Remedial Action Work Plan

300 Ohio Street Site
(C915257)
Buffalo, New York

Revised July 2014 0136-037-102

Prepared for:

4216 Group, LLC

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
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BCP SITE No. C915257

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Prepared by:

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In Association With:

TURNKEY
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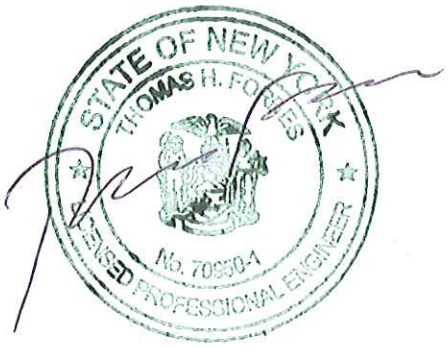
RESTORATION, LLC

Certification

I, Thomas H. Forbes, certify that I am currently a NYS registered professional engineer and that this July 2014 Remedial Action Work Plan (RAWP) for the 300 Ohio Street Site (C915257) 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).

8-25-14

Date



REMEDIAL ACTION WORK PLAN
300 Ohio Street Site
Buffalo, New York

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1.0 INTRODUCTION

Benchmark Environmental Engineering and Science, PLLC (Benchmark), in association with TurnKey Environmental Restoration, LLC (TurnKey), referred to herein as Benchmark-TurnKey, has prepared this Remedial Action (RA) Work Plan on behalf of 4216 Group, LLC. 4216 Group, LLC has elected to pursue cleanup and redevelopment of the property, located at 300 Ohio Street, Buffalo, New York (see Figures 1 and 2), under the New York State Brownfield Cleanup Program (BCP or Program) and executed a Brownfield Cleanup Agreement (BCA) with the New York State Department of Environmental Conservation (NYSDEC).

This document presents the scope of work and procedures for completion of planned remedial activities on the Site, in accordance with the approved Alternatives Analysis report (April 2014) and the NYSDEC prepared and approved Decision Document (April 2014). The remedial activities will be completed by remedial construction contractors under contract to 4216 Group, LLC and/or Benchmark-TurnKey. The work will be completed in general accordance with 6NYCRR Part 375 and NYSDEC DER-10 guidelines.

1.1 Site Background

The subject property (hereinafter, the "Project Site" or the "Site") is comprised of 11 adjoining parcels, totaling an approximate 5 acres, located at the corner of Ohio Street and Chicago Street in the City of Buffalo, New York (see Figures 1 and 2). The Site is currently improved with three buildings, multiple underground storage tanks (USTs), fuel dispensers, and concrete and asphalt covered areas. The Site is bound by Ohio Street and Chicago Street to the west and southwest; Mackinaw Street to the north; and the City of Buffalo – Conway Park to the east. The Buffalo River is located approximately 250-feet to the west of the Site.

The majority of the Site was historically utilized as an automobile filling station and fuel distribution operation since at least 1925. According to the NYSDEC Petroleum Bulk Storage Database (PBS No. 9-383511) and the City of Buffalo municipal records, the Site has contained at least 15 USTs, and one (1) aboveground storage tank (AST). The PBS record indicates that two 20,000-gallon No. 2 fuel oil USTs were previously closed in-place on-Site in 1992 and 1994, respectively

The northern portion of the Site addressed on Chicago and Mackinaw Street, included the former E&B Machinery and Central Manufacturing operations. These entities formerly operated a machine shop, trucking terminal and coffin and cooperage manufacturing operations. Historic fire insurance maps indicate that the property included a machine shop and on-Site gasoline tank(s), trucking terminal and truck repair operations.

1.2 Previous Environmental History

A summary of the findings of the environmental investigations completed at the Site is provided below. Figure 3 shows the historic and RI sample locations.

1.2.1 May 2010 Limited Phase II Site Assessment & September 2010 Supplemental Phase II Site Assessment

LCS Inc. (LCS) conducted a limited site investigation at the former Petroleum Sales and Service filling station portion of the Site (i.e., 300-354 Ohio Street). The findings of that report included the following:

- A total of 66 soil borings were completed in the locations shown on Figure 3. Visual and olfactory evidence of impacted soil/fill was noted in multiple soil boring locations across the Site. Elevated PID readings were noted in 280 out of 301 soil sample locations, with readings as high as 1,897 ppm being detected.
- Petroleum-related VOCs and SVOCs were detected at multiple soil boring locations across the site exceeding NYSDEC Part 375 Commercial and/or Industrial soil cleanup objectives (SCOs).

1.2.2 October 2010 Geophysical Survey Results, 300 Ohio Street, Buffalo, NY

AMEC Geomatrix, Inc. completed a geophysical investigation at the 300 Ohio Street Site utilizing an EM61. Geophysical surveys are utilized in an attempt to investigate and characterize subsurface anomalies. The findings of the report noted 19 anomalies, noted A-S, were detected, and described as potential USTs.

1.2.3 Remedial Investigation / Alternatives Analysis Report (RI/AAR)

A Remedial Investigation was completed to more fully characterize the Site in accordance with the BCP requirements. The RI included the advancement of test pits and

soil borings, and installation of monitoring wells to assess soil and groundwater at greater depths than previous investigations, and the collection of soil and groundwater samples.

Based on the results of the previous investigations and the RI, it was determined that remediation of the Site was necessary. A RI/AAR was prepared to provide a summary of the investigations, and complete and assessment of remedial alternatives capable of achieving the Remedial Action Objectives (RAOs) for the Site. Details of the environmental conditions and RAOs are provided below.

1.2.4 Summary of Environmental Conditions

Based on the Remedial Investigation and historic investigations, the following environmental conditions exist at the Site:

Geology/Hydrogeology

- Soil at the site consists of fill materials consisting of varying amounts of non-plastic fines, sand, brick, wood and concrete overlying lean clay and sand that is up to 9 feet thick. Native soil consists of sandy lean clay overlying reddish lean clay to depths of at least 16 fbgs.
- The uppermost water bearing unit was encountered at the soil/fill clay interface, ranging from 3-9 fbgs. Groundwater from the underlying lean clay was typically encountered between 10 and 12 fbgs.

Contamination

Surface Soil

- VOCs were not detected above Unrestricted Use SCOs (USCOs) in any of the surface soil samples.

- Select PAHs were detected at concentrations exceeding Commercial Use SCOs (CSCOs), at SS-4, SS-7, SS-8, SS-9, and SS-10. Concentrations of PAHs slightly above Unrestricted Use SCOs (USCOs) were also detected in SS-3, SS-5, and SS-6. Total PAHs were below 500 ppm for each respective surface soil sample location.

- Metals concentration exceeding CSCOs where detected in SS-10 for arsenic, barium, and lead; SS-9 for manganese; and SS-3 for cadmium. Select metals

concentrations exceeding USCOs were detected in all SS with the exception of SS-1.

- Pesticides, herbicides, and PCBs were not detected in surface soils above Commercial Use SCOs. The concentrations of 4,4'-DDE and 4,4'-DDT detected in SS-10 were slightly above the USCOs; and, Aroclors 1248, 1254, and 1260 were selectively detected above USCOs in SS-7 and SS-10.

- On-Site re-use analytical sampling was completed for a soil pile located in the northeast corner of the Site, identified as NE Soil pile. Analytical results were all below CSCOs, and the material is planned for reuse on-Site as backfill.

Subsurface Soil

- Grossly Contaminated Petroleum Soil (GCPS) was evident during the previous investigation and RI. GCPS was identified in the central area of the Site associated with the current and former UST system.

- VOCs were not detected above CSCOs outside of the GCPS area. Select VOCs were detected above USCOs, in TP-5, TP-7, TP-9, TP-13, and TP-18.

- Select PAHs were detected above CSCOs at TP-4, TP-13, MW-1, MW-2, MW-3, MW-4, and MW-6. No additional sample locations exceeded USCOs.

- Metals concentrations above CSCOs, specifically arsenic, barium and copper were detected in TP-13, and TP-19 (arsenic only). No additional sample locations exceeded USCOs.

- Pesticides, herbicides, and PCBs were not detected above USCOs in the subsurface soil samples.

Groundwater

- One VOC, benzene, was detected above GWQS/GVs in MW-2, MW-3, and MW-5; however, benzene only slightly exceeded its GWQS of 1 ug/L in MW-2 and MW-5 (1.1 ug/L and 2.3 ug/L, respectively). No free-product was noted during groundwater sampling. In all cases, total VOCs were well below 1 mg/L.

- Four PAHs (benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and chrysene exceeded their respective GWQSs.

- Pesticides, herbicides, and PCBs were not detected in groundwater above GWQS/GVs.

1.3 Primary Constituents of Concern (COCs)

Based on findings of the RI and previous investigations and the approved-Decision Document, the site-specific Constituents of Concern (COCs) are comprised of GCPS, benzene, PAHs, arsenic, cadmium, and lead.

1.4 Site-Specific Action Levels/Cleanup Goals

According to 6NYCRR Part 375-1.2(u), "Grossly Contaminated Media" means soil, sediment, surface water, or groundwater which contains sources or substantial quantities of mobile contamination in the form of non-aqueous phase liquid (NAPL), as defined in subdivision 375-1.2 (ac), that is identifiable either visually, through strong odor, by elevated contaminant vapor levels, or is otherwise readily detectable without laboratory analysis. Based on the RI results, evidence of "grossly contaminated petroleum soil-fill" (GCPS) was identified on Site.

As discussed in Section 7.3.1 of the RI/AA Report, site-specific action levels (SSALs) were developed for the BCP Site. These SSALs were developed based on the planned removal of the UST system and GCPS source area, and the feasibility of achieving the SSALs based on the nine factors outlined in 6NYCRR Part 375-1.8(f). The following SSALs were developed and used to designate soil/fill AOCs requiring remediation:

- 6NYCRR Part 375 Commercial Use SCOs for metal-AOCs;
- Total PAHs > 500 ppm; and,
- GCPS soil/fill areas with PID readings > 500 ppm.

1.5 Remedial Action Objectives

The remedial actions for the 300 Ohio Street must satisfy Remedial Action Objectives (RAOs). Remedial Action Objectives are site-specific statements that convey the goals for minimizing substantial risks to public health and the environment. For the Site, appropriate RAOs have been defined as:

Groundwater:

RAO for Public Health Protection

- Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.

RAO for Environmental Protection

- Remove the source of ground or surface water contamination.
- Prevent off-site migration of contaminated groundwater, including NAPL.

Soil:

RAO for Public Health Protection

- Prevent ingestion/direct contact with contaminated soil.

RAO for Environmental Protection

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

Soil Vapor:

RAO for Public Health Protection

- Mitigate impacts to public health resulting from existing, or the potential for, soil vapor intrusion into buildings at a site.

In general, remedial activities will include: excavation and off-site disposal of GCPS; excavation and off-site disposal of soil/fill exceeding 500 ppm total PAHs; excavation and off-site disposal of soil/fill exceeding CSCOs for arsenic, cadmium and lead; cover system placement; and, implementation of a Site Management Plan. Details of the planned remedial action are presented in Sections 2 and 3.

1.6 Project Organization and Responsibilities

4216 Group, LLC was accepted into the BCP as a non-responsible party (volunteer) per ECL§27-1405. Benchmark-TurnKey will manage the brownfield cleanup on behalf of 4216 Group, LLC. The NYSDEC Division of Environmental Remediation (Region 9), in consultation with the New York State Department of Health (NYSDOH) shall monitor the

remedial actions to verify that the work is performed in accordance with the Brownfield Cleanup Agreement, the approved RA Work Plan, and NYSDEC DER-10 guidance.

2.0 PRE-REMEDIATION TASKS

2.1 Public Information and Outreach

A fact sheet containing information about the planned remedial work will be sent to those individuals on the Brownfield Site Contact List, including subscribed property owners and residents adjacent to the Site, environmental groups, local political representatives, and interested regulatory agencies. Furthermore, a copy of this Work Plan will be made available for public review at the NYSDEC Region 9 office and the Erie County Public Library, the designated document repository.

2.2 Underground Utilities Location

The remediation contractor will contact underground facilities protection organization (Dig Safely New York, UFPO) to locate utility lines within the work area.

2.3 Health and Safety Plan Development

A Health and Safety Plan (HASP) will be prepared and enforced by the remediation contractor in accordance with the requirements of 29 CFR 1910.120. The HASP will cover all on-site remedial activities. Benchmark-TurnKey will be responsible for Site control and for the health and safety of its authorized site workers. Benchmark-TurnKey's HASP is provided for informational purposes in Appendix A. The remediation contractor will be required to develop a HASP as or more stringent than Benchmark-TurnKey's HASP.

2.4 Mobilization and Site Preparation

The remediation contractor's field operations at the Site will commence with mobilizing equipment and materials to the Site and erecting safety fencing and other temporary controls as described below.

2.5 Temporary Facilities and Controls

Temporary facilities for use during the remedial work may include a construction field trailer and portable toilets. Temporary controls will be employed for protection against off-site migration of soil and safety hazards during construction, including safety fencing, dust suppression, and erosion control as further described below.

2.5.1 Access Controls

Daily work areas will be identified with construction cones and/or temporary fencing. Work areas will be determined daily based on the planned remedial activities, and may be changed throughout the work day to ensure safe operations. Access control will consider site worker and general public safety, and tenant access requirements.

2.5.2 Dust Monitoring and Controls

A Community Air Monitoring Plan (CAMP), as more fully described in Section 4.1, will be implemented during Site excavation work. If community air monitoring indicates the need for dust suppression or if dust is visually observed leaving the Site, the remediation contractor will apply a water spray across the excavation and surrounding areas, and on Site haul roads as necessary to mitigate airborne dust formation and migration. Potable water will either be obtained from a public hydrant or provided by the on-site water service, if available.

2.5.3 Erosion and Sedimentation Control

Provisions will be made for erosion and sedimentation control at the work perimeter during remediation activities. A Master Erosion Control Plan (MECP) has been prepared and incorporated as Appendix B to this Work Plan. This MECP includes provisions for silt fencing, hay baling, mulching, and other measures, as warranted.

2.6 Supplemental Facilities Assessment

A supplemental exploratory investigation will be completed in the vicinity of suspect Tanks 21-23 (see Figure 4) to confirm removal records and ascertain tank disposition. If additional tanks are discovered they will be handled in accordance with the planned UST system removal as described in Section 3.1 below.

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3.0 CLEANUP APPROACH

The NYSDEC approved Alternatives Analysis Report and Decision Document (DD) identified the cleanup approach for the Site. Specifically, the selected remedy is a Commercial Track 4 approach incorporating the following major remedial elements:

- Excavation and off-site disposal of the UST system and GCPS;
- Excavation of soil/fill exceeding 500 ppm total PAHs, in accordance with CP-51 guidelines;
- Excavation of soil/fill exceeding Commercial Use SCOs for arsenic, cadmium and lead;
- Maintenance and placement of a site cover system in areas without building or hardscape (i.e., asphalt, concrete).
- Development of a Site Management Plan (SMP) for post-certificate of completion (COC) operation, maintenance and monitoring.

3.1 UST System Removal

Prior to excavation of the UST system, the tops of the tanks and distribution piping will be fully exposed using an excavator. The UST system will be inspected to determine proper handling and recycling/disposal of any residual contents. If residual contents are discovered, a properly licensed vacuum truck operator will be employed to remove the contents of the tanks and lines. All tanks and lines contents will be properly characterized and transported off-site to a licensed disposal/recycling facility. The UST system will be removed from the subsurface in accordance with applicable NYSDEC guidelines. Figure 4 shows the location of the UST system components relative to key Site features. The NYSDEC will be notified at least one week prior to UST system removal activities.

3.2 Grossly Contaminated Petroleum-impacted Soil/Fill (GCPS)

In accordance with 6NYCRR Part 375-1.2(u), "Grossly Contaminated Media" means soil, sediment, surface water, or groundwater which contains sources or substantial quantities of mobile contamination in the form of non-aqueous phase liquid (NAPL), that is identifiable either visually, through strong odor, by elevated contaminant vapor levels, or is otherwise readily detectable without laboratory analysis. Based on the RI and historic investigations, “grossly contaminated soil”, evidenced by substantial quantities of petroleum,

NAPL, as described above, and/or elevated PID readings in excess of 500 ppm was identified in the central area of the site surrounding current and former USTs, product piping and product dispensers ranging from approximately 0 to 14 fbgs, with the highest impacts noted generally in the 6-8 fbgs depth range. However, based on the soil analytical data, there were no exceedances of CSCOs for VOCs from subsurface soil/fill samples noted to exhibit evidence of grossly contaminated soil, including elevated PID readings as high as 1,897 ppm, with the vast majority being reported below Residential Use SCOs. As on-Site grossly contaminated soil is impacted with petroleum constituents, such material is described throughout this work plan as "Grossly Contaminated Petroleum Soil (GCPS)," as defined above, and as such PID readings in excess of 500 ppm will be used as an additional indicator of GCPS. Impacted GCPS will be removed and transported off-site for disposal and/or biotreatment, and post-excavation confirmatory samples will be collected.

Immediately following removal of the UST system, GCPS and soil/fill exceeding 500 ppm total PAHs, will be excavated and loaded into dump trucks for off-site disposal at a permitted commercial landfill. A PID and visual/olfactory observations will be used to screen soil/fill materials and assist in verifying removal of impacted soil/fill.

Following the completion of the GCPS excavation, the limited excavation planned for the area proximate to MW-1 will be completed. A qualified environmental professional (QEP) will provide oversight of the excavation activities. Lateral and vertical excavation limits will continue as described above. Any soil/fill that cannot feasibly be removed at a property boundary or surrounding a buried utility will be documented in the SMP and a demarcation material (e.g., plastic mesh, filter fabric) will be placed along the impacted sidewall as an indication of remaining contamination. Figure 4 presents the approximate location of the UST System, and Figure 5 presents the excavation plan.

3.2.1 GCPS Area – Post-Excavation Confirmation Sampling

Post excavation confirmatory composite samples will be collected from the GCPS excavated areas from excavation sidewalls and bottom, in accordance with DER-10, 5.4(b). Based on the large area planned for GCPS excavation, the post-excavation sampling plan includes a frequency of one sample per 30 feet linear feet of sidewall and one sample for each 900 square feet of excavation bottom, along the Ohio Street property boundary with preference to areas adjacent to removed UST system components; and one sample per 60 linear feet of sidewall and one sample per 1,200 square feet of excavation bottom, along the

northern, southern and eastern excavation sidewall boundary, with preference to areas adjacent to removed UST system components. All samples will be analyzed by a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) certified analytical laboratory for Target Compound List (TCL) plus CP-51 List VOCs and PAHs, in accordance with USEPA Methodology with an equivalent Category B deliverables package to facilitate data evaluation by a third-party validation expert. Expedited turnaround times may be requested for the analytical results to minimize the time that the excavation(s) remains open.

