Work Plan for Interim Remedial Measures

2424 Hamburg Turnpike Site
BCP Site No. C915296
Lackawanna, New York

January 2017

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Prepared For:

2424 Hamburg Turnpike, LLC

Prepared By:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

In Association With:

TURNKEY
ENVIRONMENTAL
RESTORATION, LLC

WORK PLAN
FOR
INTERIM REMEDIAL MEASURES

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Lackawanna, New York

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1.0 INTRODUCTION

This document presents the proposed scope of work and implementation procedures for completion of Interim Remedial Measures (IRM) at the 2424 Hamburg Turnpike Site, Brownfield Cleanup Program (BCP) Site No. C915296 located in the City of Lackawanna, Erie County, New York (Site).

The IRM will be completed by Benchmark Environmental Engineering & Science, PLLC (Benchmark), in association with TurnKey Environmental Restoration, LLC (TurnKey). The work will be completed in accordance with New York State Department of Environmental Conservation (NYSDEC) DER-10 guidelines.

1.1 Background and History

1.1.1 Property and Site Description

The BCP property, located at 2424 Hamburg Turnpike (Tax ID No. 141.59-5-2), is situated in a mixed commercial and industrial zoned area of the City of Lackawanna, Erie County, New York and consists of one parcel measuring 1.04-acres (see Figures 1 and 2).

The Site is currently unoccupied with two vacant commercial buildings consisting of a former automobile service building with four repair bays and eight in-ground hydraulic lifts and one shed with unknown contents. The Site also includes asphalt paved areas as well as concrete slabs suspected to have been associated with former on-Site structures.

Prior to being vacated, the Site was utilized as an automobile filling and service station (Stop- N-Gas) beginning in at least 1957 when three 10,000-gallon underground storage tanks (USTs) were installed on-Site. Petroleum Bulk Storage (PBS) records indicate that the three USTs were closed/removed in 1994.

The Site, located on the east side of Hamburg Turnpike (aka Route 5), is bound by an active gasoline station to the north, a retail store to the south, vacant land to the east and Hamburg Turnpike followed by vacant industrial land to the west

1.1.2 Previous Studies/Investigations

The following assessments and investigations, some completed by others under spill incidents related to the Site, have occurred at the Site:

1.1.2.1 "Inactive" NYSDEC Spill No. 9407600

The 9407600 spill record indicates that three 10,000 gallon USTs (two gasoline and one diesel fuel) were removed from the Site in 1994 by Nature's Way. During excavation activities, petroleum-impacted soil and groundwater were discovered. Approximately 500 cubic yards of contaminated soils were excavated and stockpiled on-Site in areas north and south of the existing automotive service building.

The stockpiled soil was bio-remediated on-Site by the excavation contractor and returned to the excavation subsequent to treatment. Groundwater from the excavation was pumped into a temporary holding tank, treated through activated carbon and discharged to the ground on-Site.

The spill was reclassified as "inactive" on August 28, 1995.

1.1.2.2 Administratively "Closed" NYSDEC Spill No. 1204435

The 1204435 spill record indicates that petroleum contamination was discovered during utility upgrades being completed along Hamburg Turnpike. Specifically, petroleum odors were apparent in the telecommunications manhole located along the western property boundary of the Site. The spill incident appears to have been administratively "closed" by the Department upon the Site being accepted into the BCP.

1.1.2.3 2013 Geophysical Survey Results

AMEC Environment and Infrastructure, Inc. (AMEC) completed a geophysical survey of the Site on July 23, 2013. AMEC identified four underground anomalies referred to in their report as possible "remnants of the pump islands (subsurface reinforced concrete pads) or related to USTs, associated appurtenances and/or miscellaneous buried metals.

1.1.2.4 Phase II Environmental Investigation Report, completed by TurnKey, dated January 2014.

TurnKey completed a Phase II Environmental Investigation consisting of ten (10) soil borings (SB-1 through SB-10), three of which were converted into temporary one-inch diameter monitoring wells (SB-4/TMW-1, SB-5/TMW-2 and SB-7/TMW-3), to assess subsurface conditions on-Site, including the area of potential contamination discovered during utility upgrade activities along Hamburg Turnpike (SB-7/TMW-3, Spill No. 1204435) and areas proximate to the in-ground lifts within the service building and the four underground anomalies identified during the geophysical survey.

