)	Not available.
Vapor pressure	Not available.
Vapor density	Not available.
Relative density	1 - 1.2
Solubility(ies)	
Solubility (water)	Soluble.
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
Viscosity	Not available.

10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
Chemical stability	Undergoes hydrolysis in water to form lactic acid and soybean oil.

Possibility of hazardous reactions	No dangerous reaction known under conditions of normal use.
Conditions to avoid	Avoid temperatures exceeding the flash point. Contact with incompatible materials.
Incompatible materials	Strong oxidizing agents. Bases. Acids.
Hazardous decomposition products	Thermal decomposition or combustion may produce: carbon oxides, phosphorus compounds, metal oxides.

11. Toxicological information

Information on likely routes of exposure

Inhalation	May cause irritation to the respiratory system.
Skin contact	Causes skin irritation.
Eye contact	Causes serious eye damage.
Ingestion	Ingestion may cause irritation and malaise.
Symptoms related to the physical, chemical and toxicological characteristics	Severe eye irritation. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. Permanent eye damage including blindness could result. Skin irritation. May cause redness and pain.

Information on toxicological effects

Acute toxicity	Not available.
Skin corrosion/irritation	Causes skin irritation.
Serious eye damage/eye irritation	Causes serious eye damage.
Respiratory or skin sensitization	
Respiratory sensitization	Not a respiratory sensitizer.
Skin sensitization	This product is not expected to cause skin sensitization.
Germ cell mutagenicity	No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.
Carcinogenicity	This product is not considered to be a carcinogen by IARC, ACGIH, NTP, or OSHA.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

Reproductive toxicity	This product is not expected to cause reproductive or developmental effects.
Specific target organ toxicity - single exposure	Not classified.
Specific target organ toxicity - repeated exposure	Not classified.
Aspiration hazard	Not an aspiration hazard.

12. Ecological information

Ecotoxicity	The product is not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.
Persistence and degradability	Material is readily degradable and undergoes hydrolysis in several hours.
Bioaccumulative potential	No data available.
Mobility in soil	Not available.
Other adverse effects	None known.

13. Disposal considerations

Disposal instructions	Collect and reclaim or dispose in sealed containers at licensed waste disposal site. Dispose of contents/container in accordance with local/regional/national/international regulations.
Local disposal regulations	Dispose in accordance with all applicable regulations.
Hazardous waste code	The waste code should be assigned in discussion between the user, the producer and the waste disposal company.
Waste from residues / unused products	Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).
Contaminated packaging	Empty containers should be taken to an approved waste handling site for recycling or disposal. Since emptied containers may retain product residue, follow label warnings even after container is emptied.

14. Transport information

DOT

Not regulated as dangerous goods.

IATA

Not regulated as dangerous goods.

IMDG

Not regulated as dangerous goods.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code Not established.

15. Regulatory information

US federal regulations This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.
One or more components are not listed on TSCA.

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

CERCLA Hazardous Substance List (40 CFR 302.4)

Not listed.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

Hazard categories Immediate Hazard - Yes
Delayed Hazard - No
Fire Hazard - No
Pressure Hazard - No
Reactivity Hazard - No

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous chemical Yes

SARA 313 (TRI reporting)

Not regulated.

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA) Not regulated.

US state regulations

US. Massachusetts RTK - Substance List

Not regulated.

US. New Jersey Worker and Community Right-to-Know Act

Not listed.

US. Pennsylvania Worker and Community Right-to-Know Law

Not listed.

US. Rhode Island RTK

Not regulated.

US. California Proposition 65

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): This material is not known to contain any chemicals currently listed as carcinogens or reproductive toxins.

International Inventories

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	Yes

Country(s) or region	Inventory name	On inventory (yes/no)*
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	Yes
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	Yes
Korea	Existing Chemicals List (ECL)	Yes
New Zealand	New Zealand Inventory	Yes
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	Yes
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

*A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).
A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date 09-April-2015

Revision date -

Version # 01

Further information HMIS® is a registered trade and service mark of the American Coatings Association (ACA).

HMIS® ratings Health: 3
Flammability: 1
Physical hazard: 0

NFPA ratings

Disclaimer Regenesis cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

S-MicroZVI Specification Sheet

S-MicroZVI Technical Description

S-MicroZVI® is an *In Situ* Chemical Reduction (ISCR) reagent that promotes the destruction of many organic pollutants and is most commonly used with chlorinated hydrocarbons. It is engineered to provide an optimal source of micro-scale zero valent iron (ZVI) that is both easy to use and delivers enhanced reactivity with the target contaminants via multiple pathways. S-MicroZVI can destroy many chlorinated contaminants through a direct chemical reaction (**see Figure 1**). S-MicroZVI will also stimulate anaerobic biological degradation by rapidly creating a reducing environment that is favorable for reductive dechlorination.

Sulfidated ZVI

S-MicroZVI is composed of colloidal, sulfidated zero-valent iron particles suspended in glycerol using proprietary environmentally acceptable dispersants. The passivation technique of sulfidation, completed using proprietary processing methods, provides unparalleled reactivity with chlorinated hydrocarbons like PCE and TCE and increases its stability and longevity by minimizing undesirable side reactions.

S-MicroZVI is Best in Class For

- ☑ Longevity
- ☑ Reactivity
- ☑ Transport

In addition to superior reactivity, S-MicroZVI is designed for easy handling that is unmatched by any ZVI product on the market. Shipped as a liquid suspension, S-MicroZVI requires no powder feeders, no thickening with guar, and pneumatic or hydraulic fracturing is not mandatory. When diluted with water prior to application, the resulting suspension is easy to inject using either direct push or permanent injection wells.

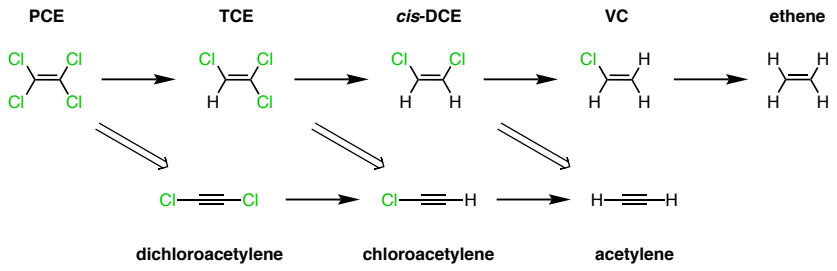


Figure 1: *Chlorinated ethene degradation pathways and products. The top pathway with single line arrows represent the reductive dechlorination (hydrogenolysis) pathway. The lower pathway with downward facing double line arrows represent the beta-elimination pathway.*

To see a list of treatable contaminants, view the S-MicroZVI treatable contaminants guide.

S-Micro ZVI®
Sulfidated Zero-Valent Iron

S-MicroZVI Specification Sheet

Chemical Composition

Iron, powders CAS 7439-89-6
Iron (II) sulfide CAS 1317-37-9
Glycerol CAS 56-81-8

Properties

Physical State: Liquid
Form: Viscous metallic suspension
Color: Dark gray
Odor: Slight
pH: Typically 7-9 as applied
Density: 15 lb/gal

Storage and Handling Guidelines

Storage:

- Use within four weeks of delivery
- Store in original containers
- Store at temperatures below 95F°
- Store away from incompatible materials

Handling:

- Never mix with oxidants or acids
- Wear appropriate personal protective equipment
- Do not taste or swallow
- Observe good industrial hygiene practices

Applications

S-MicroZVI is diluted with water on site and easily applied into the subsurface through low-pressure injections. S-MicroZVI can also be mixed with products like 3-D Microemulsion® or PlumeStop® prior to injection.

Health and Safety

The material is relatively safe to handle; however, avoid contact with eyes, skin and clothing. OSHA Level D personal protection equipment including: vinyl or rubber gloves and eye protection are recommended when handling this product. Please review the Safety Data Sheet for additional storage, and handling requirements here: S-MicroZVI SDS.

REGENESIS®

www.regenesis.com

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REGENESIS
Technology-Based Solutions for the Environment

SAFETY DATA SHEET

1. Identification

Product identifier	**S-MicroZVI or S-MZVI**
Other means of identification	None.
Recommended use	Remediation of contaminants in soil and groundwater.
Recommended restrictions	None known.

Manufacturer/Importer/Supplier/Distributor information

Company Name	Regenesis
Address	1011 Calle Sombra San Clemente, CA 92673 USA
General information	949-366-8000
E-mail	CustomerService@regenesis.com

Emergency phone number	For Hazardous Materials Incidents ONLY (spill, leak, fire, exposure or accident), call CHEMTREC 24/7 at:
USA, Canada, Mexico	1-800-424-9300
International	1-703-527-3887

2. Hazard(s) identification

Physical hazards	Not classified.
Health hazards	Not classified.
OSHA defined hazards	Not classified.