3.3 Metals Impacted Soil/Fill

Shallow excavations to remove metals-impacted soil/fill exceeding CSCOs are planned for SS-10 and TP-13 areas. Based on the RI, the estimated lateral and vertical extent of excavations are presented on Figure 5. The extent of excavation will be adjusted as determined by field observations and confirmatory sampling. Any soil/fill that cannot feasibly be removed at a property boundary or surrounding a buried utility will be documented in the SMP and a demarcation material (e.g., plastic mesh, filter fabric) will be placed along the impacted sidewall as an indication of remaining contamination.

3.3.1 Metals Impacted Soil/Fill Post-Excavation Confirmation Sampling

Post excavation confirmatory composite samples will be collected from the metals impacted soil/fill excavation areas. Sample locations from excavated areas will include samples from excavation sidewalls and bottom. A minimum of one sample per 30 linear feet of sidewall and one sample for each 900 square feet of excavation bottom will be collected. All samples will be analyzed by a NYSDOH ELAP certified analytical laboratory for metal COPCs for that excavation area in accordance with USEPA Methodology with an equivalent Category B deliverables package to facilitate data evaluation by a third-party validation expert. Expedited turnaround times may be requested for the analytical results to minimize the time that the excavation(s) remains open.

3.4 Waste Characterization

Waste characterization samples will be collected in accordance with the disposal and/or recycling facilities requirements. Pre-characterization of the soil will allow for direct loading and off-site transportation at the time of the impacted soil removal. Based on the

results of the waste characterization sampling, impacted soil will be managed according to all federal, state and local waste disposal regulations.

3.5 Off-Site Transportation and Disposal of Non-Hazardous Soil/Fill

Non-hazardous soil/fill, including GCPS, PAH-impacted, and metals-impacted soil/fill will be transported off-site for disposal at a permitted commercial solid waste disposal facility by licensed haulers. The commercial solid waste disposal facility will provide non-hazardous waste manifests and disposal receipts, which will be submitted in the Final Engineering Report.

3.6 Placement and Compaction of Backfill

Backfilling will closely follow the excavation work to minimize the amount of open excavation. However, backfill soil will be maintained at a sufficient distance from the working face of the excavation to prevent contact or mixing with fill soils designated for removal. Wetting of the backfill soil during placement, spreading, and compaction will be performed as required to control fugitive dust within the Community Air Monitoring Plan action limits.

3.6.1 Acceptable Backfill Materials

In accordance with DER-10, backfill material used on-site may consist of the following materials:

- Gravel, rock, or stone, consisting of virgin material, from a permitted mine or quarry may be imported, without chemical testing, if it meets the requirements of DER-10, or as otherwise approved by NYSDEC.
- Recycled concrete or brick from a NYSDEC-registered construction and demolition debris processing facility may be imported, without chemical testing, if it meets the requirements of DER-10, or as otherwise approved by NYSDEC.
- Imported soil/fill originating from known off-site sources having no evidence of disposal or releases of hazardous substances, hazardous, toxic or radioactive wastes, or petroleum that meets the chemical criteria of Table 1. No off-site materials meeting the definition of a solid waste as defined in 6NYCRR, Part 360-1.2(a) shall be used as backfill.

- On-site reuse of soil/fill which meets Part 375 Commercial Use SCOs and is free from visual and olfactory evidence of impact, including material which complies with the CP-51 total PAHs less than 500 ppm.
- On-site crushed concrete/brick with no visible or olfactory evidence of impacts.

3.6.2 Backfill Characterization Requirements

In addition to the above criteria, backfill materials being imported to the Site will be subject to the following characterization requirements in accordance with DER-10 Table 5.4(e)10:

Required Minimum Number of Soil Samples for Soil Imported to a Site			
Soil Quantity (CY)	**VOCs**	**SVOCs, Inorganics & PCBs/Pesticides**	
	Discrete Samples	**Composite**	**Grab/Composite Samples**
0-50	1	1	3-5 grab samples from different locations in the fill being provided will comprise a composite sample for analysis.
50-100	2	1	
100-200	3	1	
200-300	4	1	
300-400	4	2	
400-500	5	2	
500-800	6	2	
800-1,000	7	2	
>1,000	Add an additional 2 VOC and 1 composite for each additional 1,000 CY or consult with DER		

Each composite sample will be comprised of a minimum of three grab samples (samples for VOC analysis will be collected as individual grabs in lieu of composites). Samples will be analyzed for the following constituents in accordance with USEPA SW-846 methodology:

- TCL VOCs – Method 8260C
- TCL SVOCs – Method 8270D
- TAL Metals – Method 6010B
- TCL Organochlorine Pesticides and PCBs – Method 8081A/8082

Characterization testing will be performed by an independent, NYSDOH ELAP-approved laboratory. An equivalent Category B deliverables package will be furnished with the data to allow data evaluation and preparation of a Data Usability Summary Report by an independent, third party data validation expert. Quality Assurance (QA) samples will be

collected to support the data evaluation. The QA samples will include a minimum of one matrix spike, one matrix spike duplicate, and one blind duplicate per 20 verification samples.

Based on the source and initial off-site source material analytical results, a reduced sampling frequency may be requested. Written request to reduce backfill source sampling requirement will be submitted to the Department for approval prior to any modification of sampling frequency.

3.7 Groundwater Management

Water removed from excavations and surface water run-in to excavations during the impacted soil removal will be handled on-site prior to discharge to the municipal sewer. In general, water removed from excavations will be stored/settled in a portable 21,000-gallon storage tank, and if deemed necessary, will be pumped through a bag or cartridge filter prior to treatment using granular activated carbon (GAC). Following completion of excavation work, settled solids remaining in the tank and spent filter bags will be disposed of off-site.

If the accumulated waters required treatment, the spent GAC will be characterized and regenerated off-site, or disposed at a permitted disposal facility in accordance with applicable federal and state regulations. The storage tank will be decontaminated via pressure washing. Benchmark-TurnKey or the Site owner will coordinate with the City of Buffalo to obtain any necessary temporary sewer discharge permits.

3.8 Soil Cover System

Historic sampling results indicate that certain metals and SVOCs are present in surface/near-surface soil/fill on-site above Part 375 Commercial SCOs. The remedial evaluation conducted in the RI/AA Report concluded that a Track 2 Commercial cleanup remedy was not practicable; therefore, placement of a soil cover system is a feasible engineering control to protect human health and the environment. The soil cover system will be comprised of:

- **Non-Vegetated Areas:** These areas will be covered by an asphalt/concrete paving system, building foundations approximately 4 to 6 inches thick; or recycled on-site concrete/brick materials, or approved off-site source backfill material compacted to at least 12 inches thick. Cover materials will be tested in accordance with Table 5.4(3)10 of DER-10 (refer to Section 3.4.1), or as otherwise approved by NYSDEC.

- **Vegetated Areas:** A minimum of 12 inches of imported backfill or re-used on-site soil/fill, tested and determined to meet CSCOs and not exhibit nuisance characteristics (visual and olfactory), will be placed. The uppermost approximate four inches should be comprised of soil capable of sustaining plant growth. Non-grassed areas (e.g., landscape shrubs/beds) will be covered with chip mulch, stone, or other material to mitigate erosion around plantings.
- **Demarcation Layer:** A demarcation layer (e.g., snow fence, plastic mesh, etc.) will be placed beneath the soil cover system where hardscape (concrete/asphalt) will not be present.

3.9 Site Management Plan

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

- **Engineering and Institutional Controls Plan**. Engineering controls include any physical barrier or method employed to actively or passively contain, stabilize, or monitor contaminants; restrict the movement of contaminants; or eliminate potential exposure pathways to contaminants. Institutional controls at the site will include groundwater use restrictions and use restrictions of the site to commercial or industrial purposes.
- **Operation and Maintenance Plan** that describes the measures necessary to operate, monitor, and maintain the soil cover system.
- **Excavation Work Plan** to assure that post-remediation intrusive activities and soil/fill handling at the Property related to redevelopment, operation, and maintenance are completed in a safe and environmentally responsible manner.
- **Site Monitoring Plan** that includes: provisions for a groundwater monitoring plan and a Property-wide inspection program to assure that the IC/ECs remain effective.
- **Environmental Easement** filed with Erie County.

4.0 REMEDIAL ACTIVITIES SUPPORT DOCUMENTS

4.1 Health and Safety Protocols

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

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

The HASP also includes a contingency plan that addresses potential site-specific emergencies, and a Community Air Monitoring Plan that describes required particulate monitoring to protect the neighboring community during intrusive site remediation activities.

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

4.1.1 Community Air Monitoring

Real-time community air monitoring will be performed during intrusive remedial activities at the Site. A CAMP is included with Benchmark-TurnKey's HASP. Particulate and VOC monitoring will be performed along the downwind perimeter of the work area during excavation, grading and soil/fill handling activities in accordance with this plan. Upwind concentrations will be field monitored at the start and periodically throughout the

work day. Monitoring locations will be evaluated throughout the work day, as described in the CAMP. The CAMP is consistent with the requirements for community air monitoring at remediation sites as established by the New York State Department of Health (NYSDOH) and 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).

4.2 Citizen Participation Activities

NYSDEC will coordinate and lead community relations throughout the course of the project with support from Benchmark-TurnKey as requested. A Citizen Participation (CP) Plan has been prepared by Benchmark-TurnKey and approved by NYSDEC. A copy of the CP Plan has been placed in the Buffalo and Erie County Public Library, the designated project document repository. The NYSDEC, with input from Benchmark-TurnKey and 4216 Group, LLC, will issue project fact sheets to keep the public informed of remedial activities.

5.0 REPORTING

5.1 Remedial Activities Reporting

Benchmark-TurnKey will be on-Site full-time during the remedial actions to document remedial activities. Monitoring and documentation of the RA activities will include: construction stake-out; record drawings; daily reports of activities; community air monitoring results; post-injection sampling and analysis; and progress photographs and sketches.

5.1.1 Field Construction Monitoring

Standard daily reporting procedures will include preparation of an Inspector's Daily Report and, when appropriate, problem identification and corrective measures reports. Appendix C 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.
- Number and type of truckloads of soil/fill removed from the site.
- Approximate sampling locations (sketches) or GPS (Trimble) coordinates and sample designations for pre-excavation characterization.
- Excavation locations and depths being excavated.

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

Photo documentation of the remedial activities will be prepared by a field representative throughout the duration of the project as necessary to convey typical work activities, changed conditions, and/or special circumstances.

5.2 Final Engineering Report

A Final Engineering Report (FER) will be prepared at the conclusion of remedial activities. The FER will include the following information and documentation, consistent with the NYSDEC's DER-10 Technical Guidance for Site Remediation:

- Introduction and background.
- A Site or area planimetric map showing the parcel(s) remediated, including significant site features.
- A Site map showing the lateral limits of any excavations.
- Tabular summaries of unit quantities including: volume of soil excavated and disposition of excavated soil.
- Documentation on the disposition of impacted soil removed from the Site.
- Documentation of the cover system, including survey elevations and licensed professional engineer stamped record drawings.
- Copies of daily inspection reports and, if applicable, problem identification and corrective measure reports.
- Photo documentation of remedial activities.
- Text describing the remedial activities performed; a description of any deviations from the Work Plan and associated corrective measures taken; and other pertinent information necessary to document that the Site activities were carried out in accordance with this Work Plan.

In addition, Benchmark-TurnKey will subcontract for third-party data review of post-excavation verification data by a qualified, independent data validation expert. Specifically, a Data Usability Summary Report (DUSR) will be prepared, with appropriate data qualifiers added to the results. The DUSR format will follow the NYSDEC's September 1997 DUSR guidelines and draft DER-10 guidance. The DUSR and any necessary qualifications to the data will be appended to the FER.

5.3 Site Management Plan

As described in Section 3.9, a SMP will be submitted for the Site. The SMP will include an: Engineering and Institutional Control Plan; Operation and Maintenance Plan; Excavation Plan; a Site Monitoring Plan; and, an Environmental Easement.

As part of the SMP, a soil vapor intrusion evaluation will be completed in areas of the site with remaining contamination and potential for soil vapor intrusion has been identified. Alternatively, a mitigation system may be installed as an element of future buildings without first conducting an investigation.

6.0 PROJECT SCHEDULE

The anticipated project schedule for the major tasks to be performed during implementation of the Remedial Action Work Plan is included as Figure 6. Major tasks are planned as follows:

- *May-July 2014* – Complete abatement and demolition of on-Site buildings
- *May–November 2014* – Complete remedial activities;
- *Winter/Spring 2015* – Submit Draft Environmental Easement (EE), Site Management Plan (SMP) and Final Engineering Report (FER)
- *Summer 2015* – Submit Final EE, SMP and FER
- *Summer/Fall 2015* – Receive Certificate of Completion (COC)

7.0 REFERENCES

1. LCS Inc. Supplemental Phase II Environmental Site Assessment Limited and Focused Subsurface Soil Investigation, 300 Ohio Street, Buffalo, New York. September 2010.

2. AMEC Geomatrix, Inc. Geophysical Survey Results, 300 Ohio Street, Buffalo, NY. October 2012.

3. TurnKey Environmental Restoration, LLC. Remedial Investigation Work Plan, 300 Ohio Street Site (C915257), Buffalo, New York. Revised May 2012.

4. TurnKey Environmental Restoration, LLC, in association with Benchmark Environmental Engineering & Science, PLLC, Remedial Investigation/Alternative Analysis Report (RI/AAR) Report, 300 Ohio Street Site, Buffalo, NY, BCP Site No. C915257, prepared for 4216 Group, LLC. Revised November 2013.

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

TABLE

TABLE 1

CRITERIA FOR USE OF OFF-SITE SOIL

REMEDIAL ACTION WORK PLAN
300 OHIO STREET SITE
BUFFALO, NEW YORK

Parameter	Allowable Concentration[1] for Use of Off-Site Soil
Volatile Organic Compounds (mg/kg)	
1,1,1-Trichloroethane	0.68
1,1-Dichloroethane	0.27
1,1-Dichloroethene	0.33
1,2-Dichlorobenzene	1.1
1,2-Dichloroethane	0.02
1,2-Dichloroethene(cis)	0.25
1,2-Dichloroethene(trans)	0.19
1,3-Dichlorobenzene	2.4
1,4-Dichlorobenzene	1.8
1,4-Dioxane	0.1
Acetone	0.05
Benzene	0.06
Butylbenzene	12
Carbon tetrachloride	0.76
Chlorobenzene	1.1
Chloroform	0.37
Ethylbenzene	1
Hexachlorobenzene	3.2
Methyl ethyl ketone	0.12
Methyl tert-butyl ether	0.93
Methylene chloride	0.05
Propylbenzene-n	3.9
Sec-Butylbenzene	11
Tert-Butylbenzene	5.9
Tetrachloroethene	1.3
Toluene	0.7
Trichloroethene	0.47
Trimethylbenzene-1,2,4	3.6

TABLE 1

CRITERIA FOR USE OF OFF-SITE SOIL

REMEDIAL ACTION WORK PLAN
300 OHIO STREET SITE
BUFFALO, NEW YORK

Parameter	Allowable Concentration[1] for Use of Off-Site Soil
Volatile Organic Compounds (mg/kg)	
Trimethylbenzene-1,3,5	8.4
Vinyl chloride	0.02
Xylene (mixed)	1.6
Semi-Volatile Organic Compounds (mg/kg)	
Acenaphthene	98
Acenaphthylene	107
Anthracene	500
Benzo(a)anthracene	1
Benzo(a)pyrene	1
Benzo(b)fluoranthene	1.7
Benzo(g,h,i)perylene	500
Benzo(k)fluoranthene	1.7
Chrysene	1
Dibenz(a,h)anthracene	0.56
Fluoranthene	500
Fluorene	386
Indeno(1,2,3-cd)pyrene	5.6
m-Cresol(s)	0.33
Naphthalene	12
o-Cresol(s)	0.33
p-Cresol(s)	0.33
Pentachlorophenol	0.8
Phenanthrene	500
Phenol	0.33
Pyrene	500

TABLE 1

CRITERIA FOR USE OF OFF-SITE SOIL

REMEDIAL ACTION WORK PLAN
300 OHIO STREET SITE
BUFFALO, NEW YORK

Parameter	Allowable Concentration[1] for Use of Off-Site Soil
Metals (mg/kg)	
Arsenic	16
Barium	400
Beryllium	47
Cadmium	7.5
Chromium, Hexavalent[2]	19
Chromium, Trivalent[2]	1500
Copper	270
Cyanide	27
Lead	450
Manganese	2000
Mercury (total)	0.73
Nickel	130
Selenium	4
Silver	8.3
Zinc	2480
PCBs/Pesticides (mg/kg)	
2,4,5-TP Acid (Silvex)	3.8
4,4'-DDE	17
4,4'-DDT	47
4,4'-DDD	14
Aldrin	0.19
Alpha-BHC	0.02
Beta-BHC	0.09
Chlordane (alpha)	2.9
Delta-BHC	0.25
Dibenzofuran	210
Dieldrin	0.1
Endosulfan I	102
Endosulfan II	102

TABLE 1

CRITERIA FOR USE OF OFF-SITE SOIL

REMEDIAL ACTION WORK PLAN
300 OHIO STREET SITE
BUFFALO, NEW YORK

Parameter	Allowable Concentration[1] for Use of Off-Site Soil
PCBs/Pesticides (mg/kg)	
Endosulfan sulfate	200
Endrin	0.06
Heptachlor	0.38
Lindane	0.1
Polychlorinated biphenyls	1

Notes:

1. The lower of Commercial SCO and Protection of Groundwater SCO per 6NYCRR Part 375-6.8(b)
2. The SCO for Hexavalent or Trivalent Chromium is considered to be met if the analysis for the total species of this contaminant is below the specific SCO for Hexavalent Chromium.

