Interim Remedial Measures (IRM) Work Plan

Tecumseh Phase II Business Park
Site II-4, BCP Site No. C915198D
Lackawanna, New York

September 2022

0071-021-500

Prepared For:

Tecumseh Redevelopment Inc.

Prepared By:

TurnKey Environmental Restoration, LLC

In Association With:

Benchmark

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CERTIFICATION

I, Lori E. Riker, P.E., certify that I am currently a NYS registered professional engineer and that this Interim Remedial Measures (IRM) Work Plan for the Tecumseh Phase II Business Park Site II-4 (BCP Site No. C915198D) 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).

License No.: 077625-1 **Date:** 09/20/2022

Registration State: New York **SEAL:**

LORI E. RIKER
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Lori Riker

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BCP SITE NO. C915198D
LACKAWANNA, NEW YORK

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APPENDICES

1.0 INTRODUCTION

This document presents the details of interim remedial measures (IRMs) to be undertaken within Brownfield Cleanup Program (BCP) Site No. C915198D of the Tecumseh Phase II Business Park Site II-4 in Lackawanna, NY (see Figure 1).

The proposed IRMs are being performed on behalf of Tecumseh Redevelopment Inc. (Tecumseh) through the NYSDEC BCP to address soil/fill impacts identified on the Site. Remediation of site impacts will satisfy the intended goal of expediting cleanup while facilitating redevelopment of the Site for commercial or industrial reuse.

1.1 Background

1.1.1 Historic Use

The Phase II Business Park Site II-4, referred to as the South Linde Area, is a 1.4-acre parcel that formerly housed a pure oxygen generating station that serviced Bethlehem Steel's basic oxygen furnaces. The following current and former structures/buildings are located within the Phase II Business Park Site II-4 boundaries:

- **Pump and Treat Recovery Well Sheds** provide protection to the recovery wells and associated belt skimmers.
- **Collection System Skid**
- **Erie County Sewer Department (ECSD) #6 Mix Chambers Shed** provides protection for the ECSD mixing chambers.

1.1.2 Investigative and Remedial History

The South Linde Area has undergone investigation and remediation as described in Section 2.1 of the RI/AAR Work Plan (Ref. 1). The existing groundwater collection and treatment system and primary recovery well skimmer has been operational since 2000; TurnKey installed additional product recovery wells and oil skimmers upgradient of the collection trench in 2004. The collection and product recovery systems have been effective in preventing migration of oils to Smokes Creek, and the treatment system has reliably reduced dissolved phase contaminant levels to below levels acceptable for discharge to the Creek. However, because of the persistence of floating product in piezometers upgradient of the collection system, the NYSDEC indicated that more aggressive, expedited remedial measures were necessary to address these source areas. In February 2010, TurnKey submitted and the NYSDEC approved an Interim Remedial Measures (IRM) Work Plan for implementing high vacuum extraction (HVE) at two monitoring wells and four piezometers for removal of oil product from the shallow overburden groundwater. Green Environmental Specialists, Inc. (Green) conducted HVE events periodically from May 2010 to April 2014. The retrieved oil/water mixture was transported off-site to Green's Niagara Falls, NY facility where it was blended with soil prior to disposal at Modern Landfill in Lewiston, NY. Subsequent to the April 2014 HVE event, the NYSDEC stated they did not believe the HVE was effectively mitigating the Site and requested a modification to the Linde System.

Section 2.0 describes the upgrades to the system following approval of the March 2012 Remedial Investigation/Alternatives Analysis (RI/AA) Report (Ref. 2).

1.2 Purpose and Scope

This IRM Work Plan presents the scope of work and planned approach for interim remedial measures (IRMs) on the Phase II Business Park Site II-4. Completion of these IRMs will allow Tecumseh to move forward with a Purchase and Sale Agreement (PSA) with Erie County Industrial Land Development Corporation (ILDC). The scope of remedial activities includes:

- Excavating grossly petroleum-impacted soil/fill from the South Linde Area for treatment via ex-situ bioremediation on-site.
- Removing primary collection system (skimmer, monitoring wells, piezometers and select recovery wells) during remedial excavation measures.
- Treating excavation water via filter bags and granular activated carbon prior to discharge to the South Return Water Trench (SRWT).
- Decommissioning the remaining treatment system (collection trench and recovery well RW-1) upon completion of remedial excavation measures.

This IRM Work Plan has been prepared in accordance with Section 5.3b of NYSDEC's May 2010 DER-10 Technical Guidance for Site Investigation and Remediation (Ref. 3). As such, it addresses the following items:

- A description of completed remedial measures (Section 2.0).
- A description of the remedial actions to be undertaken, the basis for the actions, and the technical approach (Sections 3.0 and 4.0).

- Health, safety, and community air monitoring procedures (Sections 4.1.4 and 5.0.
- Project documentation requirements (Section 6.0) including a summary of drawings and information to be provided as part of the Final Engineering Report.
- Post-remedial monitoring actions to be undertaken (Section 7.0)
- The anticipated construction schedule (Section 8.0).
- References sited in this IRM Work Plan (Section 9.0).

1.3 Project Organization and Responsibilities

Benchmark Civil/Environmental Engineering & Geology, PLLC in association with TurnKey Environmental Restoration, LLC (Benchmark-TurnKey) will implement the remedial work on behalf of Tecumseh on a design-build basis. The work will be performed in accordance with the BCA, approved IRM Work Plan, and NYSDEC DER-10 guidance.

2.0 REMEDIAL MEASURES

2.1 2012 RI/AA Alternative 3

The 2012 RI/AA Report prepared by TurnKey selected Alternative 3 as the remedial plan to address continued remediation of the South Linde Site. Under this alternative, the intermittent HVE events were discontinued. This alternative also included the over drilling of PZ-2 to construct a 6-inch recovery well in its place. The alternative also included moving the belt skimmer that operated at recovery well RW-3 and had negligible capture of product to the new recovery well location for continuous oil removal. The NYSDEC approved the RI/AA Report but did not issue a Decision Document for Site II-4, indicating that a more aggressive approach was preferred to address the oil impacts. As such, the proposed alterations under Alternative 3 were not completed. Continued operation and maintenance tasks were completed on the Linde system to increase free phase oil removal from this area and satisfy the groundwater RAOs.

To facilitate the timely sale and transfer of the Site per the ILDC-Tecumseh PSA, the client has elected to pursue Alternative 2, which includes excavation of source area soil/ fill with on-site treatment. Section 3.0 describes the planned remedial work.

3.0 PLANNED REMEDIAL ACTIONS

3.1 Pump and Treat System Decommissioning

The existing groundwater treatment system equipment located at the surface will be removed prior to excavation. Subsurface parts including the discharge pipe, monitoring wells, and piezometers will be removed during excavation activities. The only equipment to remain in place is the collection trench and recovery well RW-1, which will be used to dewater the excavation. Upon completion of the remedial measures, the collection trench and recovery well will be removed and/or decommissioned as described in Section 4.5.

3.2 Soil/Fill Excavation

Sub-surface soil borings and monitoring wells were completed in April 1999 by URS to determine extent of contamination. Sub-surface exploratory test pits were completed in July 2021 by Benchmark-TurnKey to further define the limits of the petroleum-impacted soil/fill within the South Linde Area. The test pits were excavated approximately 12 to 16 feet below ground surface (fbgs) except for TP-L-3 that was only completed to 6 fbgs due to an uncovered 18-inch steel pipe. The test pit location could not be moved due to an active power line above and below grade.

Both the historic April 1999 results and observations made during the July 2021 test pit investigation were used to determine the proposed excavation extents shown on Figure 3. Petroleum impacts were identified from 9 to 20 fbgs; however, the source area will be excavated until no visual or olfactory evidence of gross petroleum impact remains or it reaches the safe working limits adjacent to the Erie County Sewer Department (ECSD) active 30-inch sewer line to the west and National Grid easement parallel to Smokes Creek to the south. In addition, up to 3,200 pounds of PetroFix™ by Regenesis will be mixed with approximately 540 cubic yards of non-impacted overburden soil/fill and backfilled along the downgradient side of the excavation to address potential residual soil/fill impacts.

The excavated petroleum-impacted soil/fill will be bioremediated on a biotreatment pad constructed on Site II-3 of the Phase II Business Park. The excavation will be immediately backfilled with the screened non-impacted soil/fill along with other NYSDEC-approved material (if required) to just above the groundwater elevation. Excavation side slopes will be graded to provide a gentle slope toward the excavation bottom and the area enclosed with orange construction safety fencing until such time as the biotreatment work is complete and the treated soils can be returned to the Site to backfill the excavation to grade.

Previous experience during test pit excavations indicates the material is well-drained; however, provisions for managing groundwater will be in place during excavation as described in Section 4.3.2.

4.0 TECHNICAL APPROACH

4.1 Pre-Mobilization Tasks

4.1.1 Pre-Construction Meeting

A pre-construction meeting will be held with key representatives of the Project Team before the remedial activities begin. Attendees at the meeting will include Benchmark-TurnKey's Project Manager and remediation personnel. The designated NYSDEC Project Manager and NYSDOH representative will also be notified and invited to attend. Agenda items will include:

- Construction schedule
- Work sequencing
- Designation of responsibilities, contact personnel, and phone numbers
- Project documentation requirements
- Staging of equipment
- Transportation routes/site egress
- Health and safety requirements
- Temporary controls (dust suppression, storm water management)
- Work hours
- Site security

4.1.2 Progress Meetings

Progress meetings may be conducted throughout the construction period as needed to keep the project moving forward. Progress meetings will be attended by the Benchmark-TurnKey Project Manager and field management personnel. NYSDEC and NYSDOH will have access to all progress meetings.

4.1.3 Locating Utilities

Prior to excavation work, Site infrastructure drawings will be reviewed. National Grid will be contacted to determine the easement boundary surrounding the on-site utility pole with three mounted transformers located just south of the estimated excavation extents. Erie County Sewer Department (ECSD) will also be contacted and alerted to the excavation, which will encompass a 30-inch force main located just south of the excavation. The horizontal extents for the excavation area will be marked out.

4.1.4 Health and Safety Plan Development

The July 2013 Site Health and Safety Plan (HASP) for Brownfield Cleanup Program (Appendix B), prepared in accordance with the requirements of 40CFR 300.150 of the NCP and 29CFR 1910.120 and previously approved by the NYSDEC for Business Park investigation work, was updated in October 2020 and will be used for the remedial activities described herein. Benchmark-TurnKey will be responsible for Site control and for the health and safety of its authorized Site workers. Any other parties involved in on-site construction will be required to develop a HASP as or more stringent than Benchmark-TurnKey's HASP. The HASP will be subject to revision, as necessary, based on new information that is discovered during the remedial action.

Benchmark-TurnKey will also be responsible for performing community air monitoring during intrusive activities involving subgrade disturbance as discussed in Section 5.0 of this RAWP.

4.2 Temporary Facilities and Controls

4.2.1 Mobilization and Site Preparation

Field operations at the Site will commence with mobilizing equipment and materials to the Site; setting up and connecting temporary utilities, if required; and constructing temporary storm water controls.

4.2.2 Construction Facilities

Benchmark-TurnKey personnel involved in the remedial work will have a field office located in the Benchmark-TurnKey offices located at 2558 Hamburg Turnpike.

4.2.3 Dust Suppression

Dust suppression will be an integral component of the excavation, re-grading, biopad tilling, and final backfilling activities. During excavation and re-grading work, water will be sprayed across the surface of the work area as necessary to mitigate airborne dust formation and migration and assure conformance with community air monitoring thresholds. The biopad soils will be sprayed with water as needed to mitigate dust generation during tilling activities. Water will also be sprayed as needed to control visible dust migration from the handling, placement, and compaction of final backfill material. Other dust suppression techniques that may be used to supplement the water spray include:

- Applying water on haul roads.
- Hauling materials in properly tarped containers or vehicles.
- Restricting vehicle speeds on-site.

All reasonable attempts will be made to keep visible and/or fugitive dust to a minimum and adhere to particulate emissions limits identified in the Community Air Monitoring Plan (see Section 5.0).

4.2.4 Storm Water Management

Due to the highly permeable nature of the slag/fill material, its coarse gradation, and the relatively flat topography in the proposed work area, storm water ponding/runoff is not expected to pose a significant soil particulate or contaminant transport pathway during remedial activities. During the excavation work, Benchmark-TurnKey will undertake specific measures to assure proper management of storm water and preclude migration of contaminants to surface waters or other areas of the Site including, but not limited to:

- Placement of silt sock along the top of the Smokes Creek and SRWT bank within the IRM excavation limits.
- Direct loading of trucks where feasible to avoid staging of impacted materials.
- Use of poly sheeting for lay-down and daily cover if staging of impacted materials is necessary.
- In addition, the oil absorbing boom that remains at the base of the bank of Smokes Creek as part of the existing South Linde pump and treat system contingency measures will be monitored daily during construction and replaced as necessary to preclude migration of sheen and/or floating oils into the Creek.

Storm water management and control measures will be implemented for the biotreatment pad. All storm water that contacts the biotreatment pad will be collected and properly managed. Section 4.4.2 of this Work Plan provides construction and operation details for the biotreatment pad.

4.3 Excavation, Remediation, and Re-grading

4.3.1 Excavation

If active utilities are present, care will be taken to maintain appropriate setbacks or stabilize utilities as necessary to allow excavation to proceed. Woody vegetation that is removed will be transported off-site. Figure 3 shows the predetermined extent of impacted soil/fill excavation work (approx. 11,000 square feet).

The upper nine feet of soil/fill in the planned excavation area, equating to approximately 3,667 CY, is assumed to be non-impacted. During excavation activities, this material will be screened and if there are no elevated PID readings (i.e., greater than 25 ppm), or observed olfactory/visual impacts, the material will be stockpiled adjacent to the excavation for use as backfill. The petroleum-impacted soil/fill from 9 to 20 fbgs (approx. 4,500 CY) will be direct-loaded and transported to the biopad on the Phase II Business Park Site II-3 for treatment.

The excavation will be completed in three phases, taking care to leave the collection trench and recovery well RW-1 in-place to aid in dewatering of the excavation. Excavation will start along the bank of Smokes Creek. The excavation along the bank will be backfilled with non-impacted soil/fill immediately following excavation activities to help stabilize the sidewall of the excavation. The second phase will include excavation of the eastern half of the planned IRM excavation area, backfilling with non-impacted soil/fill to just above groundwater elevation. The third phase will be the excavation of the remaining western half of the excavation area and removal of the collection trench and recovery well RW-1 as the final step. During excavation it may be necessary to bench down to reach impacted soils. Two excavators may also be used to facilitate load out of deeper soils to dump trucks. Care will be taken to minimize dust formation during excavation and loading (see Section 4.2.3). The excavation equipment will have sufficient boom length to allow for placement of soil/fill into the truck bed. Side dumping (i.e., with a front-end loader) will only be permitted if fugitive dust can be consistently controlled within the Community Air Monitoring Plan (CAMP) action limits. The excavated areas will be surveyed (i.e., approximate boundaries as determined by GPS and average depth as manually measured) and the information will be transferred to a Site map.

Confirmatory samples will be collected from the sidewall of the excavation every 60 linear feet (approximately 10 samples) and every 3,000 square feet (approximately 4 samples) from the floor of the excavation. These confirmatory samples will be analyzed for target compound list (TCL) volatile organic carbons (VOCs) plus tentatively identified compounds (TICs), TCL semi-volatile organic compounds (SVOCs) plus TICs, polychlorinated biphenyls (PCBs), arsenic, barium, cadmium, chromium, lead, and mercury.

4.3.2 Transporting Impacted Soil/Fill to Biotreatment Pad

Impacted soil/fill material will be transported to the biotreatment pad on Site II-3 using an over the road dump truck and/or an off-road dump truck. Impacted materials will not leave the Site or the biotreatment area unless requiring off-site disposal as further discussed under Section 4.4.4. Every attempt will be made to prevent soil/fill spillage during loading, transporting, and dumping activities. Since the excavation will be dewatered, the excavated soil/fill should not spill or leak during transport. If the soil/fill is too wet to direct load into dump trucks, it will be stockpiled within the excavation, above the water table, to help dewater the material. After it has had time to drain, the drier stockpiled material will be loaded into trucks. The dump trucks will be driving on the non-impacted overburden next to the excavation keeping the tires clean of any impacted material. On the biotreatment pad side, the dump trucks will be driving on the wood mulch. If the material is too wet and dumping on or running into the drive tires of the trucks, an elevated dumping area will be constructed at the biotreatment pad, and a dozer will be used to push the material away from the dump area. The elevated dumping area will prevent the impacted soil/fill from contacting the drive tires of the dump trucks.

Only two trucks will be delivering materials to the biopad. Both drivers will be instructed to inform the project superintendent (i.e., the Benchmark representative assigned to run CAMP, monitor the excavation, prepare daily field logs, etc.) of any release of materials that might occur between the excavation/dewatering area and the biotreatment pad. However, only trucks with lift gates having watertight seals of good integrity and/or offroad trucks loaded below the tail section will be used, and driver speeds will be maintained below the posted limit of 20 mph. Dump trucks will be filled no more than 95% full capacity to prevent spilling during transportation. In addition, the project superintendent shall perform twice daily checks of the haul route to verify absence of any spills. If any spills or releases do occur, we will have equipment on standby on the Tecumseh site to respond appropriately (front end loader and/or skid steer, and sorbent booms and pads). In such instances, the excavator operator will be directed to stop work until the spill is addressed. Any spilled materials and affected soils will be removed with a skid steer mounted sweeper and taken to the biotreatment area.

Hauling trucks will not be covered unless dust leaving the trucks or other issues with material loss is problematic.

4.3.3 Groundwater Management

Significant dewatering activities will be required based on anticipated excavation depths of up to 12 feet below the water table and the proximity of the work area to Smokes Creek. Benchmark-TurnKey will use both the existing collection trench and associated recovery well RW-1 and trash pumps to remove water from the excavation. Water will be managed within the excavation or, if needed, pumped into a 20,000-gallon Frac Tank on-site and treated using bag filters and granular activated carbon prior to transfer to a 20,000-gallon treated water Frac Tank for testing and discharge. If heavy floating oils are encountered in the excavation, Benchmark-TurnKey will employ a tube skimmer and/or oil absorbent booms to remove and collect the oils prior to pumping. The collected oil will be properly disposed off-site.

Treated groundwater will be discharged to the SRWT, consistent with the existing South Linde pump and treat system. Although the proposed temporary treatment also employs filtration and activated carbon treatment, more frequent testing will be performed to verify treatment performance. Specifically, one sample will be collected from the treated water Frac Tank and analyzed for CP-51 List VOCs and SVOCs; PCBs; 1,4-dioxane; and the list of 21 PFAS compounds (per- and polyfluoroalkyl substances). The parameter concentrations must meet the NYSDEC Generic Effluent Criteria for Surface Water Discharges per the Department's August 28, 2013 guidance prior to discharge. If the initial sample is found compliant, samples will be collected weekly thereafter (samples from the pump and treat system are currently collected monthly) for analysis of CP-51 List VOCs and SVOCs only.

Recovery and monitoring wells will be removed during excavation activities. The collection trench and recovery well RW-1 will be removed as excavation activities are winding down and/or there is no longer a need for excavation dewatering.

4.3.4 Backfilling and Re-grading of Excavation

Approximately 3,200 pounds of PetroFix™ by Regenesis will be sprayed and mixed into approximately 540 cubic yards of the non-impacted overburden soil/fill prior to backfilling. The amended soil/fill will be placed along the 265-foot downgradient boundary of the excavation over the 9-20 fbgs impacted zone to a width of 5 feet. The amended overburden soil/fill will address potential residual soil/fill impacts. The remaining non-impacted overburden soil/fill will be used as backfill in the excavation and compacted. As the biotreatment work will require several months to complete, the side slopes of the excavation area will be graded to provide a gentle slope toward the excavation area and the area enclosed with orange construction safety fencing until such time as the biotreatment work is complete and the treated soils can be returned to the Site to backfill the excavation to grade. Biotreated soils that meet cleanup objectives for the Site, as described in Section 4.4.3, will be used to backfill the remainder of the excavation. If additional backfill is required to bring the excavation area back to existing grade than off-site material meeting the criteria presented in Section 5.4(e) of NYSDEC DER-10 including PFAS (Ref. 3) may be imported to the site and used as backfill, upon NYSDEC approval. All imported soil sources will be subject to third party testing to verify that they meet the quality assurance requirements. Benchmark-TurnKey will collect and submit samples to an independent, NYSDOH ELAP-certified laboratory for analysis.

4.4 Ex-Situ Biotreatment of Petroleum-Impacted Soil/fill

4.4.1 Vegetation and Debris Removal

Woody vegetation generated during site clearing will be chipped on site and used for bio pad or transported to the permitted wood mulching facility operated by Zoladz Construction Company, Inc. on Tecumseh property.

Any concrete/debris uncovered on the Site during excavation activities will be removed and properly disposed, recycled, or relocated. Debris consisting of, but not limited to, concrete and scrap metal will be managed and disposed in accordance with local, state, and federal regulations.

4.4.2 Biotreatment Pad Preparation and Operation

Biotreatment or land farming involves the use of conventional farm and/or heavy construction earth-moving equipment to spread, aerate, and control moisture in soil to promote and accelerate natural aerobic and facultative biological degradation of volatile and semi-volatile petroleum compounds by indigenous soil microbes. This provides a cost-effective alternative to off-site transportation of this petroleum-impacted soil/fill and disposal in a commercial solid waste landfill.

An approximate 400-foot by 500-foot bioremediation pad ("biopad") will be constructed on Phase II Business Park Site II-3 as shown on Figure 4. The biopad will be defined with a one-foot earth mound on all four sides. A two-foot deep sump will be excavated within the mound of the biopad that will be used to collect and treat storm water.

Plastic sheeting (approximately 6 mil thick) will be placed on the ground surface and will cover both the earth mound and the sump areas. An approximate 6-inch wood mulch layer will be placed on top of the plastic sheeting.

The petroleum-impacted soil/fill will be transported to the biopad in dump trucks. Primary segregation of large debris (if any) will occur at the excavation location. As excavated materials are placed, graded, and tilled, secondary segregation will occur and debris not suitable for bioremediation or backfill will be disposed or scrapped. A visual inspection of loads handled at the treatment area will be performed and the approximate quantity of soil/fill will be determined by volume. Soil/fill will be placed and graded to an approximate 18-inch lift thickness. Soil/fill designated as treated will remain within the treatment area and stored until receipt of analytical results signifying that the soil/fill has been treated to the requirements described in Section 4.4.4.

4.4.3 Storm Water Monitoring

The biotreatment pad and associated storm water controls will be visually inspected for integrity weekly and after significant weather events. This visual inspection will ensure water is not flowing over the earth mound and determine if the biotreatment pad needs to be dewatered because of excessive water storage. If the biopad has greater than two inches of water (outside the sump area), the water will be pumped out, treated with particulate and carbon filtration, and stored in a Frac Tank. The water will be tested for CP-51 List VOCs and SVOCs, 1,4-dioxane, and the list of 21 PFAS compounds to verify treatment performance. Specifically, a sample will be collected from the Frac Tank and meet NYSDEC Generic Effluent Criteria for Surface Water Discharges per the Department's August 28, 2013 guidance prior to discharge.

4.4.4 Monitoring and Sampling

At least once every two weeks, soil/fill on the biotreatment pad will be visually inspected to track system performance, with tilling and moisture addition occurring as needed to promote expeditious treatment. Water will also be added to the biopad soils as needed to mitigate dust generation. Qualitative assessment of treatment performance will be made based on field assessment of visual and olfactory conditions, with the goal of eliminating gross impacts. Once the soil/fill is considered treated, a confirmatory sample will be collected at a frequency of no less than 1 per 1,000 cubic yards of treated soil/fill. The sample will be analyzed for NYSDEC CP-51 List VOCs and SVOCs. Total polycyclic aromatic hydrocarbons (PAHs) will be compared to the site-specific action limit (SSAL) of 500 ppm and VOCs will be compared to the lower value of NYSDEC Part 375 Protection of Groundwater or Commercial Use SCOs. Appendix C includes a Field Operating Procedure (FOP) for post-treatment sample collection. Once the samples meet the cleanup objectives, the soil/fill will be used to backfill the Site II-4 excavation. No bioremediated soil/fill will be transported off-site unless deemed necessary due to poor treatment response or to expedite the overall cleanup and redevelopment schedule. Soil/fill that does not meet these criteria prior to cover system placement will be disposed, with NYSDEC approval, at a permitted solid waste disposal facility. Should impacted soil/fill undergoing treatment be unsuitable for backfill at the end of the season (i.e., November 15), the procedures outlined in Section 4.4.5 will be followed.

4.4.5 Winterizing Biotreatment Pad Soils

If any untreated soil/fill remains on the biotreatment pad after November 15, due to incomplete biotreatment, the partially treated soil/fill will be bulldozed into a stockpile(s) and either covered with poly sheeting and secured or hydroseeded, depending on when treatment is halted and the forecasted precipitation and temperature. In spring, during fairer weather, the stockpile(s) will be re-graded to an approximate 12-inch lift thickness for further treatment. If the original excavation has already been backfilled to grade, this biotreated soil will be used elsewhere on the Tecumseh Site.

4.4.6 Equipment Decontamination

Following subgrade work, all equipment will be cleaned free of soil clods, mud, or clinging debris prior to removal from the Site. Equipment will be power washed, as needed, on an impermeable pad. Wash water will be collected and characterized for discharge to the SRWT.

4.5 Well Decommissioning

Groundwater monitoring well MW-05; piezometers MZ-01, MZ-02, PZ-01, PZ-02, PZ-03, and PZ-04; and recovery wells RW-1, RW-2, and RW-3 will be removed as part of the excavation activities. Monitoring well MW-05 and piezometers PZ-01 through PZ-04 will be grouted prior to removal since they are installed to approximately 30 fbgs. Removal details will be included with the Construction Closeout Report (CCR). Deep well MWN-65D, MW-01, and MW-03 will remain in place if feasible.

5.0 COMMUNITY AIR MONITORING

Real-time community air monitoring will be performed by Benchmark-TurnKey during all intrusive activities at the Site, including excavation, backfilling, and regrading, as well as during transportation and active ex-situ biotreatment. The CAMP is included with Benchmark-TurnKey's HASP (see Section 4.1.4). Particulate and vapor monitoring will be performed at one location downwind of both the work area and biotreatment area during subgrade disturbance, soil handling, and treatment activities. In addition, no visible dust will be allowed beyond the Site perimeter during these activities. 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 (Ref. 3) Appendix 1A (NYSDOH's Generic Community Air Monitoring Plan) and Appendix 1B (Fugitive Dust and Particulate Monitoring). Benchmark-TurnKey will immediately notify NYSDEC and NYSDOH of any CAMP exceedances.

6.0 DOCUMENTATION AND REPORTING

Benchmark-TurnKey will be on-site to perform and document the petroleum-impacted soil/fill excavation, backfilling, and re-grading activities. Such documentation will include, at minimum, reports of construction activities, community air monitoring results, and photographs and sketches, as necessary.

6.1 Construction Monitoring

Standard reporting procedures for Site activities will include preparation of a daily report and, when appropriate, problem identification and corrective measures reports. Appendix D contains sample project documentation forms. Information that may be included on the daily report form includes:

- Processes and locations of construction under way.
- Equipment and personnel working in the area, including subcontractors.
- A description of off-site materials received.
- A CAMP summary and actions taken to address CAMP exceedances, if any.

The NYSDEC will be promptly notified of problems requiring modifications to this IRM Work Plan prior to proceeding with or completing the construction item. Problem identification and corrective measures reports will be completed whenever major field problems are encountered and corrective measures are necessary. The completed reports will be available on-site and will be submitted to the NYSDEC as part of the Construction Closeout Report (CCR). Changes or additions to the IRM Work Plan will also be noted.

Photo documentation of remedial activities will be prepared by Benchmark-TurnKey throughout the duration of the project to convey typical work activities, changed conditions, and special circumstances.

6.2 Construction Closeout Report

TurnKey will prepare a Construction Completion Report (CCR) to document that source area remedial activities were completed in accordance with the IRM Work Plan. The CCR will present record drawings for excavation areas; community air monitoring results; quantities of materials removed/treated; and sampling results.

6.3 Addendum to the RI-AA Report

TurnKey will concurrently prepare an addendum to the RI/AA Report that will reference the CCR and revise the recommended remedial approach for the South Linde Area. Assuming the IRM is successful in addressing grossly impacted soil/fill, the remedial approach will be revised to recommend no further action other than cover system placement.

6.4 Corrective Measures Plan

If any component of the remedy is found to have failed, or if the periodic certification cannot be provided due to the failure of an institutional or engineering control, a Corrective Measures Plan will be submitted to the NYSDEC for approval. This Plan will explain the failure and provide the details and schedule for performing work necessary to correct the failure. 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 GROUNDWATER MONITORING

Groundwater monitoring will be completed prior to and post-IRM activities to assess the effectiveness of the IRM. Monitoring wells MW-01, MW-03, MW-05 and recovery wells RW-1 and RW-2 will be sampled prior to the IRM activities for CP-51 List VOCs and SVOCs, 1,4-dioxane, and list of 21 PFAS compounds. After the IRM activities are complete and the area is backfilled to grade, three groundwater monitoring wells will be installed. One of the wells will be installed in the center of the excavation area and the other two will be installed at the downgradient limits of the excavation area (see Figure 2). Additional wells may be needed if wells MW-01 and MW-03 are removed during IRM activities. The newly installed wells along with MW-01 and MW-03 will be sampled for the same parameters as the pre-IRM sampling. These wells will be sampled every six months for a total of three post-IRM events to assess groundwater quality. The need for additional groundwater monitoring will be determined by NYSDEC and NYSDOH after completion of the IRM and evaluation of the scheduled groundwater monitoring data.

8.0 PROJECT SCHEDULE

As indicated below, remedial measures (excluding cover system placement) are expected to begin in April 2023. The NYSDEC Project Manager will be notified seven days in advance of all field activities.

- April 2023 (1 week): Construct approximate 400-foot by 500-foot biopad south of the former welding and storage building on BCP Site II-3.
- May 2023 (1 week): Excavate petroleum-impacted soil/fill to pre-defined limits and transport to biopad.
- May 2023: Backfill excavations with stockpiled non-impacted soil/fill from the excavation area.
- July 2023: Analyze biotreated soils if qualitative assessment indicates soil/ fill has been treated.
- September 2023: Backfill remaining excavation with analyzed bio-treated soil/fill that meets Site cleanup objectives. If necessary, backfill to grade with clean imported material.

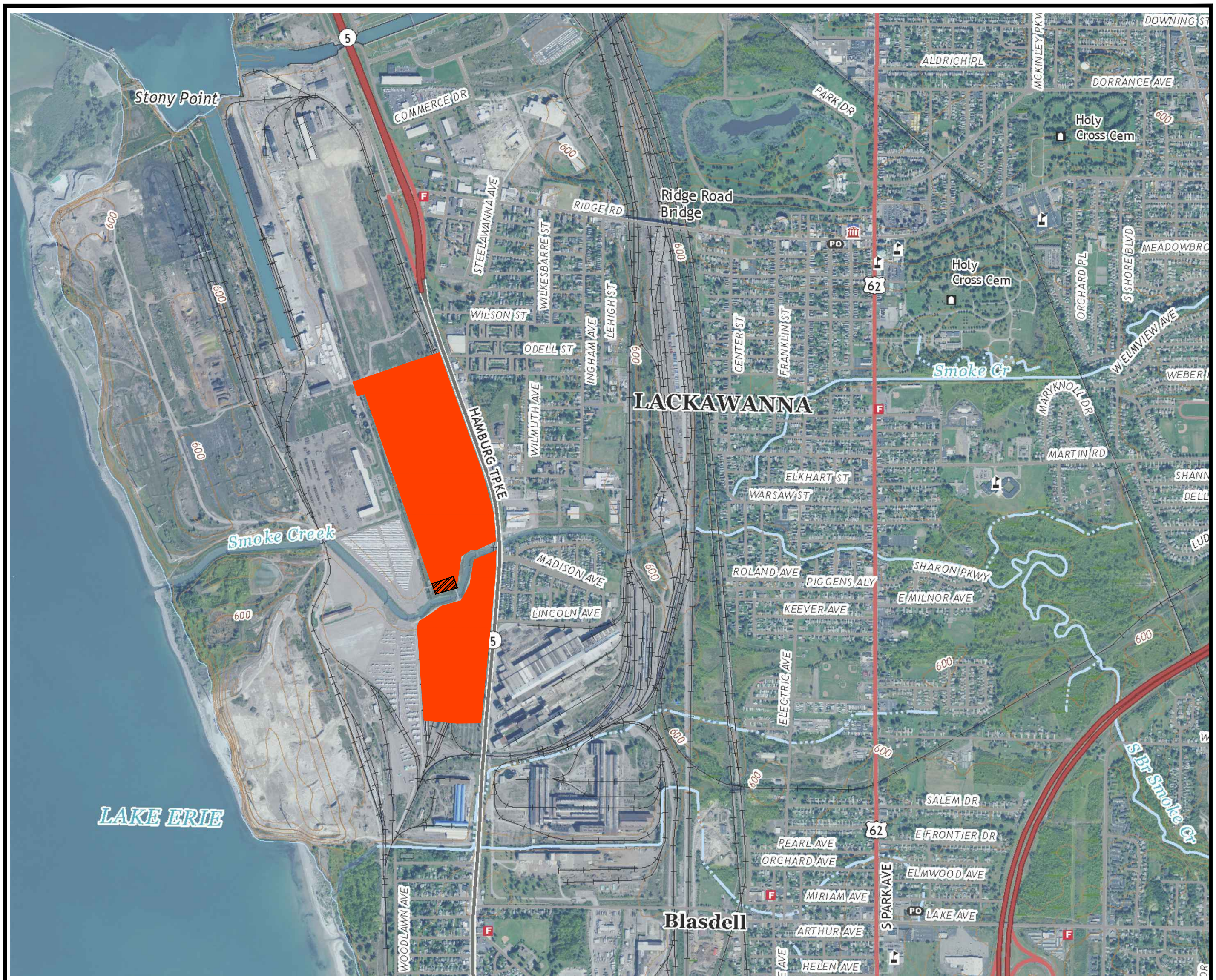
9.0 REFERENCES

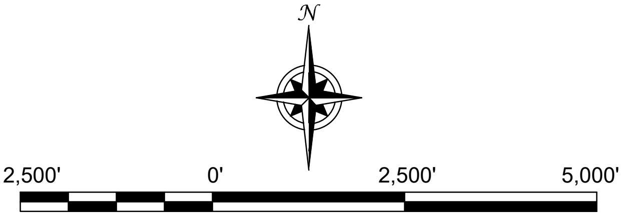
1. TurnKey Environmental Restoration LLC. *Remedial Investigation/Alternative Analysis Report (RI/AAR) Work Plan, Phase II Business Park Area, Lackawanna, New York, BCP Site No. C915198*. November 2008, Revised July 2009.
2. TurnKey Environmental Restoration, LLC. *Remedial Investigation/Alternatives Analysis Report (RI/AAR), Phase II Business Park, Tecumseh Redevelopment Inc., Lackawanna, New York*. May 2011, Revised March 2012.
3. New York State Department of Environmental Conservation. *DER-10/ Technical Guidance for Site Investigation and Remediation.* May 3, 2010.

FIGURES

F:\CAD\TurnKey\Tecumseh Redevelopment\Brownfield Cleanup Program (BCP)\Phase II Parcel\Parcel II-4\2022 AAR Addendum (RAWP)\Figure 1; Site Location and Vicinity Map.dwg, 2/24/2022 9:55:42 AM

FIGURE 1





SCALE: 1 INCH = 2,500 FEET
SCALE IN FEET
(approximate)

LEGEND:

🟥 TECUMSEH BUSINESS PARK II

▨ SITE II-4

NOTE: BASEMAP USGS BUFFALO SE QUADRANGLE 2019

TurnKey Environmental Restoration, LLC
2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

PROJECT NO.: 0071-021-500

DATE: DECEMBER 2020

DRAFTED BY: RFL

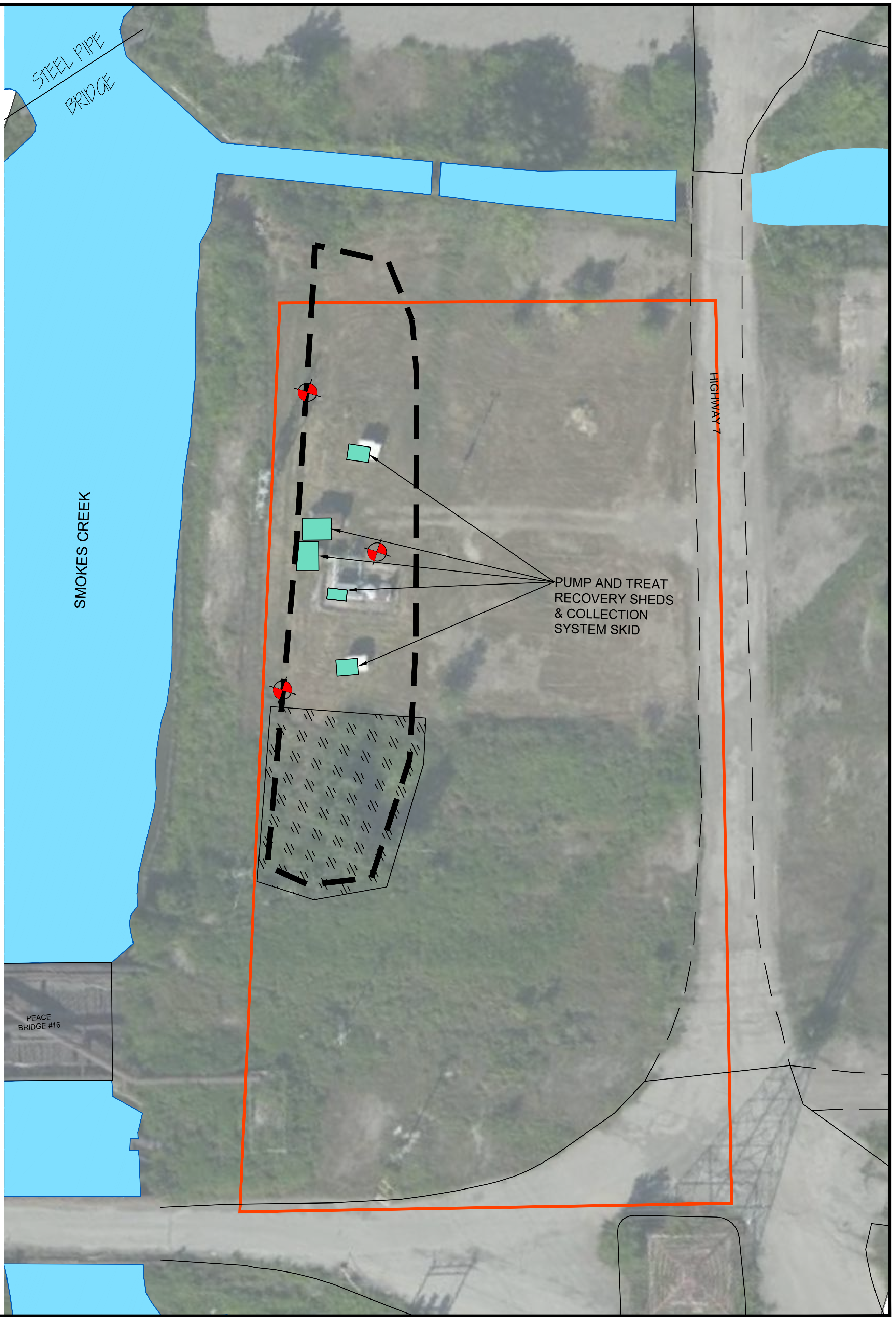
SITE LOCATION AND VICINITY MAP

IRM WORK PLAN

TECUMSEH PHASE II BUSINESS PARK
BCP SITE NO. C915198D (II-4)
LACKAWANNA, NEW YORK
PREPARED FOR
TECUMSEH REDEVELOPMENT INC.