Label elements

Hazard symbol	None.
Signal word	None.
Hazard statement	The mixture does not meet the criteria for classification.
Precautionary statement	
Prevention	Observe good industrial hygiene practices.
Response	Wash hands after handling.
Storage	Store away from incompatible materials.
Disposal	Dispose of waste and residues in accordance with local authority requirements.
Hazard(s) not otherwise classified (HNOC)	None known.
Supplemental information	Contact with acids liberates very toxic gas.

3. Composition/information on ingredients

Mixtures

Chemical name	CAS number	%
Glycerol	56-81-5	40 - 50
Zero valent iron	7439-89-6	30 - 50
Iron(II) sulfide	1317-37-9	1 - 4

Composition comments All concentrations are in percent by weight unless otherwise indicated.
Components not listed are either non-hazardous or are below reportable limits.

4. First-aid measures

Inhalation	Move to fresh air. Call a physician if symptoms develop or persist.
Skin contact	Wash off with soap and water. Get medical attention if irritation develops and persists.

Eye contact	Rinse with water. Get medical attention if irritation develops and persists.
Ingestion	Rinse mouth. Get medical attention if symptoms occur.
Most important symptoms/effects, acute and delayed	Direct contact with eyes may cause temporary irritation.
Indication of immediate medical attention and special treatment needed	Treat symptomatically.
General information	Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves.

5. Fire-fighting measures

Suitable extinguishing media	Water fog. Foam. Dry chemical powder. Carbon dioxide (CO2).
Unsuitable extinguishing media	None known.
Specific hazards arising from the chemical	During fire, gases hazardous to health may be formed. Combustion products may include: carbon oxides, iron oxides.
Special protective equipment and precautions for firefighters	Self-contained breathing apparatus and full protective clothing must be worn in case of fire.
Fire fighting equipment/instructions	Move containers from fire area if you can do so without risk.
Specific methods	Use standard firefighting procedures and consider the hazards of other involved materials.
General fire hazards	This material will not burn until the water has evaporated. Residue can burn. When dry may form combustible dust concentrations in air.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures	Keep unnecessary personnel away. For personal protection, see section 8 of the SDS.
Methods and materials for containment and cleaning up	Large Spills: Stop the flow of material, if this is without risk. Dike the spilled material, where this is possible. Absorb in vermiculite, dry sand or earth and place into containers. Following product recovery, flush area with water. Small Spills: Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination. Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS.
Environmental precautions	Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling	Avoid prolonged exposure. Observe good industrial hygiene practices.
Conditions for safe storage, including any incompatibilities	Store in original tightly closed container. Store away from incompatible materials (see Section 10 of the SDS).

8. Exposure controls/personal protection

Occupational exposure limits

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Components	Type	Value	Form
Glycerol (CAS 56-81-5)	PEL	5 mg/m3	Respirable fraction.
		15 mg/m3	Total dust.

Biological limit values	No biological exposure limits noted for the ingredient(s).
Appropriate engineering controls	Good general ventilation should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level.

Individual protection measures, such as personal protective equipment

Eye/face protection	Wear safety glasses with side shields (or goggles).

Skin protection	
Hand protection	Wear appropriate chemical resistant gloves. Suitable gloves can be recommended by the glove supplier.
Skin protection	
Other	Wear suitable protective clothing.
Respiratory protection	In case of insufficient ventilation, wear suitable respiratory equipment.
Thermal hazards	Wear appropriate thermal protective clothing, when necessary.
General hygiene considerations	Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance	
Physical state	Liquid.
Form	Viscous metallic suspension.
Color	Dark gray
Odor	Slight.
Odor threshold	Not available.
pH	7 - 8 (When mixed with water) 10 (As shipped)
Melting point/freezing point	Not available.
Initial boiling point and boiling range	Not available.
Flash point	Not available.
Evaporation rate	Not available.
Flammability (solid, gas)	Not applicable.
Upper/lower flammability or explosive limits	
Flammability limit - lower (%)	Not available.
Flammability limit - upper (%)	Not available.
Vapor pressure	Not available.
Vapor density	Not available.
Relative density	Not available.
Solubility(ies)	
Solubility (water)	Not available.
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
Viscosity	3000 cP (77 °F (25 °C))
Other information	
Explosive properties	Not explosive.
Oxidizing properties	Not oxidizing.

10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
Chemical stability	Material is stable under normal conditions.
Possibility of hazardous reactions	Contact with acids will release highly flammable and highly toxic hydrogen sulfide gas. Can react with some acids with the evolution of hydrogen.
Conditions to avoid	Contact with incompatible materials. Avoid drying out product. May generate combustible dust if material dries.
Incompatible materials	Strong oxidizing agents. Acids.

Hazardous decomposition products No hazardous decomposition products are known.

11. Toxicological information

Information on likely routes of exposure

Inhalation Spray mist may irritate the respiratory system. For dry material: Dust may irritate respiratory system.

Skin contact Prolonged or repeated exposure may cause minor irritation.

Eye contact Direct contact with eyes may cause temporary irritation.

Ingestion May cause discomfort if swallowed.

Symptoms related to the physical, chemical and toxicological characteristics Direct contact with eyes may cause temporary irritation.

Information on toxicological effects

Acute toxicity Not expected to be acutely toxic.

Components	Species	Test Results
Glycerol (CAS 56-81-5)		
Acute		
Dermal		
LD50	Rabbit	> 18700 mg/kg
Oral		
LD50	Rat	27200 mg/kg

Skin corrosion/irritation Prolonged skin contact may cause temporary irritation.

Serious eye damage/eye irritation Direct contact with eyes may cause temporary irritation.

Respiratory or skin sensitization

Respiratory sensitization Not a respiratory sensitizer.

Skin sensitization This product is not expected to cause skin sensitization.

Germ cell mutagenicity No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.

Carcinogenicity Not classifiable as to carcinogenicity to humans.

IARC Monographs. Overall Evaluation of Carcinogenicity

Not listed.

NTP Report on Carcinogens

Not listed.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1053)

Not regulated.

Reproductive toxicity This product is not expected to cause reproductive or developmental effects.

Specific target organ toxicity - single exposure Not classified.

Specific target organ toxicity - repeated exposure Not classified.

Aspiration hazard Not an aspiration hazard.

Further information Contains an ingredient known to produce adverse effects in a small percentage of hypersensitive individuals exhibited as respiratory distress and allergic skin reactions.

12. Ecological information

Ecotoxicity The product is not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.

Components		Species	Test Results
Glycerol (CAS 56-81-5)			
Aquatic			
Acute			
Crustacea	EC50	Daphnia magna	> 10000 mg/l, 24 Hours

Persistence and degradability No data is available on the degradability of this product.

Bioaccumulative potential No data available.

Partition coefficient n-octanol / water (log Kow)

Glycerol (CAS 56-81-5)	-1.76

Mobility in soil No data available.

Other adverse effects None known.

13. Disposal considerations

Disposal instructions Collect and reclaim or dispose in sealed containers at licensed waste disposal site.

Local disposal regulations Dispose in accordance with all applicable regulations.

Hazardous waste code The waste code should be assigned in discussion between the user, the producer and the waste disposal company.

Waste from residues / unused products Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).

Contaminated packaging Since emptied containers may retain product residue, follow label warnings even after container is emptied. Empty containers should be taken to an approved waste handling site for recycling or disposal.

14. Transport information

DOT

Not regulated as dangerous goods.

IATA

Not regulated as dangerous goods.

IMDG

Not regulated as dangerous goods.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code Not established.

15. Regulatory information

US federal regulations This product is not known to be a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

CERCLA Hazardous Substance List (40 CFR 302.4)

Not listed.

SARA 304 Emergency release notification

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1053)

Not regulated.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous chemical No

SARA 313 (TRI reporting)

Not regulated.

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA) Not regulated.

FEMA Priority Substances Respiratory Health and Safety in the Flavor Manufacturing Workplace

Glycerol (CAS 56-81-5)	Other Flavoring Substances with OSHA PEL's

US state regulations

US. Massachusetts RTK - Substance List

Glycerol (CAS 56-81-5)

US. New Jersey Worker and Community Right-to-Know Act

Glycerol (CAS 56-81-5)

US. Pennsylvania Worker and Community Right-to-Know Law

Glycerol (CAS 56-81-5)

US. Rhode Island RTK

Glycerol (CAS 56-81-5)

California Proposition 65

California Safe Drinking Water and Toxic Enforcement Act of 2016 (Proposition 65): This material is not known to contain any chemicals currently listed as carcinogens or reproductive toxins. For more information go to www.P65Warnings.ca.gov.