Elevated photoionization detector (PID) readings above background (0.0 ppm) and petroleum odors were identified in seven of the ten soil borings (SB-4 through SB-10) with the highest PID reading noted as 1,098 parts per million (ppm) at SB-6 (2-4'). In addition, approximately one-inch of floating petroleum product was noted in a monitoring well, TMW-1, completed north of the former UST excavation area.

Six soil samples were analyzed by the laboratory for Target Compound List (TCL) plus CP-51 volatile organic compounds (VOCs) and CP-51 semi volatile organic compounds (SVOCs) and two groundwater samples were analyzed for TCL plus CP-51 VOCs. The following bullet points summarize laboratory analytical results:

- Petroleum VOCs were detected at concentrations above CP-51 and/or Part 375 Protection of Groundwater, Unrestricted and/or Restricted Residential Use Soil Cleanup Objectives SCOs (USCOs and RRSCOs, respectively) in all six soil samples.
- Three soil samples exhibited SVOC concentrations above CP-51 and/or Part 375 Protection of Groundwater, USCOs, RRSCOs, Commercial and/or Industrial Use SCOs (CSCOs and ISCOs, respectively).

Both groundwater samples exhibited petroleum VOCs at concentrations above Class GA Groundwater Quality Standards (GWQS) with the more significant concentrations (16,333 micrograms per liter (ug/L) total VOCs) identified at TMW-2. Due to the presence of product at TMW-1, concentrations exceeding GWQS are assumed to be present.

1.1.2.5 BCP Application, completed by Benchmark, Revised August 2015

A BCP Application was prepared by Benchmark for the 2424 Hamburg Turnpike Site and was submitted to the Department in August 2015. The Site was accepted into the BCP (No. C915296) and a BCA (Index No. C915296-10-15) was issued by the Department on November 2, 2015.

Benchmark completed the following work upon the Site being successfully entered into the BCP:

1.1.2.6 RI/AA Work Plan, completed by Benchmark, Revised April 2016.

TurnKey completed an RI/AA Work Plan detailing proposed investigation activities at the Site. The proposed scope of work included soil boring advancement; test pit excavations; surface soil/fill sampling; monitoring well installation; and groundwater quality sample collection.

The NYSDEC approved the work plan as indicated in a letter dated April 15, 2016.

1.1.2.7 Draft RI/AAR, 2424 Hamburg Turnpike Site, Lackawanna, NY, completed by Benchmark, dated September 2016.

The RI consisted of six test pits and nine soil borings, five of which were converted into monitoring wells. Two surface soil samples were also collected from the Site. The following bullets summarize the main findings as provided in the RI/AAR:

- The surface soil/fill has only minor SVOC and metal impacts; the only exceedance of CSCOs was benzo(a)pyrene at RI SS-1. Individual concentrations of SVOCs and metals were identified at concentrations slightly above USCOs. The SVOCs and metals identified are ubiquitous to industrial soil/fill and have been identified at numerous nearby sites.
- Grossly contaminated soil (GCS) was identified on the Site within the footprint of the historic automotive repair building, west of the repair building and north of the former UST excavation area. GCS was noted to include strong petroleum-like odors and PID readings >100 ppm (up to 1,235 ppm). An approximate one-inch thick layer of product was identified north of the former UST excavation area during the Phase II investigation at SB-4/TMW-1. No VOCs, pesticides, herbicides, or polychlorinated biphenyls (PCBs) were detected above Part 375 CSCOs. Only one metal, arsenic, was detected slightly above its respective Part 375 CSCO in subsurface soil/fill at two sample locations. Benzo(a)pyrene was detected above Part 375 CSCOs at four RI sample locations and two Phase II sample locations. Five additional polycyclic aromatic hydrocarbons (PAHs) exceeded CSCOs at one Phase II boring location. Total PAH concentrations were reported at less than 500 ppm except for SB-5.
- Regarding groundwater, petroleum-related VOCs concentrations exceeded GWQS/GVs at RI and Phase II wells located northwest, west and southwest of the historic automotive repair building. SVOCs were predominantly reported as non-detect, trace (estimated), or detected at concentrations below GWQS/GVs. Only naphthalene at MW-3 and an estimated concentration of phenol at MW-4 exceeded GWQS/GVs. Total and dissolved metals detected at concentrations above GWQS/GVs include naturally occurring minerals such as iron, manganese, and sodium. Additionally, total arsenic was detected above its respective GWQS/GV at MW-2 and MW-5; however, dissolved arsenic was not detected. Herbicides and PCBs

were reported as non-detect. Pesticides were non-detect except for an estimated concentration of 4'4'-DDD at MW-5 which was significantly below the GWQS/GV.