LEGEND:

🟩	EXISTING STRUCTURE
🟥	PHASE II BPA SUBPARCEL BOUNDARY
▬ ▬ ▬	PLANNED LINDE EXCAVATION AREA
▨	VEGETATIVE COVER TO BE CLEARED
⌖	PLANNED MONITORING WELL



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

DATE: FEBRUARY 2022
DRAFTED BY: CMC

SITE PLAN (AERIAL)

IRM WORK PLAN

TECUMSEH PHASE II BUSINESS PARK
BCP SITE NO. C915198D (SITE II-4)
LACKAWANNA, NEW YORK
PREPARED FOR
TECUMSEH REDEVELOPMENT INC.

BENCHMARK
IN ASSOCIATION WITH
TURNKEY ENVIRONMENTAL RESTORATION, LLC

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

JOB NO.: T0071-021-500

FIGURE 2

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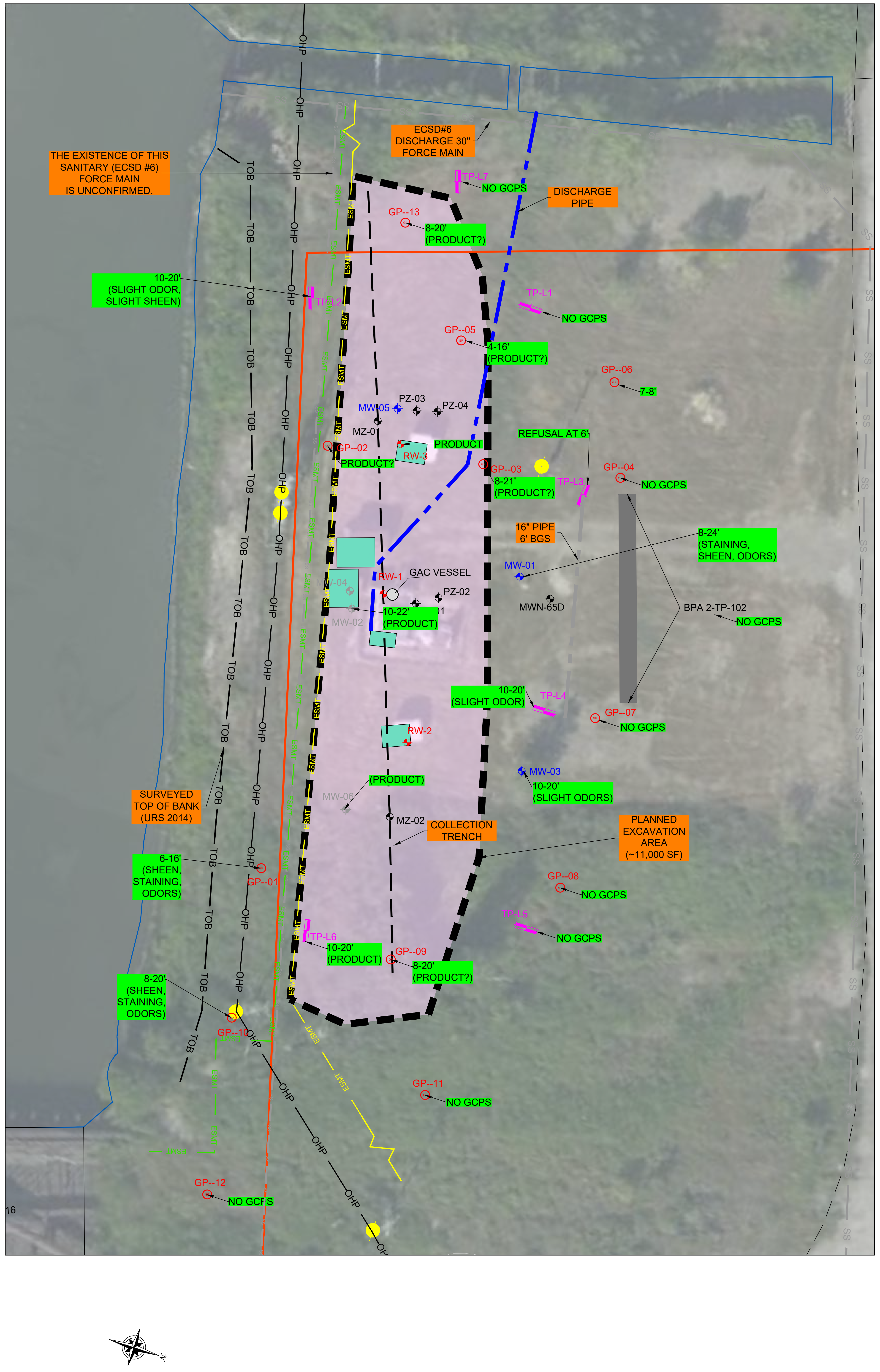
F:\CAD\TurnKey\Tecumseh Redevelopment\Brownfield Cleanup Program (BCP)\Phase II Parcel\Parcel II-4\2022 AAR Addendum (RAWP)\Figure 3; Remedial PlanRev.dwg, 4/22/2022 11:27:19 AM



SCALE: 1 INCH = 20 FEET
SCALE IN FEET
(approximate)

LEGEND:

—— TOB —— TOB ——	TOP OF SMOKES CREEK BANK (BASED ON URS 2014)
—— ESMT ——	(15' WIDE ELECTRICAL EASEMENT
▭	AREA OF PLANNED SOIL/FILL EXCAVATION
🟩	EXISTING STRUCTURE
MW-01 ⌖	LINDE AREA FILL UNIT MONITORING WELL
MWN-65D ⌖	LINDE AREA BEDROCK UNIT MONITORING WELL
RW-1 ⌖	LINDE AREA RECOVERY WELL
PZ-01 ⌖	LINDE AREA PIEZOMTER
CO-02 ⊙	LINDE AREA CLEAN-OUT PIEZOMETER
MW-02 ⌖	LINDE AREA MONITORING WELL (ABANDONED)
GP--07 ⊙	EXPLORATORY GEOPROBE (1999)
BPA 2-TP-102 ▬	TEST TRENCH EXCAVATED 3-26-2010
TP-L7 ▬	TEST PIT EXCAVATED 2021
—— SS —— SS ——	SANITARY SEWER FORCE MAIN FROM ECSD#6
——OHP —●—OHP ——	OVERHEAD POWER LINE AND POLE
NO GCPS 4-16'	LABELS IN GREEN INDICATED OBSERVATIONS MADE DURING BORING AND TEST PIT EXPLORATIONS
——	BCP SITE BOUNDARY
—— ESMT ——	PERMANENT US ARMY CORPS DREDGING MAINTENANCE BOUNDARY BASED ON URS 2014 DRAWING.

BENCHMARK
IN ASSOCIATION WITH
TURNKEY ENVIRONMENTAL RESTORATION, LLC
2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218,
(716) 856-0599

JOB NO.: 0071-021-500

REVISIONS

NO.	BY	DATE	REMARKS

SEAL

DRAWN BY:	RFL
DATE:	APRIL 2022
CHECKED BY:	
APPROVED BY:	

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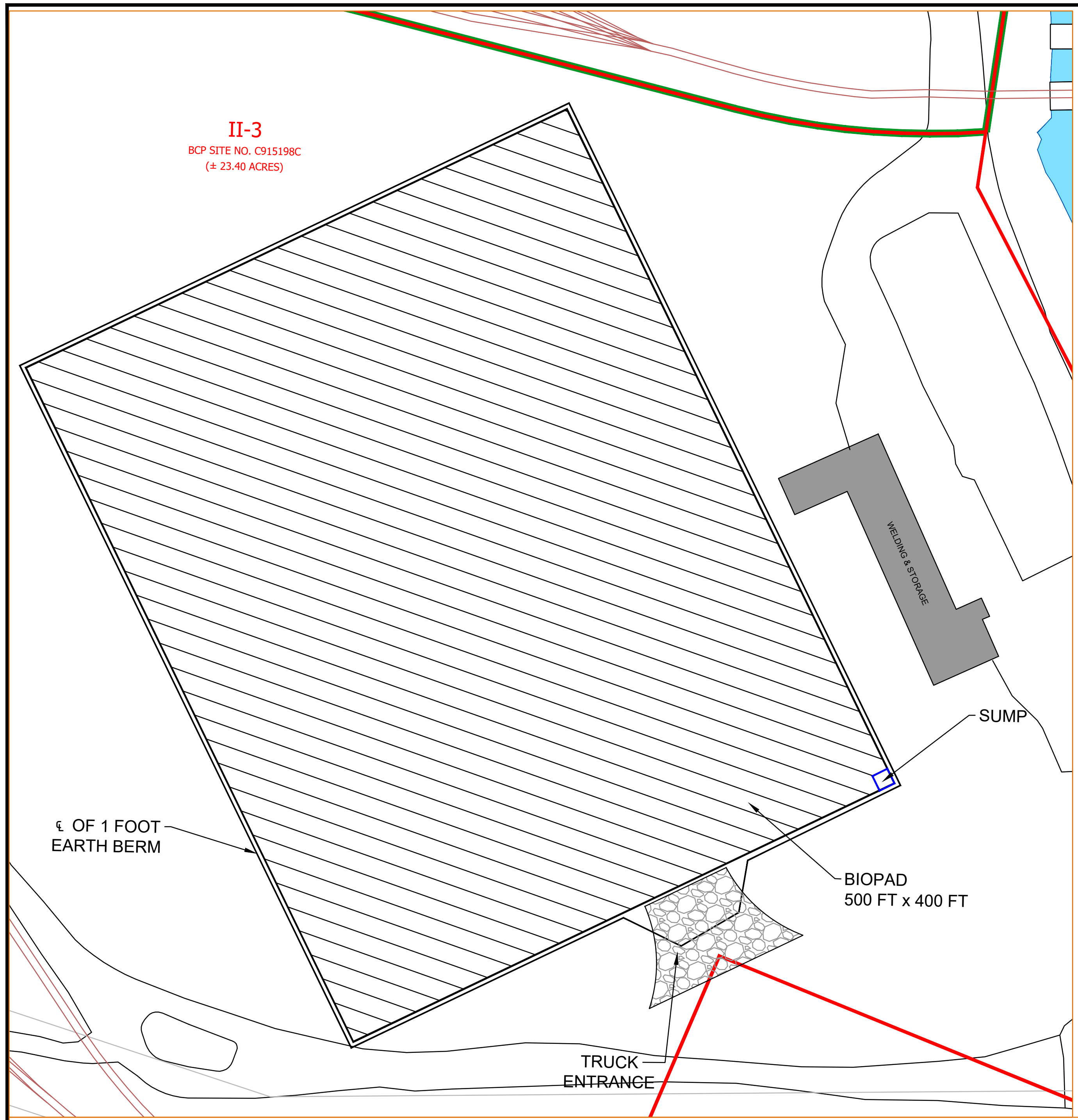
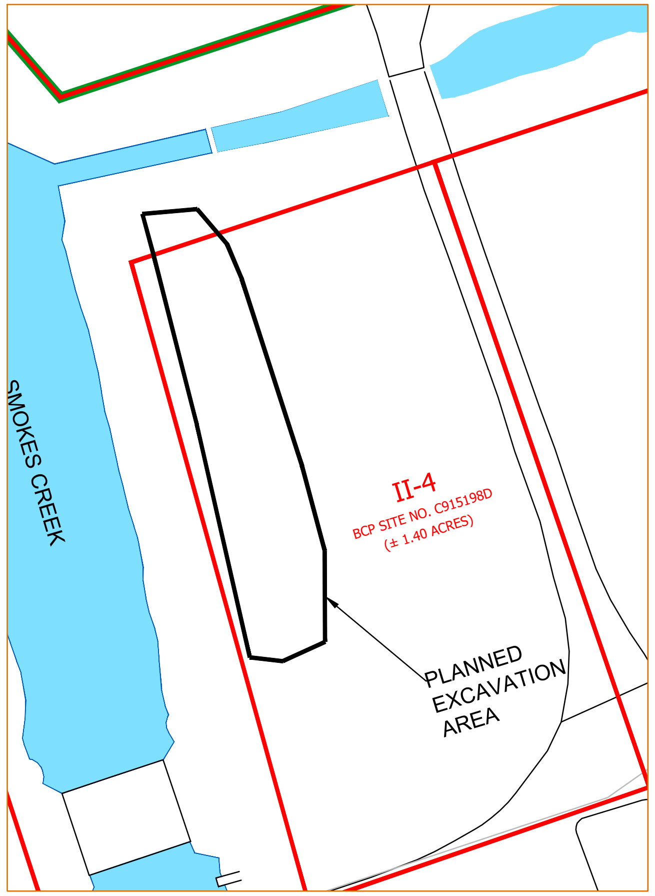
PLANNED REMEDIAL EXCAVATION AREA

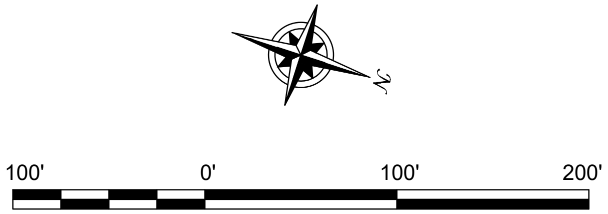
IRM WORK PLAN
TECUMSEH PHASE II BUSINESS PARK
BCP SITE NO. C915198D (SITE II-4)
LACKAWANNA, NEW YORK
PREPARED FOR
TECUMSEH REDEVELOPMENT INC.

FIGURE 3

F:\CAD\TurnKey\Tecumseh Redevelopment\Brownfield Cleanup Program (BCP)\Phase II Parcel\Parcel II-4\2022 AAR Addendum (RAWP)\Figure 4; Biopad location.dwg, 6/17/2022 2:26:59 PM





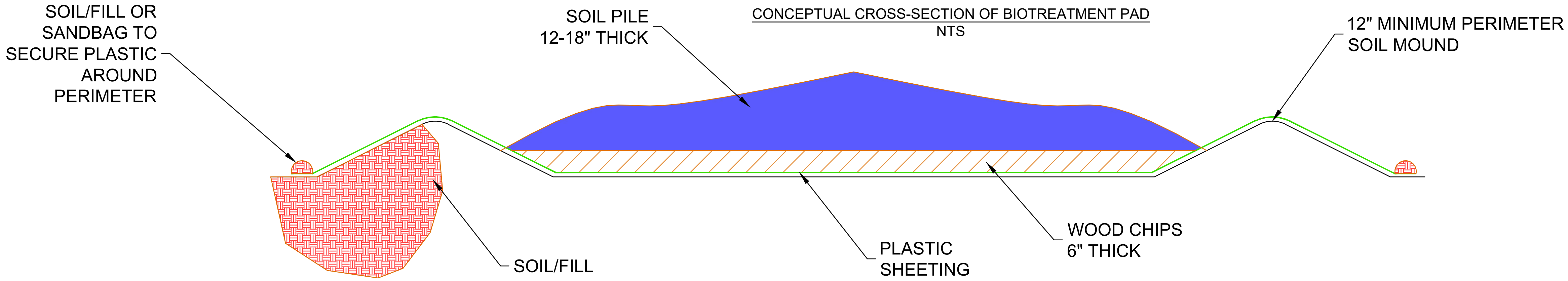


SCALE: 1 INCH = 100 FEET
SCALE IN FEET
(approximate)

LEGEND:

🟥	TECUMSEH PHASE II BUSINESS PARK SUB PARCEL BOUNDARY
▬	EXISTING BUILDING / STRUCTURE

CONCEPTUAL CROSS-SECTION OF BIOTREATMENT PAD
NTS



DATE: FEBRUARY 2022
DRAFTED BY: CMC

BENCHMARK IN ASSOCIATION WITH TURNKEY ENVIRONMENTAL RESTORATION, LLC

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

JOB NO.: 0071-021-500

BIOPAD LOCATION

IRM WORK PLAN

TECUMSEH PHASE II BUSINESS PARK
BCP SITE NO. C915198D (SITE II-4)
LACKAWANNA, NEW YORK
PREPARED FOR
TECUMSEH REDEVELOPMENT INC.

FIGURE 4

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APPENDIX A

PRE-RA INVESTIGATION RESULTS

TABLE ????

SUMMARY OF GROUNDWATER ANALYTICAL DATA

Periodic Review Report

Phase II Business Park Area, Parcel II - 4
Lackawanna, New York

PARAMETER [1]	GWQS [2]	LOCATION							
		MW-01 [3]		MW-01		MWN-65D [3]		MWN-65D	
		4/30/2010		2/26/2015		4/29/2010		2/26/2015	
		Parcel 4							
Field Measurements [5]:									
Sample No.	**--**	initial	final	initial	final	initial	final	initial	final
pH (units)	**6.5 - 8.5**	**9.20**	**9.28**	7.90	8.03	6.54	6.63	6.79	6.81
Temperature (°C)	**NA**	12.3	13.5	8.0	7.6	12.5	13.3	10.7	10.5
Sp. Conductance (uS)	**NA**	435.0	433.3	635.4	652.8	1712	1707	2320	2301
Turbidity (NTU)	**NA**	12.9	10.2	7.7	4.3	48.0	68.0	12.8	15.1
Dissolved Oxygen (mg/L)	**NA**	--	--	--	--	--	--	2.0	2.0
Eh (mV)	**NA**	-113	-119	-92	-94	25	29	10	7
Total Inorganic Compounds (mg/L):									
Arsenic - Total	**0.025**	**0.491**		**0.21**		ND		ND	
Barium - Total	**1**	0.0222		0.041		0.388		0.45	
Hexavalent Chromium - Total	**0.05**	--		ND		--		ND	
Copper - Total	**0.2**	--		0.006 J		--		ND	
Manganese - Total	**0.3**	--		**0.36 J**		--		**0.033**	
Nickel - Total	**0.1**	--		0.0051 J		--		ND	
Zinc - Total	2*	--		0.0016 J, B		--		0.0021 J, B	
Cyanide - Total	0.2	NA		0.009 J		NA		ND	
Volatile Organic Compounds (ug/L):									
1,2,4-Trimethylbenzene	**5**	ND		ND		1.6		ND	
1,3,5 - Trimethylbenzene	**5**	ND		ND		0.48		ND	
1,1-Dichloroethene	**5**	--		2.1		--		ND	
Benzene	**1**	0.58 B		**8.3**		0.31 B		ND	
Ethylbenzene	**5**	ND		ND		0.25		ND	
Methyl-t-Butyl Ether (MTBE)	**10**	ND		ND		0.72		ND	
m-Xylene & p-Xylene	**10**	ND		ND		1.6		ND	
o-Xylene	**5**	ND		ND		0.67		ND	
n-Butylbenzene	**5**	ND		ND		0.31 J		ND	
Toluene	**5**	ND		ND		1.6 B		ND	
Xylenes, total	**15**	ND		ND		2.3		ND	
Semi-Volatile Organic Compounds (ug/L):									
Benzaldehyde	**NA**	ND		ND		ND		0.76 J, B	
Butyl benzyl phthalate	**50**	ND		ND		ND		0.66 J	
Carbazole	**NA**	0.43 J		ND		ND		ND	
Fluoranthene	**50***	0.52 J		ND		ND		ND	
Phenanthrene	**50***	1 J		ND		ND		ND	
Pyrene	**50***	0.49 J		ND		ND		ND	

Notes:

1. Only those compounds detected above the method detection limit at a minimum of one sample location are reported in this table.
2. NYSDEC Class "GA" Groundwater Quality Standards/Guidance Values (GWQS/GV) as per Technical & Operational Guidance Series 1.1.1 (June 1998,
3. Groundwater collected from April 2010 monitoring event were only analyzed for those parameters listed in the July 2009 Remedial Investigation Work Plan. .
4. Field measurements were collected immediately before and after groundwater sample collection.

Definitions:

J = Estimated Value; result is less than the sample quantitation limit but greater than zero.
B = Analyte was detecded in the associated method blank.
"--" = Not analyzed for.
NA = No Sandard is avalible at this time.
ND = Indicates parameter was not detected above laboratory reporting limit.

TP-102 NOT SAMPLED

TABLE 3B

SUBSURFACE SOIL/FILL ANALYTICAL PROGRAM SUMMARY
TEST PIT INVESTIGATION

Remedial Investigation / Alternatives Analysis Report
Phase II Business Park Area - Brownfield Cleanup Program
Tecumseh Redevelopment Inc.

Investigation Location (BPA 2-TP-#)	Rationale	Number of Samples [1,2]	Blind Duplicate Samples Collected[5]	STARS List VOCs	Full List VOCs [3,4]	SVOCs (BN only)	TCL SVOCs	COPC Metals	TAL Metals	Cyanide	PCBs
TP-79	Area of former 48" Roughing Mill, oil cellars										
TP-80		1			1		1		1	1	
TP-81		1		1		1					1
TP-81B		1		1		1					1
TP-82											
TP-83		1		1		1		1		1	
TP-84		1		1		1		1		1	
TP-85	Area of former 28"-35" Mill, pump house, transformers	1				1		1		1	1
TP-86		1			1		1		1	1	1
TP-87											
TP-88											
TP-96		1			1		1	1			1
TP-89	General Coverage: No known or suspected impact	1			1		1		1	1	1
TP-90	Area of former substation	1				1		1		1	1
TP-91	Area of active substation 7S	1				1		1			1
TP-92	Area of active substation 11A	1			1		1	1			1
TP-98	Area of active substation 10-A	1	1								1
TP-99		2			1						1
TP-99B		1			1						
TP-100	General Coverage: No known or suspected impact	1			1		1	1			
TP-101	Area of former pedestrian tunnel										
TP-102	Area of former Plant No. 2										
TP-104	Area of former paint storage shed	1				1					
TP-105	General Coverage: No known or suspected impact	1			1		1	1			
	TOTAL:	**79**	**5**	**17**	**21**	**54**	**19**	**56**	**14**	**45**	**32**

Notes:

1. All samples to be collected from 0-2' BGS interval unless field observations indicate greater impact with depth. A minimum of one per 10 samples shall be collected from 2' to bottom depth.
2. All locations shall be sampled and archived by the laboratory for potential analysis/reanalysis.
3. Full List VOCs = TCL VOCs plus STARS List VOCs via Method 8260B.
4. Full List VOCs analysis will be taken from any additional Test Pit based on elevated PID readings (>20) and visual and/or olfactory observations.
5. Blind duplicate samples were analyzed for the same analytes as their comparative sample.

Acronyms:

VOCs = volatile organic compounds
SVOCs = semi-volatile organic compounds
TCL = Target Compound List
TAL = Target Analyte List
BN = Base Neutrals
PCBs = Polychlorinated Biphenyls

STARS = Spill Technology And Remediation Series; NYSDEC
COPCs = Constituents of Potential Concern
SWMU = Solid Waste Management Unit
TP = Test Pit

concentration above 3.2 mg/kg, which is the concentration deemed protective of groundwater quality per 6NYCRR Park 375-6.8b. Accordingly, PCBs are not expected to be present at elevated concentration in groundwater.

Shallow groundwater encountered within two test pits (BPA-2-TP-36 and BPA-2-TP-81B) was analyzed for PCBs at the request of the NYSDEC. Analysis of test pit water is not considered a reliable indicator of groundwater quality due to potential positive bias attributable to the presence of suspended solids (fines); however, the test pit water samples were collected to determine if observed sheen was indicative of PCB-contaminated oil release (i.e., oil containing >50 ppm PCBs). As indicated on Table 8, no PCBs were detected in BPA-TP-36. PCB Aroclor 1242 was detected in the sample from test pit BPA2-TP-81B at a concentration of 0.56 ug/L, which exceeds the Class GA standard of 0.09 ug/L but does not suggest that field impacts are attributable to release of a regulated PCB source.

4.3.5 Groundwater Quality Measurements

According to TOGS 1.1.1, the maximum allowable concentration for pH ranges between 6.5 and 8.5. Field pH was measured immediately before and after groundwater sample collection. As indicated on Table 8, the pH measured at well MW-01 (9.20 and 9.28) and MWN-63D (6.28) were outside this range. As discussed in Section 4.3.3, the turbidity measured at MWS-37A, MWN-63A, and MWN-64 were greater than TurnKey's threshold value of 50 NTUs. Accordingly, filtered metals samples were collected and analyzed for soluble COPCs.

4.3.6 Groundwater Field Observations

For the South Linde IRM Area well, field evidence of groundwater impact (sheen, odor) was identified during sampling of existing well MW-01; NAPL and petroleum odor were also identified in monitoring well MW-01 during development. During drilling of the borehole for monitoring well MWN-65D (March 2010), a maximum PID reading of 27.2 ppm was measured at 16 fbgs, and a petroleum-like odor was noted from 15 to 17 fbgs; the water table was noted at 8.5 fbgs. No field evidence of impact was noted during development and sampling of MWN-65D.

In addition, field evidence of groundwater impact (sheen, odor) was identified during sampling of newly installed well MWN-64; however, no field evidence of impact was noted

(PCB concentration of 2.37 ppm), was excavated due to a PCB concentration of 52 ppm (twice the industrial SCO). To define the lateral extent of this hotspot area, TurnKey conducted a supplemental investigation of this test pit. On August 19, 2010, a TurnKey project scientist excavated shallow test pits (approximately 25 feet in each compass direction) from the original test pit. Sidewall samples (0-2 foot) were collected and analyzed for PCBs. In addition, a composite sample was collected from the floor of the supplemental test pit to verify that a 2-foot excavation depth was sufficient. PCB concentrations at the supplemental locations surrounding RR-TP-30 and at the 2-foot depth interval were all below the commercial SCO of 1 ppm.

- PCB Aroclor 1242 was detected above the GWQS of 0.09 ug/L in the unfiltered water sample collected from test pit BPA2-TP-81B; the remains of a drum were found and removed during excavation of this test pit located within the former 48”-54” Roughing Mill. The concentration of PCBs in the associated soil/fill sample was estimated at 0.602 mg/kg, which is well below the commercial SCO of 1 mg/kg.
- Field evidence of groundwater impact (LNAPL) was identified in monitoring well MW-01 (located in the South Linde Area of the Site), but the analytical data indicated no excursions of the GWQS/GVs. Although pH and arsenic levels exceeded the GWQS at certain well locations, pH was within one unit of the standard and, with the exception of MW-01, arsenic was at the same order of magnitude as the GWQS/GV and/or exhibited soluble arsenic below the GWQS/GV. Sheen observed in newly installed well MWN-64 may be a result of the elevated levels of SVOCs in the subsurface at test pit location BPA2-TP-93. With these limited exceptions, the groundwater investigation findings indicate that, as would be expected based on the relatively low solubility of the soil/fill constituents prevalent in the soil/fill matrix, widespread groundwater impact by COPCs is not evident. However, clearly discernible sheens in test pits combined with petroleum odor, free product, and/or elevated PID readings are indicative of potential localized impact to the saturated soil/fill (i.e., smear zone) due to past Site operations.

Based on the RI Findings, remedial measures for unsaturated and saturated (smear zone) soil/fill as well as localized groundwater within the South Linde IRM area are warranted. Sections 8 through 10 constitute an Alternatives Analysis Report (AAR) in accordance with NYSDEC DER-10 guidance.

8.0 DEVELOPMENT OF REMEDIAL ACTION OBJECTIVES AND GENERAL RESPONSE ACTIONS

The development of an appropriate remedial approach begins with definition of site-specific Remedial Action Objectives (RAOs) to address substantial human health and ecological risk or other significant environmental issues identified in the Remedial Investigation (RI). General Response Actions are then developed as potential means to achieve the RAOs.

8.1 Remedial Action Objectives

RAOs for this Site have been developed based on the findings of the RI, which have identified localized "hotspot" soil/fill in discrete portions of the Site and product on test pit water in several areas of the Site as listed below. Hotspots are soil/fill areas where non-ubiquitous constituents significantly exceed industrial SCOs and/or had notable field observations indicating gross contamination (free product, significant staining, excessive odor, high PID readings). Those areas with soil/fill above the commercial SCOs will require cover under commercial reuse scenarios; however, unless these soils are also grossly impacted, no further investigation or remediation is warranted.

- PAH-impacted surface soil/fill near BPA2-TP-80 and BPA2-TP-85 in excess of 500 ppm.
- PAH-impacted saturated soil/fill (i.e., smear zone) near BPA2-TP-53, BPA2-TP-89, BPA2-TP-93, and BPA2-TP-95 with field evidence of impact, including product floating on the water table.
- Saturated soil/fill near test pit BPA2-TP-81B based on field evidence of impact (i.e., drum remains, sheen on water table at 9 fbgs, greasy soil, and odor).
- Field evidence of impact (elevated PID readings) in test pits BPA2-TP-16, and BPA2-TP-99, -99A, and -99B.
- Arsenic-impacted surface soil/fill at six locations with concentrations in excess of site-specific SCO of 118 ppm.
- Well MW-01 in the South Linde Area of the site (presence of floating product).

In developing the RAOs, consideration is given to the reasonably anticipated future use of the Site (i.e., commercial and/or industrial reuse – see Section 8.4), and the applicable

- **Hotspot "N" – BPA2-TP-58:** Arsenic was detected in the original test pit at a concentration of 122 ppm. Arsenic was detected in the supplemental test pit 10 feet to the south at a concentration of 127 ppm; the 20-foot sample detected arsenic at a concentration of 112 ppm. Therefore, the extent of impact is estimated to be 30 feet by 20 feet, for an in-place volume of approximately 45 cubic yards. Accounting for contingency and excavation inefficiencies the volume for ex-situ treatment and/or disposal alternatives is estimated to be 70 cubic yards.
- **Hotspot "O" – BPA2-TP-103** Arsenic was detected in the original test pit at an estimated concentration of 198 ppm. Arsenic was detected below the site-specific SCO of 118 ppm at all supplemental test pit locations. Therefore, the extent of impact is estimated to be 20 feet by 20 feet, for an in-place volume of approximately 30 cubic yards. Accounting for contingency and excavation inefficiencies the volume for ex-situ treatment and/or disposal alternatives is estimated to be 45 cubic yards.

Based on the estimated and assumed extent of the impacts described above, the total estimated in-place volume of arsenic-impacted "hotspot" soil/fill is 250 cubic yards. The volume of soil/fill for ex-situ treatment and/or disposal alternatives is estimated to be 370 cubic yards.

9.4 South Linde Area Source Area Soil/Fill

As discussed in Section 1.2, an active groundwater pump-and-treat system, including a belt skimmer product recovery system, is present and being operated in the South Linde Area of the Site. Figure 5 shows the South Linde Area collection system, monitoring wells, and piezometers. Based on historical monitoring of the wells and piezometers in this area (as documented in monthly reports to the NYSDEC), free-phase floating product (i.e., light non-aqueous phase liquid, or LNAPL) is sporadically present at the groundwater interface. Groundwater levels recorded in the wells and piezometers since 2004 have ranged between 9 and 23 fbgs (smear zone). In addition RI Test pit BPA2-TP-102 was excavated north of MW-01 (see Figure 3) to a depth of 12 fbgs, with groundwater encountered at approximately 8 fbgs (at the interface between fill and silty clay). No olfactory or visual impacts were noted and all PID readings were 0.0 ppm, substantiating the isolated nature of the LNAPL.

For purposes of evaluating the smear zone excavation alternative, the aerial extent of impact has been assumed to be 175-foot (E-W) by 75-foot (N-S). Based on field observations, the depth of impact is assumed to be the entire 14-foot smear zone. Therefore, the in-place soil/fill volume would be approximately 6,800 cubic yards. The volume of water anticipated to be present within this area, assuming a porosity of 0.3 and dewatering from 9

TABLES

TABLE 1-1
BETHLEHEM STEEL CORP - LINDE PLANT
FLOATING PRODUCT ANALYTICAL SAMPLE RESULTS
WATER LINE TRENCH EXCAVATION

Location I.D.			SC-EAST PIT	SC-WEST PIT
Sample I.D.			SC-EAST PIT	SC-WEST PIT
Matrix				
Date Sampled			09/20/96	09/20/96
Parameter	**Units**	**Criteria***		
Volatiles				
Benzene	UG/KG	0.7	NA	5000 U
Ethylbenzene	UG/KG	5	NA	5000 U
Methyl t-Butyl Ether	UG/KG		NA	5000 U
Toluene	UG/KG	5	NA	5000 U
Xylene (total)	UG/KG		NA	5000 U
1,2,4-Trimethylbenzene	UG/KG	5	NA	12000
Isopropylbenzene	UG/KG		NA	5000 U
n-Propylbenzene	UG/KG	5	NA	5000 U
p-Isopropyltoluene	UG/KG		NA	5000 U
1,3,5-Trimethylbenzene	UG/KG		NA	5000 U
n-Butylbenzene	UG/KG	5	NA	9400
sec-Butylbenzene	UG/KG	5	NA	5000 U
t-Butylbenzene	UG/KG	5	NA	5000 U
Naphthalene	UG/KG	10	NA	18000
Semivolatiles				
Anthracene	UG/KG	50	NA	1000000 U
Fluorene	UG/KG	50	NA	170000
Phenanthrene	UG/KG	50	NA	1000000 U
Pyrene	UG/KG	50	NA	1000000 U
Acenaphthylene	UG/KG		NA	1000000 U
Benzo(a)anthracene	UG/KG	0.002	NA	1000000 U
Fluoranthene	UG/KG	50	NA	1000000 U
Benzo(b)fluoranthene	UG/KG	0.002	NA	1000000 U
Benzo(k)fluoranthene	UG/KG	0.002	NA	1000000 U
Chrysene	UG/KG	0.002	NA	1000000 U
Benzo(a)pyrene	UG/KG	0.002	NA	1000000 U
Benzo(g,h,i)perylene	UG/KG	0.002	NA	1000000 U
Indeno(1,2,3-cd)pyrene	UG/KG	0.002	NA	1000000 U
Dibenz(a,h)anthracene	UG/KG	50	NA	1000000 U
PCBs				
Aroclor 1016	MG/KG		0.3 U	2 U
Aroclor 1221	MG/KG		0.3 U	2 U
Aroclor 1232	MG/KG		0.3 U	2 U
Aroclor 1242	MG/KG		0.3 U	2 U
Aroclor 1248	MG/KG		0.3 U	2 U

NOTES:

*** - New York State Department of Environmental Conservation. 1992. Spill Technology and Remediation Series (STARS) Memo #1, Petroleum-Contaminated Soil Guidance Policy. August.**

⬭ - Concentration exceeds Criteria.

MADE BY ________ DATE ________
CHKD BY ________ DATE ________

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TABLE 1-1
BETHLEHEM STEEL CORP - LINDE PLANT
FLOATING PRODUCT ANALYTICAL SAMPLE RESULTS
WATER LINE TRENCH EXCAVATION

Location I.D.			SC-EAST PIT	SC-WEST PIT
Sample I.D.			SC-EAST PIT	SC-WEST PIT
Matrix				
Date Sampled			09/20/96	09/20/96
Parameter	**Units**	**Criteria***		
PCBs				
Aroclor 1254	MG/KG		0.3 U	2 U
Aroclor 1260	MG/KG		0.3 U	2 U
TCLP Metals				
Arsenic	MG/L		NA	1 U
Barium	MG/L		NA	0.6 U
Cadmium	MG/L		NA	0.01 U
Chromium	MG/L		NA	0.1 U
Lead	MG/L		NA	0.2 U
Mercury	MG/L		NA	0.004 U
Selenium	MG/L		NA	1 U
Silver	MG/L		NA	0.1 U
Miscellaneous				
Flash Point	DEGC		N	N
Diesel Range Organics	MG/KG		8300 U	4990 U
Gasoline Range Organics	MG/KG		8300 U	4990 U
Kerosene Range Organics	MG/KG		8300 U	4990 U
Lubricating Oil	MG/KG		440000	990000
Unknown Hydrocarbon	MG/KG		8300 U	4990 U

NOTES:

*** - New York State Department of Environmental Conservation. 1992. Spill Technology and Remediation Series (STARS) Memo #1, Petroleum-Contaminated Soil Guidance Policy. August.**

⬭ - Concentration exceeds Criteria.

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TABLE 1-2
BETHLEHEM STEEL CORP - LINDE PLANT
SOIL ANALYTICAL SAMPLE RESULTS
WATER LINE EXCAVATION SOIL STOCKPILE

Volatiles – heated
Semi-Vols – methylene chloride concentrated
"TOTAL" analysis

Location I.D.			SAMPLE A	SAMPLE B	SAMPLE C
Sample I.D.			SAMPLE A	SAMPLE B	SAMPLE C
Matrix			Soil	Soil	Soil
Date Sampled			09/24/96	09/24/96	09/24/96
Parameter	Units	Criteria*			
Volatiles					
Benzene	UG/KG	~~0.7~~ 20	100 U	2 U	2 U
Ethylbenzene	UG/KG	~~5~~ 100	100 U	2 U	2 U
Methyl t-Butyl Ether	UG/KG		2000 U	24 U	24 U
Toluene	UG/KG	5	100 U	2 U	2 U
Xylene (total)	UG/KG		100 U	2 U	2 U
1,2,4-Trimethylbenzene	UG/KG	5	100 U	2 U	78
Isopropylbenzene	UG/KG		100 U	2 U	2 U
n-Propylbenzene	UG/KG	5	100 U	2 U	3
p-Isopropyltoluene	UG/KG		100 U	2 U	20
1,3,5-Trimethylbenzene	UG/KG		100 U	2 U	5
n-Butylbenzene	UG/KG	5	100 U	2 U	2 U
sec-Butylbenzene	UG/KG	5	100 U	2 U	2 U
t-Butylbenzene	UG/KG	5	100 U	2 U	6
Naphthalene	UG/KG	10 ~~200~~	130	2 U	19
Semivolatiles					
Anthracene	UG/KG	50 1000	1900 U	2500	2000 U
Fluorene	UG/KG	50	1900 U	1900 U	2000 U
Phenanthrene	UG/KG	50	1900 U	6100	3600
Pyrene	UG/KG	50	1900	6700	4400
Acenaphthylene	UG/KG	400	1900 U	1900 U	2000 U
Benzo(a)anthracene	UG/KG	~~0.002~~ .04	1900 U	3300	2900
Fluoranthene	UG/KG	~~50~~ 1000	2900	8500	6600
Benzo(b)fluoranthene	UG/KG	0.002 .04	1900 U	2800	2800
Benzo(k)fluoranthene	UG/KG	0.002	1900 U	2600	2500
Chrysene	UG/KG	0.002	1900 U	3700	3300
Benzo(a)pyrene	UG/KG	0.002	1900 U	3100	2900
Benzo(g,h,i)perylene	UG/KG	0.002	1900 U	2100	2700
Indeno(1,2,3-cd)pyrene	UG/KG	0.002	1900 U	2000	2700
Dibenz(a,h)anthracene	UG/KG	~~50~~ 1000	1900 U	1900 U	2000 U
TPH				43,400	34,400

Tentatively 1-1 & 1-2

Should be TCLP alternative

U = not detected

NOTES:

*** - New York State Department of Environmental Conservation. 1992. Spill Technology and Remediation Series (STARS) Memo #1, Petroleum-Contaminated Soil Guidance Policy. August.**

○ - Concentration exceeds Criteria.