FIGURES

F:\CAD\TurnKey\Ellicott Development\300 Ohio Street\RAWP\Figure 1; Site Location and Vicinity Map.dwg

FIGURE 1

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

SITE LOCATION AND VICINITY MAP

REMEDIAL ACTION WORK PLAN

300 OHIO STREET SITE
BCP SITE NO. C915257
BUFFALO, NEW YORK

PREPARED FOR

4216 GROUP, LLC

PROJECT NO.:	0136-037-102
DATE:	MAY 2014
DRAFTED BY:	BLR

F:\CAD\TurnKey\Ellicott Development\300 Ohio Street\RAWP\RAWP FIGURES.dwg

DATE: MAY 2014
DRAFTED BY: BLR

SITE PLAN (AERIAL)

REMEDIAL ACTION WORK PLAN

300 OHIO STREET SITE
BCP SITE NO. C915257
BUFFALO, NEW YORK

PREPARED FOR

4216 GROUP, LLC

FIGURE 2

TURNKEY ENVIRONMENTAL RESTORATION, LLC

2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

JOB NO.: 0136-037-102

LEGEND:

- BCP BOUNDARY
- PARCEL BOUNDARY
- EXISTING ON-SITE STRUCTURE AND NUMBER
- FENCE
- TP-1 — RI TEST PIT LOCATION
- MW-1 — RI MONITORING WELL LOCATION
- SS-3 — RI SURFACE SAMPLE LOCATION
- SB-1 — RI SOIL BORING SAMPLE LOCATION
- BH32 — HISTORIC BORE HOLE SAMPLE LOCATION (PER LCS, INC. 2010)

NE SOIL PILE
MW-6
TP-17
SS-8
TP-13
SS-5
MW-4
SS-6
TP-14
TP-16
SS-9
TP-18
③
TP-12
SS-4
TP-15
SS-7
TP-19
SS-10
MW-7
MACKINAW STREET
ADJACENT BUILDING
②
①
TP-11
SB-1
BH35
BH32
DEMOLISHED
TP-10
MW-5
TP-9
CHICAGO STREET
OHIO STREET
CONWAY PARK
BH43 BH46 BH1 BH65 BH45 BH44 BH2
SS-2
TP-6
SS-1
BH3 BH4 BH5
TP-3
BH6 BH9 BH7 BH8
TP-1
BH64 BH62 BH63 BH47
SS-3
TP-7
BH48 BH49 BH38 BH42 BH41 BH40 BH39
MW-3
BH50 BH66 BH20 BH13 BH23 BH22 BH21 BH14 BH11 BH10
MW-1
TP-2
BH12
BH24 BH54
TP-5
BH15
TP-4
BH27 BH19 BH16 BH53
BH28 BH52 BH18 BH31 BH56 BH55 BH25 BH51 BH17
MW-2
BH60 BH30 BH57 BH29
TP-8
BH61
BH59 BH33 BH58 BH37 BH36
BH34
BUFFALO RIVER

N

80' 0' 80' 160'

SCALE: 1 INCH = 80 FEET
SCALE IN FEET
(approximate)

DATE: MAY 2014
DRAFTED BY: BLR

2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

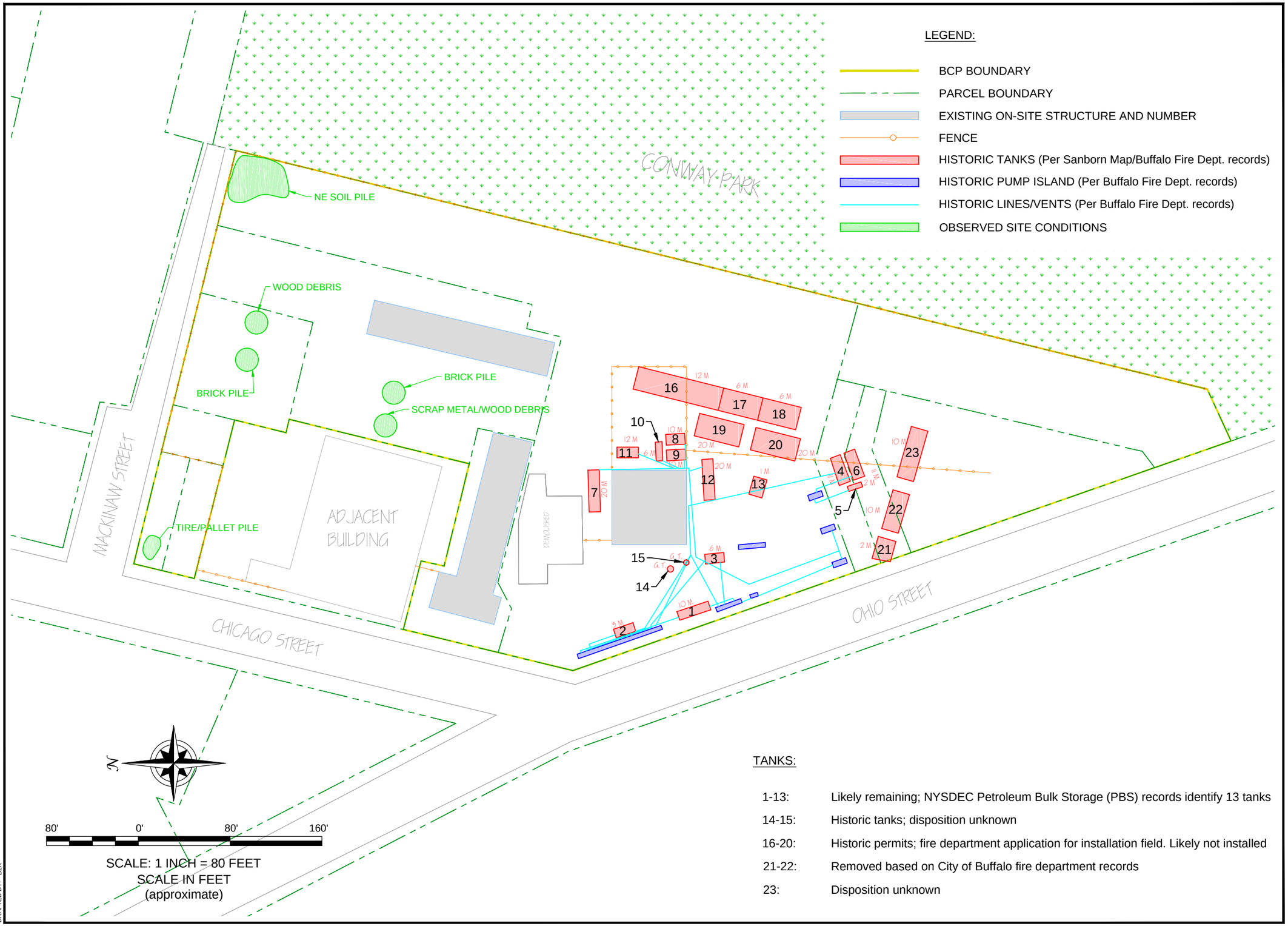
TURNKEY ENVIRONMENTAL RESTORATION, LLC

JOB NO.: 0136-037-102

REMEDIAL INVESTIGATION SAMPLE LOCATIONS

REMEDIAL ACTION WORK PLAN
300 OHIO STREET SITE
BCP SITE NO. C915257
BUFFALO, NEW YORK
PREPARED FOR
4216 GROUP, LLC

FIGURE 3



TANKS:

1-13:	Likely remaining; NYSDEC Petroleum Bulk Storage (PBS) records identify 13 tanks
14-15:	Historic tanks; disposition unknown
16-20:	Historic permits; fire department application for installation field. Likely not installed
21-22:	Removed based on City of Buffalo fire department records
23:	Disposition unknown

DATE: MAY 2014
DRAFTED BY: BLR

2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

TurnKey Environmental Restoration, LLC

JOB NO.: 0136-037-102

INFRASTRUCTURE & OBSERVED SITE CONDITIONS

REMEDIAL ACTION WORK PLAN

300 OHIO STREET SITE
BCP SITE NO. C915257
BUFFALO, NEW YORK

PREPARED FOR
4216 GROUP, LLC

FIGURE 4

F:\CAD\TurnKey\Ellicott Development\300 Ohio Street\RAWP\RAWP FIGURES.dwg

LEGEND:

- BCP BOUNDARY
- PARCEL BOUNDARY
- EXISTING ON-SITE STRUCTURE
- FENCE
- PETROLEUM-IMPACTED AREA OF CONCERN (AOC)
- METALS-IMPACTED AREA OF CONCERN (AOC)
- TP-1 RI TEST PIT LOCATION
- MW-1 RI MONITORING WELL LOCATION
- SS-3 RI SURFACE SAMPLE LOCATION
- SB-1 RI SOIL BORING SAMPLE LOCATION
- BH32 HISTORIC BORE HOLE SAMPLE LOCATION (PER LCS, INC. 2010)

CONWAY PARK

MACKINAW STREET

CHICAGO STREET

OHIO STREET

ADJACENT BUILDING

DEMOLISHED

MW-1 MW-2 MW-3 MW-4 MW-5 MW-6 MW-7

SS-1 SS-2 SS-3 SS-4 SS-5 SS-6 SS-7 SS-8 SS-9 SS-10

TP-1 TP-2 TP-3 TP-4 TP-5 TP-6 TP-7 TP-8 TP-9 TP-10 TP-11 TP-12 TP-13 TP-14 TP-15 TP-16 TP-17 TP-18 TP-19

BH1 BH2 BH3 BH4 BH5 BH6 BH7 BH8 BH9 BH10 BH11 BH12 BH13 BH14 BH15 BH16 BH17 BH18 BH19 BH20 BH21 BH22 BH23 BH24 BH25 BH27 BH28 BH29 BH30 BH31 BH32 BH33 BH34 BH35 BH36 BH37 BH38 BH39 BH40 BH41 BH42 BH43 BH44 BH45 BH46 BH47 BH48 BH49 BH50 BH51 BH52 BH53 BH54 BH55 BH56 BH57 BH58 BH59 BH60 BH61 BH62 BH63 BH64 BH65 BH66

N

80' 0' 80' 160'

SCALE: 1 INCH = 80 FEET
SCALE IN FEET
(approximate)

DATE: MAY 2014
DRAFTED BY: BLR

2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

TURNKEY ENVIRONMENTAL RESTORATION, LLC

JOB NO.: 0136-037-102

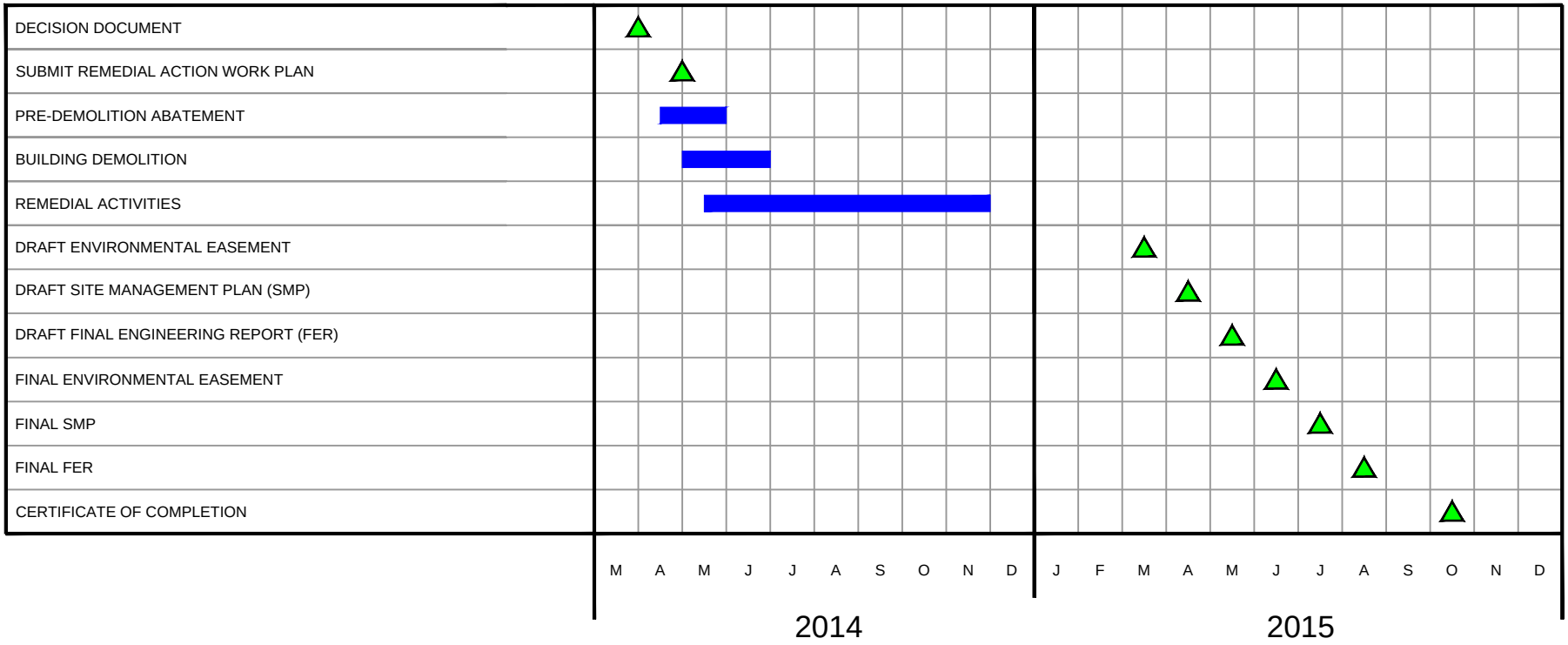
EXCAVATION PLAN

REMEDIAL ACTION WORK PLAN
300 OHIO STREET SITE
BCP SITE NO. C915257
BUFFALO, NEW YORK
PREPARED FOR
4216 GROUP, LLC

FIGURE 5

F:\CAD\TurnKey\Ellicott Development\300 Ohio Street\RAWP\Figure 6; Project Schedule.dwg

PROJECT TASKS:



TURNKEY ENVIRONMENTAL RESTORATION, LLC

2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

PROJECT NO.: 0136-037-102

DATE: MAY 2014 (REVISED JULY 2014)

DRAFTED BY: BLR

PROJECT SCHEDULE

REMEDIAL ACTION WORK PLAN

300 OHIO STREET SITE
BCP SITE NO. C915257
BUFFALO, NEW YORK

PREPARED FOR

4216 GROUP, LLC

FIGURE 6

APPENDIX A

HEALTH AND SAFETY PLAN

SITE HEALTH AND SAFETY PLAN
for
BROWNFIELD CLEANUP PROGRAM
REMEDIAL ACTIVITIES

300 OHIO STREET SITE
BUFFALO, NEW YORK

May 2014 0136-037-102

Prepared for:

4216 GROUP, LLC

300 OHIO STREET SITE
HEALTH AND SAFETY PLAN FOR REMEDIAL ACTIVITIES

ACKNOWLEDGEMENT

Plan Reviewed by (initial):

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

Project Manager: Michael Lesakowski

Designated Site Safety and Health Officer: Bryan C. Hann

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

300 OHIO STREET SITE
HEALTH AND SAFETY PLAN FOR REMEDIAL ACTIVITIES

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300 OHIO STREET SITE
HEALTH AND SAFETY PLAN FOR REMEDIAL ACTIVITIES

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300 OHIO STREET SITE
HEALTH AND SAFETY PLAN FOR REMEDIAL ACTIVITIES

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APPENDICES

1.0 INTRODUCTION

1.1 General

In accordance with OSHA requirements contained in 29 CFR 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 remedial activities at the 300 Ohio Street Site located in the City of Buffalo, New York. This HASP presents procedures for TurnKey-Benchmark employees who will be involved with remedial 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 the course of field activities to provide real-time data for on-going assessment of potential hazards.

1.2 Background

The Site is an approximate 5.0-acre parcel located at the corner of Ohio and Chicago Street, comprised of eleven tax parcels with addresses of 300 Ohio Street, 326 Ohio Street, 328 Ohio Street, 340 Ohio Street, 354 Ohio Street, 11 Chicago Street, 71 Chicago Street, 73 Chicago Street, 75 Chicago Street, 49 Mackinaw Street, and 53 Mackinaw. Conway Park, owned by the City of Buffalo, runs adjacent the eastern edge of the Site (see Figures 1 and 2).

The portion of the Site addressed at 300 Ohio Street is developed with a former gasoline service station and auto repair facility that was built in approximately 1925 (see Figure 2). According to the NYSDEC Petroleum Bulk Storage Database (PBS No. 9-383511) and the City of Buffalo municipal records, the Site has contained at least 15

underground storage tanks (USTs), and one (1) aboveground storage tank (AST). Several notes within the municipal records indicate UST replacements due to leaking tanks. The PBS record indicates that two 20,000-gallon No. 2 fuel oil USTs were closed in-place on-Site. The northern portion of the Site addressed on Chicago and Mackinaw Street, included the former E&B Machinery and Central Manufacturing operations. Historic Sanborn maps indicate that the property consisted of a machine shop, trucking terminal and coffin and cooperage manufacturing operations. Currently multiple debris piles and a large soil/fill pile are located along the western boundary of the 300 Ohio Street parcel, immediately adjacent to the Conway Park property to the east.

The Site is bound by Ohio Street and Chicago Street to the west and southwest; Mackinaw Street to the North; and the City of Buffalo-Conway Park to the east (see Figure 2). The Buffalo River is located approximately 250-ft to the west of the Site. The Site is located in a historically industrial area of the City of Buffalo. The land use surrounding the Site is a mixed commercial, vacant, residential and recreational area with the residential areas being approximately 0.2-miles to the east and 0.4-miles to the north.

1.3 Known and Suspected Environmental Conditions

In November 2013 TurnKey-Benchmark completed a Remedial Investigation (RI) of the site (Ref 2). The RI Report identifies grossly contaminated petroleum impacted soil (GPCS) in the central area of the site surrounding current and former USTs, product piping and product dispensers. Certain SVOCs and metals were detected within non-native fill materials above their respective Commercial Use SCOs; total Polycyclic Aromatic Hydrocarbons (PAH) above 500 ppm were noted in two sample locations. No VOCs, PCBs, herbicides, or pesticides were detected above Commercial Use SCOs, with the vast majority being reported below Unrestricted Use SCOs. In addition to the GCPS, benzene was detected slightly above its groundwater quality standard (GWQS).

LCS Inc. (LCS) conducted a limited Phase II Site Assessment in May 2010 and a Supplemental Phase II Site Assessment (September 2010) at the former Petroleum Sales and Service filling station portion of the Site (i.e., 300-354 Ohio Street). The findings of the September 2010 assessment (Ref. 1) are presented below (the initial May 2010 investigation results were incorporated into the findings of the September 2010 report).

- 66 soil borings were completed on the site. Visual and olfactory evidence of impacted soil/fill was noted in multiple soil boring locations by field personnel across the Site. Elevated PID readings were noted in 280 out of 301 soil sample locations, with readings as high as 1,897 ppm being detected.
- Petroleum-impacted soil related VOCs and SVOCs were detected at multiple soil boring locations across the site exceeding NYSDEC Part 375 Commercial and/or Industrial soil cleanup objectives (SCOs) and NYSDEC CP-51 SSCOs for VOCs and SVOCs were detected at multiple soil boring locations across the site.

The former filling station portion of the Site is also listed on the NYSDEC Spills Database including at least 12 spill events between 1988 and 2010. However, all spill files for the Site were administratively closed upon acceptance to the BCP, and remediation of the Site will be conducted under the guidance of the BCP.

1.4 Parameters of Interest

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

- **Inorganic Compound –** The inorganic COPCs potentially present at elevated concentrations are arsenic, cadmium, and lead.

- **Volatile Organic Compound (VOC)** – The VOC COPC potentially present at elevated concentration may include benzene in groundwater, and GCPS.

- **Semi-Volatile Organic Compounds (SVOCs) – The** SVOCs potentially present at elevated PAH concentrations including; benzo(b)fluoranthene, benzo(a)pyrene, chrysene, and pyrene.

1.5 Overview of Remedial Activities

TurnKey-Benchmark personnel will be on-site to observe and perform remedial activities. The field activities to be completed as part of the remedial activities are summarized below. Planned remedial activities are more fully described in the Remedial Action Work Plan (RAWP) for the Site (Ref. 4).