US. California. Candidate Chemicals List. Safer Consumer Products Regulations (Cal. Code Regs, tit. 22, 69502.3, subd. (a))

Zero valent iron (CAS 7439-89-6)

International Inventories

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	Yes
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	Yes
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Existing Chemicals List (ECL)	Yes
New Zealand	New Zealand Inventory	Yes
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	Yes
Taiwan	Taiwan Chemical Substance Inventory (TCSI)	Yes
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

*A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).
A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date 27-December-2018

Revision date -

Version # 01

HMIS® ratings Health: 1
Flammability: 1
Physical hazard: 0

NFPA ratings

Disclaimer Regenesis cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

BDI PLUS® Technical Description

Bio-Dechlor INOCULUM Plus (BDI PLUS®) is an enriched natural consortium containing species of Dehalococcoides sp. (DHC). BDI PLUS has been shown to simulate the rapid and complete dechlorination of chlorinated solvents such as tetrachloroethene (PCE), trichloroethene (TCE), dichloroethene (DCE) and vinyl chloride (VC) to non-toxic end products, ethene, carbon dioxide and water.

The culture also contains microbes capable of dehalogenating halomethanes (e.g., carbon tetrachloride and chloroform) and haloethanes (e.g., 1,1,1-TCA and 1,1-DCA) as well as mixtures of these contaminants.

Species of Dehalococcoides sp. (DHC)

For a list of treatable contaminants with the use of BDI PLUS, view the Range of Treatable Contaminants Guide

Chemical Composition

- Non-hazardous, naturally-occurring, non-altered anaerobic microbes and enzymes in a water-based medium.

Properties

- Appearance – Murky, yellow to grey water
- Odor – Musty
- pH 6.0 to 8.0
- Density – Approximately 1.0 grams per cubic centimeter (0.9 to 1.1 g/cc)
- Solubility – Soluble in Water
- Vapor Pressure – None
- Non-hazardous

Storage and Handling Guidelines

Storage
Store in original tightly closed container
Store away from incompatible materials
Recommended storage containers: plastic lined steel, plastic, glass, aluminum, stainless steel, or reinforced fiberglass
Store in a cool, dry area at 4-5°C (39 - 41°F)
Material may be stored for up to 3 weeks at 2-4°C without aeration

Handling
Avoid prolonged exposure
Observe good industrial hygiene practices
Wear appropriate personal protective equipment

BDI PLUS® Technical Description

Applications

- BDI PLUS is delivered to the site in liquid form and is designed to be injected directly into the saturated zone requiring treatment.
- Most often diluted with de-oxygenated water prior to injection into either hydraulic push injection points or properly constructed injection wells.
- The typical dilution rate of the injected culture is 10 gallons of deoxygenated water to 1 liter of standard BDI PLUS culture.

Application instructions for this product are contained here BDI PLUS Application Instructions.

Health and Safety

Material is non-hazardous and relatively safe to handle; however avoid contact with eyes and prolonged contact with skin. OSHA Level D personal protection equipment including: vinyl or rubber gloves and safety goggles or a splash shield are recommended when handling this product. An eyewash station is recommended. Please review the Material Safety Data Sheet for additional storage, usage, and handling requirements here: BDI PLUS SDS.

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949.366.8000

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SAFETY DATA SHEET

1. Identification

Product identifier	**Bio-Dechlor INOCULUM® Plus**
Other means of identification	DHC microbial consortium (SDC-9).
Recommended use	Soil and Groundwater Remediation.
Recommended restrictions	None known.

Manufacturer/Importer/Supplier/Distributor information

Company Name	Regenesis
Address	1011 Calle Sombra San Clemente, CA 92673
Telephone	949-366-8000
E-mail	CustomerService@regenesis.com
Emergency phone number	CHEMTREC® at 1-800-424-9300 (International)

2. Hazard(s) identification

Physical hazards	Not classified.
Health hazards	Not classified.
OSHA defined hazards	Not classified.

Label elements

Hazard symbol	None.
Signal word	None.
Hazard statement	The mixture does not meet the criteria for classification.
Precautionary statement	
Prevention	Observe good industrial hygiene practices.
Response	Wash hands after handling.
Storage	Store away from incompatible materials.
Disposal	Dispose of waste and residues in accordance with local authority requirements.
Hazard(s) not otherwise classified (HNOC)	None known.

3. Composition/information on ingredients

Mixtures

The manufacturer lists no ingredients as hazardous according to OSHA 29 CFR 1910.1200.

Chemical name	CAS number	%
DHC microbial consortium comprised of microorganisms of the genus Dehalococcoides	Not Applicable	100

Composition comments All concentrations are in percent by weight unless otherwise indicated.

4. First-aid measures

Inhalation	Move to fresh air. Call a physician if symptoms develop or persist.
Skin contact	Wash off with soap and water. Get medical attention if irritation develops and persists.
Eye contact	Rinse with water. Get medical attention if irritation develops and persists.
Ingestion	Rinse mouth. Get medical attention if symptoms occur.
Most important symptoms/effects, acute and delayed	Direct contact with eyes may cause temporary irritation.
Indication of immediate medical attention and special treatment needed	Treat symptomatically.

General information	If you feel unwell, seek medical advice (show the label where possible). Show this safety data sheet to the doctor in attendance.

5. Fire-fighting measures

Suitable extinguishing media	Carbon dioxide (CO2). Water. Foam.
Unsuitable extinguishing media	None known.
Specific hazards arising from the chemical	During fire, gases hazardous to health may be formed.
Special protective equipment and precautions for firefighters	Self-contained breathing apparatus and full protective clothing must be worn in case of fire.
Fire fighting equipment/instructions	Move containers from fire area if you can do so without risk.
Specific methods	Use standard firefighting procedures and consider the hazards of other involved materials. Use water spray to keep fire-exposed containers cool.
General fire hazards	No unusual fire or explosion hazards noted. The product itself does not burn.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures	Keep unnecessary personnel away. Avoid contact with spilled material. For personal protection, see section 8 of the SDS.
Methods and materials for containment and cleaning up	This product is miscible in water. Disinfect the spill area with 5% bleach solution after clean-up. Large Spills: Stop the flow of material, if this is without risk. Dike the spilled material, where this is possible. Cover with plastic sheet to prevent spreading. Absorb in vermiculite, dry sand or earth and place into containers. Following product recovery, flush area with water. Small Spills: Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination. Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS.
Environmental precautions	Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling	Avoid prolonged exposure. Observe good industrial hygiene practices. Wear appropriate personal protective equipment (See Section 8).
Conditions for safe storage, including any incompatibilities	Store in original tightly closed container. Recommended storage containers: plastic lined steel, plastic, glass, aluminum, stainless steel, or reinforced fiberglass. Store away from incompatible materials (see Section 10 of the SDS). Store in a cool, dry area at 4 - 5°C (39 - 41°F).

8. Exposure controls/personal protection

Occupational exposure limits	No exposure limits noted for ingredient(s).
Biological limit values	No biological exposure limits noted for the ingredient(s).
Appropriate engineering controls	General ventilation normally adequate. Provide eyewash station.

Individual protection measures, such as personal protective equipment

Eye/face protection	Tightly fitting safety goggles.
Skin protection	
Hand protection	The following glove materials are recommended: vinyl or rubber.
Other	Wear suitable protective clothing.
Respiratory protection	Not normally needed. In case of insufficient ventilation, wear suitable respiratory equipment. If engineering controls do not maintain airborne concentrations below recommended exposure limits (where applicable) or to an acceptable level (in countries where exposure limits have not been established), an approved respirator must be worn.
Thermal hazards	Wear appropriate thermal protective clothing, when necessary.
General hygiene considerations	Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance	
Physical state	Liquid.
Form	Liquid.
Color	Murky yellow.
Odor	Musty.
Odor threshold	Not available.
pH	Not available.
Melting point/freezing point	Not available.
Initial boiling point and boiling range	212 °F (100 °C)
Flash point	Not flammable.
Evaporation rate	Not available.
Flammability (solid, gas)	Not applicable.
Upper/lower flammability or explosive limits	
Flammability limit - lower (%)	Not available.
Flammability limit - upper (%)	Not available.
Explosive limit - lower (%)	Not available.
Explosive limit - upper (%)	Not available.
Vapor pressure	Not available.
Vapor density	Not available.
Relative density	0.9 - 1.1
Solubility(ies)	
Solubility (water)	Soluble.
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
Viscosity	Not available.

10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
Chemical stability	Material is stable under normal conditions.
Possibility of hazardous reactions	No dangerous reaction known under conditions of normal use.
Conditions to avoid	Contact with incompatible materials. Keep from freezing.
Incompatible materials	Strong oxidizing agents. Bases. Acids.
Hazardous decomposition products	No hazardous decomposition products are known.

11. Toxicological information

Information on likely routes of exposure

Inhalation	Prolonged inhalation may be harmful.
Skin contact	Prolonged or repeated skin contact may result in minor irritation.
Eye contact	Direct contact with eyes may cause temporary irritation.
Ingestion	Ingestion may cause irritation and stomach discomfort.
Symptoms related to the physical, chemical and toxicological characteristics	Direct contact with eyes may cause temporary irritation.