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TABLE 1-3
BETHLEHEM STEEL CORP - LINDE PLANT
SOIL ANALYTICAL SAMPLE RESULTS
WATER LINE EXCAVATION SOIL STOCKPILE

Text pg 1-2

Location I.D.			SOIL PILE 1	SOIL PILE 2	SP-1	SP-2	SP-3
Sample I.D.			SOIL PILE 1	SOIL PILE 2	SP-1	SP-2	SP-3
Matrix			Soil	Soil	Soil	Soil	Soil
Date Sampled			11/25/96	11/25/96	05/20/97	05/20/97	05/20/97
Parameter	**Units**	**Criteria***					
Miscellaneous							
Unknown Hydrocarbon	MG/KG		NA	NA	10 U	10 U	10 U

NOTES:

*** - New York State Department of Environmental Conservation. 1992. Spill Technology and Remediation Series (STARS) Memo #1, Petroleum-Contaminated Soil Guidance Policy. August.**

⬭ - Concentration exceeds Criteria.

MADE BY: ________ DATE ________
CHKD BY ________ DATE ________

Water extraction

TCLP

Text Pg 1-2

TABLE 1-3
BETHLEHEM STEEL CORP - LINDE PLANT
SOIL ANALYTICAL SAMPLE RESULTS
WATER LINE EXCAVATION SOIL STOCKPILE

Location I.D.			SOIL PILE 1	SOIL PILE 2	SP-1	SP-2	SP-3
Sample I.D.			SOIL PILE 1	SOIL PILE 2	SP-1	SP-2	SP-3
Matrix			Soil	Soil	Soil	Soil	Soil
Date Sampled			11/25/96	11/25/96	05/20/97	05/20/97	05/20/97
Parameter	**Units**	**Criteria***					
TCLP Volatiles							
Benzene	UG/L	0.7	0.5 U	0.7	1.0 U	1.0 U	1.0 U
Ethylbenzene	UG/L	5	0.5 U	0.5 U	1.0 U	1.0 U	1.0 U
Methyl t-Butyl Ether	UG/L		0.5 U	0.5 U	1.0 U	1.0 U	1.0 U
Toluene	UG/L	5	0.5 U	0.5	1.0 U	1.0 U	7
Xylene (total)	UG/L		1.0 U	1.0 U	2.0 U	2.0 U	2.0 U
1,2,4-Trimethylbenzene	UG/L	5	0.5 U	0.5 U	1.0 U	1.0 U	1.0 U
Isopropylbenzene	UG/L		0.5 U	0.5 U	1.0 U	1.0 U	1.0 U
n-Propylbenzene	UG/L	5	0.5 U	0.5 U	1.0 U	1.0 U	1.0 U
p-Isopropyltoluene	UG/L		0.5 U	0.5 U	NA	NA	NA
1,3,5-Trimethylbenzene	UG/L		0.5 U	0.5 U	1.0 U	1.0 U	1.0 U
n-Butylbenzene	UG/L	5	0.5 U	0.5 U	1.0 U	1.0 U	1.0 U
sec-Butylbenzene	UG/L	5	0.5 U	0.5 U	1.0 U	1.0 U	1.0 U
t-Butylbenzene	UG/L	5	0.5 U	0.5 U	1.0 U	1.0 U	1.0 U
Naphthalene	UG/L	10	16	0.5 U	1.0 U	1.0 U	1.0 U
TCLP Semivolatiles							
Acenaphthene	UG/L	20	1.0 U	1.0 U	10 U	10 U	10 U
Anthracene	UG/L	50	1.0 U	1.0 U	10 U	10 U	10 U
Benzo(a)anthracene	UG/L	0.002	1.0 U	1.0 U	10 U	10 U	10 U
Benzo(b)fluoranthene	UG/L	0.002	1.0 U	1.0 U	10 U	10 U	10 U
Benzo(k)fluoranthene	UG/L	0.002	1.0 U	1.0 U	10 U	10 U	10 U
Benzo(g,h,i)perylene	UG/L	0.002	1.0 U	1.0 U	10 U	10 U	10 U
Benzo(a)pyrene	UG/L	0.002	1.0 U	1.0 U	10 U	10 U	10 U
Chrysene	UG/L	0.002	1.0 U	1.0 U	10 U	10 U	10 U
Dibenz(a,h)anthracene	UG/L	50	1.0 U	1.0 U	10 U	10 U	10 U
Fluoranthene	UG/L	50	1.0 U	1.0 U	10 U	10 U	10 U
Fluorene	UG/L	50	1.0 U	1.0 U	10 U	10 U	10 U
Indeno(1,2,3-cd)pyrene	UG/L	0.002	1.0 U	1.0 U	10 U	10 U	10 U
Naphthalene	UG/L	10	1.0	1.0 U	10 U	10 U	10 U
Phenanthrene	UG/L	50	1.0 U	1.0 U	10 U	10 U	10 U
Pyrene	UG/L	50	1.0 U	1.0 U	10 U	10 U	10 U
Miscellaneous							
Diesel Range Organics	MG/KG		NA	NA	10 U	10 U	10 U
Kerosene Range Organics	MG/KG		NA	NA	10 U	10 U	10 U
Lubricating Oil	MG/KG		NA	NA	10 U	10 U	10 U
Motor Oil	MG/KG		NA	NA	240	1300	110

NOTES:

*** - New York State Department of Environmental Conservation. 1992. Spill Technology and Remediation Series (STARS) Memo #1, Petroleum-Contaminated Soil Guidance Policy. August.**

⬭ - Concentration exceeds Criteria.

MADE BY: ________ DATE: ________
CHKD. BY: ________ DATE: ________

TABLE 1-4
BETHLEHEM STEEL CORP - LINDE PLANT
GROUNDWATER ANALYTICAL SAMPLE RESULTS - PREVIOUS INVESTIGATIONS

Location I.D.			MW-01	MW-01	MW-02	MW-02	MW-03
Sample I.D.			MW-01	MW-01	MW-02	MW-02	MW-03
Matrix			Water	Water	Water	Water	Water
Date Sampled			06/19/97	11/04/97	06/19/97	04/17/98	06/19/97
Parameter	**Units**	**Criteria***					
Volatiles							
Benzene	UG/L	0.7	14	8	1.0 U	1 U	1.0 U
Ethylbenzene	UG/L	5	1.0 U	1 U	1.0 U	1 U	1.0 U
Methyl t-Butyl Ether	UG/L		1.0 U	1 U	1.0 U	1 U	1.0 U
Toluene	UG/L	5	4	2	1.0 U	1 U	1.0 U
Xylene (total)	UG/L		9	5	2.0 U	1 U	2.0 U
1,2,4-Trimethylbenzene	UG/L	5	13	7	1.0 U	1.4	1.0 U
Isopropylbenzene	UG/L		1.0 U	1 U	1.0 U	1 U	1.0 U
n-Propylbenzene	UG/L	5	1	2	1.0 U	1 U	1.0 U
p-Isopropyltoluene	UG/L		1.0 U	1 U	1.0 U	1 U	1.0 U
1,3,5-Trimethylbenzene	UG/L		7	3	1.0 U	1 U	1.0 U
n-Butylbenzene	UG/L	5	1.0 U	1 U	1.0 U	1 U	1.0 U
sec-Butylbenzene	UG/L	5	1.0 U	1 U	1.0 U	1 U	1.0 U
t-Butylbenzene	UG/L	5	1.0 U	1 U	1.0 U	1 U	1.0 U
Naphthalene	UG/L	10	20	20	1.0 U	1 U	1.0 U
Semivolatiles							
Anthracene	UG/L	50	8 U	0.7 J	8 U	10 U	8 U
Fluorene	UG/L	50	8 U	4 J	8 U	10 U	8 U
Phenanthrene	UG/L	50	22 U	3 J	22 U	5	22 U
Pyrene	UG/L	50	8 U	1 J	8 U	10 U	8 U
Acenaphthylene	UG/L		8 U	0.4 J	8 U	10 U	8 U
Benzo(a)anthracene	UG/L	0.002	31 U	10 U	31 U	10 U	31 U
Fluoranthene	UG/L	50	8 U	1 J	8 U	20 U	8 U
Benzo(b)fluoranthene	UG/L	0.002	19 U	10 U	19 U	10 U	19 U
Benzo(k)fluoranthene	UG/L	0.002	10 U	10 U	10 U	10 U	10 U
Chrysene	UG/L	0.002	10 U	10 U	10 U	10 U	10 U
Benzo(a)pyrene	UG/L	0.002	10 U	10 U	10 U	10 U	10 U
Benzo(g,h,i)perylene	UG/L	0.002	10 U	10 U	10 U	10 U	10 U
Indeno(1,2,3-cd)pyrene	UG/L	0.002	10 U	10 U	10 U	10 U	10 U
Dibenz(a,h)anthracene	UG/L	50	10 U	10 U	10 U	10 U	10 U
Naphthalene	UG/L	10	6 U	7 J	6 U	10 U	6 U
Miscellaneous							
Diesel Range Organics	MG/L		1.0 U	NA	1.0 U	NA	1.0 U
Kerosene Range Organics	MG/L		1.0 U	NA	1.0 U	NA	1.0 U
Lubricating Oil	MG/L		1.0 U	NA	6.8	NA	1.0 U
Motor Oil	MG/L		8.1	NA	1.0 U	NA	11

NOTES:

*** - New York State Department of Environmental Conservation. 1992. Spill Technology and Remediation Series (STARS) Memo #1, Petroleum-Contaminated Soil Guidance Policy. August.**

⬭ - Concentration exceeds Criteria.

MADE BY ________ DATE ________
CHKD BY ________ DATE ________

TABLE 1-4
BETHLEHEM STEEL CORP - LINDE PLANT
GROUNDWATER ANALYTICAL SAMPLE RESULTS - PREVIOUS INVESTIGATIONS

Location I.D.			MW-01	MW-01	MW-02	MW-02	MW-03
Sample I.D.			MW-01	MW-01	MW-02	MW-02	MW-03
Matrix			Water	Water	Water	Water	Water
Date Sampled			06/19/97	11/04/97	06/19/97	04/17/98	06/19/97
Parameter	**Units**	**Criteria***					
Miscellaneous							
Unknown Hydrocarbon	MG/L		1.0 U	NA	1.0 U	NA	1.0 U

NOTES:

*** - New York State Department of Environmental Conservation. 1992. Spill Technology and Remediation Series (STARS) Memo #1, Petroleum-Contaminated Soil Guidance Policy. August.**

⬭ **- Concentration exceeds Criteria.**

TABLE 1-5
BETHLEHEM STEEL CORP - LINDE PLANT
SOIL ANALYTICAL SAMPLE RESULTS
PRODUCT RECOVERY PIT EXCAVATION SOILS - BIOREMEDIATION ASSESSMENT

Text pg 1-3

Location I.D.			BIOPILENORTH	BIOPILENORTH	BIOPILESOUTH	BIOPILESOUTH
Sample I.D.			**BIOPILENORTH**	**BIOPILENORTH**	**BIOPILESOUTH**	**BIOPILESOUTH**
Matrix			**Soil**	**Soil**	**Soil**	**Soil**
Date Sampled			**09/23/98**	**12/16/98**	**09/23/98**	**12/16/98**
Parameter	**Units**	**Criteria***				
Miscellaneous						
Total Organic Carbon	MG/KG		6.9	3.3	6.10	2.9
Total Petroleum Hydrocarbons	MG/KG		80400	36300	143000	44500

NOTES:

*** - New York State Department of Environmental Conservation. 1992. Spill Technology and Remediation Series (STARS) Memo #1, Petroleum-Contaminated Soil Guidance Policy. August.**

○ - Concentration exceeds Criteria.

MADE BY________ DATE________
CHKD BY________ DATE________

TABLE 2-1

INVESTIGATION-DERIVED WASTE SUMMARY

Drum #	Drum Contents	Well Boring Location	Quantity	Generator
1	Development Water	MW-1	Full	URSGWC
2	Development Water	MW-1	Full	URSGWC
3	Development Water	MW-1	Full	URSGWC
4	Soil Cuttings	MW-4	Full	URSGWC
5	Soil Cuttings	MW-5	Full	URSGWC
6	Soil Cuttings	MW-6	Full	URSGWC
7	Poly Decon Liner with Soil Cuttings	MW-4 thru MW-6	Full	URSGWC
8	Decon Water	Steam Cleaning Water	Full	URSGWC
9	Personal Protective Equip.	NA	Full	GTI/URSGWC
10	Oil Product and Bailers (HDPE)	MW-2/MW-3	1/3 Full	GTI
11	Development Water	MW-6	Full	URSGWC
12	Development Water	MW-4	Full	URSGWC
13	Development Water	MW-4	Full	URSGWC
14	Development Water	MW-4/MW-6	Full	URSGWC
15	Development Water	MW-5	Full	URSGWC
16	Development Water	MW-5	Full	URSGWC
17	Personal Protective Equip.	NA	1/4 Full	URSGWC
18	Purge Water	MW-4/ MW-5/MW-6	Full	URSGWC

TABLE 3-1

SUMMARY OF WATER LEVEL AND PRODUCT MEASUREMENTS
BSC-FORMER LINDE PLANT

Monitoring Well ID	Date	Ground Elevation	Casing Elevation	Riser Elevation	* Depth to Product (ft)	* Depth to Water (ft)	Product Thickness (ft)	Product Sp. Grav.	Water Equivalent	Corr. Depth to Water	Corr. Water Elevation
MW-1	06/04/97	NA	NA	595.93	10.53	10.53	Sheen	NA	NA	10.53	585.40
	06/19/97	NA	NA	595.93	10.78	10.78	Sheen	NA	NA	10.78	585.15
	07/28/97	NA	NA	595.93	10.74	10.74	Sheen	NA	NA	10.74	585.19
	11/03/97	NA	NA	595.93	10.27	10.27	Sheen	NA	NA	10.27	585.66
	01/12/98	NA	NA	595.93	10.34	10.36	0.02	0.87	0.02	10.34	585.59
	02/09/98	NA	NA	595.93	10.58	10.61	0.03	0.87	0.03	10.58	585.35
	02/27/98	NA	NA	595.93	10.58	10.60	0.02	0.87	0.02	10.58	585.35
	03/03/98	NA	NA	595.93	10.61	10.62	0.01	0.87	0.01	10.61	585.32
	03/11/98	NA	NA	595.93	10.66	10.67	0.01	0.87	0.01	10.66	585.27
	03/18/98	NA	NA	595.93	10.64	10.65	0.01	0.87	0.01	10.64	585.29
	04/17/98	NA	NA	595.93	10.64	10.66	0.02	0.87	0.02	10.64	585.29
MW-2	06/04/97	NA	NA	595.69	11.88	11.88	Sheen	NA	NA	11.88	583.81
	06/19/97	NA	NA	595.69	11.83	11.83	Sheen	NA	NA	11.83	583.86
	07/28/97	NA	NA	595.69	11.66	11.67	0.01	0.87	0.01	11.66	584.03
	11/03/97	NA	NA	595.69	11.94	12.14	0.20	0.87	0.17	11.97	583.72
	01/12/98	NA	NA	595.69	11.13	15.71	4.58	0.87	3.98	11.73	583.96
	02/09/98	NA	NA	595.69	12.00	16.11	4.11	0.87	3.58	12.53	583.16
	02/27/98	NA	NA	595.69	11.82	14.16	2.34	0.87	2.04	12.12	583.57
	03/03/98	NA	NA	595.69	12.90	13.32	0.42	0.87	0.37	12.95	582.74
	03/11/98	NA	NA	595.69	11.95	13.55	1.60	0.87	1.39	12.16	583.53
	03/18/98	NA	NA	595.69	11.27	12.67	1.40	0.87	1.22	11.45	584.24
	04/17/98	NA	NA	595.69	11.64	12.91	1.27	0.87	1.10	11.81	583.88
MW-3	06/04/97	NA	NA	595.67	10.29	10.29	Sheen	NA	NA	10.29	585.38
	06/19/97	NA	NA	595.67	10.49	10.49	Sheen	NA	NA	10.49	585.18
	07/28/97	NA	NA	595.67	10.50	10.50	Sheen	NA	NA	10.5	585.17
	11/03/97	NA	NA	595.67	10.06	10.25	0.19	0.87	0.17	10.08	585.59
	01/12/98	NA	NA	595.67	10.08	10.85	0.77	0.87	0.67	10.18	585.49
	02/09/98	NA	NA	595.67	10.34	10.84	0.50	0.87	0.44	10.41	585.27
	02/27/98	NA	NA	595.67	10.34	10.61	0.27	0.87	0.23	10.38	585.29
	03/03/98	NA	NA	595.67	10.32	10.54	0.22	0.87	0.19	10.35	585.32
	03/11/98	NA	NA	595.67	10.41	10.60	0.19	0.87	0.17	10.43	585.24
	03/18/98	NA	NA	595.67	10.40	10.57	0.17	0.87	0.15	10.42	585.25
	04/17/98	NA	NA	595.67	10.41	10.63	0.22	0.87	0.19	10.44	585.23

TABLE 3 - 1

SUMMARY OF WATER LEVEL AND PRODUCT MEASUREMENTS
BSC-FORMER LINDE PLANT

Monitoring Well ID	Date	Ground Elevation	Casing Elevation	Riser Elevation	* Depth to Product (ft)	* Depth to Water (ft)	Product Thickness (ft)	Product Sp. Grav.	Water Equivalent	Corr. Depth to Water	Corr. Water Elevation
MW-1	05/07/99	593.23	595.86	595.93	10.80	10.85	0.05	0.87	0.04	10.81	585.12
	05/19/99	593.23	595.86	595.93	10.92	10.92	Sheen	NA	NA	10.92	585.01
MW-2	05/07/99	593.06	595.84	595.69	12.08	18.06	5.98	0.87	5.20	12.86	582.83
	05/18/99	593.06	595.84	595.69	12.26	16.71	4.45	0.87	3.87	12.84	582.85
	05/19/99	593.06	595.84	595.69	12.34	14.63	2.29	0.87	1.99	12.64	583.05
MW-3	05/07/99	593.16	595.76	595.67	10.64	11.25	0.61	0.87	0.53	10.72	584.95
	05/18/99	593.16	595.76	595.67	10.66	11.24	0.58	0.87	0.50	10.74	584.93
	05/19/99	593.16	595.76	595.67	10.73	11.0	0.27	0.87	0.23	10.77	584.90
MW-4	05/07/99	593.14	595.73	595.57	12.42	16.52	4.10	0.87	3.57	12.95	582.62
	05/18/99	593.14	595.73	595.57	12.41	13.12	0.71	0.87	0.62	12.50	583.07
	05/19/99	593.14	595.73	595.57	12.40	12.59	0.19	0.87	0.17	12.42	583.15
MW-5	05/07/99	592.76	595.69	595.13	12.32	12.37	0.05	0.87	0.04	12.33	582.80
	05/19/99	592.76	595.69	595.13	11.75	11.75	Sheen	NA	NA	11.75	583.38
MW-6	05/07/99	593.62	596.69	596.35	12.31	12.48	0.17	0.87	0.15	12.33	584.02
	05/19/99	593.62	596.69	596.35	12.43	12.43	Sheen	NA	NA	12.43	583.92

* Measuring Point = Top of Riser
Elevation of water is not corrected

Date	Smokes Creek Elevation (feet)
07/28/97	579.16
11/03/97	579.76
05/07/99	581.66
05/18/99	581.41
05/19/99	581.41

TABLE 3-2

SUMMARY OF FREE PRODUCT THICKNESSES

Event No.	Date	Apparent Free Product Thickness (feet)	Estimate of Formation Thickness of Free Product (feet)	
			Bail Test Method	CONCAWE Factor Method
MW-2	May 18, 1999	4.45	0.12	0.77
MW-3	May 18, 1999	0.58	0.09	0.10
MW-4	May 19, 1999	0.19	0.01	0.03

TABLE 4-1
BETHLEHEM STEEL CORP - LINDE PLANT
SOIL ANALYTICAL SAMPLE RESULTS
PRODUCT DELINEATION INVESTIGATION

Location I.D.			**MW-04**	**MW-05**	**MW-06**	**SS-01**	**SS-02**
Sample I.D.			**SBMW4**	**SBMW5**	**SBMW6**	**SS-01**	**SS-02**
Matrix			**Soil**	**Soil**	**Soil**	**Soil**	**Soil**
Date Sampled			**04/07/99**	**04/07/99**	**04/06/99**	**05/07/99**	**05/07/99**
Parameter	**Units**	**Criteria***					
Miscellaneous							
pH	SU		7.6	8.6	8.3	NA	NA
Diesel Range Organics	MG/KG		10 U	10 U	39 U	38 U	38 U
Gasoline Range Organics	MG/KG		10 U	10 U	39 U	38 U	38 U
Kerosene Range Organics	MG/KG		10 U	10 U	39 U	38 U	38 U
Lubricating Oil	MG/KG		12000	13000	41000	200000	230000
Total Petroleum Hydrocarbons	MG/KG		12000	13000	41000	200000	230000
Unknown Hydrocarbon	MG/KG		10 U	10 U	39 U	38 U	38 U

NOTES:

*** - New York State Department of Environmental Conservation. 1992. Spill Technology and Remediation Series (STARS) Memo #1, Petroleum-Contaminated Soil Guidance Policy. August.**

⬭ - Concentration exceeds Criteria.

MADE BY_________ DATE_________
CHKD BY_________ DATE_________

TABLE 4-1
BETHLEHEM STEEL CORP - LINDE PLANT
SOIL ANALYTICAL SAMPLE RESULTS
PRODUCT DELINEATION INVESTIGATION

Location I.D.			**SS-03**
Sample I.D.			**SS-03**
Matrix			**Soil**
Date Sampled			**05/07/99**
Parameter	**Units**	**Criteria***	
Miscellaneous			
pH	SU		NA
Diesel Range Organics	MG/KG		36 U
Gasoline Range Organics	MG/KG		36 U
Kerosene Range Organics	MG/KG		36 U
Lubricating Oil	MG/KG		140000
Total Petroleum Hydrocarbons	MG/KG		140000
Unknown Hydrocarbon	MG/KG		36 U

NOTES:

*** - New York State Department of Environmental Conservation. 1992. Spill Technology and Remediation Series (STARS) Memo #1, Petroleum-Contaminated Soil Guidance Policy. August.**

◯ **- Concentration exceeds Criteria.**

MADE BY:________ DATE________
CHKD BY:________ DATE:________

TABLE 4-2
BETHLEHEM STEEL CORP - LINDE PLANT
GROUNDWATER ANALYTICAL RESULTS
PRODUCT DELINEATION INVESTIGATION

Location I.D.			**MW-01**
Sample I.D.			**BSMW1**
Matrix			**Water**
Date Sampled			**04/08/99**
Parameter	**Units**	**Criteria***	
STARS Volatiles			
Benzene	UG/L	0.7	2
Ethylbenzene	UG/L	5	0.5 U
Methyl t-Butyl Ether	UG/L		10 U
Toluene	UG/L	5	0.5 U
Xylene (total)	UG/L		1
1,2,4-Trimethylbenzene	UG/L	5	4
Isopropylbenzene	UG/L		0.5 U
n-Propylbenzene	UG/L	5	0.5 U
p-Isopropyltoluene	UG/L		0.5 U
1,3,5-Trimethylbenzene	UG/L		2
n-Butylbenzene	UG/L	5	2
sec-Butylbenzene	UG/L	5	0.5 U
t-Butylbenzene	UG/L	5	0.5 U
Naphthalene	UG/L	10	0.5 U

NOTES:

*** - New York State Department of Environmental Conservation. 1992. Spill Technology and Remediation Series (STARS) Memo #1, Petroleum-Contaminated Soil Guidance Policy. August.**

⬭ - Concentration exceeds Criteria.

APPENDIX E

FREE PRODUCT BAILDOWN TEST DATA

MW-1

Calculated Actual Formation Thickness of Free Product (in feet)

I. CONCAWE Factor Method:

	5/7/99	5/19/99
A. Apparent Product Thickness:	0.05	SHEEN
B. Product Type: Oil Based Coolant		
C. Specific Gravity:	0.87	0.87
D. CONCAWE Factor:	5.8	5.8
E. Actual Thickness (A/D):	0.01	0.00

BSC- (FORMER LINDE PLANT) EVALUATION OF FLOATING PRODUCT THICKNESS

MW-2

Calculated Actual Formation Thickness of Free Product (in feet)

	5/7/99	5/18/99	5/19/99
I. Gruszczenski Bailout Method:			
Apparent Product Thickness:		4.45	
Calculated Actual Thickness:			
A. Depth to Product		12.89	
B. Depth to Water		13.01	
C. Actual Thickness (B-A)		0.12	
II. CONCAWE Factor Method:			
A. Apparent Product Thickness:	5.98	4.45	2.29
B. Product Type: Oil Based Coolant			
C. Specific Gravity:	0.87	0.87	0.87
D. CONCAWE Factor:	5.8	5.8	5.8
E. Actual Thickness (A/D):	1.03	0.77	0.39

MW-3

Calculated Actual Formation Thickness of Free Product (in feet)

I. Gruszczenski Bailout Method:

	5/7/99	5/18/99	5/19/99
Apparent Product Thickness:		0.58	
Calculated Actual Thickness:			
A. Depth to Product		10.72	
B. Depth to Water		10.81	
C. Actual Thickness (B-A)		0.09	

II. CONCAWE Factor Method:

	5/7/99	5/18/99	5/19/99
A. Apparent Product Thickness:	0.61	0.58	0.27
B. Product Type: Oil Based Coolant			
C. Specific Gravity:	0.87	0.87	0.87
D. CONCAWE Factor:	5.8	5.8	5.8
E. Actual Thickness (A/D):	0.11	0.10	0.05

MW-4

Calculated Actual Formation Thickness of Free Product (in feet)

I. Gruszczenski Bailout Method:

	5/7/99	5/18/99	5/19/99
Apparent Product Thickness:			0.19
Calculated Actual Thickness:			
A. Depth to Product			12.56
B. Depth to Water			12.57
C. Actual Thickness (B-A)			0.01

II. CONCAWE Factor Method:

	5/7/99	5/18/99	5/19/99
A. Apparent Product Thickness:	4.10	0.71	0.19
B. Product Type: Oil Based Coolant			
C. Specific Gravity:	0.87	0.87	0.87
D. CONCAWE Factor:	5.8	5.8	5.8
E. Actual Thickness (A/D):	0.71	0.12	0.03

MW-5
Calculated Actual Formation Thickness of Free Product (in feet)

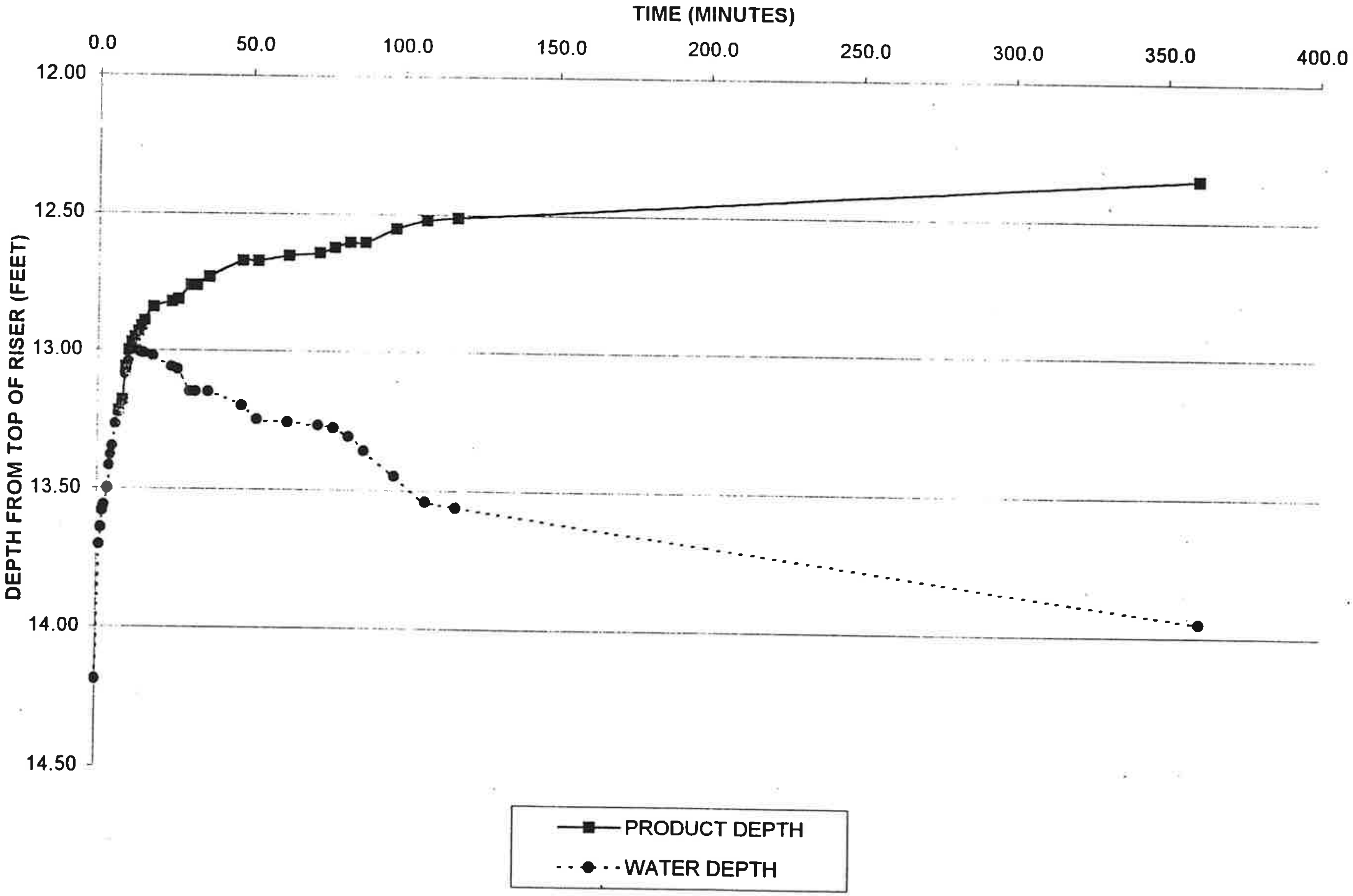
		5/7/99	5/19/99
I. CONCAWE Factor Method:			
A. Apparent Product Thickness:		0.05	SHEEN
B. Product Type:	Oil Based Coolant		
C. Specific Gravity:		0.87	0.87
D. CONCAWE Factor:		5.8	5.8
E. Actual Thickness (A/D):		0.01	0.00

MW-6

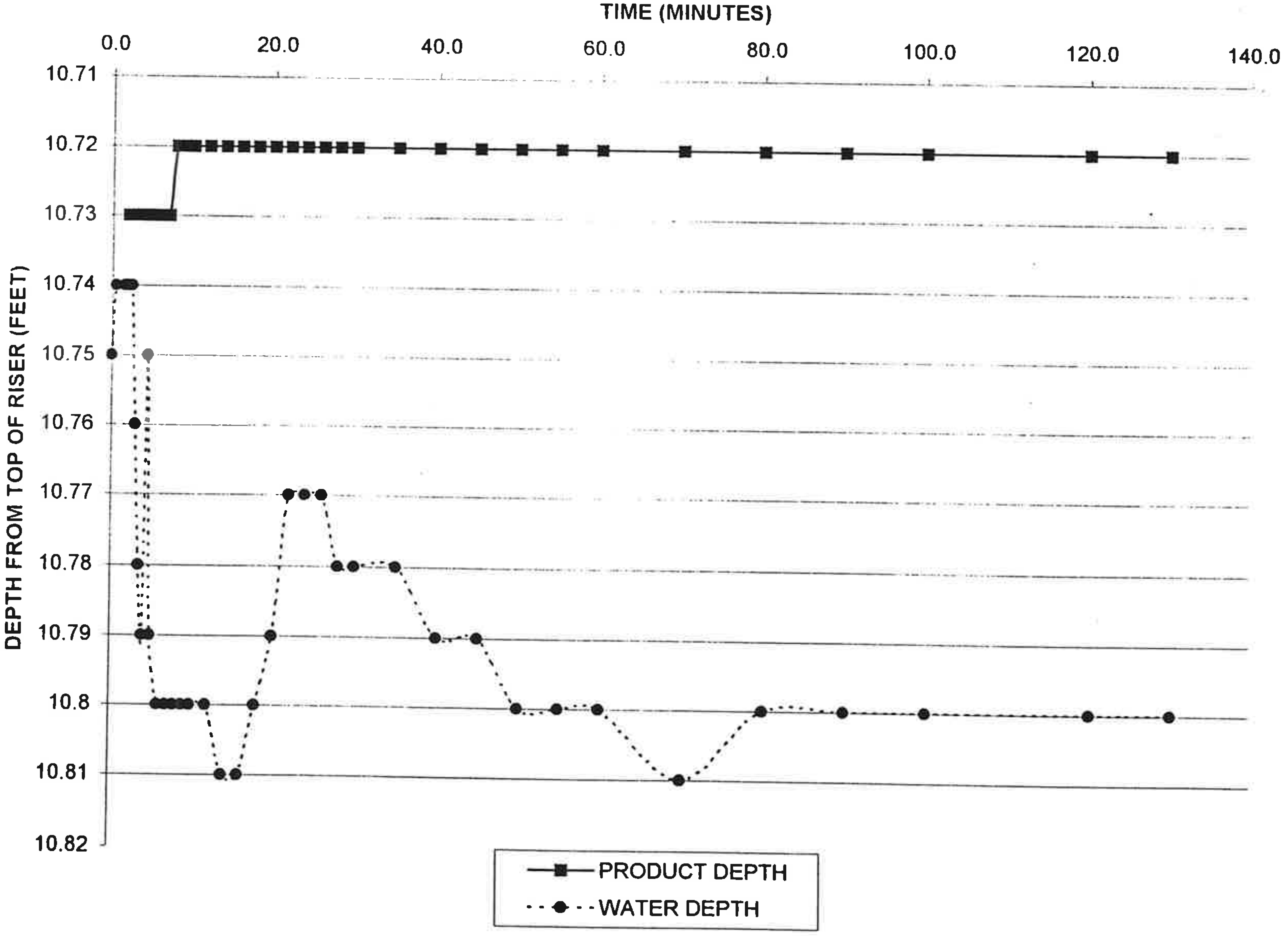
Calculated Actual Formation Thickness of Free Product (in feet)

	5/7/99	5/19/99
I. CONCAWE Factor Method:		
A. Apparent Product Thickness:	0.17	SHEEN
B. Product Type: Oil Based Coolant		
C. Specific Gravity:	0.87	0.87
D. CONCAWE Factor:	5.8	5.8
E. Actual Thickness (A/D):	0.03	0.00

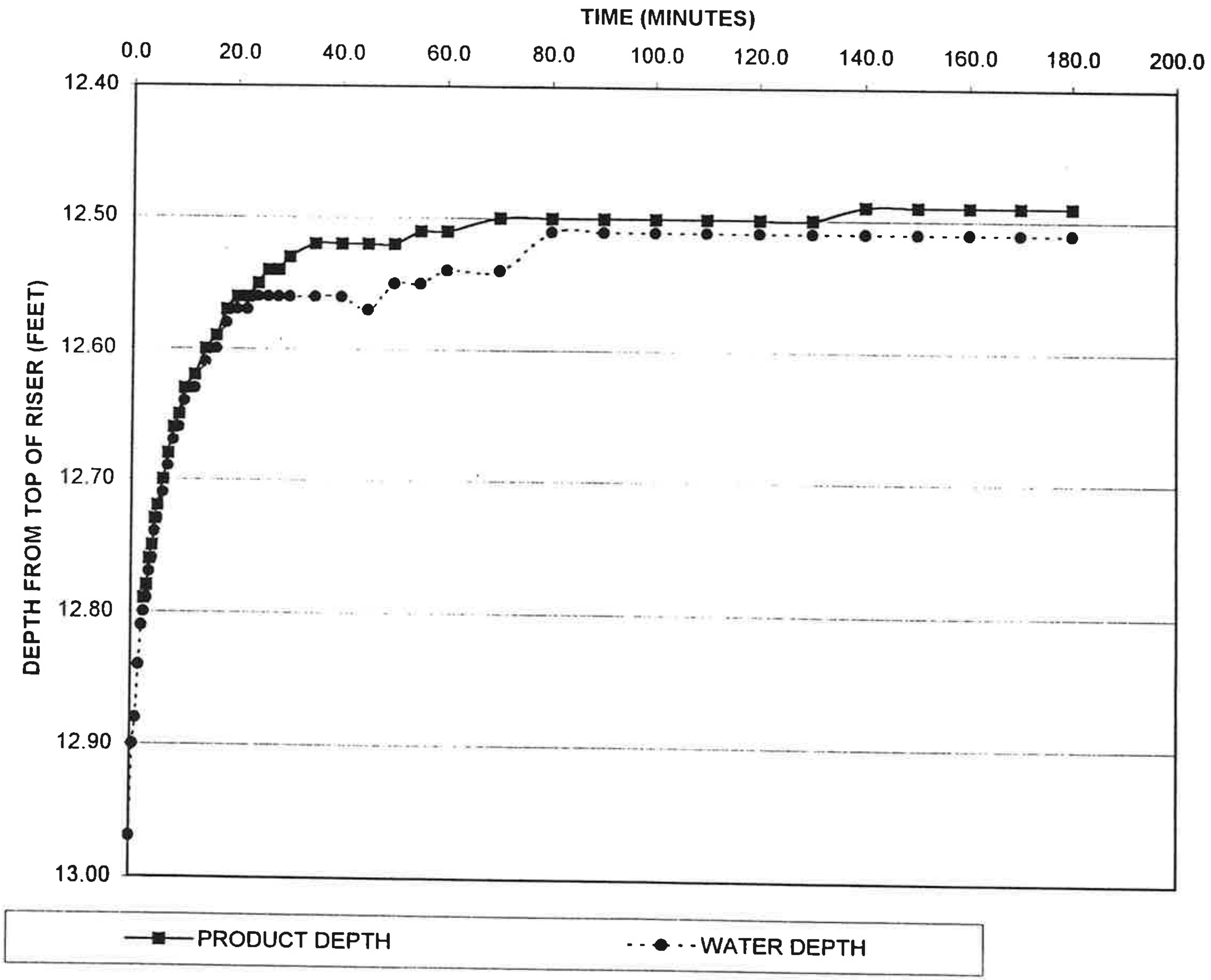
FREE PRODUCT BAILDOWN TEST FOR MW-2 (5/18/99)