Remedial Action Activities

1. **Excavation & Offsite Disposal of Contaminant Source Areas:** Approximately 12,670 cubic yards of soil will be removed from the site for disposal at an off-site permitted facility. All excavations will include confirmation sampling.

2. **Confirmation Sampling:** TurnKey-Benchmark personnel will collect confirmation soil samples to verify that excavations attain the following maximum concentrations:
   - Part 375 - Commercial Use SCOs
   - CP-51 - Total PAH less than 500 ppm

3. **Backfill:** Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to replace the excavated soil or complete the backfilling of excavations and establish the designed grades at the site below the cover system

4. **Cover System:** The cover will consist either of the structures, such as buildings, pavement, and sidewalks comprising the site development, or one foot of surface soil which met the applicable soil cleanup objectives (SCOs). The soil cover will be placed over a demarcation layer and any backfill material brought to the site will meet the requirements for the identified site use as set forth in DER-10.

2.0 ORGANIZATIONAL STRUCTURE

This chapter of the HASP describes the lines of authority, responsibility and communication as they pertain to health and safety functions at the Site. The purpose of this chapter is to identify the personnel who impact the development and implementation of the HASP and to describe their roles and responsibilities. This chapter also identifies other contractors/sub-contractors 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 29 CFR 1910.120(b)(2). This section will be reviewed by the Project Manager and updated as necessary to reflect the current organizational structure at this Site.

2.1 Roles and Responsibilities

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 this Site 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 this Site is ***Mr. Michael Lesakowski.*** 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, 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 Site Safety and Health Officer (SSHO).
- Reviewing the emergency response coordination plan to assure its effectiveness.
- Serving as the primary liaison with Site contractors and the property owner.

2.1.3 Site Safety and Health Officer

The Site Safety and Health Officer (SSHO) for this Site is ***Mr. Bryan C. Hann***. The qualified alternate SSHO is ***Mr. Richard L. Dubisz.*** 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 29 CFR Part 1910.120(e)), that they have obtained medical clearance to wear respiratory protection (per 29 CFR Part 1910.134), and that they are properly trained in the selection, use and maintenance of personal protective equipment, including qualitative respirator fit testing.
- Performing or overseeing Site monitoring as required by the HASP.
- Assisting in the preparation and review of the HASP.
- Maintaining site-specific safety and health records as described in this HASP.

- Coordinating with the Project Manager, Site Workers, and Contractor's SSHO as necessary for safety and health efforts.

2.1.4 Site Workers

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

2.1.5 Other Site Personnel

Other Site personnel who will have health and safety responsibilities will include the Excavation Contractor, who will be responsible for developing, implementing and enforcing a Health and Safety Plan 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's HASP shall cover all non-TurnKey/Benchmark Site personnel. Each Contractor shall assign a 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 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 shall be responsible for ensuring that these individuals have received OSHA-required training (29 CFR 1910.120(e)), including initial, refresher and site-specific training, and shall be responsible for the safety and health of these individuals while they are on-site.

3.0 HAZARD EVALUATION

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

3.1 Chemical Hazards

As discussed in Section 1.3, historic activities have potentially resulted in impacts to Site soils and groundwater. Visual and olfactory observations, as well as elevated PID readings, indicate a potential VOC impact to Site soil. In addition to VOCs, soil and groundwater may be impacted by SVOCs (PAHs) and/or inorganic compounds due to historic use as a gasoline service station, machine shop and automotive repair shop. Table 1 lists exposure limits for airborne concentrations of the COPCs identified in Section 1.4 of this HASP. Brief descriptions of the toxicology of the prevalent COPCs and related health and safety guidance and criteria are provided below.

1. Inorganic Compounds

- **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.

- **Cadmium (CAS #7440-43-9)** 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.

- **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.

2. **Petroleum Hydrocarbons:**

   - **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.

3. **Polycyclic Aromatic Hydrocarbons (PAHs)** are formed as a result of the 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; dibenzo(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.

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

3.2 Physical Hazards

Remedial activities at the 300 Ohio Street Site may present the following physical hazards:

- The potential for physical injury during heavy construction equipment use, such as backhoes, excavators and drilling equipment.
- The potential for heat/cold stress to employees during the summer/winter months (see Section 10.0).
- The potential for 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 remedialoperations and sampling activities at the Site. Since it is impossible to list all potential sources of injury, it shall be the responsibility of each individual to exercise proper care and caution during all phases of the work.

4.0 TRAINING

4.1 Site Workers

All personnel performing remedial activities at the Site (such as, but not limited to, equipment operators, general laborers, and drillers) 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 29 CFR 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 subsequent to 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 29 CFR 1910.120(e)(5), and is specifically designed to meet the requirements of OSHA 29 CFR 1910.120(e)(3) and 1910.120(e)(8). The training covers, as a minimum, the following topics:

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

- Safe use of engineering controls and equipment.
- Decontamination procedures.
- Emergency response and escape.
- Confined space entry procedures.
- Heat and cold stress monitoring.
- Elements of a Health and Safety Plan.
- Spill containment.

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

Any employee who has not been certified as having received health and safety training in conformance with 29 CFR 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 course of the work. Supplemental briefings are provided as necessary to notify employees of any changes to this HASP as a result 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 (e.g., based on monitoring results); changes in the work schedule/plan; newly discovered hazards; and safety incidents occurring during Site work.

4.2 Supervisor Training

On-site safety and health personnel who are directly responsible for or who supervise the safety and health of workers engaged in hazardous waste operations (i.e., SSHO) shall receive, in addition to the appropriate level of worker training described in Section 4.1,

above, 8 additional hours of specialized supervisory training, in compliance with 29 CFR 1910.120(e)(4).

4.3 Emergency Response Training

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

4.4 Site Visitors

Each Contractor's SSHO will provide a site-specific briefing to 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 29 CFR 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, or developed signs or symptoms of over-exposure to hazardous substances, or were accidentally exposed to substances at concentrations above the permissible exposure limits without necessary personal protective equipment. Such exams are performed as soon as possible following development of symptoms or the known exposure event.

Medical evaluations are performed by Health Works 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) 823-5050 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 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.

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

In conformance with OSHA regulations, 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 Site safety officer. Excessive facial hair (i.e., beards, long mustaches or sideburns) that interferes with the satisfactory respirator-to-face seal is prohibited.

- Contact with surfaces/materials either suspected or known to be contaminated will be avoided to minimize the potential for transfer to personnel, cross contamination and need for decontamination.

- Medicine and alcohol can synergize the effects of exposure to toxic chemicals. Due to possible contraindications, use of prescribed drugs should be reviewed with the 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, drill rigs etc.) are as follows:

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

- Subsurface work will not be initiated without first clearing underground utility services.

- Heavy equipment should not be operated within 20 feet of overhead wires. This distance may be increased if windy conditions are anticipated or if lines carry high voltage. The Site should also be sufficiently clear to ensure the project staff can move around the heavy machinery safely.

- Care should be taken to avoid overhead wires when moving heavy-equipment from location to location.

- Hard hats, safety boots and safety glasses should be worn at all times in the vicinity of heavy equipment. Hearing protection is also recommended.

- The work Site should be kept neat. This will prevent personnel from tripping and will allow for fast emergency exit from the Site.

- Proper lighting must be provided when working at night.

- Construction activities should be discontinued during an electrical storm or severe weather conditions.

- The presence of combustible gases should be checked before igniting any open flame.

- Personnel shall stand upwind of any construction operation when not immediately involved in sampling/logging/observing activities.

- Personnel will not approach the edge of an unsecured trench/excavation closer than 2 feet.

7.0 PERSONAL PROTECTIVE EQUIPMENT

7.1 Equipment Selection

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

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

- **Level A:** Should be selected when the highest level of respiratory, skin and eye protection is needed.

- **Level B:** Should be selected when the highest level of respiratory protection is needed, but a lesser level of skin protection is required. Level B protection is the minimum level recommended on initial Site entries until the hazards have been further defined by on-site studies. Level B (or Level A) is also necessary for oxygen-deficient atmospheres.

- **Level C:** Should be selected when the types of airborne substances are known, the concentrations have been measured and the criteria for using air-purifying respirators are met. In atmospheres where no airborne contaminants are present, Level C provides dermal protection only.

- **Level D:** Should not be worn on any Site with elevated respiratory or skin hazards. This is generally a work uniform providing minimal protection.

OSHA requires the use of certain PPE under conditions where an immediate danger to life and health (IDLH) may be present. Specifically, OSHA 29 CFR 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 29 CFR 1910.120(g)(3)(iv) requires donning totally-encapsulating chemical protective suits (with a protection level equivalent to Level A protection) in conditions where skin absorption of a hazardous substance may result in a substantial possibility of immediate serious illness, injury or death, or impair the ability to escape.

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

7.2 Protection Ensembles

7.2.1 Level A/B Protection Ensemble

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

The recommended PPE for level A/B is:

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

7.2.2 Level C Protection Ensemble

Level C protection is distinguished from Level B by the equipment used to protect the respiratory system, assuming the same type of chemical-resistant clothing is used. The main selection criterion for Level C is that conditions permit wearing an air-purifying device. The device (when required) must be an air-purifying respirator (MSHA/NIOSH approved) equipped with filter cartridges. Cartridges must be able to remove the substances encountered. Respiratory protection will be used only with proper fitting, training and the approval of a qualified individual. In addition, an air-purifying respirator can be used only if: oxygen content of the atmosphere is at least 19.5% in volume; substances are identified and concentrations measured; substances have adequate warning properties; the individual passes a qualitative fit-test for the mask; and an appropriate cartridge/canister is used, and its service limit concentration is not exceeded.

Recommended PPE for Level C conditions includes:

- Full-face piece, air-purifying respirator equipped with MSHA 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.

7.2.3 Level D Protection Ensemble

As indicated above, Level D protection is primarily a work uniform. It can be worn in

areas where only boots can be contaminated, where there are no inhalable toxic substances and where the atmospheric contains at least 19.5% oxygen.

Recommended PPE for Level D includes:

- Coveralls.
- Safety boots/shoes.
- Safety glasses or chemical splash goggles.
- Hardhat.
- Optional gloves; escape mask; face shield.

7.2.4 Recommended Level of Protection for Site Tasks

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

8.0 EXPOSURE MONITORING

8.1 General

Based on the results of historic sample analysis and the nature of the proposed work activities at the Site, the possibility exists that organic vapors and/or particulates may be released to the air during intrusive construction activities. Ambient breathing zone concentrations may at times, exceed the permissible exposure limits (PELs) established by OSHA for the individual compounds (see Table 1), in which case respiratory protection will be required. Respiratory and dermal protection may be modified (upgraded or downgraded) by the SSHO based upon real-time field monitoring data.

8.1.1 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.

8.1.2 Off-Site Community Air Monitoring

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

Ground intrusive activities are defined by NYSDOH Appendix 1A Generic Community Air Monitoring Plan (Ref. 3) 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 and sediment samples or the collection of groundwater samples from existing wells. Continuous monitoring is required for ground intrusive activities and periodic monitoring is required for non-intrusive activities. Periodic monitoring consists of taking a reading upon arrival at a sample location, monitoring while opening a well cap or overturning soil, monitoring while bailing a well, and taking a reading prior to leaving a sampling location. This may be upgraded to continuous if the sampling location is in close proximity to individuals not involved in the Site activity (i.e., on a curb of a busy street). The action levels below will be used during periodic monitoring.

8.2 Monitoring Action Levels

8.2.1 On-Site Work Zone Action Levels

The PID, or other appropriate instrument(s), will be used by TurnKey-Benchmark personnel to monitor organic vapor concentrations as specified in this HASP. Combustible gas will be monitored with the "combustible gas" option on the combustible gas meter or other appropriate instrument(s). In addition, fugitive dust/particulate concentrations will be monitored during major soil intrusion (viz., well/boring installation) using a real-time particulate monitor as specified in this plan. In the absence of such monitoring, appropriate respiratory protection for particulates shall be donned. Sustained readings obtained in the breathing zone may be interpreted (with regard 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 remedial activities. 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 mg/m^3 - Continue field operations.
- 50-150 mg/m^3 - Don dust/particulate mask or equivalent
- Greater than 150 mg/m^3 - Don dust/particulate mask or equivalent. Initiate engineering controls to reduce respirable dust concentration (viz., wetting of excavated soils or tools at discretion of Site Health and Safety Officer).

Readings with the organic vapor analyzer, combustible gas meter, and particulate monitor will be recorded and documented on the appropriate Project Field Forms. All instruments will be calibrated before use on a daily basis and the procedure will be documented on the appropriate Project Field Forms.

8.2.2 Community Air Monitoring Action Levels

In addition to the action levels prescribed in Section 8.2.1 for 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 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.

- **Special Requirements for Work Within 20 Feet of Potentially Exposed Individuals or Structures**

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

  - If total VOC concentrations opposite the walls of occupied structures or next to intake vents exceed 1 ppm, monitoring should occur within the occupied structure (s). 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, the following activities will be undertaken:

  1. All Emergency Response Contacts as listed in this Health and Safety Plan and the Emergency Response Plan (Appendix A) will be advised.

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

  3. 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 in the listed sequence in the event that 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.

o **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 less than PM-10 and integrating over a period of 15-minutes for comparison to the airborne particulate action levels. The equipment will be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration will be visually assessed during all work activities. All readings will be recorded and will be available for NYSDEC and NYSDOH review. Readings will be interpreted as follows:

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter (ug/m^3) greater than the background (upwind perimeter) reading for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression provided that the downwind PM-10 particulate levels do not exceed 150 ug/m^3 above the upwind level and that visible dust is not migrating from the work area.

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

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

9.0 SPILL RELEASE/RESPONSE

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

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

9.1 Potential Spills and Available Controls

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

- CERCLA Hazardous Substances as identified in 40 CFR Part 302, where such materials pose the potential for release in excess of their corresponding Reportable Quantity (RQ).

- Extremely Hazardous Substances as identified in 40 CFR Part 355, Appendix A, where such materials pose the potential for release in excess of their corresponding Reportable Quantity (RQ).

- Hazardous Chemicals as defined under Section 311(e) of the Emergency Planning and Community Right-To-Know Act of 1986, where such chemicals are present or will be stored in excess of 10,000 lbs.

- Toxic Chemicals as defined in 40 CFR Part 372, where such chemicals are present or will be stored in excess of 10,000 lbs.

- Chemicals regulated under 6NYCRR Part 597, where such materials pose the potential for release in excess of their corresponding Reportable Quantity (RQ).

Oil/petroleum products are considered to pose a significant spill potential whenever

the following situations occur:

- The potential for a "harmful quantity" of oil (including petroleum and non-petroleum-based fuels and lubricants) to reach navigable waters of the U.S. exists (40 CFR Part 112.4). Harmful quantities are considered by USEPA to be volumes that could form a visible sheen on the water or violate applicable water quality standards.

- The potential for any amount of petroleum to reach any waters of NY State, including groundwater, exists. Petroleum, as defined by NY State in 6NYCRR Part 612, is a petroleum-based heat source, energy source, or engine lubricant/maintenance fluid.

- The potential for any release, to soil or water, of petroleum from a bulk storage facility regulated under 6NYCRR Part 612. A regulated petroleum storage facility is defined by NY State as a site having stationary tank(s) and intra-facility piping, fixtures and related equipment with an aggregate storage volume of 1,100 gallons or greater.

9.2 Initial Spill Notification and Evaluation

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

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

9.3 Spill Response

For 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 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 remains, and will be drummed with the absorbent.

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

- Green Environmental Specialists, Inc.: (716) 298-5297
- Environmental Products and Services, Inc.: (716) 447-4700

9.4 Post-Spill Evaluation

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

10.0 HEAT/COLD STRESS MONITORING

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 Site Safety and Health Officer and/or his or her designee will be responsible for monitoring TurnKey-Benchmark field personnel for symptoms of heat/cold stress.

10.1 Heat Stress Monitoring

Personal protective equipment may place an employee at risk of developing heat stress, a common and potentially serious illnesses often encountered at construction, landfill, waste disposal, industrial or other unsheltered sites. The potential for heat stress is dependent on a number of factors, including environmental conditions, clothing, workload, physical conditioning and age. Personal protective equipment 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; pain in the hands, feet and abdomen.

- Heat exhaustion occurs from increased stress on various body organs including inadequate blood circulation due to cardiovascular insufficiency or dehydration. Signs and symptoms include: pale, cool, moist skin; heavy sweating; dizziness; nausea; fainting.

- Heat stroke is the most serious form of heat stress. Temperature regulation fails and the body temperature rises to critical levels. Immediate action must be taken to cool the body before serious injury and death occur. Competent medical help must be obtained. Signs and symptoms are: red, hot, usually dry skin; lack of or reduced perspiration; nausea; dizziness and confusion; strong, rapid pulse; coma.

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

- Heart rate may be measured by the radial pulse for 30 seconds as early as possible in the resting period. The rate at the beginning of the rest period should not exceed 100 beats per minute. If the rate is higher, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest periods stay the same. If the pulse rate is 100 beats per minute at the beginning of the nest rest period, the following work cycle should be further shortened by 33%.

- Body temperature may be measured orally with a clinical thermometer as early as

possible in the resting period. Oral temperature at the beginning of the rest period should not exceed 99.6 degrees Fahrenheit. If it does, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest period remains the same. However, if the oral temperature exceeds 99.6 degrees Fahrenheit at the beginning of the next period, the work cycle may be further shortened by 33%. Oral temperature should be measured at the end of the rest period to make sure that it has dropped below 99.6 degrees Fahrenheit. No TurnKey-Benchmark employee will be permitted to continue wearing semi-permeable or impermeable garments when his/her oral temperature exceeds 100.6 degrees Fahrenheit.

10.2 Cold Stress Monitoring

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

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

    1) **Frost nip** - This is the first stage of the freezing process. It is characterized by a whitened area of skin, along with a slight burning or painful sensation. Treatment consists of removing the victim from the cold conditions, removal of boots and gloves, soaking the injured part in warm water (102 to 108 degrees Fahrenheit) and drinking a warm beverage. Do not rub skin to generate friction/ heat.

    2) **Superficial Frostbite** - This is the second stage of the freezing process. It is characterized by a whitish gray area of tissue, which will be firm to the touch but will yield little pain. The treatment is identical for Frost nip.

    3) **Deep Frostbite** - In this final stage of the freezing process the affected tissue will be cold, numb and hard and will yield little to no pain. Treatment is identical to that for Frost nip.

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

    1) Shivering

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

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

1) Remove the victim from the cold environment and remove wet or frozen clothing. (Do this carefully as frostbite may have started.)

2) Perform active re-warming with hot liquids for drinking (Note: do not give the victim any liquid containing alcohol or caffeine) and a warm water bath (102 to 108 degrees Fahrenheit).

3) Perform passive re-warming with a blanket or jacket wrapped around the victim.

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

- Education of workers to recognize the symptoms of frostbite and hypothermia.
- Workers should dress warmly, with more layers of thin clothing as opposed to one thick layer.
- Personnel should remain active and keep moving.
- Personnel should be allowed to take shelter in heated areas, 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 degrees Fahrenheit with precipitation).