Information on toxicological effects

Acute toxicity	Not expected to be acutely toxic.
Skin corrosion/irritation	Prolonged skin contact may cause temporary irritation.
Serious eye damage/eye irritation	Direct contact with eyes may cause temporary irritation.
Respiratory or skin sensitization	
Respiratory sensitization	Not a respiratory sensitizer.
Skin sensitization	This product is not expected to cause skin sensitization.
Germ cell mutagenicity	No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.
Carcinogenicity	This product is not considered to be a carcinogen by IARC, ACGIH, NTP, or OSHA.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

Reproductive toxicity	This product is not expected to cause reproductive or developmental effects.
Specific target organ toxicity - single exposure	Not classified.
Specific target organ toxicity - repeated exposure	Not classified.
Aspiration hazard	Not an aspiration hazard.
Chronic effects	Prolonged inhalation may be harmful.
Further information	May be harmful by inhalation, ingestion, or skin absorption via bacterial action.

12. Ecological information

Ecotoxicity	The product is not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.
Persistence and degradability	This material will degrade in the environment. Material is readily degradable and undergoes hydrolysis in several hours.
Bioaccumulative potential	No data available.
Mobility in soil	Expected to be highly mobile in soil.
Other adverse effects	None known.

13. Disposal considerations

Disposal instructions	Collect and reclaim or dispose in sealed containers at licensed waste disposal site.
Local disposal regulations	Dispose in accordance with all applicable regulations.
Hazardous waste code	The waste code should be assigned in discussion between the user, the producer and the waste disposal company.
Waste from residues / unused products	Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).
Contaminated packaging	Empty containers should be taken to an approved waste handling site for recycling or disposal. Since emptied containers may retain product residue, follow label warnings even after container is emptied.

14. Transport information

DOT

Not regulated as dangerous goods.

IATA

Not regulated as dangerous goods.

IMDG

Not regulated as dangerous goods.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code	Not available.

15. Regulatory information

US federal regulations

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

CERCLA Hazardous Substance List (40 CFR 302.4)

Not listed.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

Hazard categories

Immediate Hazard - No
Delayed Hazard - No
Fire Hazard - No
Pressure Hazard - No
Reactivity Hazard - No

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous chemical No

SARA 313 (TRI reporting)

Not regulated.

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA) Not regulated.

US state regulations

US. Massachusetts RTK - Substance List

Not regulated.

US. New Jersey Worker and Community Right-to-Know Act

Not listed.

US. Pennsylvania Worker and Community Right-to-Know Law

Not listed.

US. Rhode Island RTK

Not regulated.

US. California Proposition 65

Not Listed.

International Inventories

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	No
Canada	Domestic Substances List (DSL)	No
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	No
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Existing Chemicals List (ECL)	No
New Zealand	New Zealand Inventory	No
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	No

Country(s) or region	Inventory name	On inventory (yes/no)*
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	No

*A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).
A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date 12-February-2015

Revision date -

Version # 01

Further information HMIS® is a registered trade and service mark of the American Coatings Association (ACA).

HMIS® ratings Health: 0
Flammability: 0
Physical hazard: 0

NFPA ratings

Disclaimer Regenesis cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

PlumeStop® Liquid Activated Carbon™ Technical Description

PlumeStop Liquid Activated Carbon is an innovative groundwater remediation technology designed to rapidly remove and permanently degrade groundwater contaminants. PlumeStop is composed of very fine particles of activated carbon (1-2µm) suspended in water through the use of unique organic polymer dispersion chemistry. Once in the subsurface, the material behaves as a colloidal biomatrix, binding to the aquifer matrix, rapidly removing contaminants from groundwater, and expediting permanent contaminant biodegradation.

This unique remediation technology accomplishes treatment with the use of highly dispersible, fast-acting, sorption-based technology, capturing and concentrating dissolved-phase contaminants within its matrix-like structure. Once contaminants are sorbed onto the regenerative matrix, biodegradation processes achieve complete remediation at an accelerated rate.

Distribution of PlumeStop in water

To see a list of treatable contaminants with the use of PlumeStop, view the Range of Treatable Contaminants Guide.

Chemical Composition

- Water - CAS# 7732-18-5
- Colloidal Activated Carbon ≤2.5 - CAS# µm 7440-44-0
- Proprietary Additives

Properties

- Physical state: Liquid
- Form: Aqueous suspension
- Color: Black
- Odor: Odorless
- pH: 8 - 10

Storage and Handling Guidelines

Storage
Store in original tightly closed container
Store away from incompatible materials
Protect from freezing

Handling
Avoid contact with skin and eyes
Avoid prolonged exposure
Observe good industrial hygiene practices
Wash thoroughly after handling
Wear appropriate personal protective equipment

PlumeStop® Liquid Activated Carbon™ Technical Description

Applications

PlumeStop is easily applied into the subsurface through gravity-feed or low-pressure injection.

Health and Safety

Wash hands after handling. Dispose of waste and residues in accordance with local authority requirements. Please review the Material Safety Data Sheet for additional storage, usage, and handling requirements here: PlumeStop SDS.

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949.366.8000

REGENESIS
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SAFETY DATA SHEET

1. Identification

Product identifier **PlumeSTOP®**

Other means of identification None.

Recommended use Soil and Groundwater Remediation.

Recommended restrictions None known.

Manufacturer/Importer/Supplier/Distributor information

Company Name Regenesis

Address 1011 Calle Sombra
San Clemente, CA 92673

Telephone 949-366-8000

E-mail CustomerService@regenesis.com

Emergency phone number CHEMTREC® at 1-800-424-9300 (International)

2. Hazard(s) identification

Physical hazards Not classified.

Health hazards Not classified.

OSHA defined hazards Not classified.

Label elements

Hazard symbol None.

Signal word None.

Hazard statement The mixture does not meet the criteria for classification.

Precautionary statement

Prevention Observe good industrial hygiene practices.

Response Wash hands after handling.

Storage Store away from incompatible materials.

Disposal Dispose of waste and residues in accordance with local authority requirements.

Hazard(s) not otherwise classified (HNOC) None known.

3. Composition/information on ingredients

Mixtures

Chemical name	CAS number	%
Water	7732-18-5	>75
Colloidal activated carbon ≤2.5 µm	7440-44-0	<25
Proprietary additives		≤2

Composition comments All concentrations are in percent by weight unless otherwise indicated.

4. First-aid measures

Inhalation Move to fresh air. Call a physician if symptoms develop or persist.

Skin contact Wash off with soap and water. Get medical attention if irritation develops and persists.

Eye contact Rinse with water. Get medical attention if irritation develops and persists.

Ingestion Rinse mouth. Get medical attention if symptoms occur.

Most important symptoms/effects, acute and delayed Direct contact with eyes may cause temporary irritation.

Indication of immediate medical attention and special treatment needed	Treat symptomatically.
General information	If you feel unwell, seek medical advice (show the label where possible). Show this safety data sheet to the doctor in attendance.

5. Fire-fighting measures

Suitable extinguishing media	Carbon dioxide, alcohol-resistant foam, dry chemical, water spray, or water fog.
Unsuitable extinguishing media	None known.
Specific hazards arising from the chemical	During fire, gases hazardous to health may be formed. Combustion products may include: carbon monoxide, carbon dioxide, sodium oxides, metal oxides.
Special protective equipment and precautions for firefighters	Use protective equipment appropriate for surrounding materials.
Fire fighting equipment/instructions	Move containers from fire area if you can do so without risk.
Specific methods	Use standard firefighting procedures and consider the hazards of other involved materials. Use water spray to keep fire-exposed containers cool.
General fire hazards	This material will not burn until the water has evaporated. Residue can burn. When dry may form combustible dust concentrations in air.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures	Keep unnecessary personnel away. Avoid contact with spilled material. For personal protection, see section 8 of the SDS.
Methods and materials for containment and cleaning up	This product is miscible in water. Large Spills: Stop the flow of material, if this is without risk. Dike the spilled material, where this is possible. Cover with plastic sheet to prevent spreading. Absorb in vermiculite, dry sand or earth and place into containers. Following product recovery, flush area with water. Small Spills: Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination. Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS.
Environmental precautions	Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling	Avoid contact with skin and eyes. Avoid prolonged exposure. Observe good industrial hygiene practices. Wash thoroughly after handling. Wear appropriate personal protective equipment (See Section 8).
Conditions for safe storage, including any incompatibilities	Store in original tightly closed container. Store away from incompatible materials (see Section 10 of the SDS). Protect from freezing.

8. Exposure controls/personal protection

Occupational exposure limits

US. OSHA Table Z-3 (29 CFR 1910.1000)

Components	Type	Value	Form
Colloidal activated carbon ≤2.5 µm (CAS 7440-44-0)	TWA	5 mg/m3	Respirable fraction.
		15 mg/m3	Total dust.

US. NIOSH: Pocket Guide to Chemical Hazards

Components	Type	Value	Form
Colloidal activated carbon ≤2.5 µm (CAS 7440-44-0)	TWA	2.5 mg/m3	Respirable.

Biological limit values	No biological exposure limits noted for the ingredient(s).
Appropriate engineering controls	Good general ventilation (typically 10 air changes per hour) should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level.