FREE PRODUCT BAILDOWN TEST FOR MW-3 (5/18/99)



FREE PRODUCT BAILDOWN TEST FOR MW-4 (5/189/99)



FREE PRODUCT BAILDOWN TEST RESULTS

MW-2

Time (min)	* Depth to Top of Product (ft)	* Depth to Water (ft)
0.0		14.19
1.0		13.70
1.5		13.64
2.0		13.58
2.5		13.56
3.5		13.50
4.0		13.42
4.5		13.38
5.0		13.35
6.0		13.27
7.0	13.22	13.23
8.0	13.18	13.19
9.0	13.06	13.09
10.0	13.00	13.04
11.0	12.97	13.00
12.0	12.95	13.00
13.0	12.93	13.00
14.0	12.91	13.01
15.0	12.89	13.01
18.0	12.84	13.02
24.0	12.82	13.06
26.0	12.81	13.07
30.0	12.76	13.15
32.0	12.76	13.15
36.0	12.73	13.15
47.0	12.67	13.20
52.0	12.67	13.25
62.0	12.65	13.26
72.0	12.64	13.27
77.0	12.62	13.28
82.0	12.60	13.31
87.0	12.60	13.36
97.0	12.55	13.45
107.0	12.52	13.54
117.0	12.51	13.56
360.0	12.35	13.95

MW-3

Time (min)	* Depth to Top of Product (ft)	* Depth to Water (ft)
0.0		10.75
0.5		10.74
1.5		10.74
2.0	10.73	10.74
2.5	10.73	10.74
3.0	10.73	10.76
3.5	10.73	10.78
4.0	10.73	10.79
4.5	10.73	10.75
5.0	10.73	10.79
6.0	10.73	10.80
7.0	10.73	10.80
8.0	10.72	10.80
9.0	10.72	10.80
10.0	10.72	10.80
12.0	10.72	10.80
14.0	10.72	10.81
16.0	10.72	10.81
18.0	10.72	10.80
20.0	10.72	10.79
22.0	10.72	10.77
24.0	10.72	10.77
26.0	10.72	10.77
28.0	10.72	10.78
30.0	10.72	10.78
35.0	10.72	10.78
40.0	10.72	10.79
45.0	10.72	10.79
50.0	10.72	10.80
55.0	10.72	10.80
60.0	10.72	10.80
70.0	10.72	10.81
80.0	10.72	10.80
90.0	10.72	10.80
100.0	10.72	10.80
120.0	10.72	10.80
130.0	10.72	10.80

MW-4

Time (min)	* Depth to Top of Product (ft)	* Depth to Water (ft)
0.0		12.97
0.5		12.90
1.0		12.88
1.5		12.84
2.0		12.81
2.5	12.79	12.80
3.0	12.78	12.79
3.5	12.76	12.77
4.0	12.75	12.76
4.5	12.73	12.74
5.0	12.72	12.73
6.0	12.70	12.71
7.0	12.68	12.69
8.0	12.66	12.67
9.0	12.65	12.66
10.0	12.63	12.64
12.0	12.62	12.63
14.0	12.60	12.61
16.0	12.59	12.60
18.0	12.57	12.58
20.0	12.56	12.57
22.0	12.56	12.57
24.0	12.55	12.56
26.0	12.54	12.56
28.0	12.54	12.56
30.0	12.53	12.56
35.0	12.52	12.56
40.0	12.52	12.56
45.0	12.52	12.57
50.0	12.52	12.55
55.0	12.51	12.55
60.0	12.51	12.54
70.0	12.50	12.54
80.0	12.50	12.51
90.0	12.50	12.51
100.0	12.50	12.51
110.0	12.50	12.51
120.0	12.50	12.51
130.0	12.50	12.51
140.0	12.49	12.51
150.0	12.49	12.51
160.0	12.49	12.51
170.0	12.49	12.51
180.0	12.49	12.51

APPENDIX B

SITE-WIDE HEALTH AND SAFETY PLAN

Site-Wide Health and Safety Plan (HASP)

Tecumseh Redevelopment BCP Sites
Lackawanna, New York

April 2010 0071-014-630
Revised July 2013
Updated October 2020

Prepared By:

TurnKey
Environmental
Restoration, LLC

Benchmark
Environmental
Engineering &
Science, PLLC

SITE HEALTH AND SAFETY PLAN
for
BROWNFIELD CLEANUP PROGRAM

TECUMSEH REDEVELOPMENT BCP SITES
LACKAWANNA, NEW YORK

April 2010 | 0071-014-630
Revised July 2013
Updated October 2020

Prepared By:

TurnKey Environmental Restoration, LLC

TurnKey Environmental Restoration, LLC
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(716) 856-0599

In Association With:

Benchmark Environmental Engineering & Science, PLLC

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Buffalo, NY 14218
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TECUMSEH REDEVELOPMENT SITE
SITE-WIDE HEALTH AND SAFETY PLAN

ACKNOWLEDGEMENT

Plan Reviewed by (initial):

Corporate Health and Safety Director:	Thomas H. Forbes, P.E.
Project Managers:	Paul H. Werthman, P.E. & Thomas H. Forbes, P.E.
Designated Site Safety and Health Officer:	Paul W. Werthman
Alternate Site Safety and Health Officer:	John T. Deth

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

TECUMSEH REDEVELOPMENT BCP SITES
SITE-WIDE HEALTH AND SAFETY PLAN

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TECUMSEH REDEVELOPMENT BCP SITES
SITE-WIDE HEALTH AND SAFETY PLAN

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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 TurnKey Environmental Restoration, LLC and Benchmark Environmental Engineering & Science, PLLC employees (referred to jointly hereafter as "TurnKey-Benchmark") during Brownfield Cleanup Program (BCP) investigation, remedial, and redevelopment activities on the Tecumseh Redevelopment Site (former Bethlehem Steel Lackawanna Works), located in the City of Lackawanna, New York. This HASP presents procedures for TurnKey-Benchmark employees who will be involved with 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. TurnKey-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 field activities to provide real-time data for on-going assessment of potential hazards.

1.2 Background

Tecumseh Redevelopment Inc. (Tecumseh) owns land at 2303 Hamburg Turnpike, approximately 2 miles south of the City of Buffalo (see Figure 1). Most of Tecumseh's property is in the City of Lackawanna (the City), with portions of the property extending into the Town of Hamburg. Tecumseh's property is bordered by NY State Route 5 (Hamburg Turnpike) on the east; Lake Erie to the west and northwest; and other industrial properties to the south and the northeast. Figure 2 provides an overview of the Tecumseh Property, including major leased or licensed parcels, and adjacent parcels owned by others.

The Tecumseh property is located on a portion of the Site of the former Bethlehem Steel Corporation (BSC) Lackawanna Works in a primarily industrial area. The property was formerly used for production of steel, coke, and related products by BSC. Steel production on the property was discontinued in 1983 and the coke ovens ceased activity in 2000. Tecumseh acquired the property, along with other BSC assets, out of bankruptcy in 2003.

A Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) of the 1,100-acre Tecumseh property was initiated by BSC under an Administrative Order issued by the United States Environmental Protection Agency (USEPA) in 1990. Tecumseh completed the RFI in January 2005. In September 2006, USEPA approved the RFI and terminated Bethlehem Steel's (and in turn Tecumseh's) obligation under the 1990 Administrative Order. Tecumseh entered into an Order on Consent with the New York State Department of Environmental Conservation (NYSDEC) to undertake a corrective measures study (CMS) at certain solid waste management units (SWMUs) primarily on the western slag fill and coke manufacturing portion of the property.

Outside of the CMS Area, Tecumseh designated five parcels for redevelopment under the New York State Brownfield Cleanup Program (BCP) including the Phase I, IA, II, and III Business Park, most of which have been remediated under the BCP and are in various stages of commercial/industrial redevelopment. The Steel Winds Site was remediated under the BCP and redeveloped as a commercial wind farm. Figure 3 shows the BCP Sites.

This Site-Wide Health and Safety Plan (HASP) applies to the Business Park Sites under the BCP.

1.3 Known and Suspected Environmental Conditions

The Phase I, IA, II, and III Business Parks were formerly used to house portions of BSC's steelmaking operations. The slag and other industrial fill materials contain highly variable and sometimes elevated concentrations of metals, as well as semi-volatile and volatile organic compounds (SVOCs and VOCs). In addition, groundwater in contact with the soil/fill materials described above may exhibit elevated concentrations of corresponding soluble COPCs (e.g., BTEX) in groundwater.

1.4 Parameters of Interest

Constituents of potential concern (COPCs) at the BCP Sites include:

- **Volatile Organic Compounds (VOCs)** – VOCs present at elevated concentration may include benzene, toluene, ethylbenzene, and xylene (i.e., BTEX). These VOCs are typically associated with storage and handling of petroleum products such as gasoline.

- **Semi-Volatile Organic Compounds (SVOCs) –** SVOCs present at elevated concentrations may include base-neutral semi-volatile organic compounds (SVOCs) from oils, greases, and fuels associated with the operation of locomotive engines, steel mills, petroleum bulk storage, and other historic steel manufacturing operations. Specifically, polycyclic aromatic hydrocarbons (PAHs), which are byproducts of incomplete combustion and impurities in petroleum products. Although PAHs are commonly found in urban soil environments, they may be present at the Site at concentrations that are elevated compared to typical "background" levels. Naphthalene is a natural component of fossil fuels such as petroleum and coal; it is also formed when natural products such as wood or tobacco are burned.
- **Polychlorinated Biphenyls (PCBs)** – The potential impact of surface and subsurface soils by PCBs in discrete areas associated with former substations, rail yards, and hydraulic pump houses.
- **Inorganic Compounds** – Inorganic COPCs potentially present at elevated concentrations due to steel making activities may include arsenic, cadmium, chromium, lead, and mercury. Several of these parameters are components of coke and slag which are prevalent in the planned work area.

In addition, groundwater in contact with the soil/fill materials described above may exhibit elevated concentrations of corresponding soluble COPCs (e.g., BTEX).

1.5 Overview of BCP Activities

TurnKey-Benchmark personnel will be on-site to observe the general BCP investigation, remedial, and redevelopment activities described below. Detailed BCP activities are more fully described in the individual work plans for each property.

1. **Pre-Construction:** TurnKey-Benchmark will clear the work area of vegetation; install a stabilized construction entrance and temporary security fencing along the perimeter of the work area and the adjacent roads; and implement erosion control measures (e.g., silt socks at exterior work perimeter and surrounding exposed storm drains within and proximate to the work area). Dig Safely NY will be contacted to mark-out public underground utilities within the planned work area; the extents of known private utilities in the work area will be marked based on available historic drawings.
2. **Soil/Fill Excavation:** TurnKey-Benchmark will monitor all soil/fill excavations (e.g., wind turbine foundation excavation, test pit investigations, trenching for utility installation or repair) and related activities to visually inspect soil/fill for evidence of contamination.

3. **Soil/Fill Documentation Sampling:** TurnKey-Benchmark will collect surface and subsurface soil/fill documentation samples following excavation.
4. **Groundwater and Surface Water Management:** During excavation, surface water and/or perched groundwater infiltration may occur. TurnKey-Benchmark will direct the contractor to collect and characterize the water and coordinate disposal/treatment of the collected water. If required by a specific project, TurnKey-Benchmark may mobilize a temporary groundwater pretreatment system comprised of a storage (frac) tank, bag filters, activated carbon, and a treated water storage tank prior to excavation to handle groundwater encountered during the excavation work.
5. **Subgrade Work:** Significant grading may be required before implementation of remedial measures (e.g., cover system placement).
6. **Cover Soil Placement:** A soil cover system will be placed over select portions of the Site to reduce potential contact with impacted soil/fill. TurnKey-Benchmark will oversee installation of the cover system.
7. **Groundwater Monitoring Well Installation/Development and Sampling:** TurnKey-Benchmark will observe the installation of groundwater monitoring wells, develop the wells, and collect samples for the long-term groundwater monitoring program.
8. **Groundwater Remediation:** TurnKey-Benchmark personnel will oversee groundwater remediation at the Site, which may include installation of treatment (ORC/HRC) filter socks in groundwater monitoring wells or in-situ amendment injections.

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 BCP Sites. 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 establishes 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 the BCP Sites.

2.1 Roles and Responsibilities

All Turnkey-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 the BCP Sites are detailed in the following paragraphs.

2.1.1 Corporate Health and Safety Director

The TurnKey-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 Environmental Engineering & Science, PLLC and TurnKey Environmental Restoration, LLC, 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 TurnKey-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 these Sites is ***Paul H. Werthman, P.E. or Thomas H. Forbes, P.E.*** The Project Manager has the responsibility and authority to direct all TurnKey-Benchmark work operations at the Site. The Project Manager coordinates safety and health functions with the Site Safety and Health Officer (SSHO) and bears ultimate responsibility for proper implementation of this HASP. He 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 TurnKey-Benchmark workers with work assignments and overseeing their performance.
- Coordinating health and safety efforts with the 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 Site Safety and Health Officer (SSHO) for this Site is ***Mr. Brock M. Greene***. The qualified alternate SSHO is ***Mr. John T. Deth.*** The SSHO reports to the Project Manager. The SSHO is on-site or readily accessible to the Site during all 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 TurnKey-Benchmark personnel on the Site.
- Serving as the point of contact for safety and health matters.
- Ensuring that TurnKey-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/ subcontractor'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/subcontractor's HASP); using proper personal protective equipment (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 contractor(s) and/or subcontractor(s) who will be responsible for developing, implementing, and enforcing a HASP equally stringent or more stringent than TurnKey-Benchmark's HASP. TurnKey-Benchmark assumes no responsibility for the health and safety of anyone outside its direct employ. Each contractor/subcontractor's HASP shall cover all non-TurnKey-Benchmark Site personnel. Each contractor/subcontractor shall assign an SSHO who will coordinate with TurnKey-Benchmark's SSHO as necessary to ensure effective lines of communication and consistency between contingency plans.

In addition to TurnKey-Benchmark and contractor/subcontractor personnel, other individuals who may have responsibilities in the work zone include subcontractors and governmental agencies performing Site inspection work (i.e., the New York State Department of Environmental Conservation). The contractor/subcontractor 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 BCP Sites, 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 and incidental ingestion of soil/fill, and through the inhalation of contaminated particles or vapors, during test pit completion, monitoring well installation, and soil/fill excavation. In addition, the use of drilling and/or medium to large-sized construction equipment (e.g., excavators) 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 related to the former steel-manufacturing operations and facilities have resulted in elevated concentrations of VOCs, SVOCs, PCBs, and inorganic compounds in soil/fill 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.

- **Arsenic (CAS #7440-38-2)** is a naturally occurring element and is usually found combined with one or more elements, such as oxygen or sulfur. Inhalation is a more important exposure route than ingestion. First phase exposure symptoms include nausea, vomiting, diarrhea, and pain in the stomach. Prolonged contact is corrosive to the skin and mucus membranes. Arsenic is considered a Group A human carcinogen by the USEPA. Exposure via inhalation is associated with an increased risk of lung cancer. Exposure via the oral route is associated with an increased risk of skin cancer.
- **Benzene (CAS #71-43-2)** poisoning occurs most commonly through inhalation of the vapor; however, benzene can also penetrate the skin and poison in that way. Locally, benzene has a comparatively strong irritating effect, producing erythema and burning and, in more severe cases, edema and blistering. Exposure to high

concentrations of the vapor (i.e., 3,000 ppm or higher) may result in acute poisoning characterized by the narcotic action of benzene on the central nervous system. In acute poisoning, symptoms include confusion, dizziness, tightening of the leg muscles, and pressure over the forehead. Chronic exposure to benzene (i.e., long-term exposure to concentrations of 100 ppm or less) may lead to damage of the blood-forming system. Benzene is very flammable when exposed to heat or flame and can react vigorously with oxidizing materials.

- **Cadmium** is a natural element and is usually combined with one or more elements, such as oxygen, chloride, or sulfur. Breathing high levels of cadmium severely damages the lungs and can cause death. Ingestion of high levels of cadmium severely irritates the stomach, leading to vomiting and diarrhea. Long term exposure to lower levels of cadmium leads to a buildup of this substance in the kidneys and possible kidney disease. Other potential long term effects are lung damage and fragile bones. Cadmium is suspected to be a human carcinogen.
- **Chromium (CAS #7440-47-3)** is used in the production of stainless steel, chrome plated metals, and batteries. Two forms of chromium, hexavalent (CR+6) and trivalent (CR+3) are toxic. Hexavalent chromium is an irritant and corrosive to the skin and mucus membranes. Chromium is a potential occupational carcinogen. Acute exposures to dust may cause coughing, wheezing, headaches, pain and fever.
- **Ethylbenzene (CAS #100-41-4)** is a component of automobile gasoline. Over-exposure may cause kidney, skin liver and/or respiratory disease. Signs of exposure may include dermatitis, irritation of the eyes and mucus membranes, headache. Narcosis and coma may result in more severe cases.
- **Lead (CAS #7439-92-1)** can affect almost every organ and system in our bodies. The most sensitive is the central nervous system, particularly in children. Lead also damages kidneys and the immune system. The effects are the same whether it is breathed or swallowed. Lead may decrease reaction time, cause weakness in fingers, wrists, or ankles, and possibly affect memory. Lead may cause anemia.
- **Mercury (CAS #7439-97-6)** is used in industrial applications to produce caustic and chlorine, and in electrical control equipment and apparatus. Over-exposure to mercury may cause coughing, chest pains, bronchitis, pneumonia, indecision, headaches, fatigue, and salivation. Mercury is a skin and eye irritant.
- **Naphthalene (CAS #91-20-3)** is a white solid with a strong smell; is also called mothballs, moth flakes, white tar, and tar camphor. Naphthalene is a natural component of fossil fuels such as petroleum and coal; it is also formed when natural products such as wood or tobacco are burned. Acute exposure to naphthalene can cause systemic reactions, including nausea, headache, diaphoresis, hematuria, fever, anemia, liver damage, vomiting, convulsions, and coma. Acute exposure can also cause eye irritation, confusion, excitement, malaise, abdominal pain, irritation to the

bladder, profuse sweating, jaundice, hematopoietic, hemoglobinuria, renal shutdown, and dermatitis. Exposure to a large amount of naphthalene can cause red blood cells to be damaged or destroyed, a condition called hemolytic anemia, which leads to fatigue, lack of appetite, restlessness, and a pale appearance. Poisoning may occur by ingestion of large doses, skin and/or eye contact, inhalation, or skin absorption.

- **Polycyclic Aromatic Hydrocarbons (PAHs)** are formed because of pyrolysis and incomplete combustion of organic matter such as fossil fuel. PAH aerosols formed during the combustion process disperse throughout the atmosphere, resulting in the deposition of PAH condensate in soil, water and on vegetation. In addition, several products formed from petroleum processing operations (e.g., roofing materials and asphalt) also contain elevated levels of PAHs. Hence, these compounds are widely dispersed in the environment. PAHs are characterized by a molecular structure containing three or more fused, unsaturated carbon rings. Seven of the PAHs are classified by USEPA as probable human carcinogens (USEPA Class B2). These are: benzo(a)pyrene; benzo(a)anthracene; benzo(b)fluoranthene; benzo(k)fluoranthene; chrysene; dibenz(a,h)anthracene; and indeno(1,2,3-cd)pyrene. The primary route of exposure to PAHs is through incidental ingestion and inhalation of contaminated particulates. PAHs are characterized by an organic odor and exist as oily liquids in pure form. Acute exposure symptoms may include acne-type blemishes in areas of the skin exposed to sunlight.

- **Polychlorinated Biphenyls (PCBs)** are associated with former substations, rail yards, and hydraulic pump houses on the Site. PCBs can be absorbed into the body by inhalation of its aerosol, through the skin, and by ingestion. Repeated or prolonged contact with skin may cause dermatitis. PCBs may have effects on the liver. Animal tests show that PCBs possibly cause toxic effects in human reproduction. In the food chain, bioaccumulation takes place, specifically in aquatic organisms. A harmful contamination of the air will be reached rather slowly on evaporation of this substance at 20°C.

- **Toluene (CAS #108-88-3)** is a common component of paint thinners and automobile fuel. Acute exposure predominantly results in central nervous system depression. Symptoms include headache, dizziness, fatigue, muscular weakness, drowsiness, and coordination loss. Repeated exposures may cause removal of lipids from the skin, resulting in dry, fissured dermatitis.

- **Xylenes (o, m, and p) (CAS #95-47-6, 108-38-3, and 106-42-3)** are colorless, flammable liquids present in paint thinners and fuels. Acute exposure may cause central nervous system depression, resulting in headache, dizziness, fatigue, muscular weakness, drowsiness, and coordination loss. Repeated exposures may also cause removal of lipids from the skin, producing dry, fissured dermatitis.

Exposure of high concentrations of vapor may cause eye irritation and damage, as well as irritation of the mucus membranes.

With respect to the anticipated BCP 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

BCP investigation, remedial, and redevelopment activities at the Tecumseh Sites may present the following physical hazards:

- Physical injury during heavy construction equipment use, such as backhoes, excavators, drilling equipment, and tandem trucks.
- Heat/cold stress to employees during the summer/winter months (see Section 10.0).
- 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 investigation, remedial, and redevelopment activities at the Sites. 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.

3.3 Construction Related Hazards

Construction activities may include the following physical hazards:

- Fall Hazards (slip/trip)
- Excavations and Trenches
- Excavator Use/Overhead Work
- Other Heavy Equipment and Vehicle use
- Electrical Shock (overhead wires proximate to work area)
- Dewatering

3.3.1 Fall Hazards

Fall hazards will be mitigated for the duration of excavation activities by minimizing the area of soil/ground disturbance and keeping the work area reasonably clear of tripping hazards. Any ladders used during remedial/redevelopment activities will be inspected before use and checked to ensure the ladder is the correct type, correct length, and has a loading rating to support the required weight. Metal ladders or ladders with metallic components shall not be used around electrical equipment. Damaged or defective ladders will be discarded and replaced. Any stairways used during remedial/redevelopment activities will be inspected for dangerous objects and debris. Treads must cover the entire area of the staircase including steps and landings, and the stairways will be inspected to ensure they are not slippery. Stairways greater than 30 inches tall, or with at least four risers must have a handrail.

3.3.2 Excavation and Trenches

Prior to excavation, underground utility locations will be identified, and temporary construction fencing will be installed around the entire outside perimeter of the work area. At the end of each day, plywood or steel plate will be placed to cover any unfilled excavation, and the excavations will be securely closed off by the construction fencing. Trenching will be controlled to limit open excavation areas to only the length that can be backfilled in the same day to the extent feasible. For the duration of excavation activities, all personnel will keep their distance from the excavator, and only approach the excavator when it is still, from the front, and when eye contact is made with the operator. Trench boxes will be used to stabilize trenches and prevent cave-ins. <u>No one shall enter an excavation at any time for any reason</u>. Once each section of trench has been excavated, it will be inspected each day and after any event that may increase the hazard including rain events, vibrations, or excessive surcharge loads, to ensure continued stability until the trench has been filled. All excavation spoils and equipment will be placed at least 2 feet away from the edge of the trench.

3.3.3 Heavy Equipment and Vehicles

- Heavy equipment/vehicles to be used during construction activities include but are not limited to excavators, loaders, dozers, and dump trucks. All heavy equipment and vehicles will be inspected prior to use, during use, and at the end of the day to ensure they are working properly and do not need to be serviced. Heavy equipment safety procedures include those listed below. The service, parking, and emergency brake systems will be checked daily. All heavy equipment and vehicles must have a working horn, seats, seat belts, a windshield with safety glass (vehicles with cabs only), and rollover protective structures.

- All personnel will keep their distance from heavy equipment and vehicles when in use, and only approach the heavy equipment/vehicles when then are still, from the front, and when eye contact is made with the operator.
- Hearing protection should be worn by workers while heavy equipment and vehicles are in use to prevent hearing damage. Safety boots, high visibility vests or shirts, and safety glasses should always be worn in the vicinity of heavy equipment.
- All heavy equipment must always use an alarm when backing up.
- The work Site should be kept neat to prevent personnel from tripping and allow for fast emergency exit from the Site.
- Proper lighting must be provided when working at night. Some projects may only allow work to occur during daylight hours.
- 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.
- At night, all heavy equipment/vehicles left on Site will have lights and reflectors installed for visibility, and the parking brake must be used whenever stopped.

3.3.4 Excavator and Overhead Work

In addition to the requirements for heavy equipment use, the following safety precautions will be followed during use of excavators or other equipment that will involve overhead work:

- Prior to use, overhead utilities will be identified. Equipment must operate at least 10 feet away from any overhead electrical power line.
- Only qualified operators may operate the equipment. All preventative maintenance and repairs shall be up to date and performed only by qualified technicians. Loads will never be swung overhead of any worker or bystander or above the cab of a truck, and high visibility safety vests and hard hats will be worn by all workers. All personnel must stay outside the area of the excavator arm and bucket swing radius.
- Excavation beneath the equipment shall not be allowed.

- Only one person shall be in the cab at any time; no personnel shall ride in the bucket or use the bucket or arm as a personal support.
- When proceeding up an incline, extend the arm and carry the bucket close to the ground and rolled out. When proceeding down an incline carry the bucket low with its bottom parallel to the ground.
- Hand signals must be posted at the Site to ensure all workers understand the signals to be used by the operator and signal person.
- Movement of the equipment will be slow and gradual.

3.3.5 Electrical Shock

Electrical safety procedures must be followed to protect workers from surrounding utility lines. All overhead and underground utility lines must be located and identified. All personnel and equipment, including swing radii, must remain at least 10 feet away from any aboveground electrical lines. If the exact location of any underground utilities is in question, hand excavation may be completed followed by careful excavation using the backhoe once the utility is identified and located.

3.3.6 Dewatering

If the groundwater table is reached during excavation activities, the excavation must be dewatered to prevent it from filling with water and to prevent cave-ins. All water will be pumped directly into frac tanks, where the water will be treated and released to grade. No untreated water will be reused or discharged. Dewatering should be stopped if signs of erosion or instability are observed and should never be done during heavy rainfall.

4.0 TRAINING

4.1 Site Workers

All personnel performing investigation, remedial, and redevelopment activities at the Site (such as, but not limited to, equipment operators, general laborers, drillers, and supervisors) 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 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 TurnKey-Benchmark's Buffalo, NY office. Contractors/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 because of 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 (i.e., 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, 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/subcontractor's SSHO will provide a site-specific briefing to all Site visitors and other non-TurnKey-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 TurnKey-Benchmark employees as stipulated under 29CFR Part 1910.120(f). These exams include initial employment, annual and employment termination physicals for all TurnKey-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; 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 PPE. Such exams are performed as soon as possible following development of symptoms or the known exposure event.

Medical evaluations are performed by Health Works WNY, an occupational health care provider under contract with TurnKey-Benchmark. Health Works WNY's local facility is located at 1900 Ridge Road, West Seneca, New York 14224. The facility can be reached at (716) 712-0670 to schedule routine appointments or post-exposure examinations.

Medical evaluations are conducted according to the TurnKey-Benchmark Medical Monitoring Program and include an evaluation of the workers' ability to use respiratory protective 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. 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 yrs 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.

In conformance with OSHA regulations, TurnKey-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

All TurnKey-Benchmark employees shall conform to the following safe work practices during all 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 SSHO. 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 TurnKey-Benchmark occupational physician. Alcoholic beverage and illegal drug intake are strictly forbidden during the workday.
- All 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.
- All 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 TurnKey-Benchmark employees, as requested, and required.

The recommended specific safety practices for working around the contractor's equipment (e.g., backhoes, bulldozers, excavators, etc.) are discussed in Section 3.3.

7.0 COVID-19 SAFE WORK PRACTICES

All Benchmark-TurnKey employees shall conform to the following daily protocols during all on-site work activities for the duration of the COVID-19 outbreak:

- All work will be completed outside; a construction trailer and portable sanitary facilities will be provided. Nevertheless, if any TurnKey-Benchmark employee must enter a facility for any reason, the visit will be coordinated in advance and the employee will submit a visitor form for review and approval at least 48 hours in advance of the visit.
- TurnKey-Benchmark personnel shall complete and electronically submit to the corporate Health and Safety Director and/or his designee the daily health assessment form included as Appendix B. Any positive responses shall require evaluation prior to reporting for work. In addition, no employees or visitors shall be allowed on-site if they have traveled to a destination requiring mandatory quarantine (as established and updated by the NYS Governor's Office) and have not fulfilled the minimum quarantine duration requirements.
- Visitors shall complete a paper copy of the health assessment form included in Appendix B prior to accessing the work area or field trailer. The form shall be completed in advance when possible, otherwise it shall be completed in the visitor's personal vehicle or outside the work area with instruction that any positive responses require evaluation by TurnKey-Benchmark's corporate Health and Safety Director prior to allowing access to the Site. A visitor sign-in sheet will be filled out and maintained, with visitor health assessment forms, in the field trailer.
- TurnKey-Benchmark will ensure that there is an adequate supply of PPE, hand washing, and disinfecting chemicals at the Site. Supplies will be checked on a regular basis to avoid running out.
- All TurnKey-Benchmark employees must comply with the minimum 6-foot physical distancing whenever possible. When this cannot be accomplished, PPE (masks, gloves, and eye protection as needed) will be worn. Pre-shift or tailgate meetings will be held in a space large enough that employees can be 6 feet apart.
- For use in reducing exposure to COVID-19, the following face masks shall be used inside of equipment cabs and in the trailer:
    - Disposable surgical masks
    - KN-95
    - N-95
    - Self-made face mask provided it covers the nose and mouth
- All shared spaces, tools, and equipment will be disinfected at a minimum of once per shift or at the beginning and end of each shift or before equipment or space is

shared by another employee. Heavy equipment and vehicles should also be disinfected at the same frequency. This includes steering wheels, door handles, and all controls. Disinfection can be accomplished with a variety of different chemicals. Disinfectant wipes (e.g. Clorox wipes) or spray (e.g., Lysol) are acceptable as is 70% alcohol or bleach solution (1/4 cup bleach to 1 gallon water). Nitrile gloves and safety glasses are required during the handing of disinfection chemicals. At no time is it permitted to mix cleaning chemicals. Only one cleaner is to be used at a time. The Center for Disease Control (CDC) guidance on cleaning hard, non-porous surfaces is to:

  - Follow labeled instructions on all containers.
  - Clean surface with soap and water to remove all visible debris and stains.
  - Rinse surface with clean water and wipe with clean towel.
  - Apply the disinfectant. To effectively kill the virus, make sure the surface stays wet with the disinfectant for at least 10 minutes before wiping with a clean towel.
  - Rinse with water and allow surface to air dry.
  - Remove gloves and discard.
  - Wash hands after removing gloves and handling any contaminated material, trash, or waste.

- Physical distancing practices will be followed, and masks will always be worn if more than one person is inside the field trailer. A portable restroom will be set up on-site for TurnKey-Benchmark employee use. All surfaces in the field trailer and portable restroom will be disinfected at a minimum of once per shift or at the beginning and end of each shift or before equipment or space is shared by another employee.

8.0 PERSONAL PROTECTIVE EQUIPMENT

8.1 Equipment Selection

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 are designated A through D consistent with USEPA Level of Protection designation:

- **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.

8.2 Protection Ensembles

8.2.1 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.

8.2.2 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 and 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.

8.2.3 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.

8.2.4 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 Section 1.5, the minimum required levels of protection for these tasks are identified in Table 3. These requirements must be followed in addition to the COVID-19 PPE requirements as discussed in Section 7.0.

9.0 EXPOSURE MONITORING

9.1 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 2), 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.

9.1.1 On-Site Work Zone Monitoring

TurnKey-Benchmark personnel will conduct routine, real-time air monitoring during all intrusive construction phases such as excavation, backfilling, drilling, etc. The work area will be monitored at regular intervals using a photo-ionization detector (PID), combustible gas meter 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 TurnKey-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.

9.1.2 Off-Site Community Air Monitoring

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

Ground intrusive activities are defined by NYSDOH Appendix 1A Generic Community Air Monitoring Plan (Ref. 1) and attached as Appendix C. Ground intrusive activities include soil/waste excavation and handling; test pitting or trenching; and the installation of soil borings or monitoring wells. Non-intrusive activities include the collection of soil, sediment, or groundwater 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 monitoring 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 (e.g., on a curb of a busy street). The action levels below will be used during periodic monitoring. This will provide a real-time method for determination of substantial vapor and/or particulate releases to the surrounding community because of the Site work.

9.2 Monitoring Action Levels

9.2.1 On-Site Work Zone Action Levels

The PID, explosimeter, or other appropriate instrument(s), will be used by TurnKey-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 using a real-time particulate monitor as specified in this HASP. In the absence of such monitoring, appropriate respiratory protection for particulates shall be donned. Sustained readings obtained in the breathing zone may be interpreted (as compared to other Site conditions) as follows for TurnKey-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 explosimeter will be used to monitor levels of both combustible gases and oxygen during RD activities involving deep excavation, if required. Action levels based on the instrument readings shall be as follows:

- Less than 10% LEL - Continue engineering operations with caution.
- 10-25% LEL - Continuous monitoring with extreme caution, determine source/cause of elevated reading.
- Greater than 25% LEL - Explosion hazard, evaluate source and leave the Work Zone.
- 19.5-21% oxygen - Proceed with extreme caution; attempt to determine potential source of oxygen displacement.
- Less than 19.5% oxygen - Leave work zone immediately.
- 21-25% oxygen - Continue engineering operations with caution.
- Greater than 25% oxygen - Fire hazard potential, leave Work Zone immediately.

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

- Less than 50 $\mu g/m^3$ - Continue field operations.
- 50-150 $\mu g/m^3$ - Don dust/particulate mask or equivalent
- Greater than 150 $\mu g/m^3$ - Don dust/particulate mask or equivalent. Initiate engineering controls to reduce respirable dust concentration (i.e., wetting of excavated soils or tools at discretion of SSHO).

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

9.2.2 Community Air Monitoring Action Levels

In addition to the action levels prescribed in Section 9.2.1 for TurnKey-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 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 halted and monitoring continued. If the total organic vapor level readily decreases below 5 ppm over background, work activities can resume but more frequent intervals of monitoring, as directed by the SSHO, must be conducted.
  - If total organic vapors levels at the downwind perimeter of the work area persist at levels greater than 5 ppm over background but less than 25 ppm, work activities must be halted, corrective actions taken, and monitoring continued. After these steps, work activities can resume provided that the organic vapor level 200 feet downwind of the working area or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less (but in no case <20 feet), is below 5 ppm over background for the 15-minute average.
  - If the total organic vapor level is above 25 ppm at the perimeter of the work area, the SSHO must be notified and work activities shut down. The SSHO will determine when re-entry of the work area 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 15-miniute readings will be recorded and available for NYSDEC and NYSDOH personnel to review.

- **ORGANIC VAPOR CONTINGENCY MONITORING PLAN:**
  - If total organic vapor levels are greater than 5 ppm over background 200 feet downwind from the work area or half the distance to the nearest off-site residential/commercial structure (whichever is less), work activities must be halted.
  - If, following the cessation of the work activities or as the result of an emergency, total organic levels persist above 5 ppm above background 200 feet downwind or half the distance to the nearest off-site residential/ commercial structure 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 total 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 SSHO 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 SSHO.

  The following personnel are to be notified in the listed sequence if a 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 (μg/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 μg/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 μg/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 μg/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).

10.0 SPILL RELEASE/RESPONSE

This section 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 is to plan appropriate response, control, countermeasures, 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.

10.1 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 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 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 613, 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 613. 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.

The evaluation indicates that, based on Site history and decommissioning records, a hazardous material spill and/or a petroleum product spill is not likely to occur during remedial or redevelopment efforts.

10.2 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 as Appendix A of this HASP, will be implemented immediately if an emergency release occurs.

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.

10.3 Spill Response

For all 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/subcontractor 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 (i.e., 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: (800) 348-0316 or (716) 695-0161
- Allied Environmental Services: (800) 992-5781 or (716) 675-4570
- Environmental Products & Services of Vermont: (800) 577-4557 or (716) 597-0001

10.4 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 10.2. 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.

11.0 HEAT/COLD STRESS MONITORING

Since some of the work activities at the Site will be scheduled for both the summer and winter months, measures will be taken to minimize heat/cold stress to TurnKey-Benchmark employees. The SSHO and/or his or her designee will be responsible for monitoring TurnKey-Benchmark field personnel for symptoms of heat/cold stress.

11.1 Heat Stress Monitoring

PPE 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; and 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; and coma.

The monitoring of personnel wearing protective clothing should commence when the ambient temperature is 70°F 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 (bpm). If the rate is higher, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest periods remains the same. If the pulse rate is 100 bpm minute at the beginning of the next 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°F. 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°F 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°F. No TurnKey-Benchmark employee will be permitted to continue wearing semi-permeable or impermeable garments when his/her oral temperature exceeds 100.6°F.

11.2 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°F); 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 SSHO 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 workers 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°F with precipitation).
  - As a screening measure whenever anyone worker on-site develops hypothermia.

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

12.0 WORK ZONES AND SITE CONTROL

Work zones around the areas designated for construction activities will be established daily and communicated to all employees and other Site users by the SSHO. It shall be each contractor/subcontractor's SSHO's responsibility to ensure that all 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. The zone will be delineated by flagging tape. All personnel entering the Exclusion Zone must wear the prescribed level of PPE identified in Section 9.
- 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 all 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 if they are wearing the prescribed level of protection. Entrance of all personnel must be approved by the SSHO.

The SSHO will maintain a Health and Safety Logbook containing the names of TurnKey-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.

13.0 DECONTAMINATION

13.1 Decontamination for TurnKey-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. All TurnKey-Benchmark personnel on-site shall follow the procedure below, or the contractor/subcontractor'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.

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/subcontractor. 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 six consecutive months or longer, shower facilities will be provided for worker use in accordance with OSHA 29CFR 1910.120(n).

13.2 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."

13.3 Decontamination of Field Equipment

Decontamination of heavy equipment will be conducted by the contractor/ subcontractor in accordance with his approved HASP in the Contamination Reduction Zone. As a minimum, this will include manually removing heavy soil contamination, followed by steam cleaning on an impermeable pad.

Decontamination of all tools used for sample collection purposes will be conducted by TurnKey-Benchmark personnel. It is expected that all 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.
- Wash with water to remove all visible foreign matter.
- Wash with detergent.
- Rinse all parts with distilled-deionized water.
- Allow to air dry.
- Wrap all parts in aluminum foil or polyethylene.

14.0 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 TurnKey-Benchmark employees is not anticipated to be necessary to complete the investigation, remedial, and redevelopment activities identified in Section 1.5. 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 TurnKey-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 TurnKey-Benchmark's corporate Health and Safety Director. TurnKey-Benchmark employees shall not enter a confined space without these procedures and permits in place.

15.0 FIRE PREVENTION AND PROTECTION

15.1 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.

15.2 Equipment and Requirements

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

15.3 Flammable and Combustible Substances

All storage, handling, or use of flammable and combustible substances will be under the supervision of qualified persons. All 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 NFPA.

15.4 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.

16.0 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 as Figure A-1.