- The visual and olfactory evidence of impact observed at Phase II temporary well TMW-1 and the petroleum-like odors at RI well MW-3 are likely associated with the GCS present on the Site. Removal of GCS and in-ground lifts during planned remedial activities will mitigate these groundwater impacts. Groundwater flows in a north-northwesterly direction.
- Based on the alternatives analysis evaluation, Commercial Use (Track 4) Cleanup was the recommended final remedial approach for the 2424 Hamburg Turnpike Site.

1.2 Project Objectives

IRMs will be completed to immediately address known environmental impacts related to past use of the Site. An IRM will quickly mitigate risks to public health and the environment. Specific to the 2424 Hamburg Turnpike Site, IRM activities are anticipated to include: removal of existing in-ground hydraulic lifts, their contents, if any, and surrounding petroleum-impacted soil from within the former automotive service building along with excavation of known petroleum-impacted soils within the northern portion of the building, as identified during the 2016 RI. IRM activities will include off-Site transport of impacted soils for treatment. This Work Plan includes anticipated IRM activities based on current information and may be modified, subject to NYSDEC approval, immediately after the IRM fieldwork is completed.

The cleanup objectives employed during the IRM will be 6NYCRR Part 375 CSCOs; however, 2424 Hamburg Turnpike, LLC may choose to remediate to a higher level of cleanup (e.g., RRSCOs) during the course of remedial work. Details of anticipated IRM activities are included below in Section 2.0.

2.0 INTERIM REMEDIAL MEASURES

As indicated above, IRMs will be completed to immediately address known environmental impacts related to past use of the Site and such will address some of the Site conditions identified in the RI. Specifically, IRM activities will include the following:

- Extracting and properly disposing off-site the remaining contents, if any, of the in-ground lifts;
- Removing and transferring the seven existing in-ground lifts within the former automotive repair building to a recycling facility.
- Excavating GCS (visual evidence of impact and/or exceedance of 100 ppm on PID as defined in the RI/AA Report) encountered during in-ground lift removal activities;
- Excavation of known GCS from within the northern portion of the former automotive service building identified during previous intrusive work, including the 2016 RI.
- If needed, groundwater will be properly handled.

The NYSDEC will be notified at least one week prior to commencement of lift removal activities.

2.1 Utility Clearance

Prior to any intrusive activities, Dig Safely New York (Call 811) will be contacted by the site contractor a minimum of three business days in advance of the work. As the IRM work will be completed within the vacant building, utilities are not anticipated to cause excavation limitations; however, if underground utilities are present on the property and are anticipated to interfere with intrusive activities, the NYSDEC will be contacted to discuss mitigating measures.

2.2 In-ground Lift Removal Activities

As shown on Figure 3, the historic automotive repair building includes seven existing in-ground hydraulic lifts.

Prior to excavation of the in-ground lifts, the tops of the lifts will be opened and exposed using an excavator for visual inspection to determine proper handling of any residual contents.

If residual contents are discovered, a properly licensed vacuum truck operator will be employed to remove the contents of the lifts. Lift contents will be properly characterized and disposed of off-site at a licensed disposal/recycling facility.

Once the contents are extracted, the lifts will be removed from the ground and staged on plastic sheeting. The lifts will be cleared of residual soils and transported off-site for disposal or recycling as scrap. Any appurtenant piping attached to the lifts will be removed as part of the IRM work.

2.3 Removal of Impacted Soils

GCS present surrounding the in-ground lifts and appurtenant piping will be excavated along with known GCS within the northern portion of the building proximate investigation locations SB-8 through SB-12. Impacted soils from these areas will be loaded into dump trucks and transported off-site to either Tonawanda Terminals Corporation (TTC) Biotreatment Facility (BTF) in Tonawanda, New York for treatment or a 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. All excavation work will be directed by an experienced TurnKey Environmental Scientist. Lateral and vertical excavation will continue as described above until suspected source area soils and visually impacted soil/fill is removed, Part 375 CSCOs are met, excavation has reached the feasible limits or property line, and/or NYSDEC agrees that no further excavation is required.