Individual protection measures, such as personal protective equipment

Eye/face protection	Wear approved chemical safety goggles.
Skin protection	
Hand protection	Rubber, neoprene or PVC gloves are recommended. Wash hands after handling.
Other	Avoid contact with the skin. Wear suitable protective clothing.
Respiratory protection	Not normally needed. In case of insufficient ventilation, wear suitable respiratory equipment. If engineering controls do not maintain airborne concentrations below recommended exposure limits (where applicable) or to an acceptable level (in countries where exposure limits have not been established), an approved respirator must be worn.
Thermal hazards	Wear appropriate thermal protective clothing, when necessary.
General hygiene considerations	Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance	
Physical state	Liquid.
Form	Aqueous suspension.
Color	Black.
Odor	Odorless.
Odor threshold	Not available.
pH	8 - 10
Melting point/freezing point	Not available.
Initial boiling point and boiling range	Not available.
Flash point	Not flammable.
Evaporation rate	Not available.
Flammability (solid, gas)	Not applicable.
Upper/lower flammability or explosive limits	
Flammability limit - lower (%)	Not available.
Flammability limit - upper (%)	Not available.
Explosive limit - lower (%)	Not available.
Explosive limit - upper (%)	Not available.
Vapor pressure	Not available.
Vapor density	Not available.
Relative density	1 - 1.2
Solubility(ies)	
Solubility (water)	Miscible
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
Viscosity	Not available.

10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
Chemical stability	Material is stable under normal conditions.
Possibility of hazardous reactions	No dangerous reaction known under conditions of normal use.
Conditions to avoid	Contact with incompatible materials. Keep from freezing.
Incompatible materials	Strong oxidizing agents. Water reactive materials.

Hazardous decomposition products	Combustion may produce: carbon oxides.

11. Toxicological information

Information on likely routes of exposure

Inhalation	Prolonged inhalation may be harmful.
Skin contact	Prolonged or repeated skin contact may result in minor irritation.
Eye contact	Direct contact with eyes may cause temporary irritation.
Ingestion	Expected to be a low ingestion hazard.
Symptoms related to the physical, chemical and toxicological characteristics	Direct contact with eyes may cause temporary irritation.

Information on toxicological effects

Acute toxicity Not expected to be acutely toxic.

Components	Species	Test Results
Colloidal activated carbon ≤2.5 µm (CAS 7440-44-0)		
Acute		
Inhalation		
LC50	Rat	> 8500 mg/m³, air
Oral		
LD50	Rat	> 2000 mg/kg, (Female)

Skin corrosion/irritation	Prolonged skin contact may cause temporary irritation.
Serious eye damage/eye irritation	Direct contact with eyes may cause temporary irritation.
Respiratory or skin sensitization	
Respiratory sensitization	Not a respiratory sensitizer.
Skin sensitization	This product is not expected to cause skin sensitization.
Germ cell mutagenicity	No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.
Carcinogenicity	This product is not considered to be a carcinogen by IARC, ACGIH, NTP, or OSHA.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

Reproductive toxicity	This product is not expected to cause reproductive or developmental effects.
Specific target organ toxicity - single exposure	Not classified.
Specific target organ toxicity - repeated exposure	Not classified.
Aspiration hazard	Not an aspiration hazard.
Chronic effects	Prolonged inhalation may be harmful.

12. Ecological information

Ecotoxicity	The product is not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.
Persistence and degradability	No data is available on the degradability of this product.
Bioaccumulative potential	No data available.
Mobility in soil	Expected to be temporarily highly mobile in soil.
Other adverse effects	None known.

13. Disposal considerations

Disposal instructions	Collect and reclaim or dispose in sealed containers at licensed waste disposal site.
Local disposal regulations	Dispose in accordance with all applicable regulations.
Hazardous waste code	The waste code should be assigned in discussion between the user, the producer and the waste disposal company.

Waste from residues / unused products	Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).
Contaminated packaging	Empty containers should be taken to an approved waste handling site for recycling or disposal. Since emptied containers may retain product residue, follow label warnings even after container is emptied.

14. Transport information

DOT

Not regulated as dangerous goods.

IATA

Not regulated as dangerous goods.

IMDG

Not regulated as dangerous goods.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code	Not established.

15. Regulatory information

US federal regulations

All components are listed on or exempt from the U.S. EPA TSCA Inventory List.
This product is not known to be a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

CERCLA Hazardous Substance List (40 CFR 302.4)

Not listed.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

Hazard categories

Immediate Hazard - No
Delayed Hazard - No
Fire Hazard - No
Pressure Hazard - No
Reactivity Hazard - No

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous chemical	No

SARA 313 (TRI reporting)

Not regulated.

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA)	Not regulated.

US state regulations

US. Massachusetts RTK - Substance List

Not regulated.

US. New Jersey Worker and Community Right-to-Know Act

Colloidal activated carbon ≤2.5 µm (CAS 7440-44-0)

US. Pennsylvania Worker and Community Right-to-Know Law

Not listed.

US. Rhode Island RTK

Not regulated.

US. California Proposition 65

Not Listed.

International Inventories

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	Yes
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	Yes
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Existing Chemicals List (ECL)	Yes
New Zealand	New Zealand Inventory	Yes
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	Yes
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

*A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).
A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date 26-February-2015

Revision date -

Version # 01

Further information HMIS® is a registered trade and service mark of the American Coatings Association (ACA).

HMIS® ratings Health: 0
Flammability: 0
Physical hazard: 0

NFPA ratings

Disclaimer Regenesis cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

REGENESIS
Technology-Based Solutions for the Environment

SAFETY DATA SHEET

1. Identification

Product identifier	**PlumeSTOP® Nutrients**
Other means of identification	None.
Recommended use	Soil and Groundwater Remediation.
Recommended restrictions	None known.

Manufacturer/Importer/Supplier/Distributor information

Company Name	Regenesis
Address	1011 Calle Sombra San Clemente, CA 92673
Telephone	949-366-8000
E-mail	CustomerService@regenesis.com
Emergency phone number	CHEMTREC® at 1-800-424-9300 (International)

2. Hazard(s) identification

Physical hazards	Not classified.
Health hazards	Not classified.
OSHA defined hazards	Not classified.

Label elements

Hazard symbol	None.
Signal word	None.
Hazard statement	The mixture does not meet the criteria for classification.
Precautionary statement	
Prevention	Observe good industrial hygiene practices.
Response	Wash hands after handling.
Storage	Store away from incompatible materials.
Disposal	Dispose of waste and residues in accordance with local authority requirements.
Hazard(s) not otherwise classified (HNOC)	None known.
Supplemental information	None.

3. Composition/information on ingredients

Mixtures

The manufacturer lists no ingredients as hazardous according to OSHA 29 CFR 1910.1200.

4. First-aid measures

Inhalation	Move to fresh air. Call a physician if symptoms develop or persist.
Skin contact	Wash off with soap and water. Get medical attention if irritation develops and persists.
Eye contact	Do not rub eyes. Rinse with water. Get medical attention if irritation develops and persists.
Ingestion	Rinse mouth. Get medical attention if symptoms occur.
Most important symptoms/effects, acute and delayed	Dusts may irritate the respiratory tract, skin and eyes.
Indication of immediate medical attention and special treatment needed	Treat symptomatically.
General information	Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves.

5. Fire-fighting measures

Suitable extinguishing media	Water fog. Foam. Dry chemical powder. Carbon dioxide (CO2). Apply extinguishing media carefully to avoid creating airborne dust.
Unsuitable extinguishing media	None known.
Specific hazards arising from the chemical	During fire, gases hazardous to health may be formed.
Special protective equipment and precautions for firefighters	Self-contained breathing apparatus and full protective clothing must be worn in case of fire.
Fire fighting equipment/instructions	Use water spray to cool unopened containers. Avoid dust formation.
Specific methods	Use standard firefighting procedures and consider the hazards of other involved materials.
General fire hazards	No unusual fire or explosion hazards noted.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures	Keep unnecessary personnel away. Wear appropriate protective equipment and clothing during clean-up. Use a NIOSH/MSHA approved respirator if there is a risk of exposure to dust/fume at levels exceeding the exposure limits. For personal protection, see section 8 of the SDS.
Methods and materials for containment and cleaning up	Avoid the generation of dusts during clean-up. Collect dust using a vacuum cleaner equipped with HEPA filter. This product is miscible in water. Stop the flow of material, if this is without risk. Large Spills: Wet down with water and dike for later disposal. Shovel the material into waste container. Following product recovery, flush area with water. Small Spills: Sweep up or vacuum up spillage and collect in suitable container for disposal. For waste disposal, see section 13 of the SDS.
Environmental precautions	Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling	Minimize dust generation and accumulation. Provide appropriate exhaust ventilation at places where dust is formed. Practice good housekeeping.
Conditions for safe storage, including any incompatibilities	Store in original tightly closed container. Store in a well-ventilated place. Store away from incompatible materials (see Section 10 of the SDS).