17.0 REFERENCE

1. New York State Department of Health. 2002. *Generic Community Air Monitoring Plan, Appendix 1A, DER-10 Technical Guidance for Site Investigation and Remediation*. May 2010.

TABLES

TABLE 1

TOXICITY DATA FOR CONSTITUENTS OF POTENTIAL CONCERN

Site-Wide Health and Safety Plan
Tecumseh Redevelopment BCP Sites
Lackawanna, New York

Parameter	Synonyms	CAS No.	Code	Concentration Limits [1]		
				PEL	TLV	IDLH
Volatile Organic Compounds (VOCs): ppm						
Benzene	Benzol, Phenyl hydride	71-43-2	Ca	1	0.5	500
Ethylbenzene	Ethylbenzol, Phenylethane	100-41-4	*none*	100	100	800
Toluene	Methyl benzene, Methyl benzol	108-88-3	C-300	200	50	500
Xylene, Total	o-, m-, p-isomers	1330-20-7	*none*	100	100	900
Polycyclic Aromatic Hydrocarbons (PAHs)[2]: ppm						
Acenaphthene	*none*	83-32-9	*none*	--	--	--
Acenaphthylene	*none*	208-96-8	*none*	--	--	--
Anthracene	*none*	120-12-7	*none*	--	--	--
Benz(a)anthracene	*none*	56-55-3	*none*	--	--	--
Benzo(a)pyrene	*none*	50-32-8	*none*	--	--	--
Benzo(b)fluoranthene	*none*	205-99-2	*none*	--	--	--
Benzo(ghi)perylene	*none*	191-24-2	*none*	--	--	--
Benzo(k)fluoranthene	*none*	207-08-9	*none*	--	--	--
Chrysene	*none*	218-01-9	*none*	--	--	--
Dibenz(ah)anthracene	*none*	53-70-3	*none*	--	--	--
Fluoranthene	*none*	206-44-0	*none*	--	--	--
Fluorene	*none*	86-73-7	*none*	--	--	--
Indeno(1,2,3-cd)pyrene	*none*	193-39-5	*none*	--	--	--
Naphthalene	Naphthalin, Tar camphor, White tar	91-20-3	*none*	10	10	250
Phenanthrene	*none*	85-01-8	*none*	--	--	--
Pyrene	*none*	129-00-0	*none*	--	--	--
Polychlorinated Inorganic Compounds: mg/m^3						
Aroclor 1242	Chlorodiphenyl, 42% chlorine	53469-21-9	Ca	--	--	--
Aroclor 1260	Chlorodiphenyl, 60% chlorine	11096-82-5	*none*	--	--	--
Inorganic Compounds: mg/m^3						
Arsenic	*none*	7440-38-2	Ca	0.01	0.01	5
Cadmium	*none*	7440-43-9	Ca	0.005	0.01	9
Chromium	*none*	7440-47-3	*none*	1	0.5	250
Lead	*none*	7439-92-1	*none*	0.05	0.15	100
Mercury	*none*	7439-97-6	C-0.1	0.1	0.05	10

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. Individual parameters listed are those most commonly detected at steel/coke manufacturing sites.
3. " -- " = 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 as yet been determined.
TLV = Threshold Limit Value, established by American Conference of Industrial Hygienists (ACGIH), equals the max. exposure concentration allowable for 8 hr/d @ 40 hr/wk.
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
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

TABLE 2

POTENTIAL ROUTES OF EXPOSURE TO CONSTITUENTS OF POTENTIAL CONCERN

Site-Wide Health and Safety Plan
Tecumseh Redevelopment BCP Sites
Lackawanna, New York

Activity [1]	Direct Contact with Soil/Fill	Inhalation of Vapors or Dust	Direct Contact with Groundwater
1. Pre-Construction	x	x	
2. Soil/Fill Excavation	x	x	x
3. Soil/Fill Documentation Sampling	x	x	
4. Groundwater and Surface Water Management	x		x
5. Subgrade Work	x	x	
6. Cover Soil Placement	x	x	
7. Groundwater Monitoring Well Installation, Development and Sampling	x	x	x
8. Groundwater Remediation	x	x	x

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

TABLE 3

REQUIRED LEVELS OF PROTECTION FOR BCP ACTIVITIES

Site-Wide Health and Safety Plan
Tecumseh Redevelopment BCP Sites
Lackawanna, New York

Activity	Respiratory Protection [1]	Clothing	Gloves [2]	Boots [2, 3]	Other Required PPE/Modifications [2, 4]
1. Pre-Construction	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	HH SGSS
2. Soil/Fill Excavation	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L	outer: L inner: STSS	HH SGSS
3. Soil/Fill Documentation Sampling	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L	outer: L inner: STSS	HH SGSS
4. Groundwater and Surface Water Management	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	HH SGSS
5. Subgrade Work	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L	outer: L inner: STSS	HH SGSS
6. Cover Soil Placement	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L	outer: L inner: STSS	HH SGSS
7. Groundwater Monitoring Well Installation, Development and Sampling	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	HH SGSS
8. Groundwater Remediation	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L	outer: L inner: STSS	HH SGSS

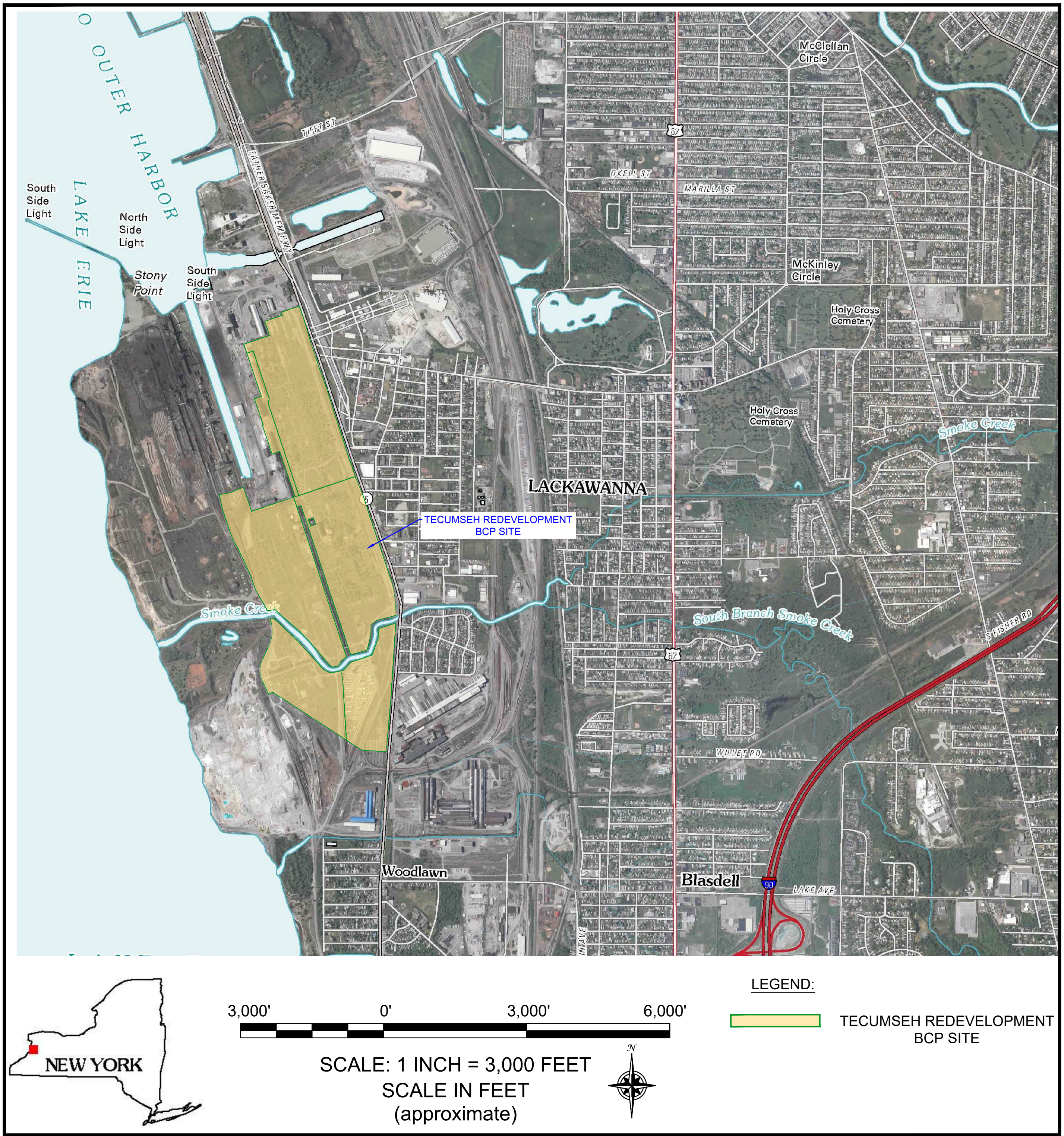
Notes:

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
2. HH = hardhat; L= Latex; L/N = latex inner glove/nitrile outer glove; N = Nitrile; S = Saranex; SG = safety glasses; SGSS = safety glasses w/ 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 or Site Safety Technician whenever potentially contaminated airborne particulates (i.e., dust) are present in significant amounts in the breathing zone. Goggles may be substituted with safety glasses w/side-shields whenever contact with contaminated liquids is not anticipated.

FIGURES

F:\CAD\TurnKey\Tecumseh Redevelopment\Brownfield Cleanup Program (BCP)\Site-Wide HASP\2020 Update\Figure 1; Site Location Plan.dwg, 10/12/2020 10:18:10 AM

FIGURE 1



LEGEND:

🟨	TECUMSEH REDEVELOPMENT BCP SITE

TurnKey Environmental Restoration, LLC IN ASSOCIATION WITH Benchmark Environmental Engineering & Science, PLLC

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

PROJECT NO.: 0071-014-630

DATE: OCTOBER 2020

DRAFTED BY: RFL

SITE LOCATION AND VICINITY MAP

SITE-WIDE HEALTH AND SAFETY PLAN

TECUMSEH LACKAWANNA SITE
LACKAWANNA, NEW YORK

PREPARED FOR
TECUMSEH REDEVELOPMENT INC.

***DISCLAIMER:* PROPERTY OF BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC. & TURNKEY ENVIRONMENTAL RESTORATION, LLC** *IMPORTANT: THIS DRAWING PRINT IS LOANED FOR MUTUAL ASSISTANCE AND AS SUCH IS SUBJECT TO RECALL AT ANY TIME. INFORMATION CONTAINED HEREON IS NOT TO BE DISCLOSED OR REPRODUCED IN ANY FORM FOR THE BENEFIT OF PARTIES OTHER THAN NECESSARY SUBCONTRACTORS & SUPPLIERS WITHOUT THE WRITTEN CONSENT OF BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC & TURNKEY ENVIRONMENTAL RESTORATION, LLC.*

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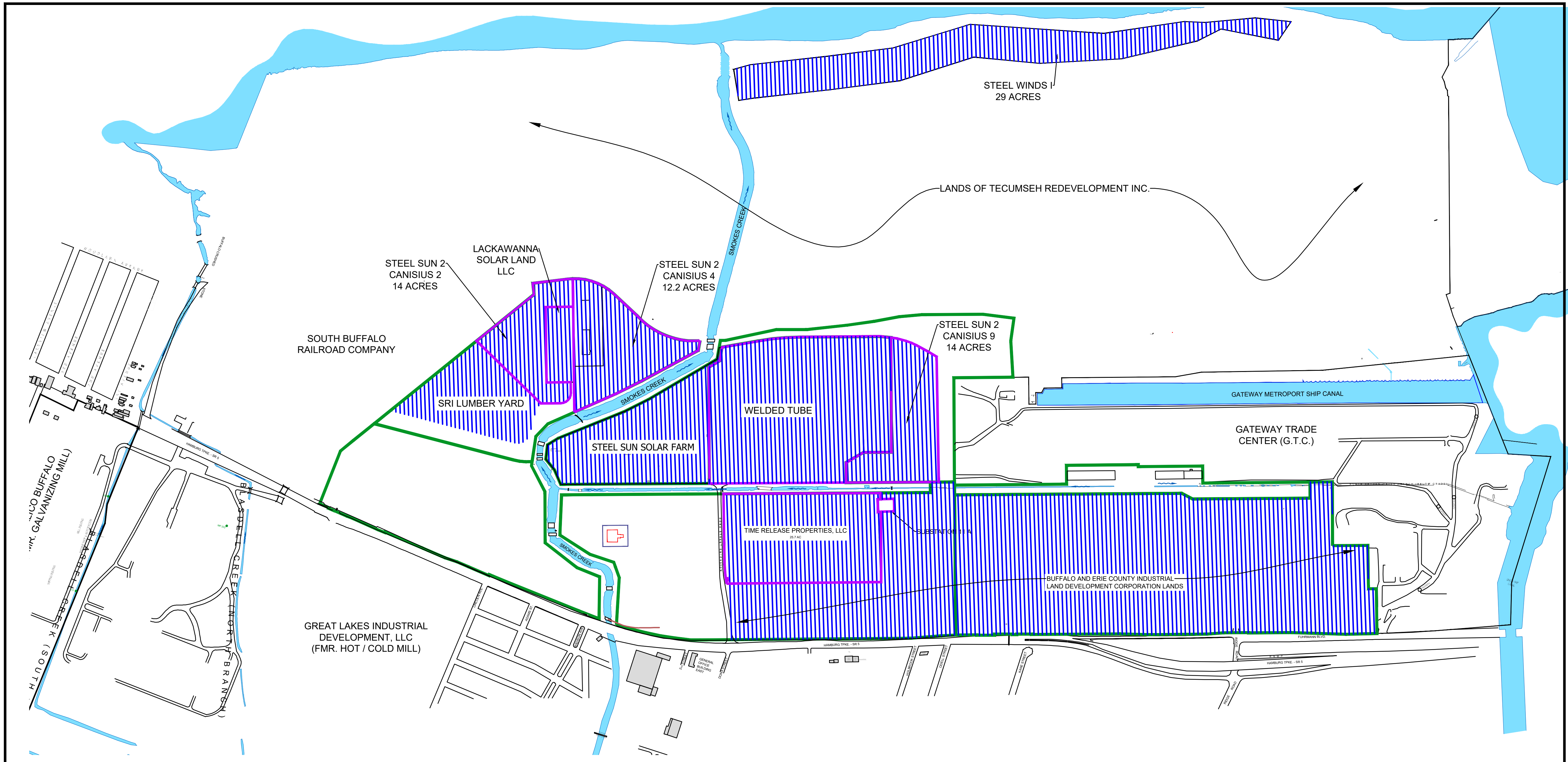

LEGEND:

🟪 PROPERTY BOUNDARIES

▥ BCP PARCELS OWNED BY OTHERS OR UNDER LONG-TERM LEASE.

🟩 BUSINESS PARK PHASE I, IA, II, III BOUNDARIES

1,000' 0' 1,000' 2,000'

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

DATE: OCTOBER 2020
DRAFTED BY: RFL

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

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

JOB NO.: 0071-014-630

SITE PLAN OF TECUMSEH PROPERTY

SITE-WIDE HEALTH AND SAFETY PLAN

TECUMSEH LACKAWANNA SITE
LACKAWANNA, NEW YORK

PREPARED FOR
TECUMSEH REDEVELOPMENT INC.

FIGURE 2

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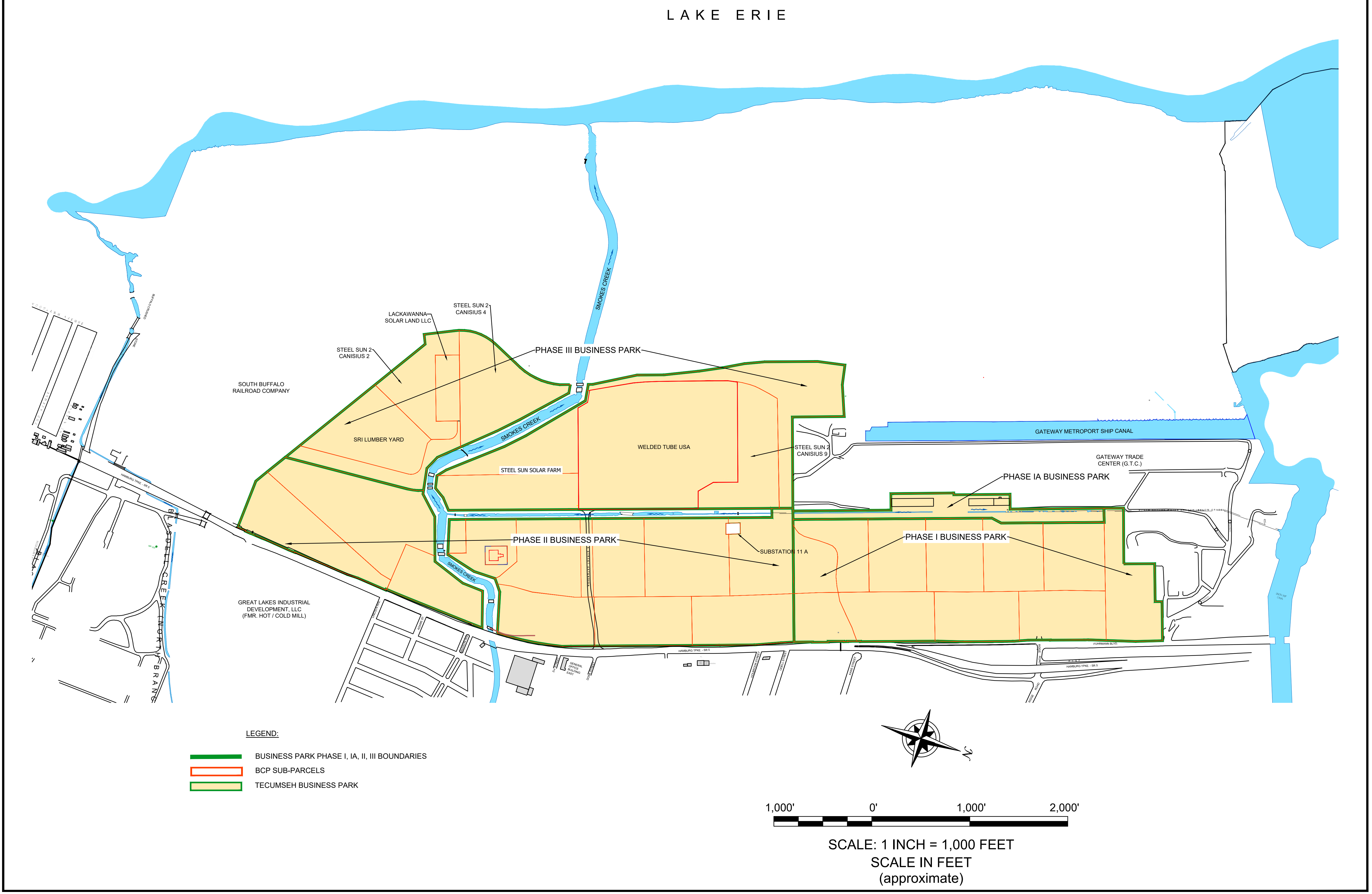
F:\CAD\TurnKey\Tecumseh Redevelopment\Brownfield Cleanup Program (BCP)\Site-Wide HASP\2020 Update\Figure 3; BCP Site Plan.dwg, 10/12/2020 2:10:17 PM



DATE: OCTOBER 2020
DRAFTED BY: RFL

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

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

JOB NO.: 0071-014-630

SITE PLAN OF BCP SITES

SITE-WIDE HEALTH AND SAFETY PLAN

TECUMSEH LACKAWANNA SITE
LACKAWANNA, NEW YORK

PREPARED FOR
TECUMSEH REDEVELOPMENT INC.

FIGURE 3

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APPENDIX A

EMERGENCY RESPONSE PLAN

EMERGENCY RESPONSE PLAN
for
BROWNFIELD CLEANUP PROGRAM

TECUMSEH REDEVELOPMENT BCP SITES
LACKAWANNA, NEW YORK

April 2010
Revised July 2013
Updated October 2020

0071-014-630

TECUMSEH REDEVELOPMENT BCP SITES
SITE-WIDE HEALTH AND SAFETY PLAN
APPENDIX A: EMERGENCY RESPONSE PLAN

TABLE OF CONTENTS

LIST OF FIGURES

1.0 GENERAL

This report presents the site-specific Emergency Response Plan (ERP) referenced in the Site-Wide Health and Safety Plan (HASP) prepared for BCP investigation, remedial, and redevelopment activities conducted at the Tecumseh Redevelopment BCP Sites in Lackawanna, New York. This ERP describes 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/subcontractors 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
2. Fire

Source of Emergency:

1. Slip/trip/fall
2. Fire

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 that off-site responders might require because of the hazards at this Site but not ordinarily stocked.

Any additional personal protective equipment (PPE) required and stocked for emergency response is also listed in 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 8.0 of the 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
Spill Response Kit	2	Benzol Yard ICM Treatment Building; Electric Stores Building
First Aid Kit	3	Site Vehicles; Benzol Yard ICM Treatment Building; Electric Stores Building
Chemical Fire Extinguisher	2 (minimum)	All heavy equipment and Site Vehicles

Emergency PPE	Quantity	Location
Full-face respirator	1 for each worker	Site Vehicles
Chemical-resistant suits	4 (minimum)	Site Vehicles

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 TurnKey-Benchmark personnel field vehicle.

5.0 EMERGENCY CONTACTS

The following identifies the emergency contacts for this ERP.

Emergency Telephone Numbers:

Project Manager: *Paul H. Werthman, P.E.*
Work: (716) 856-0635
Mobile: (716) 998-4151

Project Manager: *Thomas H. Forbes, P.E.*
Work: (716) 856-0599
Mobile: (716) 864-1730

Corporate Health and Safety Director: *Thomas H. Forbes, P.E.*
Work: (716) 856-0599
Mobile: (716) 864-1730

Site Safety and Health Officer (SSHO): *Brock M. Greene*
Work: (716) 856-0635
Mobile: (716) 225-3314

Alternate SSHO: *John T. Deth*
Work: (716) 856-0635
Mobile: (716) 863-0333

MERCY HOSPITAL (ER):	(716) 826-7000
FIRE:	911
AMBULANCE:	911
BUFFALO 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:

Tecumseh Redevelopment Inc.
2303 Hamburg Turnpike
Lackawanna, New York 14218
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 an adequate method of internal communication is understood by all personnel entering the site. Unless all 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 evacuation.
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 13.0 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 TurnKey-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 (or Alternate SSHO) so that appropriate action can be initiated. Contractors/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/subcontractor'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 (i.e., 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 the 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 Mercy Hospital (see Figure A-1):

The following directions describe the best route to Mercy Hospital:

- From the Dona Street Extension, turn left (north) onto Hamburg Turnpike (SR 5).
- Proceed north on Hamburg Turnpike (SR 5) to the Tifft Street Exit and turn right onto Tifft Street.
- Take Tifft Street east crossing South Park Avenue and McKinley Parkway. Bear left on Edgewood Avenue.
- Turn right on Abbott Road and Mercy Hospital will be on right hand side. Follow signs to emergency room (ER).

9.0 EMERGENCY RESPONSE CRITIQUE & RECORD KEEPING

Following an emergency, the SSHO and Project Manager shall review the effectiveness of this 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/subcontractor 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

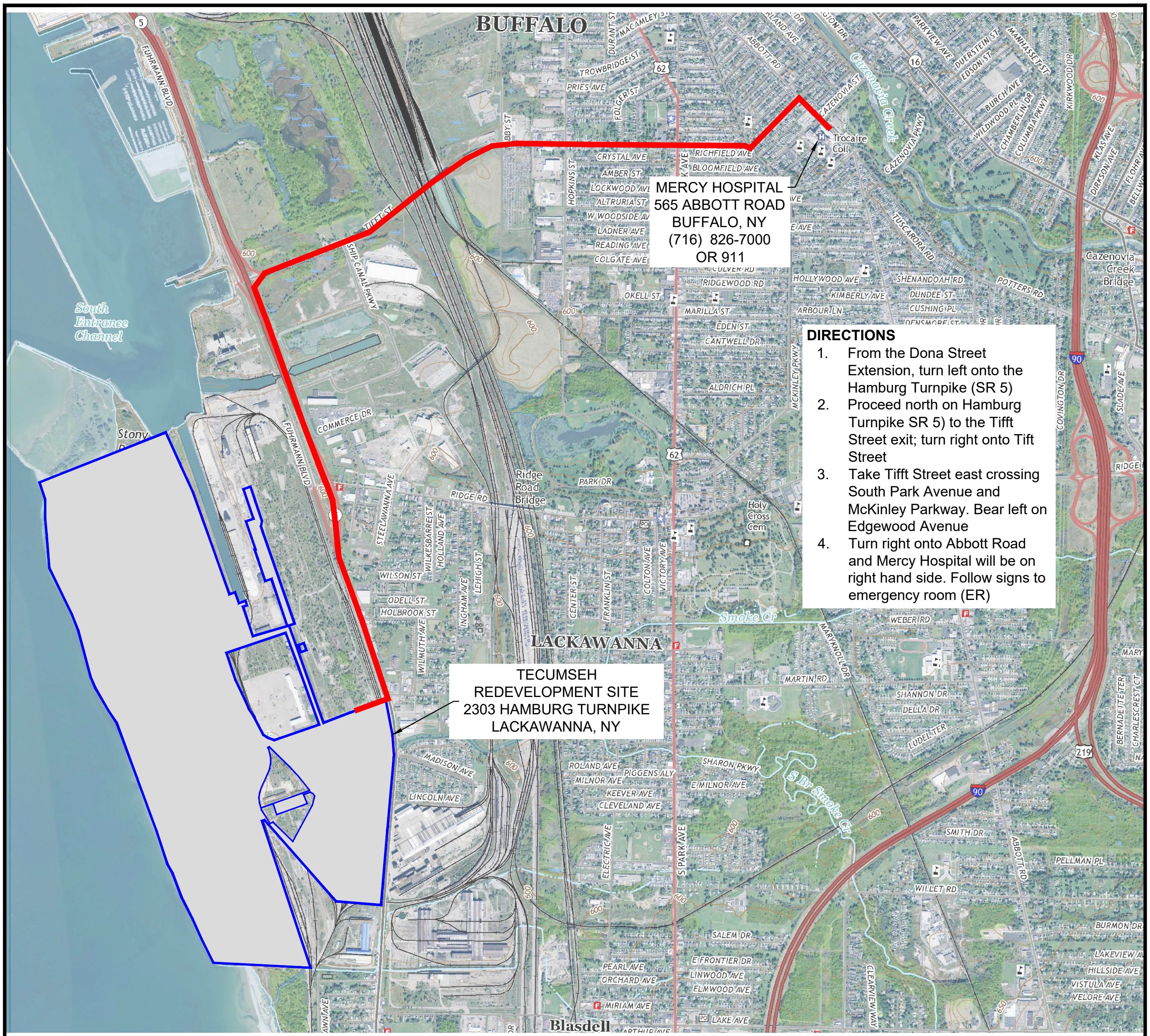
10.0 EMERGENCY RESPONSE TRAINING

All 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.

FIGURE

F:\CAD\TurnKey\Tecumseh Redevelopment\Brownfield Cleanup Program (BCP)\Site-Wide HASP\2020 Update\Figure A1; Hospital Route Map.dwg, 10/9/2020 3:18:42 PM

FIGURE 1



MERCY HOSPITAL
565 ABBOTT ROAD
BUFFALO, NY
(716) 826-7000
OR 911

DIRECTIONS
1. From the Dona Street Extension, turn left onto the Hamburg Turnpike (SR 5)
2. Proceed north on Hamburg Turnpike SR 5) to the Tifft Street exit; turn right onto Tifft Street
3. Take Tifft Street east crossing South Park Avenue and McKinley Parkway. Bear left on Edgewood Avenue
4. Turn right onto Abbott Road and Mercy Hospital will be on right hand side. Follow signs to emergency room (ER)

TECUMSEH
REDEVELOPMENT SITE
2303 HAMBURG TURNPIKE
LACKAWANNA, NY

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

N

LEGEND:

▭	TECUMSEH PROPERTY
▬	HOSPITAL ROUTE

TURNKEY ENVIRONMENTAL RESTORATION, LLC IN ASSOCIATION WITH BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

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

PROJECT NO.: 0071-014-630

DATE: OCTOBER 2020

DRAFTED BY: RFL

HOSPITAL ROUTE MAP

SITE-WIDE HEALTH AND SAFETY PLAN

TECUMSEH LACKAWANNA SITE
LACKAWANNA, NEW YORK

PREPARED FOR
TECUMSEH REDEVELOPMENT INC.

__DISCLAIMER:__ PROPERTY OF BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC. & TURNKEY ENVIRONMENTAL RESTORATION, LLC __IMPORTANT:__ THIS DRAWING PRINT IS LOANED FOR MUTUAL ASSISTANCE AND AS SUCH IS SUBJECT TO RECALL AT ANY TIME. INFORMATION CONTAINED HEREON IS NOT TO BE DISCLOSED OR REPRODUCED IN ANY FORM FOR THE BENEFIT OF PARTIES OTHER THAN NECESSARY SUBCONTRACTORS & SUPPLIERS WITHOUT THE WRITTEN CONSENT OF BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC & TURNKEY ENVIRONMENTAL RESTORATION, LLC.

APPENDIX B

PROJECT FORMS

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

TURNKEY
ENVIRONMENTAL
RESTORATION, LLC

Health Assessment Questionnaire

This form is to submitted daily prior to starting work. It is a mandatory DOH requirement. Electronic signatures or employee initials are sufficient for electronic submittal. In the event this form cannot be filled out a statement must be submitted indicating that the answers of each question.

Part 1: Employee Information
Name:

Part 2: Self-Declaration	
1	Have you travelled domestically (outside of NY State) or internationally in the last 14 days? ☐ Yes ☐ No
2	Have you been had close contact with anyone diagnosed with COVID-19 in the last 14 days? ☐ Yes ☐ No
3	Have you been in contact with anyone who has travelled domestically or internationally in the last 14 days? ☐ Yes ☐ No
4	Have you experienced any NEW cold or flu-like symptoms in the last 48 hours (to include fever greater than 100.4°F, cough, sore throat, respiratory illness, difficulty breathing, loss of taste or smell, muscle aches, nausea)? ☐ Yes ☐ No

If the answer to any of these questions is “yes”, you should return or remain at home and contact your supervisor immediately.

Part 3: Acknowledgement		
Name (Print)	**Signature**	**Date**

Part 4: Internal Assessment		
This form has been reviewed by:	Name:	Date:

Infectious Disease Visitor Questionnaire

The safety of our employees, customers, families, and visitors remain Benchmark-TurnKey's first priority. As the Coronavirus disease 2019 (COVID-19) outbreak continues to evolve, we will periodically update company guidance based on current recommendations from the CDC. Only business critical visitors are permitted at this time at our office location as well as any field offices. To prevent the spread of COVID-19 and reduce the potential risk of exposure to our workforce and visitors, we are conducting a simple screening questionnaire. Your participation is important to help us take precautionary measures to protect you and our staff.

Part 1: Visitor Information

Name:	
Organization Name:	Your Business Contact Information: Phone: Email:
Name of BMTK employee you are here to see:	
Purpose of Visit:	

Part 2: Self-Declaration by Visitor

1	Have you travelled domestically (outside of NY State) or internationally in the last 14 days? ☐ Yes ☐ No
2	Have you been had close contact with anyone diagnosed with COVID-19 in the last 14 days? ☐ Yes ☐ No
3	Have you been in contact with anyone who has travelled domestically or internationally in the last 14 days? ☐ Yes ☐ No
4	Have you experienced any cold or flu-like symptoms in the last 14 days (to include fever greater than 100.4°F, cough, sore throat, respiratory illness, difficulty breathing, loss of taste or smell, muscle aches, nausea)? ☐ Yes ☐ No

If the answer to any of these questions is "yes", access to the building or field office will be denied.

Part 3: Visitor Acknowledgement

Name (Print)	**Signature**	**Date**

Part 4: Internal Assessment

Access to building or field office: ☐ Approved ☐ Denied

TurnKey Environmental Restoration, LLC
Benchmark Environmental Engineering & Science, PLLC

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:

APPENDIX C

NYSDOH GENERIC COMMUNITY AIR MONITORING PLAN

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 C

FIELD OPERATING PROCEDURES

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

FIELD OPERATING PROCEDURES

Calibration and Maintenance of Portable Photoionization Detector (PID)

FOP 011.1

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

PURPOSE

This procedure describes a general method for the calibration and maintenance of a portable photoionization detector (PID). The PID detects and initially quantifies a reading of the volatile organic compound (VOC) concentration in air. The PID is used as a field-screening tool for initial evaluation of soil samples and for ambient air monitoring of compounds with ionization potentials (IP) less than the PID lamp electron voltage (eV) rating. The IP is the amount of energy required to move an electron to an infinite distance from the nucleus thus creating a positive ion plus an electron. It should be noted that all of the major components of air (i.e., carbon dioxide, methane, nitrogen, oxygen etc.) have IP's above 12 eV. As a result, they will not be ionized by the 9.8, 10.6, or 11.7 eV lamps typically utilized in field PIDs. The response of the PID will then be the sum of the organic and inorganic compounds in air that are ionized by the appropriate lamp (i.e., 9.8, 10.6 or 11.7 eV). Attached to this FOP is a table summarizing common organic compounds and their respective IPs.

Calibration is performed to verify instrument accuracy and function. All field instruments will be calibrated, verified and recalibrated at frequencies required by their respective operating manuals or manufacturer's specifications, but not less than once each day that the instrument is in use. Compound-specific calibration methods should be selected on a project-by-project basis to increase the accuracy of the instrument. The best way to calibrate a PID to different compounds is to use a standard of the gas of interest. However, correction factors have been determined that enable the user to quantify a large number of chemicals using only a single calibration gas, typically isobutylene. Field personnel should have access to all operating manuals for the instruments used for the field measurements. This procedure also documents critical maintenance activities for this meter.

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

Note: The information included below is equipment manufacturer- and model-specific, however, accuracy, calibration, and maintenance procedures for this type of portable equipment are typically similar. The information below pertains to the MiniRAE 2000 Portable VOC Monitor equipped with a 10.6 eV lamp. The actual equipment to be used in the field will be equivalent or similar. The following information is provided for general reference; the equipment-specific manufacturer's manual should be followed with precedence over this FOP.

Note: The PID indicates <u>total</u> VOC concentration readings that are normalized to a calibration standard, so actual quantification of individual compounds is not provided. In addition, the PID response to compounds is highly variable, dependent on ionization potential of the compound, and the presence or absence of other compounds.

ACCURACY

The MiniRAE 2000 is accurate to ± 2 ppm or 10% of the reading for concentrations ranging from 0-2,000 ppm and ± 20% of the reading at concentrations greater than 2,000 ppm. Response time is less than two seconds to 90 percent of full-scale. The operating temperature range is 0 to 45° C and the operating humidity range is 0 to 95 % relative humidity (non-condensing).

CALIBRATION PROCEDURE

The calibration method and correction factor, if applicable, will be selected on a project-by-project basis and confirmed with the Project Manager prior to the start of field work.

1. Calibrate all field test equipment at the beginning of each sampling day. Check and recalibrate the PID according to the manufacture's specifications.

2. Calibrate the PID using a compressed gas cylinder or equivalent containing the calibration standard, a flow regulator, and a tubing assembly. In addition, a compressed gas cylinder containing zero air ("clean" air) may be required if ambient air conditions do not permit calibration to "clean air".

3. Fill two Tedlar® bags equipped with a one-way valve with zero-air (if applicable) and the calibration standard gas.

4. Assemble the calibration equipment and actuate the PID in its calibration mode.

5. Select the appropriate calibration method. Calibration may be completed with two methods: 1) where the calibration standard gas is the same as the measurement gas (no correction factor is applied) or 2) where the calibration standard gas is not the same as the measurement gas and a correction factor will be applied. An isobutylene standard gas must be used as the calibration standard gas for the use of correction factors with the MiniRAE 2000. See below for additional instructions for calibration specific to use with or without correction factors.

<u>Calibrating Without a Correction Factor</u>

Navigate within the menu to select the "cal memory" for the specific calibration standard gas prior to calibration. The default gas selections for the MiniRAE 2000 are as follows:

Cal Memory #0	Isobutylene
Cal Memory #1	Hexane
Cal Memory #2	Xylene
Cal Memory #3	Benzene
Cal Memory #4	Styrene
Cal Memory #5	Toluene
Cal Memory #6	Vinyl Chloride
Cal Memory #7	Custom

The calibration standard gas for Cal Memory #1-7 may be toggled for selection of any of the approximately 100 preprogrammed calibration standard gases for use without an applied correction factor (i.e., the calibration gas must be the same as the measurement gas).

Calibrating With a Correction Factor

Navigate within the menu to select the "Cal Memory".

Select "Cal Memory #0" and toggle for selection of any of the approximately 100 preprogrammed chemicals. During calibration, the unit requests isobutylene gas and displays the isobutylene concentration immediately following calibration, but when the unit is returned to the normal reading mode, it displays the selected chemical and applies the correction factor.

If the pre-programmed list does not include the desired chemical or a user-defined measurement gas and correction factor is desired, toggle Cal Memory #0 to "user defined custom gas". A list of approximately 300 correction factors is attached in Technical Note 106 generated by MiniRAE.

6. Once the PID settings have been verified, connect the PID probe to the zero air calibration bag (or calibrate to ambient air if conditions permit) and wait for a stable indication.
7. Connect the PID probe to the calibration standard bag. Measure an initial reading of the standard and wait for a stable indication.
8. Keep the PID probe connected to the calibration standard bag, calibrate to applicable concentration (typically 100 ppm with isobutylene) with the standard and wait for a stable indication.
9. Document the calibration results and related information in the Project Field Book and on an **Equipment Calibration Log** (see attached sample), indicating the meter readings before and after the instrument has been adjusted. This is important, not only for data validation, but also to establish

maintenance schedules and component replacement. Information will include, at a minimum:

- Time, date and initials of the field team member performing the calibration
- The unique identifier for the meter, including manufacturer, model, and serial number
- The calibration standard and concentration
- Correction factors used, if any
- The brand and expiration date of the calibration standard gas
- The instrument readings: before and after calibration
- The instrument settings (if applicable)
- Pass or fail designation in accordance with the accuracy specifications presented above
- Corrective action taken (see Maintenance below) in the event of failure to adequately calibrate.

MAINTENANCE

- The probe and dust filter of the PID should be checked before and after every use for cleanliness. Should instrument response become unstable, recalibration should be performed. If this does not resolve the problem, access the photoionization bulb and clean with the manufacturer-supplied abrasive compound, then recalibrate.

- The PID battery must be recharged after each use. Store the PID in its carrying case when not in use. Additional maintenance details related to individual components of the PID are provided in the equipment manufacturer's instruction manual. If calibration or instrument performance is not in accordance with specifications, send the instrument to the equipment manufacturer for repair.

- Maintain a log for each monitoring instrument. Record all maintenance performed on the instrument on this log with date and name of the organization performing the maintenance.