2.4 Groundwater Extraction

If necessary, water removed from remedial 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 with prior approval from the City of Lackawanna/Erie County to obtain any necessary temporary sewer discharge permit.

In general, water removed from excavations will be stored/settled in a portable 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.

If a minimal volume of groundwater requires handling, a vacuum truck may be used for extraction and transport of the groundwater to the disposal/recycling facility.

2.5 Post Excavation Confirmation Sampling

Post excavation confirmatory composite samples will be collected from the excavated 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. In the case where there is no field evidence of impacts proximate to a former in-ground lift, two soil samples will be collected consisting of a bottom sample and a sidewall composite.

Post excavation soil samples will be analyzed for CP-51 VOCs and CP-51 SVOCs in accordance with United States Environmental Protection Agency (USEPA) Methodology with an equivalent Category B deliverables package to facilitate data evaluation by a third-party validation expert.

2.6 Excavation Backfill

Following NYSDEC concurrence that the remedial excavation is complete, the excavation will be backfilled with non-impacted on-Site soil, clean imported fill material that meets the requirements of Table 1. Backfill material will be placed into the excavation and compacted with the excavator/backhoe bucket in 2-foot lifts to match the existing grade of the Site and minimize settling. Alternatively, redevelopment plans may require that select backfill be placed in accordance with certain geotechnical requirements (e.g., 95% of a standard Proctor test).

3.0 QUALITY ASSURANCE PROJECT PLAN

A Quality Assurance Project Plan (QAPP) has been prepared in support of the IRM activities. The QAPP dictates implementation of the investigation tasks delineated in this Work Plan.

The QAPP will assure the accuracy and precision of data collection during the Site characterization and data interpretation periods. The QAPP identifies procedures for sample collection to mitigate the potential for cross-contamination, as well as analytical requirements necessary to allow for independent data validation. The QAPP has been prepared in accordance with USEPA's Requirements for Quality Assurance Project Plans for Environmental Data Operations; the EPA Region II CERCLA Quality Assurance Manual, and NYSDEC's DER-10 Technical Guidance for Site Investigation and Remediation (May 2010).

3.1 Scope of the QAPP

This QAPP was prepared to provide quality assurance (QA) guidelines to be implemented during the IRM activities. This document may be modified for subsequent phases of investigative work, as necessary. The QAPP provides:

- A means to communicate to the persons executing the various activities exactly what is to be done, by whom, and when.
- A culmination to the planning process that ensures that the program includes provisions for obtaining quality data (e.g., suitable methods of field operations).
- A historical record that documents the investigation in terms of the methods used, calibration standards and frequencies planned, and auditing planned.
- A document that can be used by the Project Manager's and QA Officer to assess if the activities planned are being implemented and their importance for accomplishing the goal of quality data.
- A plan to document and track project data and results.
- Detailed descriptions of the data documentation materials and procedures, project files, and tabular and graphical reports.

The QAPP is primarily concerned with the quality assurance and quality control aspects of the procedures involved in the collection, preservation, packaging, and transportation of samples; field testing; record keeping; data management; chain-of-custody procedures; laboratory analyses; and other necessary matters to assure that the investigation activities, once completed, will yield data whose integrity can be defended.

QA refers to the conduct of all planned and systematic actions necessary to perform satisfactorily all task-specific activities and to provide information and data confidence as a result of such activities. The QA for task-specific activities includes the development of procedures, auditing, monitoring and surveillance of the performance.

QC refers to the activity performed to determine if the work activities conform to the requirements. This includes activities such as inspections of the work activities in the field (e.g., verification that the items and materials installed conform to applicable codes and design specifications). QA is an overview monitoring of the performance of QC activities through audits rather than first time inspections.

3.2 QAPP Organization and Responsibility

The principal organizations involved in verifying achievement of data collection goals for the 2424 Hamburg Turnpike Site include: the NYSDEC, the New York State Department of Health (NYSDOH), 2424 Hamburg Turnpike, LLC, Benchmark in association with TurnKey, the independent environmental laboratory, and the independent third party data validator. Roles, responsibilities, and required qualifications of these organizations are discussed in the following subsections. Resumes are included in Appendix A.