8. Exposure controls/personal protection

Occupational exposure limits

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Components	Type	Value	Form
PlumeSTOP® Nutrients (as dust)	PEL	5 mg/m3	Respirable fraction.
		15 mg/m3	Total dust.

US. OSHA Table Z-3 (29 CFR 1910.1000)

Components	Type	Value	Form
PlumeSTOP® Nutrients (as dust)	TWA	5 mg/m3	Respirable fraction.
		15 mg/m3	Total dust.
		50 mppcf	Total dust.
		15 mppcf	Respirable fraction.

US. ACGIH Threshold Limit Values

Components	Type	Value	Form
PlumeSTOP® Nutrients (as dust)	TWA	3 mg/m3	Respirable particles.
		10 mg/m3	Inhalable particles.

Biological limit values	No biological exposure limits noted for the ingredient(s).
Appropriate engineering controls	Ensure adequate ventilation, especially in confined areas. Local exhaust is suggested for use, where possible, in enclosed or confined spaces.

Individual protection measures, such as personal protective equipment

Eye/face protection	Wear safety glasses with side shields (or goggles). Unvented, tight fitting goggles should be worn in dusty areas.
Skin protection	
Hand protection	Wear appropriate chemical resistant gloves. Suitable gloves can be recommended by the glove supplier.
Skin protection	
Other	Wear suitable protective clothing.
Respiratory protection	In case of inadequate ventilation, use MSHA/NIOSH approved dust respirator.
Thermal hazards	Wear appropriate thermal protective clothing, when necessary.
General hygiene considerations	Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance	
Physical state	Solid.
Form	Powder.
Color	White.
Odor	Odorless.
Odor threshold	Not available.
pH	Not available.
Melting point/freezing point	Not available.
Initial boiling point and boiling range	Not available.
Flash point	Not available.
Evaporation rate	Not available.
Flammability (solid, gas)	The product is non-combustible.
Upper/lower flammability or explosive limits	
Flammability limit - lower (%)	Not available.
Flammability limit - upper (%)	Not available.
Explosive limit - lower (%)	Not available.
Explosive limit - upper (%)	Not available.
Vapor pressure	Not available.
Vapor density	Not available.
Relative density	Not available.
Solubility(ies)	
Solubility (water)	Completely soluble.
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
Viscosity	Not available.
Other information	
Explosive properties	Not explosive.
Oxidizing properties	Not oxidizing.

10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
Chemical stability	Material is stable under normal conditions.

Possibility of hazardous reactions	No dangerous reaction known under conditions of normal use. Ammonia fumes may be released upon heating.
Conditions to avoid	Contact with incompatible materials. Excessive heat.
Incompatible materials	Strong oxidizing agents. Bases.
Hazardous decomposition products	Ammonia fumes may be released upon heating.

11. Toxicological information

Information on likely routes of exposure

Inhalation	Dust may irritate respiratory system.
Skin contact	Dust or powder may irritate the skin.
Eye contact	Dust may irritate the eyes.
Ingestion	Expected to be a low ingestion hazard.
Symptoms related to the physical, chemical and toxicological characteristics	Dusts may irritate the respiratory tract, skin and eyes.

Information on toxicological effects

Acute toxicity	Not expected to be acutely toxic.
Skin corrosion/irritation	Prolonged skin contact may cause temporary irritation.
Serious eye damage/eye irritation	Direct contact with eyes may cause temporary irritation.

Respiratory or skin sensitization

Respiratory sensitization	Not a respiratory sensitizer.
Skin sensitization	This product is not expected to cause skin sensitization.
Germ cell mutagenicity	No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.
Carcinogenicity	This product is not considered to be a carcinogen by IARC, ACGIH, NTP, or OSHA.

IARC Monographs. Overall Evaluation of Carcinogenicity

Not listed.

NTP Report on Carcinogens

Not listed.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not regulated.

Reproductive toxicity	This product is not expected to cause reproductive or developmental effects.
Specific target organ toxicity - single exposure	Not classified.
Specific target organ toxicity - repeated exposure	Not classified.
Aspiration hazard	Not an aspiration hazard.

12. Ecological information

Ecotoxicity	The product is not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.
Persistence and degradability	No data is available on the degradability of this product.
Bioaccumulative potential	No data available.
Mobility in soil	This product is completely water soluble and will disperse in soil.
Other adverse effects	No other adverse environmental effects (e.g. ozone depletion, photochemical ozone creation potential, endocrine disruption, global warming potential) are expected from this component.

13. Disposal considerations

Disposal instructions	Collect and reclaim or dispose in sealed containers at licensed waste disposal site.
Local disposal regulations	Dispose in accordance with all applicable regulations.
Hazardous waste code	The waste code should be assigned in discussion between the user, the producer and the waste disposal company.

Waste from residues / unused products	Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).
Contaminated packaging	Since emptied containers may retain product residue, follow label warnings even after container is emptied. Empty containers should be taken to an approved waste handling site for recycling or disposal.

14. Transport information

DOT

Not regulated as dangerous goods.

IATA

Not regulated as dangerous goods.

IMDG

Not regulated as dangerous goods.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code	Not applicable.

15. Regulatory information

US federal regulations

This product is not known to be a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not regulated.

CERCLA Hazardous Substance List (40 CFR 302.4)

Not listed.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

Hazard categories

Immediate Hazard - No
Delayed Hazard - No
Fire Hazard - No
Pressure Hazard - No
Reactivity Hazard - No

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous chemical	No

SARA 313 (TRI reporting)

Chemical name	CAS number	% by wt.
Ammonium sulfate	7783-20-2	40-50

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA)	Not regulated.

US state regulations

US. Massachusetts RTK - Substance List

Ammonium sulfate (CAS 7783-20-2)

US. New Jersey Worker and Community Right-to-Know Act

Not listed.

US. Pennsylvania Worker and Community Right-to-Know Law

Ammonium sulfate (CAS 7783-20-2)

US. Rhode Island RTK

Not regulated.

US. California Proposition 65

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): This material is not known to contain any chemicals currently listed as carcinogens or reproductive toxins.

International Inventories

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	No
Canada	Domestic Substances List (DSL)	No
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	No
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Existing Chemicals List (ECL)	No
New Zealand	New Zealand Inventory	No
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	No
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	No

*A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).
A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date 07-January-2016

Revision date -

Version # 01

HMIS® ratings Health: 1
Flammability: 0
Physical hazard: 0

NFPA ratings

Disclaimer Regenesis cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

APPENDIX D

PROJECT DOCUMENTATION FORMS

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

DAILY LOG	DATE			
	NO.			
	SHEET		OF	

FIELD ACTIVITY DAILY LOG

PROJECT NAME:	PROJECT NO.
PROJECT LOCATION:	CLIENT:
FIELD ACTIVITY:	

DESCRIPTION OF DAILY ACTIVITIES AND EVENTS:

TIME	DESCRIPTION

VISITORS ON SITE:	CHANGES FROM PLANS AND SPECIFICATIONS, AND OTHER SPECIAL ORDERS AND IMPORTANT DECISIONS:

WEATHER CONDITIONS:	IMPORTANT TELEPHONE CALLS:
A.M.:	
P.M.:	

PERSONNEL ON SITE:	
SIGNATURE	DATE:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

DAILY LOG	DATE			
	NO.			
	SHEET		OF	

FIELD ACTIVITY DAILY LOG
(CONTINUED)

PROJECT NAME:	PROJECT NO.

DESCRIPTION OF DAILY ACTIVITIES AND EVENTS:

TIME	DESCRIPTION

SIGNATURE	DATE:

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

DAILY LOG	DATE			
	NO.			
	SHEET		OF	

FIELD ACTIVITY DAILY LOG
(CONTINUED)

PROJECT NAME:	PROJECT NO.