ATTACHMENTS

Table 1; Summary of Ionization Potentials
Equipment Calibration Log (sample)
Technical Note TN-106

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
A		
2-Amino pyridine	8	
Acetaldehyde	10.21	
Acetamide	9.77	
Acetic acid	10.69	X
Acetic anhydride	10	
Acetone	9.69	
Acetonitrile	12.2	X
Acetophenone	9.27	
Acetyl bromide	10.55	
Acetyl chloride	11.02	X
Acetylene	11.41	X
Acrolein	10.1	
Acrylamide	9.5	
Acrylonitrile	10.91	X
Allyl alcohol	9.67	
Allyl chloride	9.9	
Ammonia	10.2	
Aniline	7.7	
Anisidine	7.44	
Anisole	8.22	
Arsine	9.89	
B		
1,3-Butadiene (butadiene)	9.07	
1-Bromo-2-chloroethane	10.63	X
1-Bromo-2-methylpropane	10.09	
1-Bromo-4-fluorobenzene	8.99	
1-Bromobutane	10.13	
1-Bromopentane	10.1	
1-Bromopropane	10.18	
1-Bromopropene	9.3	
1-Butanethiol	9.14	
1-Butene	9.58	
1-Butyne	10.18	
2,3-Butadione	9.23	
2-Bromo-2-methylpropane	9.89	
2-Bromobutane	9.98	
2-Bromopropane	10.08	

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
2-Bromothiophene	8.63	
2-Butanone (MEK)	9.54	
3-Bromopropene	9.7	
3-Butene nitrile	10.39	
Benzaldehyde	9.53	
Benzene	9.25	
Benzenethiol	8.33	
Benzonitrile	9.71	
Benzotrifluoride	9.68	
Biphenyl	8.27	
Boron oxide	13.5	X
Boron trifluoride	15.56	X
Bromine	10.54	
Bromobenzene	8.98	
Bromochloromethane	10.77	X
Bromoform	10.48	
Butane	10.63	X
Butyl mercaptan	9.15	
cis-2-Butene	9.13	
m-Bromotoluene	8.81	
n-Butyl acetate	10.01	
n-Butyl alcohol	10.04	
n-Butyl amine	8.71	
n-Butyl benzene	8.69	
n-Butyl formate	10.5	
n-Butyraldehyde	9.86	
n-Butyric acid	10.16	
n-Butyronitrile	11.67	X
o-Bromotoluene	8.79	
p-Bromotoluene	8.67	
p-tert-Butyltoluene	8.28	
s-Butyl amine	8.7	
s-Butyl benzene	8.68	
sec-Butyl acetate	9.91	
t-Butyl amine	8.64	
t-Butyl benzene	8.68	
trans-2-Butene	9.13	
C		

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	**Ionization Potential (eV)**	**Cannot be Read by 10.6 eV PID**
1-Chloro-2-methylpropane	10.66	X
1-Chloro-3-fluorobenzene	9.21	
1-Chlorobutane	10.67	X
1-Chloropropane	10.82	X
2-Chloro-2-methylpropane	10.61	X
2-Chlorobutane	10.65	X
2-Chloropropane	10.78	X
2-Chlorothiophene	8.68	
3-Chloropropene	10.04	
Camphor	8.76	
Carbon dioxide	13.79	X
Carbon disulfide	10.07	
Carbon monoxide	14.01	X
Carbon tetrachloride	11.47	X
Chlorine	11.48	X
Chlorine dioxide	10.36	
Chlorine trifluoride	12.65	X
Chloroacetaldehyde	10.61	X
α -Chloroacetophenone	9.44	
Chlorobenzene	9.07	
Chlorobromomethane	10.77	X
Chlorofluoromethane (Freon 22)	12.45	X
Chloroform	11.37	X
Chlorotrifluoromethane (Freon 13)	12.91	X
Chrysene	7.59	
Cresol	8.14	
Crotonaldehyde	9.73	
Cumene (isopropyl benzene)	8.75	
Cyanogen	13.8	X
Cyclohexane	9.8	
Cyclohexanol	9.75	
Cyclohexanone	9.14	
Cyclohexene	8.95	
Cyclo-octatetraene	7.99	
Cyclopentadiene	8.56	
Cyclopentane	10.53	
Cyclopentanone	9.26	
Cyclopentene	9.01	

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
Cyclopropane	10.06	
m-Chlorotoluene	8.83	
o-Chlorotoluene	8.83	
p-Chlorotoluene	8.7	
D		
1,1-Dibromoethane	10.19	
1,1-Dichloroethane	11.12	X
1,1-Dimethoxyethane	9.65	
1,1-Dimethylhydrazine	7.28	
1,2-Dibromoethene	9.45	
1,2-Dichloro-1,1,2,2-tetrafluoroethane (Freon 114)	12.2	X
1,2-Dichloroethane	11.12	X
1,2-Dichloropropane	10.87	X
1,3-Dibromopropane	10.07	
1,3-Dichloropropane	10.85	X
2,2-Dimethyl butane	10.06	
2,2-Dimethyl propane	10.35	
2,3-Dichloropropene	9.82	
2,3-Dimethyl butane	10.02	
3,3-Dimethyl butanone	9.17	
cis-Dichloroethene	9.65	
Decaborane	9.88	
Diazomethane	9	
Diborane	12	X
Dibromochloromethane	10.59	
Dibromodifluoromethane	11.07	X
Dibromomethane	10.49	
Dibutylamine	7.69	
Dichlorodifluoromethane (Freon 12)	12.31	X
Dichlorofluoromethane	12.39	X
Dichloromethane	11.35	X
Diethoxymethane	9.7	
Diethyl amine	8.01	
Diethyl ether	9.53	
Diethyl ketone	9.32	
Diethyl sulfide	8.43	
Diethyl sulfite	9.68	
Difluorodibromomethane	11.07	X

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
Dihydropyran	8.34	
Diiodomethane	9.34	
Diisopropylamine	7.73	
Dimethoxymethane (methylal)	10	
Dimethyl amine	8.24	
Dimethyl ether	10	
Dimethyl sulfide	8.69	
Dimethylaniline	7.13	
Dimethylformamide	9.18	
Dimethylphthalate	9.64	
Dinitrobenzene	10.71	X
Dioxane	9.19	
Diphenyl	7.95	
Dipropyl amine	7.84	
Dipropyl sulfide	8.3	
Durene	8.03	
m-Dichlorobenzene	9.12	
N,N-Diethyl acetamide	8.6	
N,N-Diethyl formamide	8.89	
N,N-Dimethyl acetamide	8.81	
N,N-Dimethyl formamide	9.12	
o-Dichlorobenzene	9.06	
p-Dichlorobenzene	8.95	
p-Dioxane	9.13	
trans-Dichloroethene	9.66	
E		
Epichlorohydrin	10.2	
Ethane	11.65	X
Ethanethiol (ethyl mercaptan)	9.29	
Ethanolamine	8.96	
Ethene	10.52	
Ethyl acetate	10.11	
Ethyl alcohol	10.48	
Ethyl amine	8.86	
Ethyl benzene	8.76	
Ethyl bromide	10.29	
Ethyl chloride (chloroethane)	10.98	X
Ethyl disulfide	8.27	

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
Ethyl ether	9.51	
Ethyl formate	10.61	X
Ethyl iodide	9.33	
Ethyl isothiocyanate	9.14	
Ethyl mercaptan	9.29	
Ethyl methyl sulfide	8.55	
Ethyl nitrate	11.22	X
Ethyl propionate	10	
Ethyl thiocyanate	9.89	
Ethylene chlorohydrin	10.52	
Ethylene diamine	8.6	
Ethylene dibromide	10.37	
Ethylene dichloride	11.05	X
Ethylene oxide	10.57	
Ethylenelmine	9.2	
Ethynylbenzene	8.82	
F		
2-Furaldehyde	9.21	
Fluorine	15.7	X
Fluorobenzene	9.2	
Formaldehyde	10.87	X
Formamide	10.25	
Formic acid	11.05	X
Freon 11 (trichlorofluoromethane)	11.77	X
Freon 112 (1,1,2,2-tetrachloro-1,2-difluoroethane)	11.3	X
Freon 113 (1,1,2-trichloro-1,2,2-trifluororethane)	11.78	X
Freon 114 (1,2-dichloro-1,1,2,2-tetrafluoroethane)	12.2	X
Freon 12 (dichlorodifluoromethane)	12.31	X
Freon 13 (chlorotrifluoromethane)	12.91	X
Freon 22 (chlorofluoromethane)	12.45	X
Furan	8.89	
Furfural	9.21	
m-Fluorotoluene	8.92	
o-Fluorophenol	8.66	
o-Fluorotoluene	8.92	
p-Fluorotoluene	8.79	
H		
1-Hexene	9.46	

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
2-Heptanone	9.33	
2-Hexanone	9.35	
Heptane	10.08	
Hexachloroethane	11.1	X
Hexane	10.18	
Hydrazine	8.1	
Hydrogen	15.43	X
Hydrogen bromide	11.62	X
Hydrogen chloride	12.74	X
Hydrogen cyanide	13.91	X
Hydrogen fluoride	15.77	X
Hydrogen iodide	10.38	
Hydrogen selenide	9.88	
Hydrogen sulfide	10.46	
Hydrogen telluride	9.14	
Hydroquinone	7.95	
I		
1-Iodo-2-methylpropane	9.18	
1-Iodobutane	9.21	
1-Iodopentane	9.19	
1-Iodopropane	9.26	
2-Iodobutane	9.09	
2-Iodopropane	9.17	
Iodine	9.28	
Iodobenzene	8.73	
Isobutane	10.57	
Isobutyl acetate	9.97	
Isobutyl alcohol	10.12	
Isobutyl amine	8.7	
Isobutyl formate	10.46	
Isobutyraldehyde	9.74	
Isobutyric acid	10.02	
Isopentane	10.32	
Isophorone	9.07	
Isoprene	8.85	
Isopropyl acetate	9.99	
Isopropyl alcohol	10.16	
Isopropyl amine	8.72	

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
Isopropyl benzene	8.69	
Isopropyl ether	9.2	
Isovaleraldehyde	9.71	
m-Iodotoluene	8.61	
o-Iodotoluene	8.62	
p-Iodotoluene	8.5	
K		
Ketene	9.61	
L		
2,3-Lutidine	8.85	
2,4-Lutidine	8.85	
2,6-Lutidine	8.85	
M		
2-Methyl furan	8.39	
2-Methyl napthalene	7.96	
1-Methyl napthalene	7.96	
2-Methyl propene	9.23	
2-Methyl-1-butene	9.12	
2-Methylpentane	10.12	
3-Methyl-1-butene	9.51	
3-Methyl-2-butene	8.67	
3-Methylpentane	10.08	
4-Methylcyclohexene	8.91	
Maleic anhydride	10.8	X
Mesityl oxide	9.08	
Mesitylene	8.4	
Methane	12.98	X
Methanethiol (methyl mercaptan)	9.44	
Methyl acetate	10.27	
Methyl acetylene	10.37	
Methyl acrylate	9.9	
Methyl alcohol	10.85	X
Methyl amine	8.97	
Methyl bromide	10.54	
Methyl butyl ketone	9.34	
Methyl butyrate	10.07	
Methyl cellosolve	9.6	
Methyl chloride	11.28	X

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
Methyl chloroform (1,1,1-trichloroethane)	11	X
Methyl disulfide	8.46	
Methyl ethyl ketone	9.53	
Methyl formate	10.82	X
Methyl iodide	9.54	
Methyl isobutyl ketone	9.3	
Methyl isobutyrate	9.98	
Methyl isocyanate	10.67	X
Methyl isopropyl ketone	9.32	
Methyl isothiocyanate	9.25	
Methyl mercaptan	9.44	
Methyl methacrylate	9.7	
Methyl propionate	10.15	
Methyl propyl ketone	9.39	
α -Methyl styrene	8.35	
Methyl thiocyanate	10.07	
Methylal (dimethoxymethane)	10	
Methylcyclohexane	9.85	
Methylene chloride	11.32	X
Methyl-n-amyl ketone	9.3	
Monomethyl aniline	7.32	
Monomethyl hydrazine	7.67	
Morpholine	8.2	
n-Methyl acetamide	8.9	
N		
1-Nitropropane	10.88	X
2-Nitropropane	10.71	X
Naphthalene	8.12	
Nickel carbonyl	8.27	
Nitric oxide, (NO)	9.25	
Nitrobenzene	9.92	
Nitroethane	10.88	X
Nitrogen	15.58	X
Nitrogen dioxide	9.78	
Nitrogen trifluoride	12.97	X
Nitromethane	11.08	X
Nitrotoluene	9.45	
p-Nitrochloro benzene	9.96	

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
O		
Octane	9.82	
Oxygen	12.08	X
Ozone	12.08	X
P		
1-Pentene	9.5	
1-Propanethiol	9.2	
2,4-Pentanedione	8.87	
2-Pentanone	9.38	
2-Picoline	9.02	
3-Picoline	9.02	
4-Picoline	9.04	
n-Propyl nitrate	11.07	X
Pentaborane	10.4	
Pentane	10.35	
Perchloroethylene	9.32	
Pheneloic	8.18	
Phenol	8.5	
Phenyl ether (diphenyl oxide)	8.82	
Phenyl hydrazine	7.64	
Phenyl isocyanate	8.77	
Phenyl isothiocyanate	8.52	
Phenylene diamine	6.89	
Phosgene	11.77	X
Phosphine	9.87	
Phosphorus trichloride	9.91	
Phthalic anhydride	10	
Propane	11.07	X
Propargyl alcohol	10.51	
Propiolactone	9.7	
Propionaldehyde	9.98	
Propionic acid	10.24	
Propionitrile	11.84	X
Propyl acetate	10.04	
Propyl alcohol	10.2	
Propyl amine	8.78	
Propyl benzene	8.72	
Propyl ether	9.27	

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
Propyl formate	10.54	
Propylene	9.73	
Propylene dichloride	10.87	X
Propylene imine	9	
Propylene oxide	10.22	
Propyne	10.36	
Pyridine	9.32	
Pyrrole	8.2	
Q		
Quinone	10.04	
S		
Stibine	9.51	
Styrene	8.47	
Sulfur dioxide	12.3	X
Sulfur hexafluoride	15.33	X
Sulfur monochloride	9.66	
Sulfuryl fluoride	13	X
T		
o-Terphenyls	7.78	
1,1,2,2-Tetrachloro-1,2-difluoroethane (Freon 112)	11.3	X
1,1,1-Trichloroethane	11	X
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	11.78	X
2,2,4-Trimethyl pentane	9.86	
o-Toluidine	7.44	
Tetrachloroethane	11.62	X
Tetrachloroethene	9.32	
Tetrachloromethane	11.47	X
Tetrahydrofuran	9.54	
Tetrahydropyran	9.25	
Thiolacetic acid	10	
Thiophene	8.86	
Toluene	8.82	
Tribromoethene	9.27	
Tribromofluoromethane	10.67	X
Tribromomethane	10.51	
Trichloroethene	9.45	
Trichloroethylene	9.47	
Trichlorofluoromethane (Freon 11)	11.77	X

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

Chemical Name	Ionization Potential (eV)	Cannot be Read by 10.6 eV PID
Trichloromethane	11.42	X
Triethylamine	7.5	
Trifluoromonobromo-methane	11.4	X
Trimethyl amine	7.82	
Tripropyl amine	7.23	
V		
o-Vinyl toluene	8.2	
Valeraldehyde	9.82	
Valeric acid	10.12	
Vinyl acetate	9.19	
Vinyl bromide	9.8	
Vinyl chloride	10	
Vinyl methyl ether	8.93	
W		
Water	12.59	X
X		
2,4-Xylidine	7.65	
m-Xylene	8.56	
o-Xylene	8.56	
p-Xylene	8.45	

EQUIPMENT CALIBRATION LOG

PROJECT INFORMATION:

Project Name: ______________________ Date: ______________________

Project No.: ______________________

Client: ______________________ Instrument Source: ☐ BM ☐ Rental

METER TYPE	UNITS	TIME	MAKE/MODEL	SERIAL NUMBER	CAL. BY	STANDARD	POST CAL. READING	SETTINGS
☐ pH meter	units		Myron L Company Ultra Meter 6P	606987		4.00		
						7.00		
						10.01		
☐ Turbidity meter	NTU		Hach 2100P Turbidimeter	970600014[illegible]		< 0.4		
						[illegible]		
						[illegible]00		
						800		
☐ Sp. Cond. meter	uS mS		Myron L Company Ultra Meter 6P	[illegible]		_______ mS @ 25 °C		
☐ PID	ppm		MinRAE 20[illegible]			open air zero		MIBK response factor = 1.0
						_____ ppm Iso. Gas		
☐ Dissolved Oxygen	ppm		YSI Model 5[illegible]	[illegible]				
☐ Particulate meter	mg/m^3					zero air		
☐ Oxygen	%					open air		
☐ Hydrogen sulfide	ppm					open air		
☐ Carbon monoxide	ppm					open air		
☐ LEL	%					open air		
☐ Radiation Meter	uR/H					background area		
☐								

ADDITIONAL REMARKS: ______________________

____

PREPARED BY: ______________________ **DATE:** ______________________

Technical Note TN-106

Revised 08/2010

Correction Factors, Ionization Energies*, And Calibration Characteristics

Correction Factors and Ionization Energies

RAE Systems PIDs can be used for the detection of a wide variety of gases that exhibit different responses. In general, any compound with ionization energy (IE) lower than that of the lamp photons can be measured.* The best way to calibrate a PID to different compounds is to use a standard of the gas of interest. However, correction factors have been determined that enable the user to quantify a large number of chemicals using only a single calibration gas, typically isobutylene. In our PIDs, correction factors can be used in one of three ways:

1) Calibrate the monitor with isobutylene in the usual fashion to read in isobutylene equivalents. Manually multiply the reading by the correction factor (CF) to obtain the concentration of the gas being measured.

2) Calibrate the unit with isobutylene in the usual fashion to read in isobutylene equivalents. Call up the correction factor from the instrument memory or download it from a personal computer and then call it up. The monitor will then read directly in units of the gas of interest.

3) Calibrate the unit with isobutylene, but input an equivalent, "corrected" span gas concentration when prompted for this value. The unit will then read directly in units of the gas of interest.

* *The term “ionization energy” is more scientifically correct and replaces the old term “ionization potential.” High-boiling (“heavy”) compounds may not vaporize enough to give a response even when their ionization energies are below the lamp photon energy. Some inorganic compounds like* H_2O_2 *and* NO_2 *give weak response even when their ionization energies are well below the lamp photon energy.*

Example 1:

With the unit calibrated to read isobutylene equivalents, the reading is 10 ppm with a 10.6 eV lamp. The gas being measured is butyl acetate, which has a correction factor of 2.6. Multiplying 10 by 2.6 gives an adjusted butyl acetate value of 26 ppm. Similarly, if the gas being measured were trichloroethylene (CF = 0.54), the adjusted value with a 10 ppm reading would be 5.4 ppm.

Example 2:

With the unit calibrated to read isobutylene equivalents, the reading is 100 ppm with a 10.6 eV lamp. The gas measured is m-xylene (CF = 0.43). After downloading this factor, the unit should read about 43 ppm when exposed to the same gas, and thus read directly in m-xylene values.

Example 3:

The desired gas to measure is ethylene dichloride (EDC). The CF is 0.6 with an 11.7 eV lamp. During calibration with 100 ppm isobutylene, insert 0.6 times 100, or 60 at the prompt for the calibration gas concentration. The unit then reads directly in EDC values.

Conversion to mg/m^3

To convert from ppm to mg/m^3, use the following formula:

$$\text{Conc. (mg/m}^3) = \frac{[\text{Conc.(ppmv) x mol. wt. (g/mole)}]}{\text{molar gas volume (L)}}$$

For air at 25 °C (77 °F), the molar gas volume is 24.4 L/mole and the formula reduces to:

$$\text{Conc.(mg/m}^3) = \text{Conc.(ppmv) x mol. wt. (g/mole) x 0.041}$$

For example, if the instrument is calibrated with a gas standard in ppmv, such as 100 ppm isobutylene, and the user wants the display to read in mg/m^3 of hexane, whose m.w. is 86 and CF is 4.3, the overall correction factor would be 4.3 x 86 x 0.041 equals 15.2.

Correction Factors for Mixtures

The correction factor for a mixture is calculated from the sum of the mole fractions Xi of each component divided by their respective correction factors CFi:

$$CFmix = 1 / (X_1/CF_1 + X_2/CF_2 + X_3/CF_3 + ... Xi/CFi)$$

Thus, for example, a vapor phase mixture of 5% benzene and 95% n-hexane would have a CFmix of CFmix = 1 / (0.05/0.53 + 0.95/4.3) = 3.2. A reading of 100 would then correspond to 320 ppm of the total mixture, comprised of 16 ppm benzene and 304 ppm hexane.

For a spreadsheet to compute the correction factor and TLV of a mixture see the appendix at the end of the CF table.

TLVs and Alarm Limits for Mixtures

The correction factor for mixtures can be used to set alarm limits for mixtures. To do this one first needs to calculate the exposure limit for the mixture. The Threshold Limit Value (TLV) often defines exposure limits. The TLV for the mixture is calculated in a manner similar to the CF calculation:

$$\text{TLV mix} = 1 / (X_1/\text{TLV}_1 + X_2/\text{TLV}_2 + X_3/\text{TLV}_3 + \ldots X_i/\text{TLV}_i)$$

In the above example, the 8-h TLV for benzene is 0.5 ppm and for n-hexane 50 ppm. Therefore the TLV of the mixture is TLVmix = 1 / (0.05/0.5 + 0.95/50) = 8.4 ppm, corresponding to 8.0 ppm hexane and 0.4 ppm benzene. For an instrument calibrated on isobutylene, the reading corrsponding to the TLV is:

$$\text{Alarm Reading} = \text{TLVmix} / \text{CFmix} = 8.4 / 3.2 = 2.6 \text{ ppm}$$

A common practice is to set the lower alarm limit to half the TLV, and the higher limit to the TLV. Thus, one would set the alarms to 1.3 and 2.6 ppm, respectively.

Calibration Characteristics

a) Flow Configuration. PID response is essentially independent of gas flow rate as long as it is sufficient to satisfy the pump demand. Four main flow configurations are used for calibrating a PID:

1) **Pressurized gas cylinder (Fixed-flow regulator):** The flow rate of the regulator should match the flow demand of the instrument pump or be slightly higher.
2) **Pressurized gas cylinder (Demand-flow regulator):** A demand-flow regulator better matches pump speed differences, but results in a slight vacuum during calibration and thus slightly high readings.
3) **Collapsible gas bag:** The instrument will draw the calibration gas from the bag at its normal flow rate, as long as the bag valve is large enough. The bag should be filled with enough gas to allow at least one minute of flow (~ 0.6 L for a MiniRAE, ~0.3 L for MultiRAE).
4) **T (or open tube) method:** The T method uses a T-junction with gas flow higher than the pump draw. The gas supply is connected to one end of the T, the instrument inlet is connected to a second end of the T, and excess gas flow escapes through the third, open end of the T. To prevent ambient air mixing, a long tube should be connected to the open end, or a high excess rate should be used. Alternatively, the instrument probe can be inserted into an open tube slightly wider than the probe. Excess gas flows out around the probe.

The first two cylinder methods are the most efficient in terms of gas usage, while the bag and T methods give slightly more accurate results because they match the pump flow better.

b) Pressure. Pressures deviating from atmospheric pressure affect the readings by altering gas concentration and pump characteristics. It is best to calibrate with the instrument and calibration gas at the same pressure as each other and the sample gas. (Note that the cylinder pressure is not relevant because the regulator reduces the pressure to ambient.) If the instrument is calibrated at atmospheric pressure in one of the flow configurations described above, then 1) pressures slightly above ambient are acceptable but high pressures can damage the pump and 2) samples under vacuum may give low readings if air leaks into the sample train.

c) Temperature. Because temperature effects gas density and concentration, the temperature of the calibration gas and instrument should be as close as possible to the ambient temperature where the unit will be used. We recommend that the temperature of the calibration gas be within the instrument's temperature specification (typically 14° to 113° F or -10° to 45° C). Also, during actual measurements, the instrument should be kept at the same or higher temperature than the sample temperature to avoid condensation in the unit.

d) Matrix. The matrix gas of the calibration compound and VOC sample is significant. Some common matrix components, such as methane and water vapor can affect the VOC signal. PIDs are most commonly used for monitoring VOCs in air, in which case the preferred calibration gas matrix is air. For a MiniRAE, methane, methanol, and water vapor reduce the response by about 20% when their concentration is 15,000 ppm and by about 40% at 30,000 ppm. Despite earlier reports of oxygen effects, RAE PID responses with 10.6 eV lamps are independent of oxygen concentration, and calibration gases in a pure nitrogen matrix can be used. H_2 and CO_2 up to 5 volume % also have no effect.

e) Concentration. Although RAE Systems PIDs have electronically linearized output, it is best to calibrate in a concentration range close to the actual measurement range. For example, 100 ppm standard gas for anticipated vapors of 0 to 250 ppm, and 500 ppm standard for expected concentrations of 250 to 1000 ppm. The correction factors in this table were typically measured at 50 to 100 ppm and apply from the ppb range up to about 1000 ppm. Above 1000 ppm the CF may vary and it is best to calibrate with the gas of interest near the concentration of interest.

f) Filters. Filters affect flow and pressure conditions and therefore all filters to be used during sampling should also be in place during calibration. Using a water trap (hydrophobic filter) greatly reduces the chances of drawing water aerosols or dirt particles into the instrument. Regular filter replacements are recommended because dirty filters can adsorb VOCs and cause slower response time and shifts in calibration.

g) Instrument Design. High-boiling (“heavy”) or very reactive compounds can be lost by reaction or adsorption onto materials in the gas sample train, such as filters, pumps and other sensors. Multi-gas meters, including EntryRAE, MultiRAE and AreaRAE have the pump and other sensors upstream of the PID and are prone to these losses. Compounds possibly affected by such losses are shown in green in the table, and may give slow response, or in extreme cases, no response at all. In many cases the multi-gas meters can still give a rough indication of the relative concentration, without giving an accurate, quantitative reading. The ppbRAE and MiniRAE series instruments have inert sample trains and therefore do not exhibit significant loss; nevertheless, response may be slow for the very heavy compounds and additional sampling time up to a minute or more should be allowed to get a stable reading.

Table Abbreviations:

CF = Correction Factor (multiply by reading to get corrected value for the compound when calibrated to isobutylene)
NR= No Response
IE = Ionization Energy (values in parentheses are not well established)
C = Confirmed Value indicated by “+” in this column; all others are preliminary or estimated values and are subject to change
ne = Not Established ACGIH 8-hr. TWA
C## = Ceiling value, given where 8-hr.TWA is not available

Disclaimer:

Actual readings may vary with age and cleanliness of lamp, relative humidity, and other factors. For accurate work, the instrument should be calibrated regularly under the operating conditions used. The factors in this table were measured in dry air at room temperature, typically at 50-100 ppm. CF values may vary above about 1000 ppm.

Updates:

The values in this table are subject to change as more or better data become available. Watch for updates of this table on the Internet at **http://www.raesystems.com**

IE data are taken from the CRC Handbook of Chemistry and Physics, 73rd Edition, D.R. Lide (Ed.), CRC Press (1993) and NIST Standard Ref. Database 19A, NIST Positive Ion Energetics, Vers. 2.0, Lias, et.al., U.S. Dept. Commerce (1993). Exposure limits (8-h TWA and Ceiling Values) are from the 2005 ACGIH Guide to Occupational Exposure Values, ACGIH, Cincinnati, OH 2005. Equations for exposure limits for mixtures of chemicals were taken from the 1997 TLVs and BEIs handbook published by the ACGIH (1997).

Compound Name	Synonym/Abbreviation	CAS No.	Formula	9.8	C	10.6	C	11.7	C	IE (eV)	TWA
Acetaldehyde		75-07-0	C_2H_4O	NR	+	6	+	3.3	+	10.23	C25
Acetic acid	Ethanoic Acid	64-19-7	$C_2H_4O_2$	NR	+	22	+	2.6	+	10.66	10
Acetic anhydride	Ethanoic Acid Anhydride	108-24-7	$C_4H_6O_3$	NR	+	6.1	+	2.0	+	10.14	5
Acetone	2-Propanone	67-64-1	C_3H_6O	1.2	+	1.1	+	1.4	+	9.71	500
Acetone cyanohydrin	2-Hydroxyisobutyronitrile	75-86-5	C_4H_7NO					4	+	11.1	C5
Acetonitrile	Methyl cyanide, Cyanomethane	75-05-8	C_2H_3N					100		12.19	40
Acetylene	Ethyne	74-86-2	C_2H_2					2.1	+	11.40	ne
Acrolein	Propenal	107-02-8	C_3H_4O	42	+	3.9	+	1.4	+	10.10	0.1
Acrylic acid	Propenoic Acid	79-10-7	$C_3H_4O_2$			12	+	2.0	+	10.60	2
Acrylonitrile	Propenenitrile	107-13-1	C_3H_3N			NR	+	1.2	+	10.91	2
Allyl alcohol		107-18-6	C_3H_6O	4.5	+	2.4	+	1.6	+	9.67	2
Allyl chloride	3-Chloropropene	107-05-1	C_3H_5Cl			4.3		0.7		9.9	1
Ammonia		7664-41-7	H_3N	NR	+	9.7	+	5.7	+	10.16	25
Amyl acetate	mix of n-Pentyl acetate & 2-Methylbutyl acetate	628-63-7	$C_7H_{14}O_2$	11	+	2.3	+	0.95	+	<9.9	100
Amyl alcohol	1-Pentanol	75-85-4	$C_5H_{12}O$			5		1.6		10.00	ne
Aniline	Aminobenzene	62-53-3	C_7H_7N	0.50	+	0.48	+	0.47	+	7.72	2
Anisole	Methoxybenzene	100-66-3	C_7H_8O	0.89	+	0.58	+	0.56	+	8.21	ne
Arsine	Arsenic trihydride	7784-42-1	AsH_3			1.9	+			9.89	0.05
Benzaldehyde		100-52-7	C_7H_6O					1		9.49	ne
Benzenamine, N-methyl-	N-Methylphenylamine	100-61-8	C_7H_9N			0.7				7.53	
Benzene		71-43-2	C_6H_6	0.55	+	0.53	+	0.6	+	9.25	0.5
Benzonitrile	Cyanobenzene	100-47-0	C_7H_5N			1.6				9.62	ne
Benzyl alcohol	α-Hydroxytoluene, Hydroxymethylbenzene, Benzenemethanol	100-51-6	C_7H_8O	1.4	+	1.1	+	0.9	+	8.26	ne
Benzyl chloride	α-Chlorotoluene, Chloromethylbenzene	100-44-7	C_7H_7Cl	0.7	+	0.6	+	0.5	+	9.14	1
Benzyl formate	Formic acid benzyl ester	104-57-4	$C_8H_8O_2$	0.9	+	0.73	+	0.66	+		ne
Boron trifluoride		7637-07-2	BF_3	NR		NR		NR		15.5	C1
Bromine		7726-95-6	Br_2	NR	+	1.30	+	0.74	+	10.51	0.1
Bromobenzene		108-86-1	C_6H_5Br			0.6		0.5		8.98	ne
2-Bromoethyl methyl ether		6482-24-2	C_3H_7OBr			0.84	+			~10	ne
Bromoform	Tribromomethane	75-25-2	$CHBr_3$	NR	+	2.5	+	0.5	+	10.48	0.5
Bromopropane,1-	n-Propyl bromide	106-94-5	C_3H_7Br	150	+	1.5	+	0.6	+	10.18	ne
Butadiene	1,3-Butadiene, Vinyl ethylene	106-99-0	C_4H_6	0.8		0.85	+	1.1		9.07	2
Butadiene diepoxide, 1,3-	1,2,3,4-Diepoxybutane	298-18-0	$C_4H_6O_2$	25	+	3.5	+	1.2		~10	ne
Butanal	1-Butanal	123-72-8	C_4H_8O			1.8				9.84	
Butane		106-97-8	C_4H_{10}			67	+	1.2		10.53	800
Butanol, 1-	Butyl alcohol, n-Butanol	71-36-3	$C_4H_{10}O$	70	+	4.7	+	1.4	+	9.99	20
Butanol, t-	tert-Butanol, t-Butyl alcohol	75-65-0	$C_4H_{10}O$	6.9	+	2.9	+			9.90	100
Butene, 1-	1-Butylene	106-98-9	C_4H_8			0.9				9.58	ne
Butoxyethanol, 2-	Butyl Cellosolve, Ethylene glycol monobutyl ether	111-76-2	$C_6H_{14}O_2$	1.8	+	1.2	+	0.6	+	<10	25
Butoxyethanol acetate	Ethanol, 2-(2-butoxyethoxy)-, acetate	124-17-4	$C_{10}H_{20}O_4$			5.6				≤10.6	
Butoxyethoxyethanol	2-(2-Butoxyethoxy)ethanol	112-34-5	$C_8H_{18}O_3$			4.6				≤10.6	
Butyl acetate, n-		123-86-4	$C_6H_{12}O_2$			2.6	+			10	150
Butyl acrylate, n-	Butyl 2-propenoate, Acrylic acid butyl ester	141-32-2	$C_7H_{12}O_2$			1.6	+	0.6	+		10
Butylamine, n-		109-73-9	$C_4H_{11}N$	1.1	+	1.1	+	0.7	+	8.71	C5
Butyl cellosolve	see 2-Butoxyethanol	111-76-2									
Butyl hydroperoxide, t-		75-91-2	$C_4H_{10}O_2$	2.0	+	1.6	+			<10	1
Butyl mercaptan	1-Butanethiol	109-79-5	$C_4H_{10}S$	0.55	+	0.52	+			9.14	0.5
Carbon disulfide		75-15-0	CS_2	4	+	1.2	+	0.44		10.07	10
Carbon tetrachloride	Tetrachloromethane	56-23-5	CCl_4	NR	+	NR	+	1.7	+	11.47	5
Carbonyl sulfide	Carbon oxysulfide	463-58-1	COS							11.18	
Cellosolve see 2-Ethoxyethanol											
CFC-14 see Tetrafluoromethane											
CFC-113 see 1,1,2-Trichloro-1,2,2-trifluoroethane											

Compound Name	Synonym/Abbreviation	CAS No.	Formula	9.8	C	10.6	C	11.7	C	IE (eV)	TWA
Chlorine		7782-50-5	Cl_2					1.0	+	11.48	0.5
Chlorine dioxide		10049-04-4	ClO_2	NR	+	NR	+	NR	+	10.57	0.1
Chlorobenzene	Monochlorobenzene	108-90-7	C_6H_5Cl	0.44	+	0.40	+	0.39	+	9.06	10
Chlorobenzotrifluoride, 4-	PCBTF, OXSOL 100 p-Chlorobenzotrifluoride	98-56-6	$C_7H_4ClF_3$	0.74	+	0.63	+	0.55	+	<9.6	25
Chloro-1,3-butadiene, 2-	Chloroprene	126-99-8	C_4H_5Cl			3					10
Chloro-1,1-difluoroethane, 1-	HCFC-142B, R-142B	75-68-3	$C_2H_3ClF_2$	NR		NR		NR		12.0	ne
Chlorodifluoromethane	HCFC-22, R-22	75-45-6	$CHClF_2$	NR		NR		NR		12.2	1000
Chloroethane	Ethyl chloride	75-00-3	C_2H_5Cl	NR	+	NR	+	1.1	+	10.97	100
Chloroethanol	Ethylene chlrohydrin	107-07-3	C_2H_5ClO					2.9		10.52	C1
Chloroethyl ether, 2-	bis(2-chloroethyl) ether	111-44-4	$C_4H_8Cl_2O$	8.6	+	3.0	+				5
Chloroethyl methyl ether, 2-	Methyl 2-chloroethyl ether	627-42-9	C_3H_7ClO			3					ne
Chloroform	Trichloromethane	67-66-3	$CHCl_3$	NR	+	NR	+	3.5	+	11.37	10
Chloro-2-methylpropene, 3-	Methallyl chloride, Isobutenyl chloride	563-47-3	C_4H_7Cl	1.4	+	1.2	+	0.63	+	9.76	ne
Chloropicrin		76-06-2	CCl_3NO_2	NR	+	~400	+	7	+	?	0.1
Chlorotoluene, o-	o-Chloromethylbenzene	95-49-8	C_7H_7Cl			0.5		0.6		8.83	50
Chlorotoluene, p-	p-Chloromethylbenzene	106-43-4	C_7H_7Cl					0.6		8.69	ne
Chlorotrifluoroethene	CTFE, Chlorotrifluoroethylene Genetron 1113	79-38-9	C_2ClF_3	6.7	+	3.9	+	1.2	+	9.76	5
Chlorotrimethylsilane		75-77-4	C_3H_9ClSi	NR		NR		0.82	+	10.83	ne
Cresol, m-	m-Hydroxytoluene	108-39-4	C_7H_8O	0.57	+	0.50	+	0.57	+	8.29	5
Cresol, o-	o-Hydroxytoluene	95-48-7	C_7H_8O			1.0				8.50	
Cresol, p-	p-Hydroxytoluene	106-44-5	C_7H_8O			1.4				8.35	
Crotonaldehyde	*trans*-2-Butenal	123-73-9 4170-30-3	C_4H_6O	1.5	+	1.1	+	1.0	+	9.73	2
Cumene	Isopropylbenzene	98-82-8	C_9H_{12}	0.58	+	0.54	+	0.4	+	8.73	50
Cyanogen bromide		506-68-3	$CNBr$	NR		NR		NR		11.84	ne
Cyanogen chloride		506-77-4	$CNCl$	NR		NR		NR		12.34	C0.3
Cyclohexane		110-82-7	C_6H_{12}	3.3	+	1.4	+	0.64	+	9.86	300
Cyclohexanol	Cyclohexyl alcohol	108-93-0	$C_6H_{12}O$	1.5	+	0.9	+	1.1	+	9.75	50
Cyclohexanone		108-94-1	$C_6H_{10}O$	1.0	+	0.9	+	0.7	+	9.14	25
Cyclohexene		110-83-8	C_6H_{10}			0.8	+			8.95	300
Cyclohexylamine		108-91-8	$C_6H_{13}N$			1.2				8.62	10
Cyclopentane 85% 2,2-dimethylbutane 15%		287-92-3	C_5H_{10}	NR	+	15	+	1.1		10.33	600
Cyclopropylamine	Aminocyclpropane	765-30-0	C_3H_7N	1.1	+	0.9	+	0.9	+		ne
Decamethylcyclopentasiloxane		541-02-6	$C_{10}H_{30}O_5Si_5$	0.16	+	0.13	+	0.12	+		ne
Decamethyltetrasiloxane		141-62-8	$C_{10}H_{30}O_3Si_4$	0.17	+	0.13	+	0.12	+	<10.2	ne
Decane		124-18-5	$C_{10}H_{22}$	4.0	+	1.4	+	0.35	+	9.65	ne
Diacetone alcohol	4-Methyl-4-hydroxy-2-pentanone	123-42-2	$C_6H_{12}O_2$			0.7					50
Dibromochloromethane	Chlorodibromomethane	124-48-1	$CHBr_2Cl$	NR	+	5.3	+	0.7	+	10.59	ne
Dibromo-3-chloropropane, 1,2-	DBCP	96-12-8	$C_3H_5Br_2Cl$	NR	+	1.7	+	0.43	+		0.001
Dibromoethane, 1,2-	EDB, Ethylene dibromide, Ethylene bromide	106-93-4	$C_2H_4Br_2$	NR	+	1.7	+	0.6	+	10.37	ne
Dichlorobenzene, o-	1,2-Dichlorobenzene	95-50-1	$C_6H_4Cl_2$	0.54	+	0.47	+	0.38	+	9.08	25
Dichlorodifluoromethane	CFC-12	75-71-8	CCl_2F_2			NR	+	NR	+	11.75	1000
Dichlorodimethylsilane		75-78-5	$C_2H_6Cl_2Si$	NR		NR		1.1	+	>10.7	ne
Dichloroethane, 1,2-	EDC, 1,2-DCA, Ethylene dichloride	107-06-2	$C_2H_4Cl_2$			NR	+	0.6	+	11.04	10
Dichloroethene, 1,1-	1,1-DCE, Vinylidene chloride	75-35-4	$C_2H_2Cl_2$			0.82	+	0.8	+	9.79	5
Dichloroethene, c-1,2-	*c*-1,2-DCE, *cis*-Dichloroethylene	156-59-2	$C_2H_2Cl_2$			0.8				9.66	200
Dichloroethene, t-1,2-	*t*-1,2-DCE, *trans*-Dichloroethylene	156-60-5	$C_2H_2Cl_2$			0.45	+	0.34	+	9.65	200
Dichloro-1-fluoroethane, 1,1-	R-141B	1717-00-6	$C_2H_3Cl_2F$	NR	+	NR	+	2.0	+		ne
Dichloromethane	see Methylene chloride										