3.2.1 NYSDEC and NYSDOH

It is the responsibility of the NYSDEC, in conjunction with the NYSDOH, to review the IRM Work Plan and supporting documents, for completeness and conformance with the site-specific cleanup objectives and to make a decision to accept or reject these documents based on this review. The NYSDEC also has the responsibility and authority to review and approve all QA documentation collected during brownfield cleanup construction and to confirm that the QA Plan was followed.

3.2.2 2424 Hamburg Turnpike, LLC

2424 Hamburg Turnpike, LLC will be responsible for complying with the QA requirements as specified herein and for monitoring and controlling the quality of the

Brownfield cleanup construction either directly or through their designated environmental consultant and/or legal counsel. 2424 Hamburg Turnpike, LLC will also have the authority to select Remedial Action Contractor(s) to assist them in fulfilling these responsibilities. The designated Project Manager is responsible for implementing the project, and has the authority to commit the resources necessary to meet project objectives and requirements.

3.2.3 Benchmark in Association with TurnKey

Benchmark in association with TurnKey are the prime consultants on this project and are responsible for the performance of all services required to implement each phase of the IRM Work Plan (hereafter referred to as the Work Plan), including, but not limited to, field operations, laboratory testing, data management, data analysis and reporting. Any one member of TurnKey's staff may fill more than one of the identified project positions (e.g., field team leader and site safety and health officer). The various quality assurance, field, laboratory and management responsibilities of key project personnel are defined below.

- *Benchmark Project Manager (PM):* *Michael Lesakowski*

The Benchmark PM has the responsibility for ensuring that the project meets the Work Plan objectives. The PM will report directly to the NYSDEC/NYSDOH Project Coordinators and is responsible for technical and project oversight. The PM will:

- Define project objectives and develop a detailed work plan schedule.
- Establish project policy and procedures to address the specific needs of the project as a whole, as well as the objectives of each task.
- Acquire and apply technical and corporate resources as needed to assure performance within budget and schedule constraints.
- Develop and meet ongoing project and/or task staffing requirements, including mechanisms to review and evaluate each task product.
- Review the work performed on each task to assure its quality, responsiveness, and timeliness.
- Review and analyze overall task performance with respect to planned requirements and authorizations.
- Review and approve all deliverables before their submission to NYSDEC.

- Develop and meet ongoing project and/or task staffing requirements, including mechanisms to review and evaluate each task product.
- Ultimately be responsible for the preparation and quality of interim and final reports.
- Represent the project team at meetings.

- *<u>Benchmark FTL/SSHO:</u>* *Bryan Mayback*

The Field Team Leader (FTL) has the responsibility for implementation of specific project tasks identified at the Site, and is responsible for the supervision of project field personnel, sub consultants, and subcontractors. The FTL reports directly to the Project Manager. The FTL will:

- Define and develop daily work activities.
- Orient field staff concerning the project's special considerations.
- Monitor and direct subcontractor personnel.
- Review the work performed on each task to ensure its quality, responsiveness, and timeliness.
- Assure that field activities, including sample collection and handling, are carried out in accordance with this QAPP.

For this project the FTL will also serve as the Site Safety and Health Officer (SSHO). As such, he is responsible for implementing the procedures and required components of the Site Health and Safety Plan (HASP), determining levels of protection needed during field tasks, controlling site entry/exit, briefing the field team and subcontractors on site-specific health and safety issues, and all other responsibilities as identified in the HASP.

3.3 Quality Assurance (QA) Responsibilities

The QA Officer will have direct access to corporate executive staff as necessary, to resolve any QA dispute, and is responsible for auditing the implementation of the QA program in conformance with the demands of specific investigations and Benchmark policies, and NYSDEC requirements. The QA Officer has sufficient authority to stop work on the investigation as deemed necessary in the event of serious QA issues.

- *Project QA Officer:* *Lori E. Riker*

Specific function and duties include:

- Performing QA audits on various phases of the field operations
- Reviewing and approving QA plans and procedures
- Providing QA technical assistance to project staff
- Reporting on the adequacy, status, and effectiveness of the QA program on a regular basis to the Project Manager for technical operations
- Responsible for assuring third party data review of all sample results from the analytical laboratory

3.4 Field Responsibilities

Benchmark field staff for this project is drawn from a pool of qualified resources. The Project Manager will use staff to gather and analyze data, and to prepare various task reports and support materials. All of the designated technical team members are experienced professionals who possess the degree of specialization and technical competence required to effectively and efficiently perform the required work.