DESCRIPTION OF DAILY ACTIVITIES AND EVENTS:

TIME	DESCRIPTION

REFERENCED PROJECT FIELD FORMS:

☐ Aquifer Test Data Sheet	☐ Impacted Soil Excavation Log	☐ Soil Gas Survey Log
☐ Chain-of-Custody Form	☐ Impacted Soil Transportation Log	☐ Step-Drawdown Test Data Sheet
☐ Construction Sample Summary Log	☐ Monitoring Well Inspection Form	☐ Survey Elevation Log
☐ Corrective Measures Report	☐ Nuclear Densitometer Field Log	☐ Tailgate Safety Meeting Form
☐ Daily Drilling Report	☐ Photographic Log	☐ Test Pit Excavation Log
☐ Drilling Safety Checklist	☐ Pipe Leakage Testing Log	☐ Underground/Overhead Utility Checklist
☐ Equipment Calibration Log	☐ Post-Closure Field Inspection Report	☐ Variance Log
☐ Field Borehole Log	☐ Pressure Packer Testing Log	☐ Water Level Monitoring Record
☐ Field Borehole/Monitoring Well Installation Log	☐ Problem Identification Report	☐ Water Quality Field Collection Log
☐ Field Investigation Report	☐ Real-Time Air Monitoring Log	☐ Water Sample Collection Log
☐ Field Slug Test Log	☐ Record of Telecom Meeting	☐ Well Abandonment/Decomm. Log
☐ Groundwater Elevation Log	☐ Sample Summary Collection Log	☐ Well Completion Detail
☐ GW Well Development and Purge Log	☐ Sediment Sample Collection Log	☐
☐ Hot Work Permit	☐ Seep Sample Collection Log	☐
☐ IDW Container Log	☐ Seepage Meter Sample Collection Log	☐

SIGNATURE DATE:

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

DAILY LOG	DATE			
	REPORT NO.			
	PAGE		OF	

PROBLEM IDENTIFICATION REPORT

Date:

Project:

Job No:

Location:

CQA Monitor(s):

Client:

Contractor:

Contractor's Supervisor:

WEATHER CONDITIONS:

Ambient Air Temp. - A.M.:

Ambient Air Temp. - P.M.:

Wind Direction:

Wind Speed:

Precipitation:

Problem Description:

Problem Location (reference test location, sketch on back of form as appropriate):

Problem Causes:

Suggested Corrective Measures or Variances:

Linked to Corrective Measures Report No. *or Variance Log No.*

Approvals (initial):

CQA Engineer:

Project Manager:

Signed:

CQA Representative

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

DAILY LOG	DATE			
	REPORT NO.			
	PAGE		OF	

CORRECTIVE MEASURES REPORT

Date:

Project:

Job No:

Location:

CQA Monitor(s):

Client:

Contractor:

Contractor's Supervisor:

WEATHER CONDITIONS:

Ambient Air Temp. - A.M.:

Ambient Air Temp. - P.M.:

Wind Direction:

Wind Speed:

Precipitation:

Corrective Measures Undertaken (reference Problem Identification Report No.)

Retesing Location:

Suggested Method of Minimizing Re-Occurrence:

Approvals (initial):

CQA Engineer:

Project Manager:

Signed:

CQA Representative

APPENDIX E

ENVIRONMENTAL EASEMENT

CHAUTAUQUA COUNTY CLERK

LARRY BARMORE

Receipt

** Reprint **
Receipt Date: 11/04/2021 09:47:46 AM
RECEIPT # 202106331730

Recording Clerk: CRANEA
Cash Drawer: CASH1
Rec'd Frm: DUKE HOLZMAN PHOTIADIS &
GRESENS LLP

Instr#: DE2021007672
DOC: EASEMENT
DEED STAMP: TT2022001482
OR Party: G PATTI ENTERPRISES LLC
EE Party: NEW YORK STATE DEPARTMENT OF
ENVIRONMENTAL CONSERVATION

Recording Fees	
Cover Page	$5.00
Recording Fee	$65.00
Cultural Ed	$14.25
Records Management - County	$1.00
Records Management - State	$4.75
Notations	$0.50
TP584	$5.00
Transfer Tax	
Transfer Tax	$0.00
DOCUMENT TOTAL: ---->	$95.50

Receipt Summary	
Document Count: 1	
TOTAL RECEIPT: ---->	$95.50
TOTAL RECEIVED: ---->	$95.50
CASH BACK: ---->	$0.00

PAYMENTS
Check # 057244 -> $95.50
DUKE HOLZMAN PHOTIADIS & GRESENS LLP

ENVIRONMENTAL EASEMENT GRANTED PURSUANT TO ARTICLE 71, TITLE 36 OF THE NEW YORK STATE ENVIRONMENTAL CONSERVATION LAW

THIS INDENTURE made this 25th day of October, 2021 between Owner, GPatti Enterprises, LLC, having an office at 115 Livingston Avenue, Jamestown, New York 14701 (the "Grantor"), and The People of the State of New York (the "Grantee"), acting through their Commissioner of the Department of Environmental Conservation (the "Commissioner", or "NYSDEC" or "Department" as the context requires) with its headquarters located at 625 Broadway, Albany, New York 12233,

WHEREAS, the Legislature of the State of New York has declared that it is in the public interest to encourage the remediation of abandoned and likely contaminated properties ("sites") that threaten the health and vitality of the communities they burden while at the same time ensuring the protection of public health and the environment; and

WHEREAS, the Legislature of the State of New York has declared that it is in the public interest to establish within the Department a statutory environmental remediation program that includes the use of Environmental Easements as an enforceable means of ensuring the performance of operation, maintenance, and/or monitoring requirements and the restriction of future uses of the land, when an environmental remediation project leaves residual contamination at levels that have been determined to be safe for a specific use, but not all uses, or which includes engineered structures that must be maintained or protected against damage to perform properly and be effective, or which requires groundwater use or soil management restrictions; and

WHEREAS, the Legislature of the State of New York has declared that Environmental Easement shall mean an interest in real property, created under and subject to the provisions of Article 71, Title 36 of the New York State Environmental Conservation Law ("ECL") which contains a use restriction and/or a prohibition on the use of land in a manner inconsistent with engineering controls which are intended to ensure the long term effectiveness of a site remedial program or eliminate potential exposure pathways to hazardous waste or petroleum; and

WHEREAS, Grantor, is the owner of real property located at the address of 115-121 West Third Street in the City of Jamestown, County of Chautauqua and State of New York, known and designated on the tax map of the County Clerk of Chautauqua as tax map parcel number: Section 387.40 Block 3 Lot 8, being the same as that property conveyed to Grantor by deed dated December 27, 2017 and recorded in the Chautauqua County Clerk's Office in Instrument No. DE2017007990. The property subject to this Environmental Easement (the "Controlled Property") comprises approximately 0.599 +/- acres, and is hereinafter more fully described in the Land Title Survey dated October 4, 2021 prepared by Kevin Michael Rodgers, L.L.S. of Rodgers Land Surveying, which will be attached to the Site Management Plan. The Controlled Property description is set forth in and attached hereto as Schedule A; and

WHEREAS, the Department accepts this Environmental Easement in order to ensure the protection of public health and the environment and to achieve the requirements for remediation established for the Controlled Property until such time as this Environmental Easement is extinguished pursuant to ECL Article 71, Title 36; and

NOW THEREFORE, in consideration of the mutual covenants contained herein and the terms and conditions of Brownfield Cleanup Agreement Index Number: C907047-07-18, Grantor conveys to Grantee a permanent Environmental Easement pursuant to ECL Article 71, Title 36 in, on, over, under, and upon the Controlled Property as more fully described herein ("Environmental Easement").

1. Purposes. Grantor and Grantee acknowledge that the Purposes of this Environmental Easement are: to convey to Grantee real property rights and interests that will run with the land in perpetuity in order to provide an effective and enforceable means of encouraging the reuse and redevelopment of this Controlled Property at a level that has been determined to be safe for a specific use while ensuring the performance of operation, maintenance, and/or monitoring requirements; and to ensure the restriction of future uses of the land that are inconsistent with the above-stated purpose.

2. Institutional and Engineering Controls. The controls and requirements listed in the Department approved Site Management Plan ("SMP") including any and all Department approved amendments to the SMP are incorporated into and made part of this Environmental Easement. These controls and requirements apply to the use of the Controlled Property, run with the land, are binding on the Grantor and the Grantor's successors and assigns, and are enforceable in law or equity against any owner of the Controlled Property, any lessees and any person using the Controlled Property.

A. (1) The Controlled Property may be used for:

Commercial as described in 6 NYCRR Part 375-1.8(g)(2)(iii) and Industrial as described in 6 NYCRR Part 375-1.8(g)(2)(iv)

(2) All Engineering Controls must be operated and maintained as specified in the Site Management Plan (SMP);

(3) All Engineering Controls must be inspected at a frequency and in a manner defined in the SMP;

(4) The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or the Chautauqua County Department of Health to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department;

(5) Groundwater and other environmental or public health monitoring must be performed as defined in the SMP;

(6) Data and information pertinent to Site Management of the Controlled Property must be reported at the frequency and in a manner defined in the SMP;

(7) All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with the SMP;

(8) Monitoring to assess the performance and effectiveness of the remedy must be performed as defined in the SMP;

(9) Operation, maintenance, monitoring, inspection, and reporting of any mechanical or physical components of the remedy shall be performed as defined in the SMP;

(10) Access to the site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by this Environmental Easement.

B. The Controlled Property shall not be used for Residential or Restricted Residential purposes as defined in 6NYCRR 375-1.8(g)(2)(i) and (ii), and the above-stated engineering controls may not be discontinued without an amendment or extinguishment of this Environmental Easement.