Compound Name	Synonym/Abbreviation	CAS No.	Formula	9.8	C	10.6	C	11.7	C	IE (eV)	TWA
Dichloropentafluoropropane	AK-225, mix of ~45% 3,3-dichloro-1,1,1,2,2-pentafluoro-propane (HCFC-225ca) & ~55% 1,3-Dichloro-1,1,2,2,3-pentafluoropropane (HCFC-225cb)	442-56-0 507-55-1	$C_3HCl_2F_5$	NR	+	NR	+	25	+		ne
Dichloropropane, 1,2-		78-87-5	$C_3H_6Cl_2$					0.7		10.87	75
Dichloro-1-propene, 1,3-		542-75-6	$C_3H_4C_{12}$	1.3	+	0.96	+			<10	1
Dichloro-1-propene, 2,3-		78-88-6	$C_3H_4Cl_2$	1.9	+	1.3	+	0.7	+	<10	ne
Dichloro-1,1,1-trifluoroethane, 2,2-	R-123	306-83-2	$C_2HCl_2F_3$	NR	+	NR	+	10.1	+	11.5	ne
Dichloro-2,4,6-trifluoropyridine, 3,5-	DCTFP	1737-93-5	$C_5Cl_2F_3N$	1.1	+	0.9	+	0.8	+		ne
Dichlorvos *	Vapona; O,O-dimethyl O-dichlorovinyl phosphate	62-73-7	$C_4H_7Cl_2O_4P$			0.9	+			<9.4	0.1
Dicyclopentadiene	DCPD, Cyclopentadiene dimer	77-73-6	$C_{10}H_{12}$	0.57	+	0.48	+	0.43	+	8.8	5
Diesel Fuel		68334-30-5	m.w. 226			0.9	+				11
Diesel Fuel #2 (Automotive)		68334-30-5	m.w. 216	1.3		0.7	+	0.4	+		11
Diethylamine		109-89-7	$C_4H_{11}N$			1	+			8.01	5
Diethylaminopropylamine, 3-		104-78-9	$C_7H_{18}N_2$			1.3					ne
Diethylbenzene	See Dowtherm J										
Diethylmaleate		141-05-9	$C_8H_{12}O_4$			4					ne
Diethyl sulfide	see Ethyl sulfide										
Diglyme	See Methoxyethyl ether	111-96-6	$C_6H_{14}O_3$								
Diisobutyl ketone	DIBK, 2,2-dimethyl-4-heptanone	108-83-8	$C_9H_{18}O$	0.71	+	0.61	+	0.35	+	9.04	25
Diisopropylamine		108-18-9	$C_6H_{15}N$	0.84	+	0.74	+	0.5	+	7.73	5
Diketene	Ketene dimer	674-82-8	$C_4H_4O_2$	2.6	+	2.0	+	1.4	+	9.6	0.5
Dimethylacetamide, N,N-	DMA	127-19-5	C_4H_9NO	0.87	+	0.8	+	0.8	+	8.81	10
Dimethylamine		124-40-3	C_2H_7N			1.5				8.23	5
Dimethyl carbonate	Carbonic acid dimethyl ester	616-38-6	$C_3H_6O_3$	NR	+	~70	+	1.7	+	~10.5	ne
Dimethyl disulfide	DMDS	624-92-0	$C_2H_6S_2$	0.2	+	0.20	+	0.21	+	7.4	ne
Dimethyl ether	see Methyl ether										
Dimethylethylamine	DMEA	598-56-1	$C_4H_{11}N$	1.1	+	1.0	+	0.9	+	7.74	~3
Dimethylformamide, N,N-	DMF	68-12-2	C_3H_7NO	0.7	+	0.7	+	0.8	+	9.13	10
Dimethylhydrazine, 1,1-	UDMH	57-14-7	$C_2H_8N_2$			0.8	+	0.8	+	7.28	0.01
Dimethyl methylphosphonate	DMMP, methyl phosphonic acid dimethyl ester	756-79-6	$C_3H_9O_3P$	NR	+	4.3	+	0.74	+	10.0	ne
Dimethyl sulfate		77-78-1	$C_2H_6O_4S$	~23		~20	+	2.3	+		0.1
Dimethyl sulfide	see Methyl sulfide										
Dimethyl sulfoxide	DMSO, Methyl sulfoxide	67-68-5	C_2H_6OS			1.4	+			9.10	ne
Dioxane, 1,4-		123-91-1	$C_4H_8O_2$			1.3				9.19	25
Dioxolane, 1,3-	Ethylene glycol formal	646-06-0	$C_3H_6O_2$	4.0	+	2.3	+	1.6	+	9.9	20
Dowtherm A see Therminol® *											
Dowtherm J (97% Diethylbenzene) *		25340-17-4	$C_{10}H_{14}$			0.5					
DS-108F Wipe Solvent	Ethyl lactate/Isopar H/ Propoxypropanol ~7:2:1	97-64-3 64742-48-9 1569-01-3	m.w. 118	3.3	+	1.6	+	0.7	+		ne
Epichlorohydrin	ECH Chloromethyloxirane, 1-chloro2,3-epoxypropane	106-89-8	C_2H_5ClO	~200	+	8.5	+	1.4	+	10.2	0.5
Ethane		74-84-0	C_2H_6			NR	+	15	+	11.52	ne
Ethanol	Ethyl alcohol	64-17-5	C_2H_6O			10	+	3.1	+	10.47	1000
Ethanolamine *	MEA, Monoethanolamine	141-43-5	C_2H_7NO	5.6	+	1.6	+			8.96	3
Ethene	Ethylene	74-85-1	C_2H_4			9	+	4.5	+	10.51	ne
Ethoxyethanol, 2-	Ethyl cellosolve	110-80-5	$C_4H_{10}O_2$			1.3				9.6	5
Ethyl acetate		141-78-6	$C_4H_8O_2$			4.6	+	3.5		10.01	400
Ethyl acetoacetate		141-97-9	$C_6H_{10}O_3$	1.4	+	1.2	+	1.0	+	<10	ne
Ethyl acrylate		140-88-5	$C_5H_8O_2$			2.4	+	1.0	+	<10.3	5
Ethylamine		75-04-7	C_2H_7N			0.8				8.86	5

Compound Name	Synonym/Abbreviation	CAS No.	Formula	9.8	C	10.6	C	11.7	C	IE (Ev)	TWA
Ethylbenzene		100-41-4	C_8H_{10}	0.52	+	0.52	+	0.51	+	8.77	100
Ethyl caprylate	Ethyl octanoate	106-32-1	$C_{10}H_{20}O_2$		+	0.52	+	0.51	+		
Ethylenediamine	1,2-Ethanediamine; 1,2-Diaminoethane	107-15-3	$C_2H_8N_2$	0.9	+	0.8	+	1.0	+	8.6	10
Ethylene glycol *	1,2-Ethanediol	107-21-1	$C_2H_6O_2$			16	+	6	+	10.16	C100
Ethylene glycol, Acrylate	2-hydroxyethyl Acrylate	818-61-1	$C_5H_8O_3$			8.2				≤10.6	
Ethylene glycol dimethyl ether	1,2-Dimethoxyethane, Monoglyme	110-71-4	$C_4H_{10}O_2$	1.1		0.86		0.7		9.2	ne
Ethylene glycol monobutyl ether acetate	2-Butoxyethyl acetate	112-07-2	$C_8H_{16}O_3$			1.3				≤10.6	
Ethylene glycol, monothio	mercapto-2-ethanol	60-24-2	C_2H_6OS			1.5				9.65	
Ethylene oxide	Oxirane, Epoxyethane	75-21-8	C_2H_4O			13	+	3.5	+	10.57	1
Ethyl ether	Diethyl ether	60-29-7	$C_4H_{10}O$			1.1	+	1.7		9.51	400
Ethyl 3-ethoxypropionate	EEP	763-69-9	$C_7H_{14}O_3$	1.2	+	0.75	+				ne
Ethyl formate		109-94-4	$C_3H_6O_2$					1.9		10.61	100
Ethylhexyl □acrylate, 2-	Acrylic acid 2-ethylhexyl ester	103-11-7	$C_{11}H_{20}O_2$			1.1	+	0.5	+		ne
Ethylhexanol	2-Ethyl-1-hexanol	104-76-7	C8$H_{18}O$			1.9				≤10.6	
Ethylidenenorbornene	5-Ethylidene bicyclo(2,2,1)hept-2-ene	16219-75-3	C_9H_{12}	0.4	+	0.39	+	0.34	+	≤8.8	ne
Ethyl (S)-(-)-lactate see also DS-108F	Ethyl lactate, Ethyl (S)-(-)-hydroxypropionate	687-47-8 97-64-3	$C_5H_{10}O_3$	13	+	3.2	+	1.6	+	~10	ne
Ethyl mercaptan	Ethanethiol	75-08-1	C_2H_6S	0.60	+	0.56	+			9.29	0.5
Ethyl sulfide	Diethyl sulfide	352-93-2	$C_4H_{10}S$			0.5	+			8.43	ne
Formaldehyde	Formalin	50-00-0	CH_2O	NR	+	NR	+	1.6	+	10.87	C0.3
Formamide		75-12-7	CH_3NO			6.9	+	4		10.16	10
Formic acid		64-18-6	CH_2O_2	NR	+	NR	+	9	+	11.33	5
Furfural	2-Furaldehyde	98-01-1	$C_5H_4O_2$			0.92	+	0.8	+	9.21	2
Furfuryl alcohol		98-00-0	$C_5H_6O_2$			0.80	+			<9.5	10
Gasoline #1		8006-61-9	m.w. 72			0.9	+				300
Gasoline #2, 92 octane		8006-61-9	m.w. 93	1.3	+	1.0	+	0.5	+		300
Glutaraldehyde	1,5-Pentanedial, Glutaric dialdehyde	111-30-8	$C_5H_8O_2$	1.1	+	0.8	+	0.6	+		C0.05
Glycidyl methacrylate	2,3-Epoxypropyl methacrylate	106-91-2	$C_7H_{10}O_3$	2.6	+	1.2	+	0.9	+		0.5
Halothane	2-Bromo-2-chloro-1,1,1-trifluoroethane	151-67-7	$C_2HBrClF_3$					0.6		11.0	50
HCFC-22 see Chlorodifluoromethane											
HCFC-123 see 2,2-Dichloro-1,1,1-trifluoroethane											
HCFC-141B see 1,1-Dichloro-1-fluoroethane											
HCFC-142B see 1-Chloro-1,1-difluoroethane											
HCFC-134A see 1,1,1,2-Tetrafluoroethane											
HCFC-225 see Dichloropentafluoropropane											
Heptane, n-		142-82-5	C_7H_{16}	45	+	2.8	+	0.60	+	9.92	400
Heptanol, 4-	Dipropylcarbinol	589-55-9	$C_7H_{16}O$	1.8	+	1.3	+	0.5	+	9.61	ne
Hexamethyldisilazane, 1,1,1,3,3,3- *	HMDS	999-97-3	$C_6H_{19}NSi_2$			0.2	+	0.2	+	~8.6	ne
Hexamethyldisiloxane	HMDSx	107-46-0	$C_6H_{18}OSi_2$	0.33	+	0.27	+	0.25	+	9.64	ne
Hexane, n-		110-54-3	C_6H_{14}	350	+	4.3	+	0.54	+	10.13	50
Hexanol, 1-	Hexyl alcohol	111-27-3	$C_6H_{14}O$	9	+	2.5	+	0.55	+	9.89	ne
Hexene, 1-		592-41-6	C_6H_{12}			0.8				9.44	30
HFE-7100 see Methyl nonafluorobutyl ether											
Histoclear (Histo-Clear)	Limonene/corn oil reagent		m.w. ~136	0.5	+	0.4	+	0.3	+		ne
Hydrazine *		302-01-2	H_4N_2	>8	+	2.6	+	2.1	+	8.1	0.01
Hydrazoic acid	Hydrogen azide		HN_3							10.7	
Hydrogen	Synthesis gas	1333-74-0	H_2	NR	+	NR	+	NR	+	15.43	ne
Hydrogen cyanide	Hydrocyanic acid	74-90-8	HCN	NR	+	NR	+	NR	+	13.6	C4.7
Hydrogen iodide *	Hydriodic acid	10034-85-2	HI			~0.6*				10.39	
Hydrogen peroxide		7722-84-1	H_2O_2	NR	+	NR	+	NR	+	10.54	1
Hydrogen sulfide		7783-06-4	H_2S	NR	+	3.3	+	1.5	+	10.45	10
Hydroxypropyl methacrylate		27813-02-1 923-26-2	$C_7H_{12}O_3$	9.9	+	2.3	+	1.1	+		ne
Iodine *		7553-56-2	I_2	0.1	+	0.1	+	0.1	+	9.40	C0.1

Compound Name	Synonym/Abbreviation	CAS No.	Formula	9.8	C	10.6	C	11.7	C	IE (eV)	TWA
Iodomethane	Methyl iodide	74-88-4	CH_3I	0.21	+	0.22	+	0.26	+	9.54	2
Isoamyl acetate	Isopentyl acetate	123-92-2	$C_7H_{14}O_2$	10.1		2.1		1.0		<10	100
Isobutane	2-Methylpropane	75-28-5	C_4H_{10}			100	+	1.2	+	10.57	ne
Isobutanol	2-Methyl-1-propanol	78-83-1	$C_4H_{10}O$	19	+	3.8	+	1.5		10.02	50
Isobutene	Isobutylene, Methyl butene	115-11-7	C_4H_8	1.00	+	1.00	+	1.00	+	9.24	Ne
Isobutyl acrylate	Isobutyl 2-propenoate	106-63-8	$C_7H_{12}O_2$			1.5	+	0.60	+		Ne
Isoflurane	1-Chloro-2,2,2-trifluoroethyl difluoromethyl ether, forane	26675-46-7	$C_3H_2ClF_5O$	NR	+	NR	+	48	+	~11.7	Ne
Isooctane	2,2,4-Trimethylpentane	540-84-1	C8H18			1.2				9.86	ne
Isopar E Solvent	Isoparaffinic hydrocarbons	64741-66-8	m.w. 121	1.7	+	0.8	+				Ne
Isopar G Solvent	Photocopier diluent	64742-48-9	m.w. 148			0.8	+				Ne
Isopar K Solvent	Isoparaffinic hydrocarbons	64742-48-9	m.w. 156	0.9	+	0.5	+	0.27	+		Ne
Isopar L Solvent	Isoparaffinic hydrocarbons	64742-48-9	m.w. 163	0.9	+	0.5	+	0.28	+		Ne
Isopar M Solvent	Isoparaffinic hydrocarbons	64742-47-8	m.w. 191			0.7	+	0.4	+		Ne
Isopentane	2-Methylbutane	78-78-4	C_5H_{12}			8.2					Ne
Isophorone		78-59-1	$C_9H_{14}O$					3		9.07	C5
Isoprene	2-Methyl-1,3-butadiene	78-79-5	C_5H_8	0.69	+	0.63	+	0.60	+	8.85	Ne
Isopropanol	Isopropyl alcohol, 2-propanol, IPA	67-63-0	C_3H_8O	500	+	6.0	+	2.7		10.12	200
Isopropyl acetate		108-21-4	$C_5H_{10}O_2$			2.6				9.99	100
Isopropyl ether	Diisopropyl ether	108-20-3	$C_6H_{14}O$			0.8				9.20	250
Jet fuel JP-4	Jet B, Turbo B, F-40 Wide cut type aviation fuel	8008-20-6 + 64741-42-0	m.w. 115			1.0	+	0.4	+		Ne
Jet fuel JP-5	Jet 5, F-44, Kerosene type aviation fuel	8008-20-6 + 64747-77-1	m.w. 167			0.6	+	0.5	+		29
Jet fuel JP-8	Jet A-1, F-34, Kerosene type aviation fuel	8008-20-6 + 64741-77-1	m.w. 165			0.6	+	0.3	+		30
Jet fuel A-1 (JP-8)	F-34, Kerosene type aviation fuel	8008-20-6 + 64741-77-1	m.w. 145			0.67					34
Jet Fuel TS	Thermally Stable Jet Fuel, Hydrotreated kerosene fuel	8008-20-6 + 64742-47-8	m.w. 165	0.9	+	0.6	+	0.3	+		30
Limonene, D-	(R)-(+)-Limonene	5989-27-5	$C_{10}H_{16}$			0.33	+			~8.2	Ne
Kerosene C10-C16 petro.distillate – see Jet Fuels		8008-20-6									
MDI – see 4,4'-Methylenebis(phenylisocyanate)											
Maleic anhydride	2,5-Furandione	108-31-6	$C_4H_2O_3$							~10.8	0.1
Mesitylene	1,3,5-Trimethylbenzene	108-67-8	C_9H_{12}	0.36	+	0.35	+	0.3	+	8.41	25
Methallyl chloride – see 3-Chloro-2-methylpropene											
Methane	Natural gas	74-82-8	CH_4	NR	+	NR	+	NR	+	12.61	Ne
Methanol	Methyl alcohol, carbinol	67-56-1	CH_4O	NR	+	NR	+	2.5	+	10.85	200
Methoxyethanol, 2-	Methyl cellosolve, Ethylene glycol monomethyl ether	109-86-4	$C_3H_8O_2$	4.8	+	2.4	+	1.4	+	10.1	5
Methoxyethoxyethanol, 2-	2-(2-Methoxyethoxy)ethanol Diethylene glycol monomethyl ether	111-77-3	$C_7H_{16}O$	2.3	+	1.2	+	0.9	+	<10	Ne
Methoxyethyl ether, 2-	bis(2-Methoxyethyl) ether, Diethylene glycol dimethyl ether, Diglyme	111-96-6	$C_6H_{14}O_3$	0.64	+	0.54	+	0.44	+	<9.8	Ne
Methyl acetate		79-20-9	$C_3H_6O_2$	NR	+	6.6	+	1.4	+	10.27	200
Methyl acrylate	Methyl 2-propenoate, Acrylic acid methyl ester	96-33-3	$C_4H_6O_2$			3.7	+	1.2	+	(9.9)	2
Methylamine	Aminomethane	74-89-5	CH_5N			1.2				8.97	5
Methyl amyl ketone	MAK, 2-Heptanone, Methyl pentyl ketone	110-43-0	$C_7H_{14}O$	0.9	+	0.85	+	0.5	+	9.30	50
Methyl bromide	Bromomethane	74-83-9	CH_3Br	110	+	1.7	+	1.3	+	10.54	1
Methyl t-butyl ether	MTBE, *tert*-Butyl methyl ether	1634-04-4	$C_5H_{12}O$			0.9	+			9.24	40
Methyl cellosolve	see 2-Methoxyethanol										
Methyl chloride	Chloromethane	74-87-3	CH_3Cl	NR	+	NR	+	0.74	+	11.22	50
Methylcyclohexane		107-87-2	C_7H_{14}	1.6	+	0.97	+	0.53	+	9.64	400
Methylene bis(phenyl-isocyanate), 4,4'- *	MDI, Mondur M		$C_{15}H_{10}N_2O_2$	Very slow ppb level response							0.005

Compound Name	Synonym/Abbreviation	CAS No.	Formula	9.8	C	10.6	C	11.7	C	IE (eV)	TWA
Methylene chloride	Dichloromethane	75-09-2	CH_2Cl_2	NR	+	NR	+	0.89	+	11.32	25
Methyl ether	Dimethyl ether	115-10-6	C_2H_6O	4.8	+	3.1	+	2.5	+	10.03	Ne
Methyl ethyl ketone	MEK, 2-Butanone	78-93-3	C_4H_8O	0.86	+	0.9	+	1.1	+	9.51	200
Methylhydrazine	Monomethylhydrazine, Hydrazomethane	60-34-4	$C_2H_6N_2$	1.4	+	1.2	+	1.3	+	7.7	0.01
Methyl isoamyl ketone	MIAK, 5-Methyl-2-hexanone	110-12-3	$C_7H_{14}O$	0.8	+	0.76	+	0.5	+	9.28	50
Methyl isobutyl ketone	MIBK, 4-Methyl-2-pentanone	108-10-1	$C_6H_{12}O$	0.9	+	0.8	+	0.6	+	9.30	50
Methyl isocyanate	CH3NCO	624-83-9	C_2H_3NO	NR	+	4.6	+	1.5		10.67	0.02
Methyl isothiocyanate	CH3NCS	551-61-6	C_2H_3NS	0.5	+	0.45	+	0.4	+	9.25	ne
Methyl mercaptan	Methanethiol	74-93-1	CH_4S	0.65		0.54		0.66		9.44	0.5
Methyl methacrylate		80-62-6	$C_5H_8O_2$	2.7	+	1.5	+	1.2	+	9.7	100
Methyl nonafluorobutyl ether	HFE-7100DL	163702-08-7, 163702-07-6	$C_5H_3F_9O$			NR	+	~35	+		ne
Methyl-1,5-pentanediamine, 2- (coats lamp) *	Dytek-A amine, 2-Methyl pentamethylenediamine	15520-10-2	C6H16N2			~0.6	+			<9.0	ne
Methyl propyl ketone	MPK, 2-Pentanone	107-87-9	$C_5H_{12}O$			0.93	+	0.79	+	9.38	200
Methyl-2-pyrrolidinone, N-	NMP, N-Methylpyrrolidone, 1-Methyl-2-pyrrolidinone, 1-Methyl-2-pyrrolidone	872-50-4	C_5H_9NO	1.0	+	0.8	+	0.9	+	*9.17*	ne
Methyl salicylate	Methyl 2-hydroxybenzoate	119-36-8	C_8H_8O3	1.3	+	0.9	+	0.9	+	~9	ne
Methylstyrene, α-	2-Propenylbenzene	98-83-9	C_9H_{10}			0.5				8.18	50
Methyl sulfide	DMS, Dimethyl sulfide	75-18-3	C_2H_6S	0.49	+	0.44	+	0.46	+	8.69	ne
Mineral spirits	Stoddard Solvent, Varsol 1, White Spirits	8020-83-5 8052-41-3 68551-17-7	m.w. 144	1.0		0.69	+	0.38	+		100
Mineral Spirits - Viscor 120B Calibration Fluid, b.p. 156-207°C		8052-41-3	m.w. 142	1.0	+	0.7	+	0.3	+		100
Monoethanolamine - see Ethanolamine											
Mustard *	HD, Bis(2-chloroethyl) sulfide	505-60-2 39472-40-7 68157-62-0	$C_4H_8Cl_2S$			0.6					0.0005
Naphtha - see VM & P Naptha											
Naphthalene	Mothballs	91-20-3	$C_{10}H_8$	0.45	+	0.42	+	0.40	+	8.13	10
Nickel carbonyl (in CO)	Nickel tetracarbonyl	13463-39-3	C_4NiO_4			0.18				<8.8	0.001
Nicotine		54-11-5	$C_{10}H_{14}N_2$			2.0				≤10.6	
Nitric oxide		10102-43-9	NO	~6		5.2	+	2.8	+	9.26	25
Nitrobenzene		98-95-3	$C_6H_5NO_2$	2.6	+	1.9	+	1.6	+	9.81	1
Nitroethane		79-24-3	$C_2H_5NO_2$					3		10.88	100
Nitrogen dioxide		10102-44-0	NO_2	23	+	16	+	6	+	9.75	3
Nitrogen trifluoride		7783-54-2	NF_3	NR		NR		NR		13.0	10
Nitromethane		75-52-5	CH_3NO_2					4		11.02	20
Nitropropane, 2-		79-46-9	$C_3H_7NO_2$					2.6		10.71	10
Nonane		111-84-2	C_9H_{20}			1.4				9.72	200
Norpar 12	n-Paraffins, mostly C_{10}-C_{13}	64771-72-8	m.w. 161	3.2	+	1.1	+	0.28	+		ne
Norpar 13	n-Paraffins, mostly C_{13}-C_{14}	64771-72-8	m.w. 189	2.7	+	1.0	+	0.3	+		ne
Octamethylcyclotetrasiloxane		556-67-2	$C_8H_{24}O_4Si_4$	0.21	+	0.17	+	0.14	+		ne
Octamethyltrisiloxane		107-51-7	$C_8H_{24}O_2Si_3$	0.23	+	0.18	+	0.17	+	<10.0	ne
Octane, n-		111-65-9	C_8H_{18}	13	+	1.8	+			9.82	300
Octene, 1-		111-66-0	C_8H_{16}	0.9	+	0.75	+	0.4	+	9.43	75
Pentane		109-66-0	C_5H_{12}	80	+	8.4	+	0.7	+	10.35	600
Peracetic acid *	Peroxyacetic acid, Acetyl hydroperoxide	79-21-0	$C_2H_4O_3$	NR	+	NR	+	2.3	+		ne
Peracetic/Acetic acid mix *	Peroxyacetic acid, Acetyl hydroperoxide	79-21-0	$C_2H_4O_3$			50	+	2.5	+		ne
Perchloroethene	PCE, Perchloroethylene, Tetrachloroethylene	127-18-4	C_2Cl_4	0.69	+	0.57	+	0.31	+	9.32	25
PGME	Propylene glycol methyl ether, 1-Methoxy-2-propanol	107-98-2	$C_6H_{12}O_3$	2.4	+	1.5	+	1.1	+		100

Compound Name	Synonym/Abbreviation	CAS No.	Formula	9.8	C	10.6	C	11.7	C	IE (eV)	TWA
PGMEA	Propylene glycol methyl ether acetate, 1-Methoxy-2-acetoxypropane, 1-Methoxy-2-propanol acetate	108-65-6	$C_6H_{12}O_3$	1.65	+	1.0	+	0.8	+		ne
Phenol	Hydroxybenzene	108-95-2	C_6H_6O	1.0	+	1.0	+	0.9	+	8.51	5
Phosgene	Dichlorocarbonyl	75-44-5	CCl_2O	NR	+	NR	+	8.5	+	11.2	0.1
Phosgene in Nitrogen	Dichlorocarbonyl	75-44-5	CCl_2O	NR	+	NR	+	6.8	+	11.2	0.1
Phosphine (coats lamp)		7803-51-2	PH_3	28		3.9	+	1.1	+	9.87	0.3
Photocopier Toner	Isoparaffin mix					0.5	+	0.3	+		ne
Picoline, 3-	3-Methylpyridine	108-99-6	C_6H_7N			0.9				9.04	ne
Pinene, α-		2437-95-8	$C_{10}H_{16}$			0.31	+	0.47		8.07	ne
Pinene, β-		18172-67-3	$C_{10}H_{16}$	0.38	+	0.37	+	0.37	+	~8	100
Piperylene, isomer mix	1,3-Pentadiene	504-60-9	C_5H_8	0.76	+	0.69	+	0.64	+	8.6	100
Propane		74-98-6	C_3H_8			NR	+	1.8	+	10.95	2500
Propanol, n-	Propyl alcohol	71-23-8	C_3H_8O			5		1.7		10.22	200
Propene	Propylene	115-07-1	C_3H_6	1.5	+	1.4	+	1.6	+	9.73	ne
Propionaldehyde	Propanal	123-38-6	C_3H_6O			1.9				9.95	ne
Propyl acetate, n-		109-60-4	$C_5H_{10}O_2$			3.5		2.3		10.04	200
Propylamine, n-	1-Propylamine, 1-Aminopropane	107-10-8	C_3H_9N	1.1	+	1.1	+	0.9	+	8.78	ne
Propylene carbonate *		108-32-7	$C_4H_6O_3$			62	+	1	+	10.5	ne
Propylene glycol	1,2-Propanediol	57-55-6	$C_3H_8O_2$	18		5.5	+	1.6	+	<10.2	ne
Propylene glycol propyl ether	1-Propoxy-2-propanol	1569-01-3	$C_6H_{14}O_2$	1.3	+	1.0	+	1.6	+		ne
Propylene oxide	Methyloxirane	75-56-9 16088-62-3 15448-47-2	C_3H_6O	~240		6.6	+	2.9	+	10.22	20
Propyleneimine	2-Methylaziridine	75-55-8	C_3H_7N	1.5	+	1.3	+	1.0	+	9.0	2
Propyl mercaptan, 2-	2-Propanethiol, Isopropyl mercaptan	75-33-2	C_3H_8S	0.64	+	0.66	+			9.15	ne
Pyridine		110-86-1	C_5H_5N	0.78	+	0.7	+	0.7	+	9.25	5
Pyrrolidine (coats lamp)	Azacyclohexane	123-75-1	C_4H_9N	2.1	+	1.3	+	1.6	+	~8.0	ne
RR7300 (PGME/PGMEA)	70:30 PGME:PGMEA (1-Methoxy-2-propanol:1-Methoxy-2-acetoxypropane)	107-98-2	$C_4H_{10}O_2$ / $C_6H_{12}O_3$			1.4	+	1.0	+		ne
Sarin	GB, Isopropyl methylphosphonofluoridate	107-44-8 50642-23-4	$C_4H_{10}FO_2P$			~3					
Stoddard Solvent - see Mineral Spirits		8020-83-5									
Styrene		100-42-5	C_8H_8	0.45	+	0.40	+	0.4	+	8.43	20
Sulfur dioxide		7446-09-5	SO_2	NR		NR	+	NR	+	12.32	2
Sulfur hexafluoride		2551-62-4	SF_6	NR		NR		NR		15.3	1000
Sulfuryl fluoride	Vikane	2699-79-8	SO_2F_2	NR		NR		NR		13.0	5
Tabun *	Ethyl N, N-dimethylphosphoramidocyanidate	77-81-6	$C_5H_{11}N_2O_2P$			0.8					15ppt
Tetrachloroethane, 1,1,1,2-		630-20-6	$C_2H_2Cl_4$					1.3		~11.1	ne
Tetrachloroethane, 1,1,2,2-		79-34-5	$C_2H_2Cl_4$	NR	+	NR	+	0.60	+	~11.1	1
Tetrachlorosilane		10023-04-7	$SiCl_4$	NR		NR		15	+	11.79	ne
Tetraethyl lead	TEL	78-00-2	$C_8H_{20}Pb$	0.4		0.3		0.2		~11.1	0.008
Tetraethyl orthosilicate	Ethyl silicate, TEOS	78-10-4	$C_8H_{20}O_4Si$			0.7	+	0.2	+	~9.8	10
Tetrafluoroethane, 1,1,1,2-	HFC-134A	811-97-2	$C_2H_2F_4$			NR		NR			ne
Tetrafluoroethene	TFE, Tetrafluoroethylene, Perfluoroethylene	116-14-3	C_2F_4			~15				10.12	ne
Tetrafluoromethane	CFC-14, Carbon tetrafluoride	75-73-0	CF_4			NR	+	NR	+	>15.3	ne
Tetrahydrofuran	THF	109-99-9	C_4H_8O	1.9	+	1.7	+	1.0	+	9.41	200
Tetramethyl orthosilicate	Methyl silicate, TMOS	681-84-5	$C_4H_{12}O_4Si$	10	+	1.9	+			~10	1
Therminol® D-12 *	Hydrotreated heavy naphtha	64742-48-9	m.w. 160	0.8	+	0.51	+	0.33	+		ne
Therminol® VP-1 *	Dowtherm A, 3:1 Diphenyl oxide: Biphenyl	101-84-8 92-52-4	$C_{12}H_{10}O$ $C_{12}H_{10}$			0.4	+				1
Toluene	Methylbenzene	108-88-3	C_7H_8	0.54	+	0.50	+	0.51	+	8.82	50

Compound Name	Synonym/Abbreviation	CAS No.	Formula	9.8	C	10.6	C	11.7	C	IE (eV)	TWA
Tolylene-2,4-diisocyanate	TDI, 4-Methyl-1,3-phenylene-2,4-diisocyanate	584-84-9	$C_9H_6N_2O_2$	1.4	+	1.4	+	2.0	+		0.002
Trichlorobenzene, 1,2,4-	1,2,4-TCB	120-82-1	$C_6H_3Cl_3$	0.7	+	0.46	+			9.04	C5
Trichloroethane, 1,1,1-	1,1,1-TCA, Methyl chloroform	71-55-6	$C_2H_3Cl_3$			NR	+	1	+	11	350
Trichloroethane, 1,1,2-	1,1,2-TCA	79-00-5	$C_2H_3Cl_3$	NR	+	NR	+	0.9	+	11.0	10
Trichloroethene	TCE, Trichoroethylene	79-01-6	C_2HCl_3	0.62	+	0.54	+	0.43	+	9.47	50
Trichloromethylsilane	Methyltrichlorosilane	75-79-6	CH_3Cl_3Si	NR		NR		1.8	+	11.36	ne
Trichlorotrifluoroethane, 1,1,2-	CFC-113	76-13-1	$C_2Cl_3F_3$			NR		NR		11.99	1000
Triethylamine	TEA	121-44-8	$C_6H_{15}N$	0.95	+	0.9	+	0.65	+	7.3	1
Triethyl borate	TEB; Boric acid triethyl ester	150-46-9	$C_6H_{15}O_3B$			2.2	+	1.1	+	~10	ne
Triethyl phosphate	Ethyl phosphate	78-40-0	$C_6H_{15}O_4P$	~50	+	3.1	+	0.60	+	9.79	ne
Trifluoroethane, 1,1,2-		430-66-0	$C_2H_3F_3$					34		*12.9*	ne
Trimethylamine		75-50-3	C_3H_9N			0.9				7.82	5
Trimethylbenzene, 1,3,5- - see Mesitylene		108-67-8									25
Trimethyl borate	TMB; Boric acid trimethyl ester, Boron methoxide	121-43-7	$C_3H_9O_3B$			5.1	+	1.2	+	10.1	ne
Trimethyl phosphate	Methyl phosphate	512-56-1	$C_3H_9O_4P$			8.0	+	1.3	+	9.99	ne
Trimethyl phosphite	Methyl phosphite	121-45-9	$C_3H_9O_3P$			1.1	+		+	*8.5*	2
Turpentine	Pinenes (85%) + other diisoprenes	8006-64-2	$C_{10}H_{16}$	0.37	+	0.30	+	0.29	+	~8	20
Undecane		1120-21-4	$C_{11}H_{24}$			2				9.56	ne
Varsol – see Mineral Spirits											
Vinyl actetate		108-05-4	$C_4H_6O_2$	1.5	+	1.2	+	1.0	+	9.19	10
Vinyl bromide	Bromoethylene	593-60-2	C_2H_3Br			0.4				9.80	5
Vinyl chloride	Chloroethylene, VCM	75-01-4	C_2H_3Cl			2.0	+	0.6	+	9.99	5
Vinyl-1-cyclohexene, 4-	Butadiene dimer, 4-Ethenylcyclohexene	100-40-3	C_8H_{12}	0.6	+	0.56	+			9.83	0.1
Vinylidene chloride - see 1,1-Dichloroethene											
Vinyl-2-pyrrolidinone, 1-	NVP, N-vinylpyrrolidone, 1-ethenyl-2-pyrrolidinone	88-12-0	C_6H_9NO	1.0	+	0.8	+	0.9	+		ne
Viscor 120B - see Mineral Spirits - Viscor 120B Calibration Fluid											
V. M. & P. Naphtha	Ligroin; Solvent naphtha; Varnish maker's & painter's naptha	64742-89-8	m.w. 111 (C_8-C_9)	1.7	+	0.97	+				300
Xylene, m-	1,3-Dimethylbenzene	108-38-3	C_8H_{10}	0.50	+	0.44	+	0.40	+	8.56	100
Xylene, o-	1,2-Dimethylbenzene	95-47-6	C_8H_{10}	0.56	+	0.46	+	0.43		8.56	100
Xylene, p-	1,4-Dimethylbenzene	106-42-3	C_8H_{10}	0.48	+	0.39	+	0.38	+	8.44	100
None				1		1		1			
Undetectable				1E+6		1E+6		1E+6			

* Compounds indicated in green can be detected using a MiniRAE 2000 or ppbRAE/+ with slow response, but may be lost by adsorption on a MultiRAE or EntryRAE. Response on multi-gas meters can give an indication of relative concentrations, but may not be quantitative and for some chemicals no response is observed.

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Appendix I:
Example of Automatic Calculation of Correction Factors, TLVs and Alarm Limits for Mixtures
(Calculations performed using Excel version of this database, available on request)

Compound	CF 9.8 eV	CF 10.6 eV	CF 11.7eV	Mol. Frac	Conc ppm	TLV ppm	STEL Ppm
Benzene	0.55	0.53	0.6	0.01	1	0.5	2.5
Toluene	0.54	0.5	0.51	0.06	10	50	150
Hexane, n-	300	4.3	0.54	0.06	10	50	150
Heptane, n-	45	2.8	0.6	0.28	50	400	500
Styrene	0.45	0.4	0.42	0.06	10	20	40
Acetone	1.2	1.1	1.4	0.28	50	750	1000
Isopropanol	500	6	2.7	0.28	50	400	500
None	1	1	1	0.00	0	1	
Mixture Value:	2.1	1.5	0.89	1.00	181 ppm	56 ppm	172 ppm
TLV Alarm Setpoint when Calibrated to Isobutylene:	26 ppm	37 ppm	62 ppm				
STEL Alarm Setpoint, same Calibration	86 ppm	115 ppm	193 ppm				

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FIELD OPERATING PROCEDURES

Composite Sample Collection Procedure for Non-VOC Analysis

FOP 013.0

COMPOSITE SAMPLE COLLECTION PROCEDURE FOR NON-VOLATILE ORGANIC ANALYSIS

PURPOSE

This guideline addresses the procedure to be used when soil samples are to be composited in the field.