3.5 Quality Assurance Objectives for Measurement Data

The overall objectives and criteria for assuring quality for this effort are discussed below. This QAPP addresses how the acquisition and handling of samples and the review and reporting of data will be documented. The objectives of this QAPP are to address the following:

- The procedures to be used to collect, preserve, package, and transport groundwater samples.
- Field data collection.
- Record keeping.
- Data management.
- Chain-of-custody procedures.
- Precision, accuracy, completeness, representativeness, decision rules, comparability and level of quality control effort conformance for sample analysis and data management by TestAmerica under EPA analytical methods.

The goals for precision, accuracy, and completeness intended for use on this project are discussed below. All data will be reported completely. No data will be omitted unless an error occurred in the analyses or the run was invalidated because of QC sample recovery or poor precision.

3.5.1 Precision

Precision is a measurement of the degree to which two or more measurements are in agreement, which is quantitatively assessed based on the standard deviation. Precision in the laboratory is assessed through the calculation of relative percent difference (RPD) and relative calculation of relative standard deviations (RSD) for three or more replicate samples.

Laboratory precision will be assessed through the analysis of matrix spike/matrix spike duplicate (MS/MSD) and field duplicate samples for organic parameters. For inorganic parameters, precision will be assessed through the analysis of matrix spike/ duplicates field duplicate pairs.

3.5.2 Accuracy

Accuracy is the degree of agreement between an observed value and an accepted reference of true value. Accuracy in the field is assessed through the use of field blanks and/or trip blanks and through the adherence to all sample handling, preservation and holding times. One trip blank will accompany each batch of groundwater sample containers (if any) shipped to the laboratory for volatile organic chemical analysis. Laboratory accuracy is assessed through the analysis of a matrix spike/matrix spike duplicate (MS/MSD) (1 per 20 samples), standard reference materials (SRM), laboratory control samples (LCS), and surrogate compounds, and the determination of percent recoveries.

3.5.3 Completeness

Data completeness is a measure of the amount of valid data obtained from a prescribed measurement system as compared with that expected and required to meet the project goals. Laboratory and field completeness will be addressed by applying data quality checks and assessments to ensure that the data collected are valid and significant.

As shown on Table 2, the laboratory completeness objectives will be 90 percent or greater. A third party data validator will assess the completeness and validity of laboratory data deliverables. For the IRM, laboratory analytical results will undergo third party data review. The completeness of an analysis will be documented by including in the report sufficient information to allow the data validator to assess the quality of the results.

Raw data such as chromatograms, spectra, calibration data, laboratory worksheets and notes, etc. will not be produced with the analytical data reporting package but will be stored with the sample results in the laboratory and made available upon request, if necessary, to substantiate analytical results. The raw data will be archived for at least two years by the laboratory. The laboratory will retain all analytical information; regardless of whether Benchmark requests the substantiation of results.

3.5.4 Data Representativeness

Data representativeness expresses the degree to which data accurately and precisely represents a characteristic of a population, parameter variations at a sampling point, a process condition, or an environmental condition within a defined spatial and/or temporal boundary. All proposed field-testing and measurement procedures were selected to maximize the degree to which the field data will represent the conditions at the Site, and the matrix being sampled or analyzed.

Performance System Audits and the proper execution of field activities are the main mechanism for ensuring data representativeness. Representativeness in the laboratory is ensured through the use of the proper analytical procedures, appropriate methods, meeting sample holding times, and analyzing and assessing field duplicate samples.

3.5.5 Comparability

Data comparability expresses the confidence with which one data set can be compared to another data set. Procedures for field measurements will assure that tests performed at various locations across the Site are conducted using accepted procedures, in a consistent manner between locations and over time, and including appropriate QA/QC procedures to ensure the validity of the data. Sampling procedures for environmental matrices are provided to ensure that samples are collected using accepted field techniques.

Environmental samples will be analyzed by TestAmerica using consistent protocols for sample preservation, holding times, sample preparation, analytical methodology, and QC as described in USEPA SW-846.

Analytical data will be comparable when similar sampling and analytical methods are used as documented in the QAPP. Comparability is also dependent on similar QA objectives. The parameter units to be used for this investigation are listed in Table 3.