C. The SMP describes obligations that the Grantor assumes on behalf of Grantor, its successors and assigns. The Grantor's assumption of the obligations contained in the SMP which may include sampling, monitoring, and/or operating a treatment system, and providing certified reports to the NYSDEC, is and remains a fundamental element of the Department's determination that the Controlled Property is safe for a specific use, but not all uses. The SMP may be modified in accordance with the Department's statutory and regulatory authority. The Grantor and all successors and assigns, assume the burden of complying with the SMP and obtaining an up-to-date version of the SMP from:

Site Control Section
Division of Environmental Remediation
NYSDEC
625 Broadway
Albany, New York 12233
Phone: (518) 402-9553

D. Grantor must provide all persons who acquire any interest in the Controlled Property a true and complete copy of the SMP that the Department approves for the Controlled Property and all Department-approved amendments to that SMP.

E. Grantor covenants and agrees that until such time as the Environmental Easement is extinguished in accordance with the requirements of ECL Article 71, Title 36 of the ECL, the property deed and all subsequent instruments of conveyance relating to the Controlled Property shall state in at least fifteen-point bold-faced type:

This property is subject to an Environmental Easement held by the New York State Department of Environmental Conservation pursuant to Title 36 of Article 71 of the Environmental Conservation Law.

F. Grantor covenants and agrees that this Environmental Easement shall be

incorporated in full or by reference in any leases, licenses, or other instruments granting a right to use the Controlled Property.

G. Grantor covenants and agrees that it shall, at such time as NYSDEC may require, submit to NYSDEC a written statement by an expert the NYSDEC may find acceptable certifying under penalty of perjury, in such form and manner as the Department may require, that:

(1) the inspection of the site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under the direction of the individual set forth at 6 NYCRR Part 375-1.8(h)(3).

(2) the institutional controls and/or engineering controls employed at such site:

(i) are in-place;

(ii) are unchanged from the previous certification, or that any identified changes to the controls employed were approved by the NYSDEC and that all controls are in the Department-approved format; and

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

(3) the owner will continue to allow access to such real property to evaluate the continued maintenance of such controls;

(4) nothing has occurred that would constitute a violation or failure to comply with any site management plan for such controls;

(5) the report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

(6) to the best of his/her knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and

(7) the information presented is accurate and complete.

3. Right to Enter and Inspect. Grantee, its agents, employees, or other representatives of the State may enter and inspect the Controlled Property in a reasonable manner and at reasonable times to assure compliance with the above-stated restrictions.

4. Reserved Grantor's Rights. Grantor reserves for itself, its assigns, representatives, and successors in interest with respect to the Property, all rights as fee owner of the Property, including:

A. Use of the Controlled Property for all purposes not inconsistent with, or limited by the terms of this Environmental Easement;

B. The right to give, sell, assign, or otherwise transfer part or all of the underlying fee interest to the Controlled Property, subject and subordinate to this Environmental Easement;

5. Enforcement

A. This Environmental Easement is enforceable in law or equity in perpetuity by Grantor, Grantee, or any affected local government, as defined in ECL Section 71-3603, against the owner of the Property, any lessees, and any person using the land. Enforcement shall not be defeated because of any subsequent adverse possession, laches, estoppel, or waiver. It is not a defense in any action to enforce this Environmental Easement that: it is not appurtenant to an interest in real property; it is not of a character that has been recognized traditionally at common

law; it imposes a negative burden; it imposes affirmative obligations upon the owner of any interest in the burdened property; the benefit does not touch or concern real property; there is no privity of estate or of contract; or it imposes an unreasonable restraint on alienation.

B. If any person violates this Environmental Easement, the Grantee may revoke the Certificate of Completion with respect to the Controlled Property.

C. Grantee shall notify Grantor of a breach or suspected breach of any of the terms of this Environmental Easement. Such notice shall set forth how Grantor can cure such breach or suspected breach and give Grantor a reasonable amount of time from the date of receipt of notice in which to cure. At the expiration of such period of time to cure, or any extensions granted by Grantee, the Grantee shall notify Grantor of any failure to adequately cure the breach or suspected breach, and Grantee may take any other appropriate action reasonably necessary to remedy any breach of this Environmental Easement, including the commencement of any proceedings in accordance with applicable law.

D. The failure of Grantee to enforce any of the terms contained herein shall not be deemed a waiver of any such term nor bar any enforcement rights.

6. Notice. Whenever notice to the Grantee (other than the annual certification) or approval from the Grantee is required, the Party providing such notice or seeking such approval shall identify the Controlled Property by referencing the following information:

County, NYSDEC Site Number, NYSDEC Brownfield Cleanup Agreement, State Assistance Contract or Order Number, and the County tax map number or the Liber and Page or computerized system identification number.

Parties shall address correspondence to:

Site Number: C907047
Office of General Counsel
NYSDEC
625 Broadway
Albany New York 12233-5500

With a copy to:

Site Control Section
Division of Environmental Remediation
NYSDEC
625 Broadway
Albany, NY 12233

All notices and correspondence shall be delivered by hand, by registered mail or by Certified mail and return receipt requested. The Parties may provide for other means of receiving and communicating notices and responses to requests for approval.

7. Recordation. Grantor shall record this instrument, within thirty (30) days of execution of this instrument by the Commissioner or her/his authorized representative in the office of the recording officer for the county or counties where the Property is situated in the manner prescribed by Article 9 of the Real Property Law.

8. Amendment. Any amendment to this Environmental Easement may only be executed by the Commissioner of the New York State Department of Environmental Conservation or the Commissioner's Designee, and filed with the office of the recording officer for the county or counties where the Property is situated in the manner prescribed by Article 9 of the Real Property Law.

9. Extinguishment. This Environmental Easement may be extinguished only by a release by the Commissioner of the New York State Department of Environmental Conservation, or the Commissioner's Designee, and filed with the office of the recording officer for the county or counties where the Property is situated in the manner prescribed by Article 9 of the Real Property Law.

10. Joint Obligation. If there are two or more parties identified as Grantor herein, the obligations imposed by this instrument upon them shall be joint and several.

11. Consistency with the SMP. To the extent there is any conflict or inconsistency between the terms of this Environmental Easement and the SMP, regarding matters specifically addressed by the SMP, the terms of the SMP will control.

Remainder of Page Intentionally Left Blank

IN WITNESS WHEREOF, Grantor has caused this instrument to be signed in its name.

GPatti Enterprises, LLC:

By: _____

Print Name: George Patti, III

Title: President Date: 10/20/21

Grantor's Acknowledgment

STATE OF NEW YORK)
) ss:
COUNTY OF Chautauqua).

On the 20 day of October, in the year 2021, before me, the undersigned, personally appeared George Patti III, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.

_____
Notary Public - State of New York

JANET L WOODFIELD
Lic. #01WO5059614
Notary Public-State of New York
Qualified in Chautauqua
My Commission Expires APRIL 29, 2022

THIS ENVIRONMENTAL EASEMENT IS HEREBY ACCEPTED BY THE PEOPLE OF THE STATE OF NEW YORK, Acting by and Through the Department of Environmental Conservation as Designee of the Commissioner,

By: _____
Michael J. Ryan, Director
Division of Environmental Remediation

Grantee's Acknowledgment

STATE OF NEW YORK)
) ss:
COUNTY OF ALBANY)

On the 25th day of October, in the year 2024 before me, the undersigned, personally appeared Michael J. Ryan, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/ executed the same in his/her/ capacity as Designee of the Commissioner of the State of New York Department of Environmental Conservation, and that by his/her/ signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

_____
Notary Public - State of New York

Caitlin E. Stephen
Notary Public, State of New York
No. 02ST6338529
Qualified in Albany County
Commission Expires Mar. 14, 2024

SCHEDULE "A" PROPERTY DESCRIPTION

ALL THAT TRACT OR PARCEL OF LAND situate in the City of Jamestown, County of Chautauqua and State of New York, being part of Lot 34, Township 2 and Range 11 of the Holland Land Company's survey and further bounded and described as follows:

BEGINNING at a point at the intersection of the easterly line of Washington Street with the southerly line of West Third Street; Thence easterly, along the southerly line of West Third Street, 80.45 feet to a point; Thence continuing easterly, and still along the southerly line of West Third Street, 20.39 feet to a point, said point located westerly, as measured along the southerly line of West Third Street, 20.69 feet from the intersection of the southerly line of West Third Street with the westerly line of Foundry Alley; Thence southerly, at an interior angle of 89°58'32", a distance of 193.00 feet to a point on the northerly line of a 7 foot wide private alley; Thence westerly, along the northerly line of said alley, 22.44 feet to a point; Thence southerly, along the westerly line of said alley, 7 feet to a point; Thence easterly, along the southerly line of said alley, 43.33 feet to a point on the westerly line of Foundry Alley; Thence southerly, along the westerly line of FoundryAlley, 50.00 feet to a point on the northerly line of West Second Street; Thence westerly, along the northerly line of West Second Street, 121.61 feet to a point at the intersection of the northerly line of West Second Street with the easterly line of Washington Street; Thence northerly, along the easterly line of Washington Street, 250.00 feet to the point of beginning containing 0.599 acre of land to be the same more or less.