- As a screening measure, whenever anyone worker on-site develops hypothermia.

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

11.0 WORK ZONES AND SITE CONTROL

Work zones around the areas designated for construction activities will be established on a daily basis and communicated to all employees and other Site users by the SSHO. It shall be each Contractor's Site Safety and Health Officer'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 personal protective equipment identified in Section 7.

- Contamination Reduction Zone - The zone where decontamination of personnel and equipment takes place. Any potentially contaminated clothing, equipment and samples must remain in the Contamination Reduction Zone until decontaminated.

- Support Zone - The part of the site that is considered non-contaminated or "clean." Support equipment will be located 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 and only 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.

12.0 DECONTAMINATION

12.1 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's procedure (if applicable), whichever is more stringent.

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

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

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

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

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

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

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

1910.120(n).

12.2 Decontamination for Medical Emergencies

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

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

12.3 Decontamination of Field Equipment

Decontamination of heavy equipment will be conducted by the Contractor in accordance with his approved Health and Safety Plan 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
- Water wash 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.

13.0 CONFINED SPACE ENTRY

OSHA 29 CFR 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 remedial activities identified in Section 2.0. In the event that 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.

14.0 FIRE PREVENTION AND PROTECTION

14.1 General Approach

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

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

14.2 Equipment and Requirements

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

14.3 Flammable and Combustible Substances

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 National Fire Protection Association.

14.4 Hot Work

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

15.0 EMERGENCY INFORMATION

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

16.0 REFERENCES

1. LCS, Inc. 2010. *Supplemental Phase II ESA: Limited and Focused Subsurface Soil & Investigation, 300 Ohio Street, Buffalo, New York*. Prepared for Russo Development, Inc. on September 17.

2. TurnKey Environmental Restoration, LLC. 2011. *Remedial Investigation Work Plan, 300 Ohio Street Site, Buffalo, New York*. Prepared for 4216 Group, LLC in November 2013.

3. New York State Department of Health. 2010. *Generic Community Air Monitoring Plan, Appendix 1A, Draft DER-10 Technical Guidance for Site Investigation and Remediation.* November 29.

4. TurnKey Environmental Restoration, LLC. 2014. *Remedial Action Work Plan, 300 Ohio Street Site, Buffalo, New York*. Prepared for 4216 Group, LLC in May

TABLES

TABLES

TURNKEY

TABLE 1

TOXICITY DATA FOR CONSTITUENTS OF POTENTIAL CONCERN

300 Ohio Street Site
Buffalo, New York

Parameter	Synonyms	CAS No.	Code	Concentration Limits		
				PEL	TLV	IDLH
Volatile Organic Compounds (VOCs): ppm						
Benzene	Benzol, Phenyl hydride	71-43-2	Ca	1	0.5	500
Semi-volatile Organic Compounds (SVOCs) : ppm						
Benzo(a)pyrene	*none*	50-32-8	*none*	--	--	--
Benzo(b)fluoranthene	*none*	205-99-2	*none*	--	--	--
Chrysene	*none*	218-01-9	*none*	--	--	--
Pyrene	*none*	129-00-0	*none*	--	--	--
Inorganic Compounds: ppm						
Arsenic	*none*	7440-38-2	Ca	0.01	0.01	5
Cadmium	*none*	7440-43-9	Ca	0.005	0.01	9
Lead	*none*	7439-92-1	*none*	0.05	0.15	100

Ca = NIOSH considers constituent to be a potential occupational carcinogen.
IDLH = Immediately Dangerous to Life or Health.
TLV = Threshold Limit Value, established by American Conference of Industrial Hygienists (ACGIH), equals the maximum exposure concentration allowable for 8 hours/day @ 40 hours/week.

TLVs are the amounts of chemicals in the air that almost all healthy adult workers are predicted to be able to tolerate without adverse effects. There are three types.

TLV-TWA (TLV-Time-Weighted Average) which is averaged over the normal eight-hour day/forty-hour work week. (Most TLVs.)

TLV-STEL or Short Term Exposure Limits are 15 minute exposures that should not be exceeded for even an instant. It is not a stand alone value but is accompanied by the TLV-TWA.

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

TURNKEY

TABLE 2

POTENTIAL ROUTES OF EXPOSURE TO THE CONSTITUENTS OF POTENTIAL CONCERN

300 Ohio Street
Buffalo, New York

Activity [1]	Direct Contact with Soil/Fill	Inhalation of Vapors or Dust	Direct Contact with Groundwater
Remedial Investigation Tasks			
Excavation & Offsite Disposal of Contaminant Source Areas	x	x	
Soil Confirmation Sampling	x	x	
Monitoring Well Sampling	x	x	x

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

TURNKEY

TABLE 3

REQUIRED LEVELS OF PROTECTION
FOR REMEDIAL ACTIVITIES

300 Ohio Street Site
Buffalo, New York

Activity	Respiratory Protection [1]	Clothing	Gloves [2]	Boots [2, 3]	Other Required PPE/Modifications [2, 4]
Remedial Investigation Tasks					
Excavation & Offsite Disposal of Contaminant Source Areas	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	HH SGSS
Soil Confirmation Sampling	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	HH SGSS
Monitoring Well Sampling	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	SGSS

Notes:

1. Respiratory equipment shall conform to guidelines presented in Section 7.0 of this HASP. The Level C requirement is an air-purifying respirator equiped with organic compound/acid gas/dust cartridge.
2. HH = hardhat; L= Latex; L/N = latex inner glove, nitrile outer glove; N = Nitrile; SGSS = safety glasses with sideshields; STSS = steel toe safety shoes.
3. Latex outer boot (or approved overboot) required whenever contact with contaminated materials may occur. SSHO may downgrade to STSS (steel-toed safety shoes) if contact will be limited to cover/replacement soils.
4. Dust masks shall be donned as directed by the SSHO (site safety and health officer) or site safety technician whenever potentially contaminated airborne particulates (i.e., dust) are present 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\Ellicott Development\300 Ohio Street\RAWP\Figure 1; Site Location and Vicinity Map.dwg

FIGURE 1

TurnKey Environmental Restoration, LLC

2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

SITE LOCATION AND VICINITY MAP

REMEDIAL ACTION WORK PLAN

300 OHIO STREET SITE
BCP SITE NO. C915257
BUFFALO, NEW YORK

PREPARED FOR

4216 GROUP, LLC

PROJECT NO.:	0136-013-011
DATE:	MAY 2014
DRAFTED BY:	BLR

F:\CAD\TurnKey\Ellicott Development\300 Ohio Street\RAWP\RAWP FIGURES.dwg

DATE: MAY 2014
DRAFTED BY: BLR

SITE PLAN (AERIAL)

REMEDIAL ACTION WORK PLAN

300 OHIO STREET SITE
BCP SITE NO. C915257
BUFFALO, NEW YORK

PREPARED FOR

4216 GROUP, LLC

FIGURE 2

TURNKEY ENVIRONMENTAL RESTORATION, LLC

2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

JOB NO.: 0136-013-011

APPENDIX A

EMERGENCY RESPONSE PLAN

EMERGENCY RESPONSE PLAN
for
BROWNFIELD CLEANUP PROGRAM
REMEDIAL ACTIVITIES

300 OHIO STREET SITE
BUFFALO, NEW YORK

May 2014 0136-037-102

Prepared for:

4216 GROUP, LLC

300 OHIO STREET SITE
HEALTH AND SAFETY PLAN FOR REMEDIAL ACTIVITIES
APPENDIX A: EMERGENCY RESPONSE PLAN

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1.0 GENERAL

This report presents the site-specific Emergency Response Plan (ERP) referenced in the Site Health and Safety Plan (HASP) prepared for the remedial activities at the 300 Ohio Street Site in Buffalo, New York. This appendix of the HASP describes potential emergencies that may occur at the Site; procedures for responding to those emergencies; roles and responsibilities during emergency response; and training all workers must receive in order to follow emergency procedures. This ERP also describes the provisions this Site has made to coordinate its emergency response planning with other contractors on-site and with off-site emergency response organizations.

This ERP is consistent with the requirements of 29 CFR 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 below. During an emergency, the Emergency Response Coordinator (ERC) is responsible for specifying the level of PPE required for emergency response. At a minimum, PPE used by emergency responders will comply with Section 7.0, Personal Protective Equipment, of 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
First Aid Kit	1	Site Vehicle
Chemical Fire Extinguisher	2 (minimum)	All heavy equipment and Site Vehicle

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

4.0 EMERGENCY PLANNING MAPS

An area-specific map of the Site will be developed on a daily basis during performance of field activities. The map will be marked to identify critical on-site emergency planning information, including: major topographical features, 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. 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 personnel field vehicle.

5.0 EMERGENCY CONTACTS

The following identifies the emergency contacts for this ERP.

Emergency Telephone Numbers:

Project Manager: ***Michael Lesakowski***
Work: (716) 856-0599
Mobile: (716) 818-3954

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

Site Safety and Health Officer (SSHO): ***Bryan C. Hann***
Work: (716) 856-0635
Mobile: (716) 870-1165

Alternate SSHO: ***Richard L. Dubisz***
Work: (716) 856-0635
Mobile: (716) 998-4334

BUFFALO GENERAL HOSPITAL (ER):	(716) 859-5600
FIRE:	911
AMBULANCE:	911
BUFFALO POLICE:	911
STATE EMERGENCY RESPONSE HOTLINE:	(800) 457-7362
NATIONAL RESPONSE HOTLINE:	(800) 424-8802
NYSDOH:	(518) 402-7860
NYSDEC:	(716) 851-7220
NYSDEC 24-HOUR SPILL HOTLINE:	(800) 457-7252

The Site location is:
300 Ohio Street Site
300 Ohio Street
Buffalo, New York 14204
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 Site Health and Safety Officer 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 excavation.

2) Visual signals: hand gripping throat, out of air/cannot breathe; hands on top of head, need assistance; thumbs up, affirmative/ everything is OK; thumbs down, no/negative; grip partner's wrist or waist, leave area immediately.

If evacuation notice is given, site workers leave the worksite with their respective buddies, if possible, by way of the nearest exit. Emergency decontamination procedures detailed in Section 12.0 of the HASP are followed to the extent practical without compromising the safety and health of site personnel. The evacuation routes and assembly area will be determined by conditions at the time of the evacuation based on wind direction, the location of the hazard source, and other factors as determined by rehearsals and inputs from emergency response organizations. Wind direction indicators are located so that workers can determine a safe up wind or cross wind evacuation route and assembly area if not informed by the emergency response coordinator at the time the evacuation alarm sounds. Since work conditions and work zones within the site may be changing on daily basis, it shall be the responsibility of the construction Site Health and Safety Officer 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 (***Bryan Hann*** or ***Richard Dubisz***) so that appropriate action can be initiated. Contractors and subcontractors on this site have coordinated their emergency response plans to ensure that these plans are compatible and that source(s) of potential emergencies are recognized, alarm systems are clearly understood, and evacuation routes are accessible to all personnel relying upon them.

7.0 EXTREME WEATHER CONDITIONS

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

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

8.0 EMERGENCY MEDICAL TREATMENT & FIRST AID

Personnel Exposure:

The following general guidelines will be employed in instances where health impacts threaten to occur or 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 Buffalo General Hospital.

- Inhalation: Move to fresh air and, if necessary, transport to Buffalo General Hospital.

- Ingestion: Decontaminate and transport to Buffalo General 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 Buffalo General Hospital via ambulance. The Site Health and Safety Officer 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 Buffalo General Hospital (see Figure 1):

The following directions describe the best route from the Site to Buffalo General Hospital:

- Travel North along Ohio St. toward Chicago St.
- Turn left to stay on Ohio St.
- Turn right onto Michigan Ave.
- Turn left onto High St. Follow signs to ER at 100 High St on the right.

9.0 EMERGENCY RESPONSE CRITIQUE & RECORD KEEPING

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

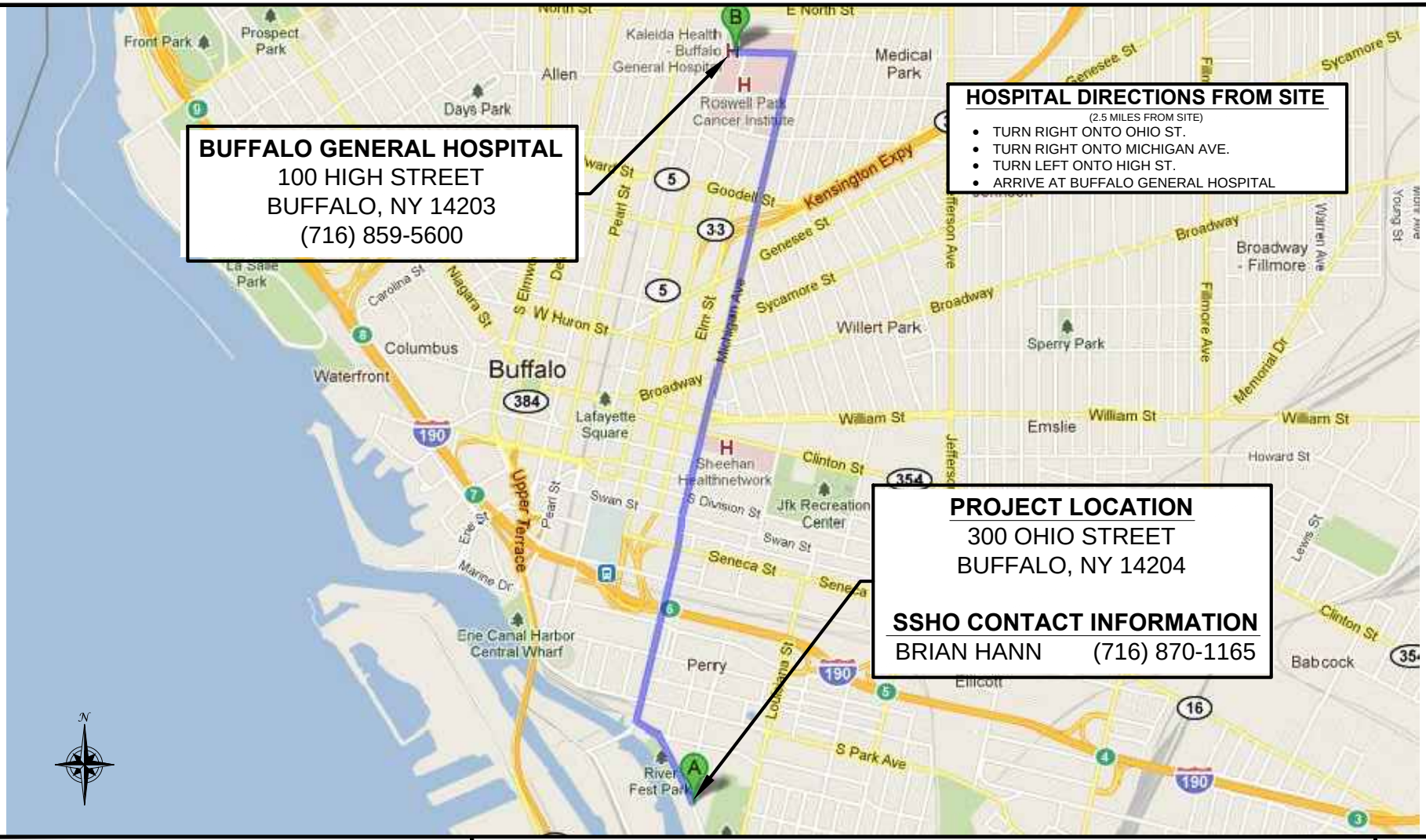
- Occupational injuries and illnesses.
- Accident investigations.
- Reports to insurance carrier or State compensation agencies.
- Reports required by the client.
- Records and reports required by local, state, federal and/or international agencies.
- Property or equipment damage.
- Third party injury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

10.0 EMERGENCY RESPONSE TRAINING

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.

FIGURES

F:\CAD\TurnKey\Elliott Development\300 Ohio Street\RAWP\Appendix A; HASP\ERP Figure A-1; Hospital Route Map.dwg



TURNKEY ENVIRONMENTAL RESTORATION, LLC
2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

PROJECT NO.: 0136-037-102

DATE: MAY 2014

DRAFTED BY: JCT

HOSPITAL ROUTE MAP

HASP: EMERGENCY REPSPONSE PLAN

300 OHIO STREET SITE
BUFFALO, NEW YORK

PREPARED FOR
4216 GROUP, LLC

FIGURE A-1

APPENDIX B

HOT WORK PERMIT FORM

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 B

MASTER EROSION CONTROL PLAN

APPENDIX B
REMEDIAL ACTION WORK PLAN

MASTER EROSION CONTROL PLAN

300 OHIO STREET SITE
BCP SITE NO. C915257
BUFFALO, NEW YORK

May 2014 0136-037-102

Prepared for:

4216 Group, LLC

Prepared By:

TurnKey Environmental Restoration, LLC

2558 Hamburg Turnpike, Suite 300

Buffalo, NY 14218

(716)856-0599

TABLE OF CONTENTS

LIST OF ATTACHMENTS

1.0 INTRODUCTION

1.1 Background

The 4216 Group, LLC has elected to pursue cleanup of the property, located at 300 Ohio Street, Buffalo, New York, under the Brownfield Cleanup Program (BCP or Program) and has been accepted into the Program (Site No. C915257) by the New York State Department of Environmental Conservation (NYSDEC).

The subject property (hereinafter, the "Project Site" or the "Site") is an approximate 5.0 acre parcel consisting located at the corner of Ohio and Chicago Street, comprised of eleven tax parcels with addresses of 300 Ohio Street, 326 Ohio Street, 328 Ohio Street, 340 Ohio Street, 354 Ohio Street, 11 Chicago Street, 71 Chicago Street, 73 Chicago Street, 75 Chicago Street, 49 Mackinaw Street, and 53 Mackinaw. Conway Park, owned by the City of Buffalo, runs adjacent the eastern edge of the Site

The Site was historically a gasoline service station and auto repair facility that was built in approximately 1925. According to the NYSDEC Petroleum Bulk Storage Database (PBS No. 9-383511) and the City of Buffalo municipal records, the Site has contained at least 15 underground storage tanks (USTs), and one (1) aboveground storage tank (AST). Several notes within the municipal records indicate UST replacements due to leaking tanks. The northern portion of the Site addressed on Chicago and Mackinaw Street, included the former E&B Machinery and Central Manufacturing operations. Historic Sanborn maps indicate that the property consisted of a machine shop, trucking terminal and coffin and cooperage manufacturing operations. Currently multiple debris piles and a large soil/fill pile are located along the western boundary of the 300 Ohio Street parcel, immediately adjacent to the Conway Park property to the east.

1.2 Purpose and Scope

This Master Erosion Control Plan (MECP) was prepared to provide guidance during remedial activities since erosion control will be a critical component of preventing the potential migration of contaminants off-site during excavation activities. This document is generic in nature and provides minimum erosion control practices to be used.