PROCEDURE

1. Transfer equal weighted aliquots of soil from individual split-spoon samples, excavator bucket, hand auger or surface soil sample location to a large precleaned stainless steel (or Pyrex glass) mixing bowl.
2. Thoroughly mix (homogenize) and break up the soil using a stainless steel scoop or trowel.
3. Spread the composite sample evenly on a stainless steel tray and quarter the sample.
4. Discard alternate (i.e., diagonal) quarters and, using a small stainless steel scoop or spatula, collect equal portions of subsample from the remaining two quarters until the amount required for the composite sample is acquired. Transfer these subsamples to a precleaned stainless steel (or Pyrex glass) mixing bowl and re-mix.
5. Transfer the composite sample to the laboratory provided, precleaned sample jars. Store any excess sample from the stainless steel tray in a separate, precleaned, wide-mouth sample jar and refrigerate for future use, if applicable.
6. Decontaminate all stainless steel (or Pyrex glass) equipment in accordance with Benchmark's Non-disposable and Non-dedicated Sampling Equipment Decontamination procedures.
7. Prepare samples in accordance with Benchmark's Sample Labeling, Storage and Shipment FOP.

8. Record all sampling details in the Project Field Book and on the Soil/Sediment Sample Collection Summary Log (sample attached).

ATTACHMENTS

Soil/Sediment Sample Collection Summary Log (sample)

REFERENCES

Benchmark FOPs:
040 Non-disposable and Non-dedicated Sampling Equipment Decontamination
046 Sample Labeling, Storage and Shipment

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SOIL/SEDIME
SAMPLE COLLECTION SUMMARY L

Field ID	Location	QC Type	Depth (feet)		Analytical Parameters	Containers	Date	Time	Sampler Initials	Comments (e.g. problems encountered, ref. to varian location changes, depth changes, import matrix observations or description, grav thickness, etc.)
			from	to						

Equipment Rinsate Blanks *- Pour clean deionized water [illegible] equipment into sample containers. Collect at a frequency of 1 per sampling method per day. Analyze for all those parameters analyzed for in the samples coll the same day. HSL Metals can be substituted by only the Metals a[illegible] exa[illegible] romium which needs a separate container). Match equipment used for constituents of concern to rinsate analyte. Note deionzied water lot # or distilay. manufacturers info & date.*

MS/MSD/MSB *- Collect at a frequency of 1 per 20 samples of each matri[illegible] or all those parameters analyzed for the samples collected the same day.*

Field Blank *- Pour clean deionized water (used as final decon rinse water) into sample containers while at the sampling site. Collect field blanks at a frequency of 1 per lot of deionized water. Note water lot number and dates in use for decon in 'Comments' sectio*

Investigation Derived Waste (IDW) Characterization samples *- One composited sample from all drums of decon fluids and soil. Please note number of drums and labels on collection log.*

Notes:

1. See QAPP for sampling frequency and actual number of QC samples.
2. CWM - clear, wide-mouth glass jar with Teflon-lined cap.
3. HDPE - high density polyethylene bottle.
4. MS/MSD/MSB - Matrix Spike, Matrix Spike Duplicate, Matrix Spike Blank.
5. BD - Blind Duplicate - indicate location of duplicate.

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FIELD OPERATING PROCEDURES

Drilling and Excavation Equipment Decontamination Procedures

FOP 018.0

DRILLING AND EXCAVATION EQUIPMENT DECONTAMINATION PROCEDURES

PURPOSE

This procedure is to be used for the decontamination of drilling and excavation equipment (i.e., drill rigs, backhoes, augers, drill bits, drill rods, buckets, and associated equipment) used during a subsurface investigation. The purpose of this procedure is to remove chemical constituents associated with a particular drilling or excavation location from this equipment. This prevents these constituents from being transferred between drilling or excavation locations, or being transported out of controlled areas.

PROCEDURE

The following procedure will be utilized prior to the use of drilling or excavation equipment at each location, and prior to the demobilization of such equipment from the site:

1. Remove all loose soil and other particulate materials from the equipment at the survey site.

2. Wrap augers, tools, plywood, and other reusable items with a plastic cover prior to transport from the site of use to the decontamination facility.

3. Transport equipment to the decontamination facility. All equipment must be decontaminated at an established decontamination facility. This facility will be placed within a controlled area, and will be equipped with necessary features to contain and collect wash water and entrained materials.

4. Wash equipment thoroughly with pressurized low-volume water or steam, supplied by a pressure washer or steam cleaner.

5. If necessary, use a brush or scraper to remove visible soils adhering to the equipment, and a non-phosphate detergent to remove any oils, grease, and/or hydraulic fluids adhering to the equipment. Continue pressure washing until all visible contaminants are removed.

6. Allow equipment to air dry.

7. Store equipment in a clean area or wrap the equipment in new plastic sheeting as necessary to ensure cleanliness until ready for use.

8. Manage all wash waters and entrained solids as described in the Benchmark Field Operating Procedure for Management of Investigation-Derived Waste.

ATTACHMENTS

none

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FIELD OPERATING PROCEDURES

Sample Labeling, Storage, and Shipment Procedures

FOP 046.0

SAMPLE LABELING, STORAGE & SHIPMENT PROCEDURES

PURPOSE

The collection and analysis of samples of environmental media, including soils, groundwater, surface water, and sediment, are the central activities of the field investigation. These samples must be properly labeled to preserve its identity, and properly stored and shipped in a manner that preserves its integrity and chain of custody. This procedure presents methods for these activities.

SAMPLE LABELING PROCEDURE

1. Assign each sample retained for analysis a unique 9-digit alphanumeric identification code or as indicated in the Project Work Plan. Typically, this code will be formatted as follows:

Sample I.D. Example: GW051402047	
GW	**Sample matrix** GW = groundwater; SW = surface water; SUB = subsurface soil; SS = surface soil; SED = sediment; L = leachate; A = air
05	Month of sample collection
14	Day of sample collection
02	Year of sample collection
047	Consecutive sample number

2. Consecutive sample numbers will indicate the individual sample's sequence in the total set of samples collected during the investigation/sampling event. The sample number above, for example, would indicate the 47th sample retained for analysis during the field investigation, collected on May 14, 2002.

3. Affix a non-removable (when wet) label to each sample container. The following information will be written on the label with black or blue ink that will not smudge when wet:

   - Project number
   - Sample ID (see Step 1 above)
   - Date of sample collection
   - Time of sample collection (military time only)
   - Specify "grab" or "composite" sample with an "X"
   - Sampler initials
   - Preservative(s) (if applicable)
   - Analytes for analysis (if practicable)

4. Record all sample label information in the Project Field Book and on a Sample Summary Collection Log (see attached samples), keyed to the sample identification number. In addition, add information regarding the matrix, sample location, depth, etc. to provide a complete description of the sample.

SAMPLE STORAGE PROCEDURE

1. Immediately after collection, placement in the proper container, and labeling, place samples to be retained for chemical analysis into resealable plastic bags.

2. Place bagged samples into an ice chest filled approximately half-full of double bagged ice. Blue ice is not an acceptable substitute for ice.

3. Maintain samples in an ice chest or in an alternative location (e.g. sample refrigerator) as approved by the Benchmark Field Team Leader until time of shipment. Periodically drain melt-water off coolers and replenish ice as necessary.

4. Ship samples on a daily basis, unless otherwise directed by the Benchmark Field Team Leader.

5. Maintain appropriate custody procedures on coolers and other sample storage containers at all times. These procedures are discussed in detail in the Project Quality Assurance Project Plan, Monitoring Plan or Work Plan.

6. Samples shall be kept in a secure location locked and controlled (i.e., locked building or fenced area) so that only the Project Field Team Leader has access to the location or under the constant visual surveillance of the same.

SAMPLE SHIPPING PROCEDURE

1. Fill out the chain-of-custody form completely (see attached sample) with all relevant information. The white original goes with the samples and should be placed in a resealable plastic bag and taped inside the sample cooler lid; the sampler should retain the copy.

2. Place a layer of inert cushioning material such as bubble pack in the bottom of cooler.

3. Place each bottle in a bubble wrap sleeve or other protective wrap. To the extent practicable, then place each bottle in a resealable plastic bag.

4. Open a garbage bag (or similar) into a cooler and place sample bottles into the garbage bag (or similar) with volatile organic analysis (VOA) vials near the center of the cooler.

5. Pack bottles with ice in plastic bags. At packing completion, cooler should be at least 50 percent ice, by volume. Coolers should be completely filled, so that samples do not move excessively during shipping.

6. Duct tape (or similar) cooler drain closed and wrap cooler completely in two or more locations to secure lid, specifically covering the hinges of the cooler.

7. Place laboratory label address identifying cooler number (i.e., 1 of 4, 2 of 4 etc.) and overnight delivery waybill sleeves on cooler lid or handle sleeve (Federal Express).

8. Sign the custody seal tape with an indelible soft-tip marker and place over the duct tape across the front and back seam between the lid and cooler body.

9. Cover the signed custody seal tape with an additional wrap of transparent strapping tape.

10. Place "Fragile" and "This Side Up" labels on all four sides of the cooler. "This Side Up" labels are yellow labels with a black arrow with the arrowhead pointing toward the cooler lid.

11. For coolers shipped by overnight delivery, retain a copy of the shipping waybill, and attach to the chain-of-custody documentation.

ATTACHMENTS

Soil/Sediment Sample Summary Collection Log (sample)
Groundwater/Surface Water Sample Summary Collection Log (sample)
Wipe Sample Summary Collection Log (sample)
Air Sample Summary Collection Log (sample)
Chain-Of-Custody Form (sample)

REFERENCES

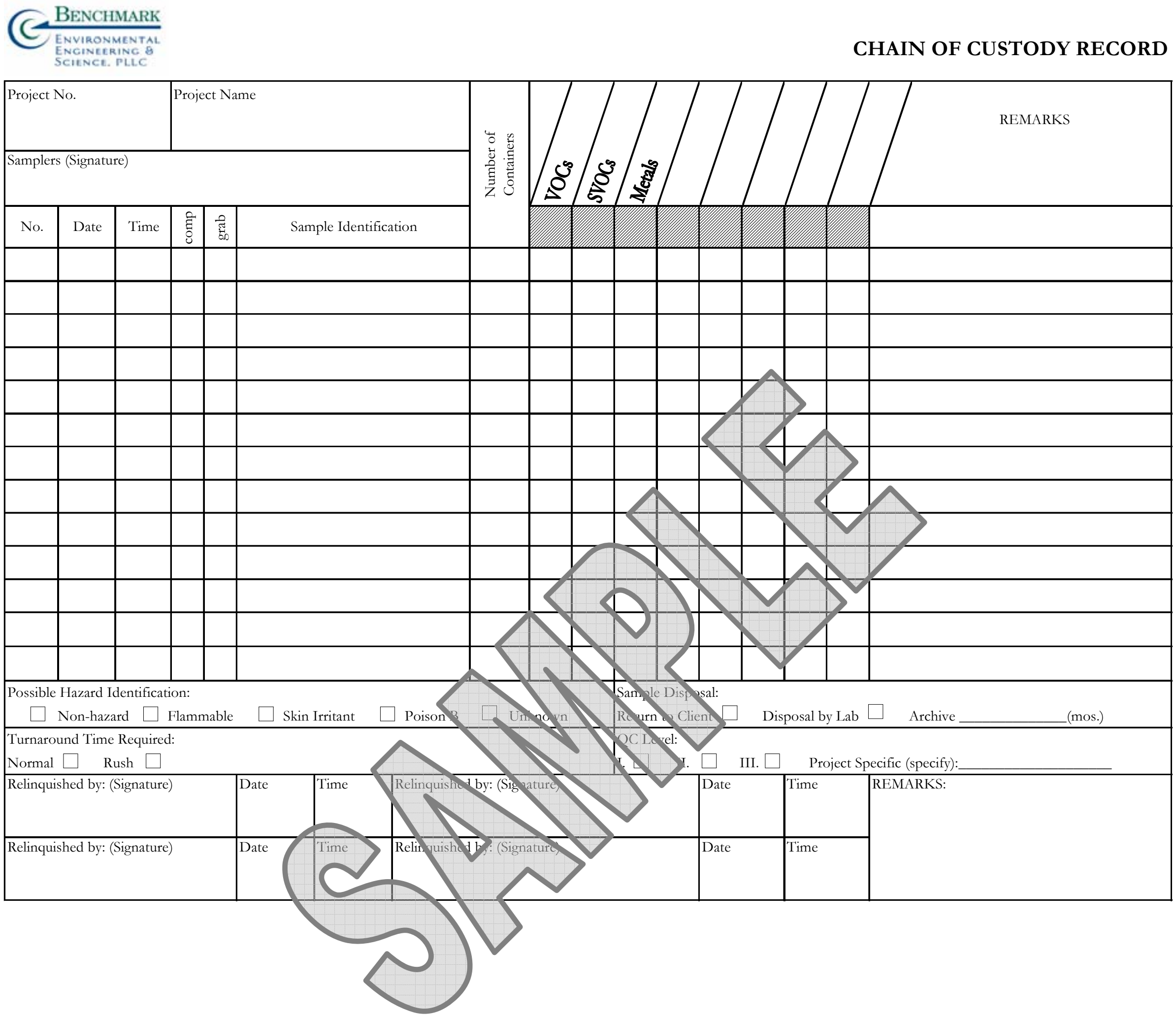
None

AIR SAMPLE COLLECTION SUMMARY LOG

Field ID	Location	QC Type	Analytical Parameters	Containers	Date	Time	Sampler Initials	Comments (e.g. problems encountered, ref. to variance, location changes, important observations or descriptions, etc.)

Notes:

1. See QAPP for sampling frequency and actual number of QC samples.
2. SC - Summa Canister.
3. TB - Tedlar Bag (quantity).
4. No Matrix Spike, Matrix Spike Duplicate, Matrix Spike Blanks, Field Duplicates, Field Blanks or Rinsates collected for air samples.



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CHAIN OF CUSTODY RECORD

Project No.	Project Name					Number of Containers	VOCs	SVOCs	Metals						REMARKS
Samplers (Signature)															
No.	Date	Time	comp	grab	Sample Identification		▨	▨	▨	▨	▨	▨	▨	▨	

Possible Hazard Identification:
☐ Non-hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal:
Return to Client ☐ Disposal by Lab ☐ Archive ____________(mos.)

Turnaround Time Required:
Normal ☐ Rush ☐

QC Level:
I. ☐ II. ☐ III. ☐ Project Specific (specify):__________________

Relinquished by: (Signature)	Date	Time	Relinquished by: (Signature)	Date	Time	REMARKS:
Relinquished by: (Signature)	Date	Time	Relinquished by: (Signature)	Date	Time	

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WIPE SAMPLE COLLECTION SUMMARY LOG

Field ID	Location	QC Type	Analytical Parameters	Containers	Date	Time	Sampler Initials	Comments (e.g. problems encountered, ref. to variance, location changes, important observations or descriptions, etc.)

Notes:

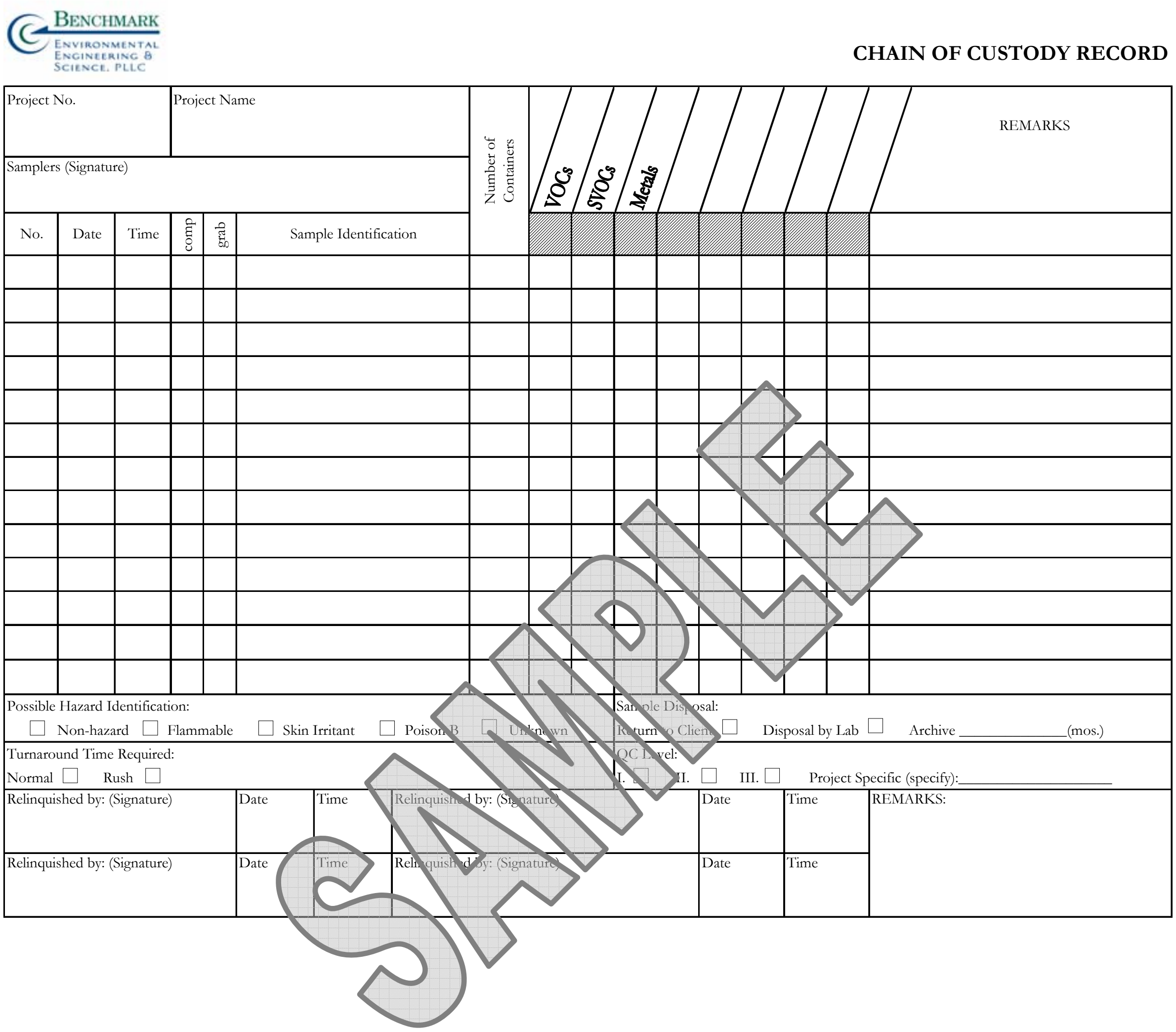
1. See QAPP for sampling frequency and actual number of QC samples.
2. CWM - clear, wide-mouth glass jar with Teflon-lined cap.
3. FD - Field Duplicate.
4. FB - Field Blank.
5. RS - Rinsate.
6. No Matrix Spike, Matrix Spike Duplicate or Matrix Spike Blanks for wipe samples.
7. Rinsates should be taken at a rate of 1 per day during wipe sampling. Only take when reusable equipment is used.
8. Wipe sample FB collected by wiping unused glove (and any other sampling equipment coming into contact with sampled surface) with prepared gauze pad and place in sample jar. Take at a rate of 1 FB per 20 samples.
9. Wipe sample FDs taken adjacent to original sample at a rate of 1 FD per 20 samples.
10. **EH :** Extract and Hold

AIR SAMPLE COLLECTION SUMMARY LOG

Field ID	Location	QC Type	Analytical Parameters	Containers	Date	Time	Sampler Initials	Comments (e.g. problems encountered, ref. to variance, location changes, important observations or descriptions, etc.)

Notes:

1. See QAPP for sampling frequency and actual number of QC samples.
2. SC - Summa Canister.
3. TB - Tedlar Bag (quantity).
4. No Matrix Spike, Matrix Spike Duplicate, Matrix Spike Blanks, Field Duplicates, Field Blanks or Rinsates collected for air samples.



CHAIN OF CUSTODY RECORD

Project No.

Project Name

Samplers (Signature)

No.	Date	Time	comp	grab	Sample Identification	Number of Containers	VOCs	SVOCs	Metals					REMARKS

Possible Hazard Identification:
☐ Non-hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal:
Return to Client ☐ Disposal by Lab ☐ Archive _____________(mos.)

Turnaround Time Required:
Normal ☐ Rush ☐

QC Level:
I. ☐ II. ☐ III. ☐ Project Specific (specify):___________________

Relinquished by: (Signature)	Date	Time	Relinquished by: (Signature)	Date	Time	REMARKS:
Relinquished by: (Signature)	Date	Time	Relinquished by: (Signature)	Date	Time	

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FIELD OPERATING PROCEDURES

Screening of Soil Samples for Organic Vapors During Impacted Soil Removal Activities

FOP 048.0

SCREENING OF SOIL SAMPLES FOR ORGANIC VAPORS DURING IMPACTED SOIL REMOVAL ACTIVITIES

PURPOSE

This procedure is used to screen soil samples for the presence of volatile organic constituents (VOCs) using a field organic vapor meter. The field meter should either be a photoionization detector (PID) or flame-ionization detector (FID) type. This type of screening is generally performed during underground storage tank (UST) and/or impacted soil removal activities as a procedure for ensuring the health and safety of the community and personnel at the site as well as to identify potential VOC-impacted soil samples for laboratory analysis (i.e., confirmatory or verification samples). Soil samples are also screened in the field to provide assessment criteria to determine horizontal and vertical extents of VOC-impacts in order to ensure soils that may have been impacted by volatile organic substances are removed.

PROCEDURE

1. Calibrate air-monitoring equipment in accordance with the appropriate Benchmark's Field Operating Procedures or manufacturers recommendations for calibration of field meters.

2. Perform community air monitoring in accordance with the Project Work Plan and/or Benchmark's FOP: Real-Time Air Monitoring During Intrusive Activities.

3. Upon proper removal of any identified UST in accordance with NYSDEC Division of Environmental Remediation, Spill Response Unit or Bulk Storage Unit guidelines and/or Benchmark's FOP: Underground Storage Tank Removal Procedures; examine the four sidewalls and bottom of the excavation for visually impacted (i.e., stained) soils.

4. If visually impacted soils are identified, direct the excavating equipment operator to scrape the impacted area (i.e., sidewall or bottom of the excavation) and present the scraped soil for evaluation. NOTE: Under no circumstances should anyone enter an excavation greater than 4 feet in depth, unless absolutely necessary. Excavation entry may only occur under strict confined space entry procedures following implementation of specific engineering controls (i.e., continuous air monitoring, excavation shoring, trench box installation, benching).

5. Visually inspect and perform an open air PID/FID scan of the scraped soil sample noting stratification, visible staining, or other evidence of impact (i.e., presence of non-aqueous phase liquid, NAPL).

6. Collect a representative sample (approximately 100 milligrams (mg)) of soil using a decontaminated or dedicated stainless steel sampling tool (i.e., spoon, spatula, scoop, or approved equivalent), for field headspace determination of VOC-impact. Place the representative soil sample into a labeled wide-mouth glass jar approximately ½ to ¾ full and seal with aluminum foil and a screw top cap. Alternatively, the soil sample may be placed into a clean, re-sealable plastic bag and sealed. Be sure to leave adequate headspace above the soil sample within either sealed container.

7. Place the field screening sample (i.e., jar or bag) in a location where the ambient temperature is at least 70° Fahrenheit for at least 15 minutes, but no more than 60 minutes.

8. Carefully remove the screw top cap from the jar and slowly insert the tip of the organic vapor meter (PID or FID) through the aluminum foil seal making the smallest hole possible. Alternatively, unseal a portion of the plastic bag just big enough to insert the probe of a calibrated PID.

9. Record the depth, sample location (i.e., sidewall, bottom) and <u>maximum</u> reading in parts per million by volume (ppmv) in the Project Field Book and Impacted Soil Excavation Log (sample attached), at the depth interval corresponding to the depth of sample collection.

10. The representative soil samples collected from the excavation will be used to assess the vertical and horizontal limits of VOC-impact and guide the impacted soil removal activities in accordance with project requirements (i.e., PID scans less than 20 ppm will not require removal unless laboratory analytical results exceed regulatory limits).

11. Collect verification/confirmation samples in accordance with NYSDEC Division of Environmental Remediation, Spill Response Unit or Bulk Storage Unit guidelines and/or Benchmark's FOP: Surface and Subsurface Soil Sampling Procedures.

ATTACHMENTS

Impacted Soil Excavation Log (sample)

REFERENCES

Benchmark FOPs:

010	*Calibration and Maintenance of Portable Flame Ionization Detector*
011	*Calibration and Maintenance of Portable Photoionization Detector*
063	*Surface and Subsurface Soil Sampling Procedures*
073	*Real-Time Air Monitoring During Intrusive Activities*
074	*Underground Storage Tank Removal Procedures*

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IMPACTED SOIL EXCAVATION LOG

Project:	EXCAVATION I.D.:
Project No.:	Excavation Date:
Client:	Excavation Method:
Location:	CQA Observer:

Excavation Location: *NOT TO SCALE*
(approximate)

Excavation Cross Section:

Grade - 0'
2'
4'
6'
8'
10'
12'
14'
16'
18'
20'

TIME	Length:	(approx.)
Start:	Width:	(approx.)
End:	Depth:	(approx.)

Verification Sample I.D.	Depth (fbgs)	Location Within Excavation (sidewall/bottom)	PID Scan (ppm)	PID Headspace (ppm)	Photos Y / N	

COMMENTS:

UST ENCOUNTERED: ☐ yes ☐ no If yes, Describe (type, material, size, capacity etc.):

GROUNDWATER ENCOUNTERED: ☐ yes ☐ no If yes, depth to GW:

VISUAL IMPACTS: ☐ yes ☐ no Describe:

OLFACTORY OBSERVATIONS: ☐ yes ☐ no Describe:

NON-NATIVE FILL ENCOUNTERED: ☐ yes ☐ no

OTHER OBSERVATIONS: ☐ yes ☐ no Describe:

QUANTITY OF IMPACTED SOIL REMOVED:

FINAL DESTINATION OF IMPACTED SOIL:

TYPE OF BACKFILL:

SURFACE COMPLETION:

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FIELD OPERATING PROCEDURES

Real-Time Air Monitoring During Intrusive Activities

FOP 073.2

REAL-TIME AIR MONITORING DURING INTRUSIVE ACTIVITIES PROCEDURE

PURPOSE

This guideline presents requirements for real-time community air monitoring and required responses during all project required intrusive activities, such as drilling, test pitting, earthwork construction etc. This procedure is consistent with the requirements for community air monitoring for all intrusive projects, including projects conducted at remediation sites, as established by the New York State Department of Health (NYSDOH) and the New York State Department of Environmental Conservation (NYSDEC). Accordingly, it follows procedures and practices outlined under NYSDEC's DER-10 (May 2010) Appendix 1A (NYSDOH's Generic Community Air Monitoring Plan) and Appendix 1B (Fugitive Dust and Particulate Monitoring).

This FOP requires real-time monitoring for constituents of concern (COC) (i.e., volatile organic compounds (VOCs), lower explosive limit (% LEL), particulates (i.e., dust) etc.) at the upwind and downwind perimeter as well as the exclusion zone of a project site during all intrusive activities. This FOP is not intended for use in establishing action levels for worker respiratory protection (see Project Health and Safety Plan (HASP) for worker protection action levels). Rather, its intent is to provide a measure of protection for the surrounding community from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The community, as referenced in this document, includes any off-site residences, public buildings/grounds and commercial or industrial establishments adjacent to the project site. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, this FOP helps to confirm that work activities did not spread contamination off-site through via air transport mechanisms. Community air monitoring shall be integrated with the construction worker personal exposure-monitoring program contained in the project and site-specific HASP.

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for volatile organic compounds (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 NYSDEC/NYSDOH staff.

MONITORING & MITIGATION PROCEDURE

Real-time air monitoring perimeter locations for monitoring stations will be established based on the location of the exclusion zone (i.e., immediate work area) and wind direction. Where wind direction is shifting or winds are calm, the downwind monitoring location will default to the perimeter location nearest the most sensitive receptor (i.e., residential property). All downwind receptors being equal, the downwind monitoring location will default to the perimeter location downwind of the prevailing winds at the site. Although additional site specific COCs may be monitored during real-time air monitoring activities, the most common COCs are discussed in this FOP, including organic vapors (i.e., VOCs), airborne particulates (i.e., fugitive dust) and combustible gases (i.e., methane) and oxygen.

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

ORGANIC VAPORS

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions. The monitoring work 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.

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

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

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

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

- **<u>Special Requirements for Work Within 20 Feet of Potentially Exposed Individuals or Structures</u>**

    - When work areas are within 20 feet of potentially exposed populations or occupied structures, the continuous monitoring locations for VOCs and particulates must reflect the nearest potentially exposed individuals and the location of ventilation system intakes for nearby structures. The use of engineering controls such as vapor/dust barriers, temporary negative-pressure enclosures, or special ventilation devices should be considered to prevent exposures related to the work activities and to control dust and odors. Consideration should be given to implementing the planned activities when potentially exposed populations are at a minimum, such as during weekends or evening hours in non-residential settings.

- If total VOC concentrations opposite the walls of occupied structures or next to intake vents exceed 1 ppm, monitoring should occur within the occupied structure (s). Background readings in the occupied spaces must be taken prior to commencement of the planned work. Any unusual background readings should be discussed with NYSDOH prior to commencement of the work.

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

- Depending upon the nature of contamination and remedial activities, other parameters (e.g., explosivity, oxygen, hydrogen SUlfide, carbon monoxide) may also need to be monitored Response levels and actions should be pre-determined, as necessary, for each site.

Additionally, if following the cessation of work and efforts to abate the emission source are unsuccessful, and if sustained organic vapor levels exceed 25 ppm above background within the 20-foot zone for more than 30 minutes, then the **Major Vapor Emission Response Plan** (see below) will automatically be placed into effect.

Major Vapor Emission Response Plan

Upon activation of Major Vapor Emission Response Plan, the following activities will be undertaken:

1. All Emergency Response Contacts as listed below and in the Site-Specific Health and Safety Plan will be contacted.

2. The local police authorities will immediately be contacted by the Site Safety and Health Officer and advised of the situation.

3. The Site Safety and Health Officer will determine if site workers can safely undertake source abatement measures. Abatement measures may include covering the source area with clean fill or plastic sheeting, or consolidating contaminated materials to minimize surface area. The Site Safety and Health Officer will adjust worker personal protective equipment as necessary to protect workers from over-exposure to organic vapors.

The following personnel are to be notified by the Site Safety and Health Officer in the listed sequence if the Major Vapor Emission Response Plan is activated:

Contact	Phone
Police/Fire Department	911
New York State DOH	(518) 402-7860
New York State DEC Region 8	(585) 226-2466, switchboard

New York State DEC Region 9	(716) 851-7220
State Emergency Response Hotline	(800) 457-7362

In addition, the Site Safety and Health Officer will provide these authorities with a description of the apparent source of the contamination and abatement measures being taken by the contractor, if any.

AIRBORNE PARTICULATES

Fugitive dust suppression and airborne particulate monitoring shall be performed during any intrusive activities involving disturbance or handling of site soil/fill materials. Fugitive dust suppression techniques will include the following minimum measures:

- Spraying potable water on all excessively dry work areas and roads.
- All fill materials leaving the site will be hauled in properly covered containers or haul trailers.
- Additional dust suppression efforts may be required as discussed below.

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

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter (µg/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 µg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.

- If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 µg/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 µg/m^3 of the upwind level and in preventing visible dust migration.

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

Visual Assessment

In conjunction with the real-time monitoring program, TurnKey personnel and any subcontractors thereof will be responsible for visually assessing fugitive dust migration from the site. If airborne dust is observed leaving the site, the work will be stopped until supplemental dust suppression techniques are employed in those areas.

Supplemental Dust Suppression

Supplemental dust suppression techniques may include but are not necessarily limited to the following measures:

- Reducing the excavation size, number of excavations or volume of material handled.
- Restricting vehicle speeds.
- Applying water on buckets during excavation and dumping.
- Wetting equipment and excavation faces.
- Wetting haul roads.
- Restricting work during extreme wind conditions.
- Use of a street sweeper on paved haul roads, where feasible.

Work can resume using supplemental dust suppression techniques provided that the measures are successful in reducing the sustained downwind particulate concentration to below 150 ug/m^3 of the upwind level, and in preventing visible dust migration off-site.

COMBUSTIBLE GASES & OXYGEN

Ambient combustible gas and oxygen concentrations should be measured prior to commencing intrusive activities each workday and a minimum of every 30-minutes thereafter. Air monitoring activities should be performed using equipment appropriate to measure combustible gases in percent lower explosive limit (LEL) and percent oxygen and calibrated daily. All combustible gas and oxygen readings must be recorded in the Project Field Book and/or Real-Time Air Monitoring Logs (sample attached) and, if applicable, be made available for State (DEC and DOH) personnel to review.

Mitigation upon the detection of various action levels of organic vapors are presented below:

Combustible Gas:

- If the sustained ambient air concentration of combustible gas at the downwind perimeter of the site exceeds a reading of 10 to 25% LEL, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 10% LEL, work activities can resume with continued monitoring.

- If sustained combustible gas levels at the downwind perimeter of the site persist at levels in excess of 25% LEL, work activities must be halted, the source of explosion hazards identified, corrective actions taken to abate emissions and monitoring continued. Following combustible gas mitigation, work activities can resume provided that the sustained total organic vapor level 200 feet downwind of the exclusions 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 a sustained value of 10% LEL.

Oxygen:

- If the sustained ambient oxygen concentration at the downwind perimeter of the site measures a reading between 19.5% - 21% oxygen, work activities can continue with extreme caution, however attempts to determine the potential source of oxygen displacement must be conducted.

- If the sustained oxygen level readily decreases below 19.5% LEL, work activities should be discontinued and all personnel must leave the area immediately.

- If the sustained oxygen level at the downwind perimeter of the site persists at levels between 21-25%, work activities can resume with caution.

- If the sustained oxygen level at the downwind perimeter of the site persists at levels exceeding 25% (fire hazard potential), work activities should be discontinued and all personnel must leave the area immediately.

ATTACHMENTS

Real-Time Air Monitoring Log (sample)

REFERENCES

TurnKey FOPs:

006	*Calibration and Maintenance of Combustible Gas/Oxygen Meter*
010	*Calibration and Maintenance of Flame Ionization Detector*
011	*Calibration and Maintenance of Portable Photoionization Detector*
084	*Calibration and Maintenance of Portable Particulate Meter*

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

REAL TIME AIR MONITORING LOG

Date:
Project Name:
Project Number:
Project Location:
Client:
Purpose of Air Monitoring:

WEATHER CONDITIONS:

Time of Day:	A.M.	P.M.
Ambient Air Temp.:		
Wind Direction:		
Wind Speed:		
Precipitation:		

Date	Personnel	Time	Air Monitoring Meter Measurement (Units)							Location/Activity/Comments
			PID (ppm)	LEL (%)	H_2S (ppm)	O_2 (%)	CO (ppm)	Particulates (mg/m^3)	Other	

NOTE: SEE EQUIPMENT CALIBRATION LOG FOR DESCRIPTION OF EQUIPMENT TYPE.

Prepared By: Date:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

FIELD OPERATING PROCEDURES

Stockpile Sampling Procedures for Chemical Analysis

FOP 079.0

STOCKPILE SAMPLING PROCEDURES
FOR CHEMICAL ANALYSIS

PURPOSE

This guideline presents a method for collecting representative soil samples from stockpiled borrow source material for chemical analysis.

GENERAL

In general, off-site soil that is brought to a Site for use as supplemental fill is subject to Quality Assurance sampling and analysis. If QA is required, all off-site soil proposed for use as Site backfill shall be documented by the subcontractor in writing to have originated from locations having no evidence of disposal or release of hazardous, toxic or radioactive substances, wastes or petroleum products. If the subcontractor designates a source as "virgin" soil, it shall be further documented in writing to be native soil material having not supported any known past industrial or commercial development or agricultural use. Borrow soils can be used as backfill once concentrations are confirmed to meet project designated criteria for the Constituents of Primary Concern (COPCs) and NYSDEC TAGM HWR-94-4046 recommended soil cleanup objectives (SCOs) or NYSDEC 6NYCRR Part 375 SCOs.

Sample collection equipment will include stainless steel mixing bowls, stainless steel mixing spoons, and a stainless steel hand auger with extension rods or a stainless steel spade or equivalent. It may be necessary to use a backhoe or drilling rig to facilitate sample collection.

SAMPLING PLAN

1. Virgin Sources – Virgin borrow sources will be confirmed acceptable for use as site backfill through collection of a single composite soil sample representative of the borrow pit or stockpile.

2. Non-Virgin Sources – Prior to sampling, determine the amount of soil that will be sampled. The soil will be tested via collection of one composite sample per 250 cubic yards of material from each source area. If more than 1,000 cubic yards of soils are excavated from a given off-site source area and all samples of the first 1,000 cubic yards meet project designated criteria, the sample collection frequency may be reduced to one composite for each additional 1,000 cubic yards of soils from the same source area, up to 5,000 cubic yards. For borrow sources greater than 5,000 cubic yards, sampling frequency may be reduced to one sample per 5,000 cubic yards, providing all earlier samples meet project designated criteria. Sampling procedure for non-virgin sources is described in the next section.

SAMPLE COLLECTION AND HANDLING

The following procedure will be used to collect representative soil samples from a non-virgin soil stockpile.

1. Using a stainless steel spade (or hand auger), a backhoe, or drilling rig, penetrate the pile to a depth of approximately 2 to 3 feet and collect four (4) representative grab samples of approximate equal volume from the top, middle, and bottom.

2. Transfer each grab into a small stainless steel mixing bowl.

3. **VOC Analysis:** Using a clean stainless steel spoon, transfer equal amounts from each small mixing bowl into a laboratory-supplied, 4 oz. VOC sample jar. This should be performed by randomly transferring several small aliquots from each bowl, taking care to minimize disturbance of the soil.

4. **Other COPCs:** Transfer equal aliquots from each small bowl into a large mixing bowl and homogenize the sample. Fill the remaining laboratory-supplied jars with the homogenized soil for all other project required COPCs (i.e., SVOCs, PCBs, Pesticides, Herbicides, inorganics, etc.).

5. Label each set of jars with the following information:
    - Project and site name
    - Sample Code
    - Project Number
    - Date/Time
    - Sample type (soil composite or grab)
    - Sampler's initials
    - Sample Preservation
    - Required analysis

    The sample code will consist of a unique, alphanumeric identification code keyed to the sampling location. Identify the sampling location on a field sketch.

6. Record all information associated with sample collection in the Project Field Book.

7. Label, store, and ship the samples in accordance with the Benchmark Field Operating Procedure for Sample Labeling, Storage and Shipment Procedures.

8. Clean the sampling and mixing equipment with Alconox and deionized water and repeat steps 1 through 7 for the remaining samples.

REFERENCES

<u>Benchmark FOPs:</u>
046 Sample Labeling, Storage and Shipment Procedures

APPENDIX D

PROJECT DOCUMENTATION FORMS

TurnKey
Environmental
Restoration, LLC

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: A.M.: P.M.:	IMPORTANT TELEPHONE CALLS:

PERSONNEL ON SITE:

SIGNATURE

DATE:

TurnKey Environmental Restoration, LLC

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

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