2.0 GENERAL PERMIT REQUIREMENTS

If construction activities disturb more than 1 acre of land, the Federal Water Pollution Control Act (as amended, 33 U.S.C. 1251 et. seq.) and the New York State Environmental Conservation Law (Article 17, Titles 7 and 8, and Article 70) would apply.

With some exceptions, operators of construction activities that will result in the disturbance of 1 or more acres of land must obtain coverage under SPDES General Permit (GP-02-01) prior to the commencement of soil disturbance. Also requiring a permit are construction activities disturbing less than 1 acre if they are part of a larger common plan of development or sale with a planned disturbance of equal to or greater than 1 acre, or activities that are designated by the NYSDEC. The NYSDEC can require a permit for construction activities disturbing less than 1 acre based on the potential for contribution to a violation of a water quality standard or for significant contribution of pollutants to waters of the United States.

The remedial activities planned for the Site will not disturb more than one-acre, and as such, the General Permit requirements will not apply to the Site.

3.0 POTENTIAL EROSION AND SEDIMENT CONTROL CONCERNS

Potential areas and items of concern during RA activities may include the following:

- Remediated areas or off-site properties adjacent to unremediated parcels need protection so they do not become impacted by Site operations.
- Storm water inlets will require protective measures to limit sediment transfer to storm sewers.
- Runoff from soil stockpiles will require erosion controls.
- Surface slopes need to be minimized as much as practical to control sediment transfer.
- Soil/fill excavated will require proper handling and disposal.

4.0 EROSION AND SEDIMENT CONTROL MEASURES

4.1 Background

Standard soil conservation practices need to be incorporated into remedial activities to mitigate soil erosion damage, off-site sediment migration, and water pollution from erosion. These practices combine vegetative and structural measures, many of which will be permanent in nature and become part of the completed project (i.e., drainage channels and grading). Other measures will be temporary and serve only during the construction stage. Selected erosion and sediment control measures will meet the following criteria:

- Incorporate temporary and permanent erosion control measures.
- Remove sediment from sediment-laden storm water before it leaves the Site.

4.2 Temporary Measures

Temporary erosion and sedimentation control measures and facilities will be used during construction. These temporary measures will be installed and maintained until they are either no longer needed or until such time as permanent measures are installed and become effective. Erosion and sediment controls shall be installed in accordance with the standards and specifications presented in Attachment B-2. At a minimum, the following temporary measures will be used:

- Silt fencing
- Temporary vegetation/mulching
- Storm Drain Inlet Protection
- Cautious placement, compaction and grading of stockpiles

4.2.1 Silt Fencing

Remedial activities may result in surface water flow to drainage ditches and swales, storm sewers, and adjacent properties. Silt fencing will be the primary sediment control measure used in these areas. Prior to extensive soil excavation or grading activities, silt fences will be installed along the perimeter of all construction areas. The orientation of the fencing will be adjusted as necessary as the work proceeds to accommodate changing site conditions.

If necessary, intermediate fencing will be used upgradient of the perimeter fencing to help lower surface water runoff velocities and reduce the volume of sediment to perimeter fencing. Stockpiles will also be surrounded with silt fencing.

As sediment collects, the silt fences will be cleaned as necessary to maintain their integrity. Removed sediment will be used elsewhere on-site as general fill. All perimeter silt fences will remain in place until construction activities in an area are completed and vegetative cover has been established.

4.2.2 Cautious Placement of Stockpiles

Excavation activities may produce stockpiles of soil and subgrade soil/fill materials. Careful placement and construction of stockpiles will be required to control erosion. Stockpiles will be placed no closer than 50 feet from storm water inlets and parcel boundaries. Additionally, stockpiles will be graded and compacted as necessary for positive surface water runoff and dust control.

4.3 Permanent Control Measures during Site Redevelopment

Permanent erosion and sedimentation control measures and structures will be installed as soon as practical during construction for long-term erosion protection. Examples of permanent erosion control measures could include:

- Minimizing the potential contact with, and migration of, subsurface soil/fill through the placement of a "clean" soil cover system in all areas not covered with structures, roads, parking areas, sidewalks, etc.
- Planting and maintaining vegetation.
- Limiting runoff flow velocities to the extent practical.

5.0 CONSTRUCTION MANAGEMENT PRACTICES

5.1 General

The following general construction practices should be evaluated for erosion and sedimentation control purposes during remedial activities:

- Clearing and grading only as much area as is necessary to accommodate the construction needs to minimize disturbance of areas subject to erosion (i.e., phasing the work).
- Covering exposed or disturbed areas of the Site as quickly as practical.
- Installing erosion and sediment control measures before disturbing the Site subgrade.
- Minimizing both on-site and off-site tracking of soil by vehicles by using routine entry/exit routes.

5.2 Monitoring, Inspection and Maintenance

All erosion and sedimentation controls described in this Plan will be inspected by a qualified representative of the Site Owner within 24 hours of a heavy rainfall event (defined as more than 0.5 inches of precipitation in a 24-hour period) and repaired or modified as necessary to effectively control erosion or turbidity problems. Inspections should include areas under construction, stockpile areas, erosion control devices (i.e., silt fences, storm drain inlet protection, etc.) and locations where vehicles enter and leave the site. Routine inspections of the entire Site should also be made on a weekly basis during development.

If inspections indicate problems, corrective measures should be implemented within 24 hours. A report summarizing the scope of the inspection, name of the inspector, date, observations made, and a description of the corrective actions taken should be completed. Attachment B-2 includes the Inspection and Maintenance Report Form.

5.2.1 Implementation

Erosion controls and features shall, at all times, be properly constructed, operated, and maintained in accordance with regulatory requirements and good engineering and construction practices. Erosion control measures and activities will be conducted in accordance with currently accepted Best Management Practices (BMPs).

Erosion control monitoring, inspection, and maintenance are an integral part of Site storm water and erosion control. The key elements of the monitoring effort include the following:

- Site inspections and maintenance
- BMPs monitoring
- Recordkeeping
- Review and modifications
- Certification of compliance

5.2.2 Site Inspections and Maintenance Practices

The temporary erosion control features will be maintained until no longer needed or permanent erosion control methods are installed. Site inspections are required every seven days or within 24 hours of a rainfall of 0.5 inches or greater. All disturbed areas, areas for material storage, locations where vehicles enter or exit the site, and all of the erosion and sediment controls identified as part of this Plan must be inspected. Controls must be in good operating condition until the affected area they protect has been completely stabilized and the construction activity is complete. If a repair is necessary, it must be completed within seven days of receipt of a report or notice, if practical. Inspection for specific erosion and sediment controls will include the following:

- Silt fence will be inspected to determine the following:
  1) Depth
  2) Condition of fabric
  3) That the fabric is attached to the posts
  4) That the fence posts are firmly in the ground
- The silt fences will be inspected weekly and within 24 hours of a 0.5 inch or greater storm event.
- Diversion berms, if used, will be inspected and any breaches promptly repaired.
- Temporary and permanent seeding and planting will be inspected for bare spots, washouts, and other potential erosion control problems.
- The Contractor shall designate individual(s) that will be responsible for erosion control, maintenance, and repair activities. The designated individual will also be responsible for inspecting the site and filling out the inspection and maintenance report.

- Personnel selected for inspection and maintenance responsibilities will receive training as directed by the Engineer. They will be trained in all the inspection and maintenance practices necessary for keeping the erosion and sediment controls used on-site in good working order.

The individual inspecting the Site must record any damages or deficiencies on the Inspection and Maintenance Report Form in Attachment B-3. This form can be used to request maintenance and repair and to document inspection and maintenance activities. Damages or deficiencies must be corrected as soon as possible after the inspection. Any changes that may be required to correct deficiencies in this Plan should also be made as soon as possible, but in no case later than seven days after the inspection.

5.2.3 Recordkeeping

A copy of the MECP and inspection and maintenance records must be kept at the Site from the time construction activities begins until the Site is stabilized. These documents will be made available upon request to regulatory agency representatives or members of the public.

5.2.4 Modifications to the Storm Water Management and Erosion Control Plan

During the course of construction, unanticipated changes may occur that affect this MECP such as schedule changes, phasing changes, staging area modifications, off-site drainage impacts, and repeated failures of designed controls. Any changes to the activities and controls identified in this Plan must be documented and the Plan revised accordingly. Certification of revisions to this plan shall be included at the end of the document.

ATTACHMENT B-1

EROSION CONTROL DETAILS

- Temporary Critical Area Plantings
- Mulching
- Silt Fence
- Storm Drain Inlet Protection

New York State
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Water

New York State Standards and Specifications for Erosion and Sediment Control

August 2005

New York State
Department of Environmental Conservation

George E. Pataki, Governor

STANDARD AND SPECIFICATIONS FOR TEMPORARY CRITICAL AREA PLANTINGS

Definition

Providing erosion control protection to a critical area for an interim period. A critical area is any disturbed, denuded slope subject to erosion.

Purpose

To provide temporary erosion and sediment control. Temporary control is achieved by covering all bare ground areas that exist as a result of construction or a natural event.

Conditions Where Practice Applies

Temporary seedings may be necessary on construction sites to protect an area, or section, where final grading is complete, when preparing for winter work shutdown, or to provide cover when permanent seedings are likely to fail due to mid-summer heat and drought. The intent is to provide temporary protective cover during temporary shutdown of construction and/or while waiting for optimal planting time.

Criteria

Water management practices must be installed as appropriate for site conditions. The area must be rough graded and slopes physically stable. Large debris and rocks are usually removed. Seedbed must be seeded within 24 hours of disturbance or scarification of the soil surface will be necessary prior to seeding.

Fertilizer or lime are not typically used for temporary seedings.

IF: Spring or summer or early fall, then seed the area with ryegrass (annual or perennial) at 30 lbs. per acre (Approximately 0.7 lb./1000 sq. ft. or use 1 lb./1000 sq. ft.).
IF: Late fall or early winter, then seed Certified 'Aroostook' winter rye (cereal rye) at 100 lbs. per acre (2.5 lbs./1000 sq. ft.).

Any seeding method may be used that will provide uniform application of seed to the area and result in relatively good soil to seed contact.

Mulch the area with hay or straw at 2 tons/acre (approx. 90 lbs./1000 sq. ft. or 2 bales). Quality of hay or straw mulch allowable will be determined based on long term use and visual concerns. Mulch anchoring will be required where wind or areas of concentrated water are of concern. Wood fiber hydromulch or other sprayable products approved for erosion control (nylon web or mesh) may be used if applied according to manufacturers' specification. Caution is advised when using nylon or other synthetic products. They may be difficult to remove prior to final seeding.

STANDARD AND SPECIFICATIONS FOR MULCHING

Definition

Applying coarse plant residue or chips, or other suitable materials, to cover the soil surface.

Purpose

The primary purpose is to provide initial erosion control while a seeding or shrub planting is establishing. Mulch will conserve moisture and modify the surface soil temperature and reduce fluctuation of both. Mulch will prevent soil surface crusting and aid in weed control. Mulch is also used alone for temporary stabilization in non-growing months.

Conditions Where Practice Applies

On soils subject to erosion and on new seedings and shrub plantings. Mulch is useful on soils with low infiltration rates by retarding runoff.

Criteria

Site preparation prior to mulching requires the installation of necessary erosion control or water management practices and drainage systems.

Slope, grade and smooth the site to fit needs of selected mulch products.

Remove all undesirable stones and other debris to meet the needs of the anticipated land use and maintenance required.

Apply mulch after soil amendments and planting is accomplished or simultaneously if hydroseeding is used.

Select appropriate mulch material and application rate or material needs. Determine local availability.

Select appropriate mulch anchoring material.

NOTE: The best combination for grass/legume establishment is straw (cereal grain) mulch applied at 2 ton/ acre (90 lbs./1000sq.ft.) and anchored with wood fiber mulch (hydromulch) at 500 – 750 lbs./acre (11 – 17 lbs./1000 sq. ft.). The wood fiber mulch must be applied through a hydroseeder immediately after mulching.

Table 3.7
Guide to Mulch Materials, Rates, and Uses

Mulch Material	Quality Standards	per 1000 Sq. Ft.	per Acre	Depth of Application	Remarks
Wood chips or shavings	Air-dried. Free of objectionable coarse material	500-900 lbs.	10-20 tons	2-7”	Used primarily around shrub and tree plantings and recreation trails to inhibit weed competition. Resistant to wind blowing. Decomposes slowly.
Wood fiber cellulose (partly digested wood fibers)	Made from natural wood usually with green dye and dispersing agent	50 lbs.	2,000 lbs.	—	Apply with hydromulcher. No tie down required. Less erosion control provided than 2 tons of hay or straw.
Gravel, Crushed Stone or Slag	Washed; Size 2B or 3A—1 1/2”	9 cu. yds.	405 cu. yds.	3”	Excellent mulch for short slopes and around plants and ornamentals. Use 2B where subject to traffic. (Approximately 2,000 lbs./cu. yd.). Frequently used over filter fabric for better weed control.
Hay or Straw	Air-dried; free of undesirable seeds & coarse materials	90-100 lbs. 2-3 bales	2 tons (100-120 bales)	cover about 90% surface	Use small grain straw where mulch is maintained for more than three months. Subject to wind blowing unless anchored. Most commonly used mulching material. Provides the best micro-environment for germinating seeds.
Jute twisted yarn	Undyed, unbleached plain weave. Warp 78 ends/yd., Weft 41 ends/ yd. 60-90 lbs./roll	48” x 50 yds. or 48” x 75 yds.	—	—	Use without additional mulch. Tie down as per manufacturers specifications. Good for center line of concentrated water flow.
Excelsior wood fiber mats	Interlocking web of excelsior fibers with photodegradable plastic netting	8” x 100” 2-sided plastic, 48” x 180” 1-sided plastic	—	—	Use without additional mulch. Excellent for seeding establishment. Tie down as per manufacturers specifications. Approximately 72 lbs./roll for excelsior with plastic on both sides. Use two sided plastic for centerline of waterways.
Compost	Up to 3” pieces, moderately to highly stable	3-9 cu. yds.	134-402 cu. yds.	1-3”	Coarser textured mulches may be more effective in reducing weed growth and wind erosion.
Straw or coconut fiber, or combination	Photodegradable plastic net on one or two sides	Most are 6.5 ft. x 3.5 ft.	81 rolls	—	Designed to tolerate higher velocity water flow, centerlines of waterways, 60 sq. yds. per roll.

Table 3.8
Mulch Anchoring Guide

Anchoring Method or Material	Kind of Mulch to be Anchored	How to Apply
1. Peg and Twine	Hay or straw	After mulching, divide areas into blocks approximately 1 sq. yd. in size. Drive 4-6 pegs per block to within 2" to 3" of soil surface. Secure mulch to surface by stretching twine between pegs in criss-cross pattern on each block. Secure twine around each peg with 2 or more tight turns. Drive pegs flush with soil. Driving stakes into ground tightens the twine.
2. Mulch netting	Hay or straw	Staple the light-weight paper, jute, wood fiber, or plastic nettings to soil surface according to manufacturer's recommendations. Should be biodegradable. Most products are not suitable for foot traffic.
3. Wood cellulose fiber	Hay or straw	Apply with hydroseeder immediately after mulching. Use 500 lbs. wood fiber per acre. Some products contain an adhesive material ("tackifier"), possibly advantageous.
4. Mulch anchoring tool	Hay or straw	Apply mulch and pull a mulch anchoring tool (blunt, straight discs) over mulch as near to the contour as possible. Mulch material should be "tucked" into soil surface about 3".
5. Tackifier	Hay or straw	Mix and apply polymeric and gum tackifiers according to manufacturer's instructions. Avoid application during rain. A 24-hour curing period and a soil temperature higher than 45^0 Fahrenheit are required.

STANDARD AND SPECIFICATIONS FOR SILT FENCE

Definition

A temporary barrier of geotextile fabric installed on the contours across a slope used to intercept sediment laden runoff from small drainage areas of disturbed soil.

Purpose

The purpose of a silt fence is to reduce runoff velocity and effect deposition of transported sediment load. Limits imposed by ultraviolet stability of the fabric will dictate the maximum period the silt fence may be used (approximately one year).

Conditions Where Practice Applies

A silt fence may be used subject to the following conditions:

1. Maximum allowable slope lengths contributing runoff to a silt fence placed on a slope are:

Slope Steepness	Maximum Length (ft.)
2:1	25
3:1	50
4:1	75
5:1 or flatter	100

2. Maximum drainage area for overland flow to a silt fence shall not exceed ¼ acre per 100 feet of fence, with maximum ponding depth of 1.5 feet behind the fence; and

3. Erosion would occur in the form of sheet erosion; and

4. There is no concentration of water flowing to the barrier.

Design Criteria

Design computations are not required for installations of 1 month or less. Longer installation periods should be designed for expected runoff. All silt fences shall be placed as close to the areas as possible, but at least 10 feet from the toe of a slope to allow for maintenance and roll down. The area beyond the fence must be undisturbed or stabilized.

Sensitive areas to be protected by silt fence may need to be reinforced by using heavy wire fencing for added support to prevent collapse.

Where ends of filter cloth come together, they shall be overlapped, folded and stapled to prevent sediment bypass. A detail of the silt fence shall be shown on the plan. See Figure 5A.8 on page 5A.21 for details.

Criteria for Silt Fence Materials

1. Silt Fence Fabric: The fabric shall meet the following specifications unless otherwise approved by the appropriate erosion and sediment control plan approval authority. Such approval shall not constitute statewide acceptance.

Fabric Properties	Minimum Acceptable Value	Test Method
Grab Tensile Strength (lbs)	90	ASTM D1682
Elongation at Failure (%)	50	ASTM D1682

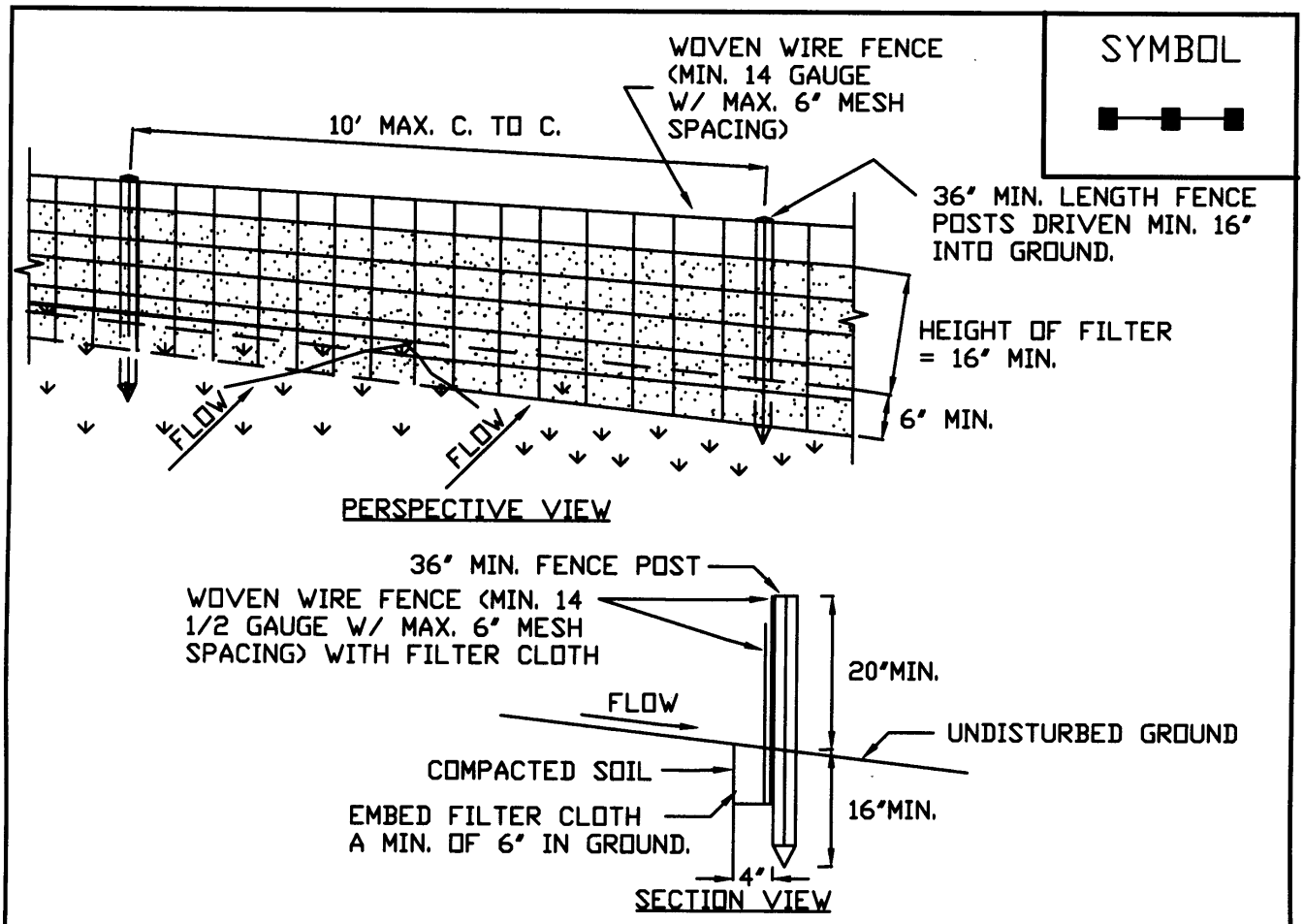
Mullen Burst Strength (PSI)	190	ASTM D3786
Puncture Strength (lbs)	40	ASTM D751 (modified)
Slurry Flow Rate (gal/min/sf)	0.3	
Equivalent Opening Size	40-80	US Std Sieve CW-02215
Ultraviolet Radiation Stability (%)	90	ASTM G-26

2. Fence Posts (for fabricated units): The length shall be a minimum of 36 inches long. Wood posts will be of sound quality hardwood with a minimum cross sectional area of 3.0 square inches. Steel posts will be standard T and U section weighing not less than 1.00 pound per linear foot.

3. Wire Fence (for fabricated units): Wire fencing shall be a minimum 14 gage with a maximum 6 in. mesh opening, or as approved.

4. Prefabricated Units: Envirofence, Geofab, or approved equal, may be used in lieu of the above method providing the unit is installed per details shown in Figure 5A.8.

Figure 5A.8
Silt Fence

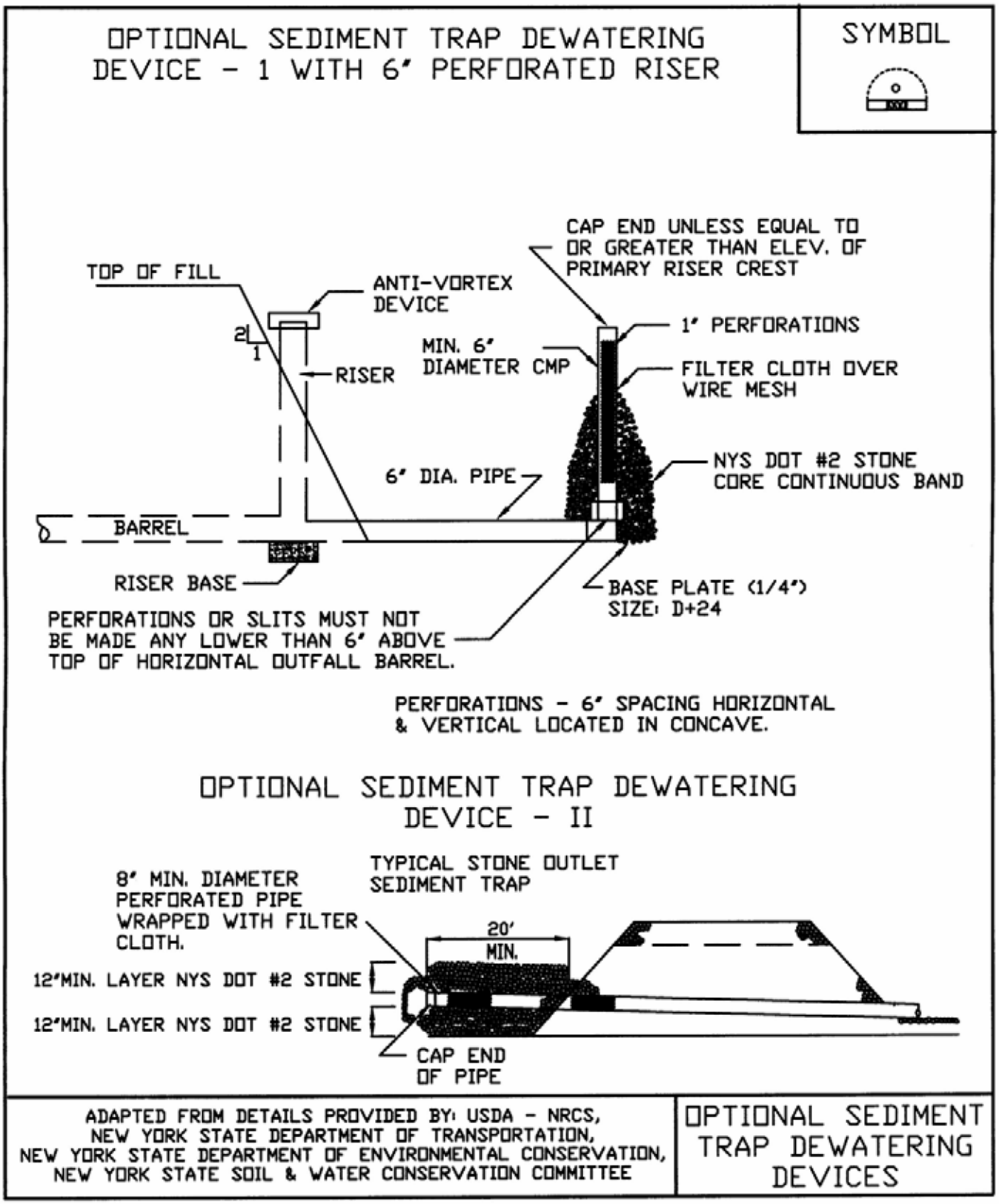


CONSTRUCTION SPECIFICATIONS

1. WOVEN WIRE FENCE TO BE FASTENED SECURELY TO FENCE POSTS WITH WIRE TIES OR STAPLES. POSTS SHALL BE STEEL EITHER "T" OR "U" TYPE OR HARDWOOD.
2. FILTER CLOTH TO BE TO BE FASTENED SECURELY TO WOVEN WIRE FENCE WITH TIES SPACED EVERY 24" AT TOP AND MID SECTION. FENCE SHALL BE WOVEN WIRE, 6" MAXIMUM MESH OPENING.
3. WHEN TWO SECTIONS OF FILTER CLOTH ADJOIN EACH OTHER THEY SHALL BE OVER-LAPPED BY SIX INCHES AND FOLDED. FILTER CLOTH SHALL BE EITHER FILTER X, MIRAFI 100X, STABILINKA T140N, OR APPROVED EQUIVALENT.
4. PREFABRICATED UNITS SHALL BE GEOFAB, ENVIROFENCE, OR APPROVED EQUIVALENT.
5. MAINTENANCE SHALL BE PERFORMED AS NEEDED AND MATERIAL REMOVED WHEN "BULGES" DEVELOP IN THE SILT FENCE.

ADAPTED FROM DETAILS PROVIDED BY: USDA - NRCS, NEW YORK STATE DEPARTMENT OF TRANSPORTATION, NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION, NEW YORK STATE SOIL & WATER CONSERVATION COMMITTEE	SILT FENCE

Figure 5A.21
Optional Sediment Trap Dewatering Devices



STANDARD AND SPECIFICATIONS FOR STORM DRAIN INLET PROTECTION

Definition

A temporary, somewhat permeable barrier, installed around inlets in the form of a fence, berm or excavation around an opening, trapping water and thereby reducing the sediment content of sediment laden water by settling.

Purpose

To prevent heavily sediment laden water from entering a storm drain system through inlets.

Conditions Where Practice Applies

This practice shall be used where the drainage area to an inlet is disturbed, it is not possible to temporarily divert the storm drain outfall into a trapping device, and watertight blocking of inlets is not advisable. **It is not to be used in place of sediment trapping devices.** This may be used in conjunction with storm drain diversion to help prevent siltation of pipes installed with low slope angle.

Types of Storm Drain Inlet Practices

There are four (4) specific types of storm drain inlet protection practices that vary according to their function, location, drainage area, and availability of materials:

I. Excavated Drop Inlet Protection
II. Fabric Drop Inlet Protection
III. Stone & Block Drop Inlet Protection
IV. Curb Drop Inlet Protection

Design Criteria

Drainage Area – The drainage area for storm drain inlets shall not exceed one acre. The crest elevations of these practices shall provide storage and minimize bypass flow.

Type I – Excavated Drop Inlet Protection

See details for Excavated Drop Inlet Protection in Figure 5A.11 on page 5A.29.

Limit the drainage area to the inlet device to 1 acre. Excavated side slopes shall be no steeper than 2:1. The minimum depth shall be 1 foot and the maximum depth 2 feet as measured from the crest of the inlet structure. Shape the excavated basin to fit conditions with the longest dimension oriented toward the longest inflow area to provide maximum trap efficiency. The capacity of the excavated basin should be established to contain 900 cubic feet per acre of disturbed area. Weep holes, protected by fabric and stone, should be provided for draining the temporary pool.

Inspect and clean the excavated basin after every storm. Sediment should be removed when 50 percent of the storage volume is achieved This material should be incorporated into the site in a stabilized manner.

Type II – Fabric Drop Inlet Protection

See Figure 5A.12 for details on Filter Fabric Drop Inlet Protection on page 5A.30.

Limit the drainage area to 1 acre per inlet device. Land area slope immediately surrounding this device should not exceed 1 percent. The maximum height of the fabric above the inlet crest shall not exceed 1.5 feet unless reinforced.

The top of the barrier should be maintained to allow overflow to drop into the drop inlet and not bypass the inlet to unprotected lower areas. Support stakes for fabric shall be a minimum of 3 feet long, spaced a maximum 3 feet apart. They should be driven close to the inlet so any overflow drops into the inlet and not on the unprotected soil. Improved performance and sediment storage volume can be obtained by excavating the area.

Inspect the fabric barrier after each rain event and make repairs as needed. Remove sediment from the pool area as

necessary with care not to undercut or damage the filter fabric. Upon stabilization of the drainage area, remove all materials and unstable sediment and dispose of properly. Bring the adjacent area of the drop inlet to grade, smooth and compact and stabilize in the appropriate manner to the site.

If straw bales are used in lieu of filter fabric, they should be placed tight with the cut edge adhering to the ground at least 3 inches below the elevation of the drop inlet. Two anchor stakes per bale shall be driven flush to bale surface. Straw bales will be replaced every 4 months until the area is stabilized.

Type III – Stone and Block Drop Inlet Protection

See Figure 5A.13 for details on Stone and Block Drop Inlet Protection on page 5A.31.

Limit the drainage area to 1 acre at the drop inlet. The stone barrier should have a minimum height of 1 foot and a maximum height of 2 feet. Do not use mortar. The height should be limited to prevent excess ponding and bypass flow.

Recess the first course of blocks at least 2 inches below the crest opening of the storm drain for lateral support. Subsequent courses can be supported laterally if needed by placing a 2x4 inch wood stud through the block openings perpendicular to the course. The bottom row should have a few blocks oriented so flow can drain through the block to dewater the basin area.

The stone should be placed just below the top of the blocks on slopes of 2:1 or flatter. Place hardware cloth of wire mesh with ½ inch openings over all block openings to hold stone in place.

As an optional design, the concrete blocks may be omitted and the entire structure constructed of stone, ringing the outlet ("doughnut"). The stone should be kept at a 3:1 slope toward the inlet to keep it from being washed into the inlet. A level area 1 foot wide and four inches below the crest will further prevent wash. Stone on the slope toward the inlet should be at least 3 inches in size for stability and 1 inch or smaller away from the inlet to control flow rate. The elevation of the top of the stone crest must be maintained 6 inches lower than the ground elevation down slope from the inlet to ensure that all storm flows pass over the stone into the storm drain and not past the structure. Temporary diking should be used as necessary to prevent bypass flow.

The barrier should be inspected after each rain event and repairs made where needed. Remove sediment as necessary to provide for accurate storage volume for subsequent rains. Upon stabilization of contributing drainage area, remove all materials and any unstable soil and dispose of properly.

Bring the disturbed area to proper grade, smooth, compact and stabilized in a manner appropriate to the site.

Type IV – Curb Drop Inlet Protection

See Figure 5A. 14 for details on Curb Drop Inlet Protection on page 5A.32.

The drainage area should be limited to 1 acre at the drop inlet. The wire mesh must be of sufficient strength to support the filter fabric and stone with the water fully impounded against it. Stone is to be 2 inches in size and clean. The filter fabric must be of a type approved for this purpose with an equivalent opening size (EOS) of 40-85. The protective structure will be constructed to extend beyond the inlet 2 feet in both directions. Assure that storm flow does not bypass the inlet by installing temporary dikes (such as sand bags) directing flow into the inlet. Make sure that the overflow weir is stable. Traffic safety shall be integrated with the use of this practice.

The structure should be inspected after every storm event. Any sediment should be removed and disposed of on the site. Any stone missing should be replaced. Check materials for proper anchorage and secure as necessary.

Figure 5A.11
Excavated Drop Inlet Protection

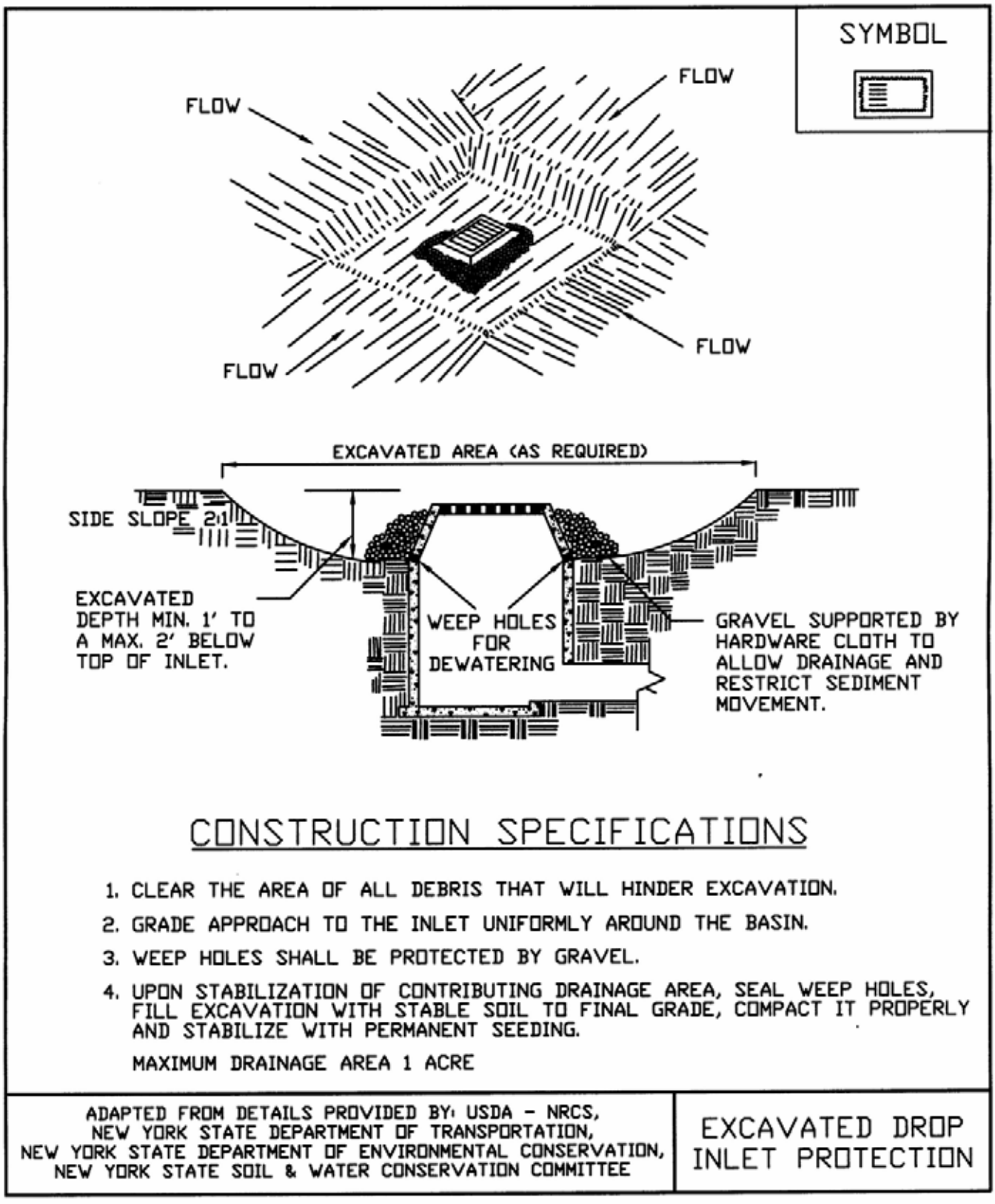
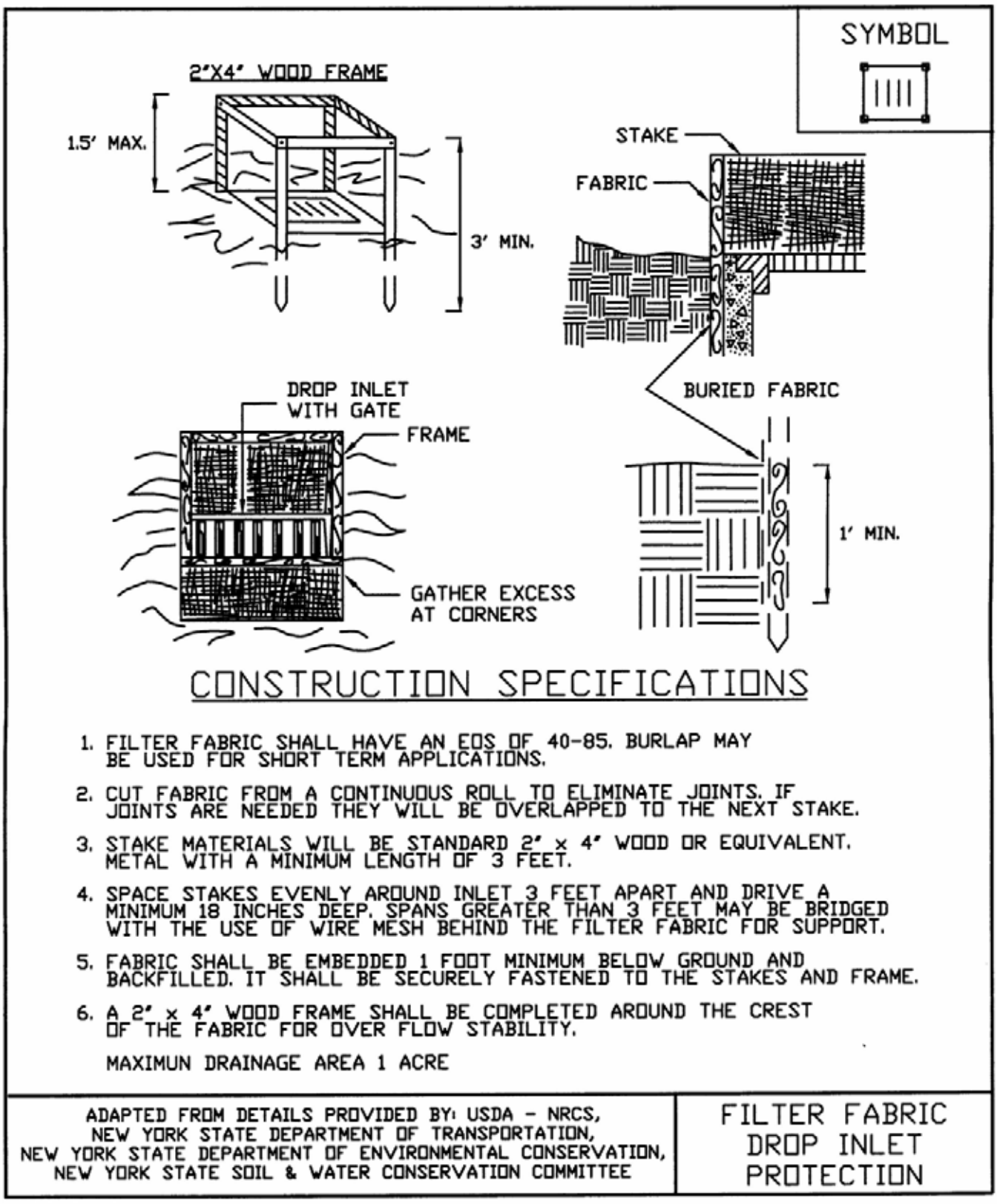


Figure 5A.12
Filter Fabric Drop Inlet Protection



CONSTRUCTION SPECIFICATIONS

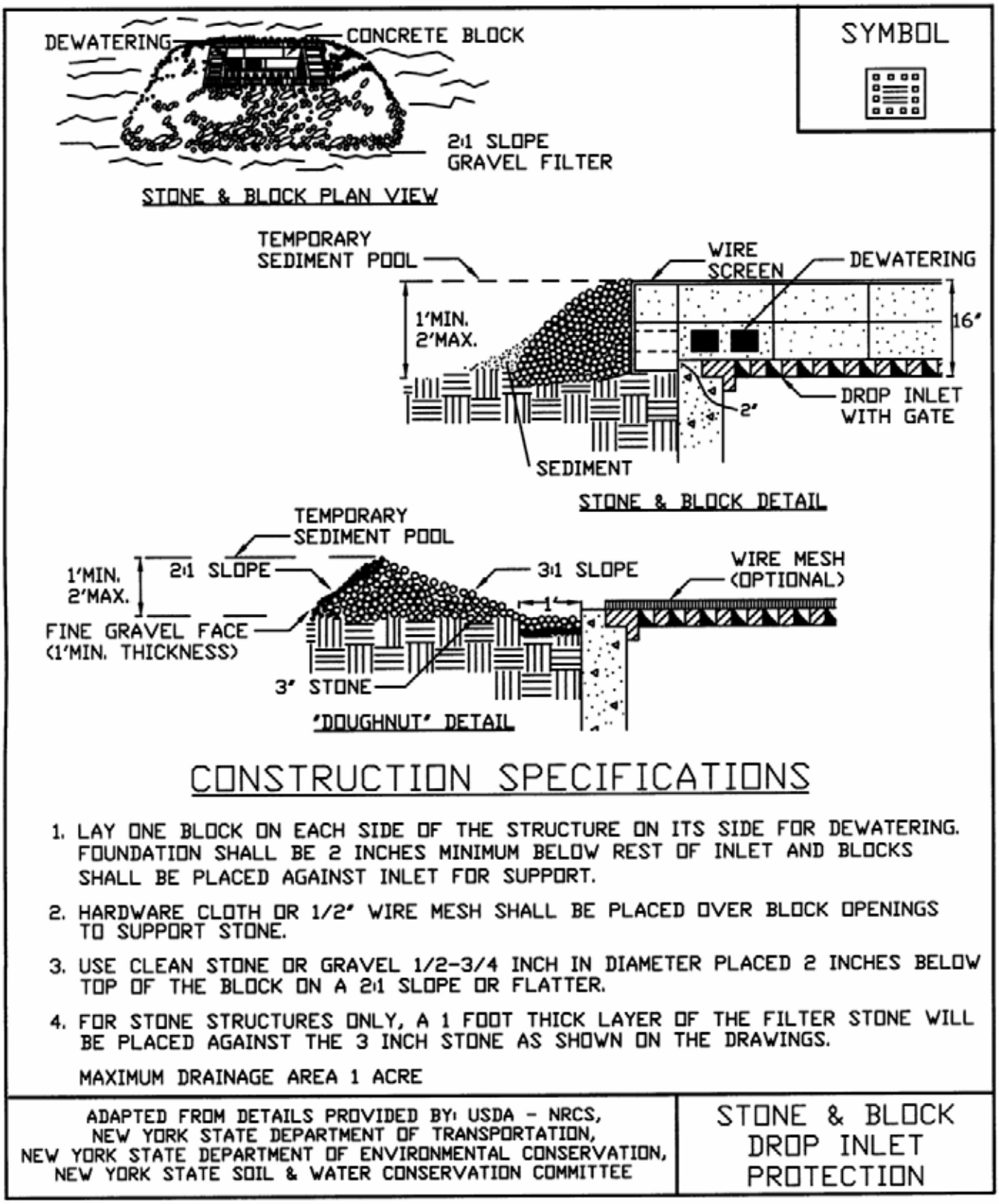
1. FILTER FABRIC SHALL HAVE AN EOS OF 40-85. BURLAP MAY BE USED FOR SHORT TERM APPLICATIONS.
2. CUT FABRIC FROM A CONTINUOUS ROLL TO ELIMINATE JOINTS. IF JOINTS ARE NEEDED THEY WILL BE OVERLAPPED TO THE NEXT STAKE.
3. STAKE MATERIALS WILL BE STANDARD 2" x 4" WOOD OR EQUIVALENT. METAL WITH A MINIMUM LENGTH OF 3 FEET.
4. SPACE STAKES EVENLY AROUND INLET 3 FEET APART AND DRIVE A MINIMUM 18 INCHES DEEP. SPANS GREATER THAN 3 FEET MAY BE BRIDGED WITH THE USE OF WIRE MESH BEHIND THE FILTER FABRIC FOR SUPPORT.
5. FABRIC SHALL BE EMBEDDED 1 FOOT MINIMUM BELOW GROUND AND BACKFILLED. IT SHALL BE SECURELY FASTENED TO THE STAKES AND FRAME.
6. A 2" x 4" WOOD FRAME SHALL BE COMPLETED AROUND THE CREST OF THE FABRIC FOR OVER FLOW STABILITY.

MAXIMUN DRAINAGE AREA 1 ACRE

ADAPTED FROM DETAILS PROVIDED BY: USDA - NRCS,
NEW YORK STATE DEPARTMENT OF TRANSPORTATION,
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION,
NEW YORK STATE SOIL & WATER CONSERVATION COMMITTEE

FILTER FABRIC
DROP INLET
PROTECTION

Figure 5A.13
Stone & Block Drop Inlet Protection



CONSTRUCTION SPECIFICATIONS

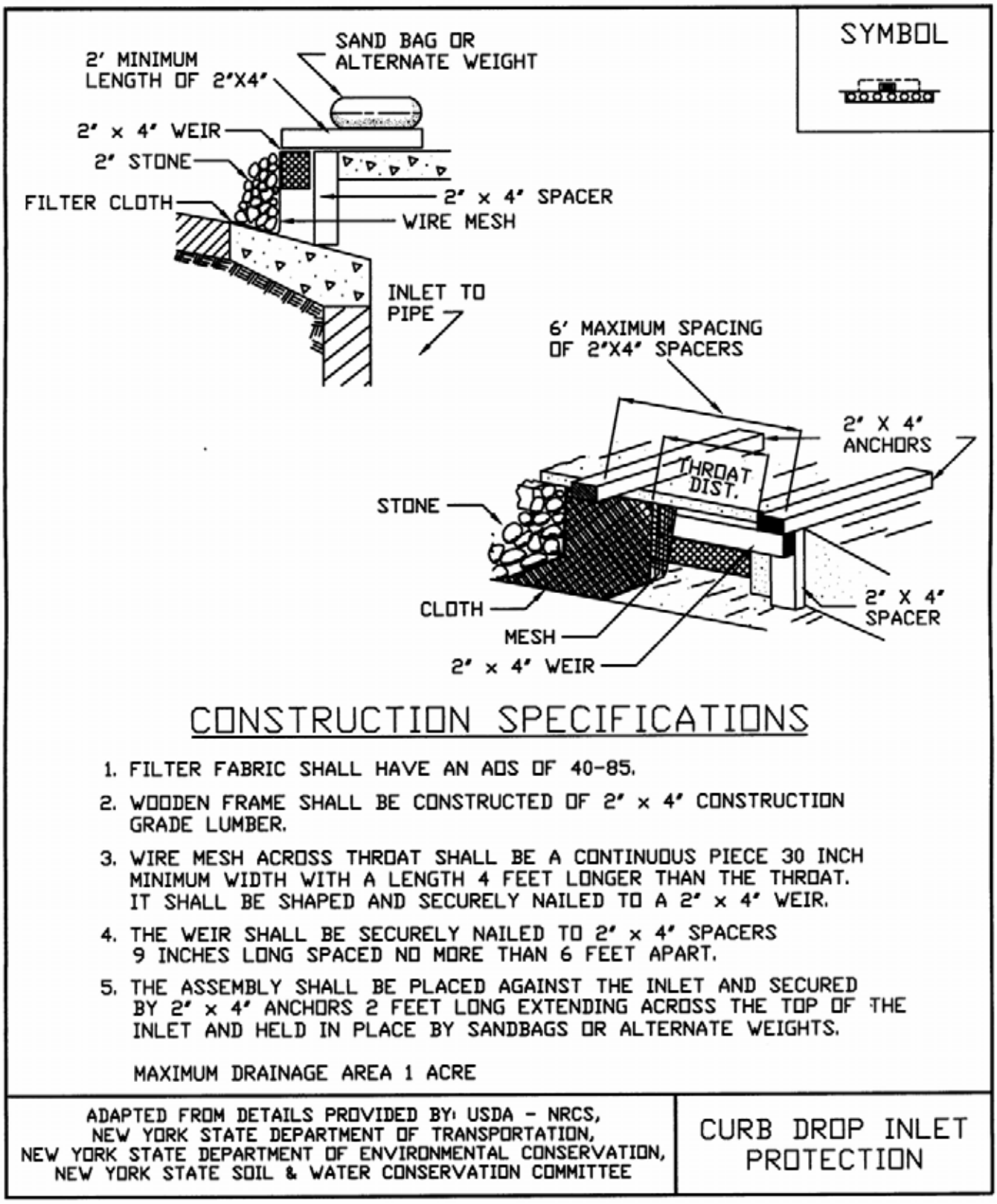
1. LAY ONE BLOCK ON EACH SIDE OF THE STRUCTURE ON ITS SIDE FOR DEWATERING. FOUNDATION SHALL BE 2 INCHES MINIMUM BELOW REST OF INLET AND BLOCKS SHALL BE PLACED AGAINST INLET FOR SUPPORT.
2. HARDWARE CLOTH OR 1/2" WIRE MESH SHALL BE PLACED OVER BLOCK OPENINGS TO SUPPORT STONE.
3. USE CLEAN STONE OR GRAVEL 1/2-3/4 INCH IN DIAMETER PLACED 2 INCHES BELOW TOP OF THE BLOCK ON A 2:1 SLOPE OR FLATTER.
4. FOR STONE STRUCTURES ONLY, A 1 FOOT THICK LAYER OF THE FILTER STONE WILL BE PLACED AGAINST THE 3 INCH STONE AS SHOWN ON THE DRAWINGS.

MAXIMUM DRAINAGE AREA 1 ACRE

ADAPTED FROM DETAILS PROVIDED BY: USDA - NRCS,
NEW YORK STATE DEPARTMENT OF TRANSPORTATION,
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION,
NEW YORK STATE SOIL & WATER CONSERVATION COMMITTEE

STONE & BLOCK
DROP INLET
PROTECTION

Figure 5A.14
Curb Drop Inlet Protection



CONSTRUCTION SPECIFICATIONS

1. FILTER FABRIC SHALL HAVE AN AOS OF 40-85.
2. WOODEN FRAME SHALL BE CONSTRUCTED OF 2" x 4" CONSTRUCTION GRADE LUMBER.
3. WIRE MESH ACROSS THROAT SHALL BE A CONTINUOUS PIECE 30 INCH MINIMUM WIDTH WITH A LENGTH 4 FEET LONGER THAN THE THROAT. IT SHALL BE SHAPED AND SECURELY NAILED TO A 2" x 4" WEIR.
4. THE WEIR SHALL BE SECURELY NAILED TO 2" x 4" SPACERS 9 INCHES LONG SPACED NO MORE THAN 6 FEET APART.
5. THE ASSEMBLY SHALL BE PLACED AGAINST THE INLET AND SECURED BY 2" x 4" ANCHORS 2 FEET LONG EXTENDING ACROSS THE TOP OF THE INLET AND HELD IN PLACE BY SANDBAGS OR ALTERNATE WEIGHTS.

MAXIMUM DRAINAGE AREA 1 ACRE

ADAPTED FROM DETAILS PROVIDED BY: USDA - NRCS,
NEW YORK STATE DEPARTMENT OF TRANSPORTATION,
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION,
NEW YORK STATE SOIL & WATER CONSERVATION COMMITTEE

CURB DROP INLET PROTECTION

ATTACHMENT B-2

INSPECTION AND MAINTENANCE REPORT FORM

Inspection and Maintenance Report Form

To be completed every 7 days and within 24 hours of a rainfall event of 0.5 inches or more

Regular Inspector:_____Rainfall Event Inspector:_____Rainfall (inches):_____

Contractor Activities	OK	NO	N/A	Notes
Are construction onsite traffic routes, parking, and storage of equipment and supplies restricted to areas specifically designated for those uses?				
Are locations of temporary soil stock piles of construction materials in approved areas?				
Is there any evidence of spills and resulting cleanup procedures?				
General Erosion & Sediment Controls				
Are sediment and erosion BMPs installed in the proper location and according to the specifications set out in the SWM & ECP?				
Are all operational storm drain inlets protected from sediment inflow?				
Do any seeded or landscaped areas require maintenance, irrigation, fertilization, seeding or mulching?				
Is there any evidence that sediment is leaving the site?				
Is there any evidence of erosion or cut fill slopes?				
Perimeter Road Use				
Does much sediment get tracked on to the perimeter road?				
Is the gravel clean or is it filled with sediment?				
Does all traffic use the perimeter road to leave the site?				
Is maintenance or repair required for the perimeter road?				

_____ _____

Inspected by (Signature) Date

Inspection and Maintenance Report Form

To be completed every 7 days and within 24 hours of a rainfall event of 0.5 inches or more

Inspector:_____

STABILIZATION MEASURES					
Area	Date Since Last Disturbed	Date of Next Disturbance	Stabilized? Yes/No	Stabilized with	Condition

Stabilization Required: _____

_____

_____

_____

_____

_____

To be performed by: _____ On or before: _____

APPENDIX C

PROJECT DOCUMENTATION FORMS

INSPECTOR'S DAILY REPORT

CONTRACTOR			
CLIENT		DATE:	

LOCATION				DAY		JOB NO.	
WEATHER		TEMP	° F	START		END	

WORK PERFORMED:

CONTRACTOR ACTIVITIES:

[PUT CONTRACTOR ACTIVITIES HERE, BE SPECIFIC. TYPE OF EQUIPMENT, ACTIVITIES PERFORMED, BY WHOM, LOCATION OF LANDFILL ETC.]

TURNKEY ACTIVITIES:

[PUT ENGINEER ACTIVITIES HERE, BE SPECIFIC. TYPE OF EQUIPMENT, ACTIVITIES AND TESTING PERFORMED, SAMPLES COLLECTED, BY WHOM, LOCATION OF LANDFILL ETC.]

TEST PERFORMED		*QA PERSONNEL* SIGNATURE			
PICTURES TAKEN	none	REPORT NO.			
VISITORS	none	SHEET	1	OF	

INSPECTOR'S DAILY REPORT

CONTRACTOR			
CLIENT		DATE:	

LOCATION				DAY		JOB NO.	
WEATHER		TEMP	° F	START		END	

INSPECTOR'S DAILY REPORT

MEETINGS HELD & RESULTS:

CONTRACTOR'S WORK FORCE AND EQUIPMENT

DESCRIPTION	*H*	#	*DESCRIPTION*	*H*	#	*DESCRIPTION*	*H*	#	*DESCRIPTION*	*H*	#
Field Engineer						Equipment			Front Loader Ton		
Superintendent			Ironworker			Generators			Bulldozer		
						Welding Equip.			DJ Dump truck		
Laborer-Foreman			Carpenter						Water Truck		
Laborer									Backhoe		
Operating Engineer			Concrete Finisher						Excavator		
						Roller			Pad foot roller		
Carpenter						Paving Equipment					
						Air Compressor					

REMARKS:

REFERENCES TO OTHER FORMS:

SAMPLES COLLECTED:					
SAMPLE NUMBER					
APPROX. LOCATION OF STOCKPILE					
NO. OF STOCKPILE					
DATE OF COLLECTION					
CLIMATOLOGIC CONDITIONS					
FIELD OBSERVATION		SHEET		OF	

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