3.6 Level of QC Effort for Sample Parameters

Field blank, method blank, trip blank, field duplicate, laboratory duplicate, laboratory control, standard reference materials (SRM) and matrix spike samples will be analyzed to assess the quality of the data resulting from the field sampling and analytical programs. QC samples are discussed below.

- Field and trip blanks consisting of distilled water will be submitted to the analytical laboratories to provide the means to assess the quality of the data resulting from the field-sampling program. Field (equipment) blank samples are analyzed to check for procedural chemical constituents at the facility that may cause sample contamination. Trip blanks are used to assess the potential for contamination of samples due to contaminant migration during sample shipment and storage.
- Method blank samples are generated within the laboratory and used to assess contamination resulting from laboratory procedures.
- Duplicate samples are analyzed to check for sampling and analytical reproducibility.
- MS/MSD and MS/Duplicate samples provide information about the effect of the sample matrix on the digestion and measurement methodology. Depending on site-specific circumstances, one MS/MSD or MS/Duplicate should be collected for every 20 or fewer investigative samples to be analyzed for organic and inorganic chemicals of a given matrix.

The general level of QC effort will be one field (blind) duplicate and one field blank (when non-dedicated equipment is used) for every 20 or fewer investigative samples of a given matrix. Additional sample volume will also be provided to the laboratory to allow one site-specific MS/MSD or MS/Duplicate for every 20 or fewer investigative samples of a given matrix. One trip blank consisting of distilled, deionized water will be included along with each sample delivery group of aqueous VOC samples.

3.7 Sampling and Analysis Plan

Methods and protocol to be used to collect environmental samples (i.e., soil, sediment and/or groundwater) for this investigation are described in the Benchmark Field Operating Procedures (FOPs) presented in Appendix B.

Sample parameter lists, holding times and sample container requirements are summarized on Table 4. The sampling program and related site activities are discussed below. To the extent allowed by existing physical conditions at the facility, sample collection efforts will adhere to the specific methods presented herein. If alternative sampling locations or procedures are implemented in response to facility specific constraints, each will be selected on the basis of meeting data objectives. Such alternatives will be approved by NYSDEC before implementation and subsequently documented for inclusion in the project file.

3.7.1 Custody Procedures

Sample custody is controlled and maintained through the chain-of-custody procedures. Chain of custody is the means by which the possession and handling of samples will be tracked from the source (field) to their final disposition, the laboratory. A sample is considered to be in a person’s custody if it is in the person’s possession or it is in the person's view after being in his or her possession or it was in that person's possession and that person has locked it in a vehicle or room. Sample containers will be cleaned and preserved at the laboratory before shipment to the Site. The following section and FOPs for Sampling, Labeling, Storage, and Shipment, located in Appendix B, describe procedures for maintaining sample custody from the time samples are collected to the time they are received by the analytical laboratory.

3.7.2 Sample Receipt

A sample custodian is responsible for receiving samples, completing chain-of-custody records, determining and documenting the condition of samples received through the Cooler Receipt and Preservation Form (CRPF), logging samples into the LIMS system based upon the order of log-in, and storing samples in appropriate limited-access storage areas. Chain-of-custody documentation is also maintained for the transfer of samples between TestAmerica, and for shipment of samples to subcontracted laboratories.

Upon sample receipt, an inventory of shipment contents is compared with the chain-of-custody record, and any discrepancies, including broken containers, inappropriate container materials or preservatives, headspace in volatile organic samples, and incorrect or unclear sample identification, are documented and communicated to the appropriate project manager.

Each sample is given a unique laboratory code and an analytical request form is generated. The analytical request contains pertinent information for each sample, including:

- Client name
- Project number
- Task number
- Purchase order number
- Air bill number
- Chain-of-custody number
- Number of samples
- Sample descriptions
- Sample matrix type
- Date and time of sampling
- Analysis due dates
- Date and time of receipt by lab
- Client sample identification
- Any comments regarding special instructions or discrepancies

3.7.3 Sample Storage

Samples are stored in secure limited-access areas. Walk-in coolers or refrigerators are maintained at 4°C, ± 2°C, or as required by the applicable regulatory program. The temperatures of all refrigerated storage areas are monitored and recorded a minimum of once per day. Deviations of temperature from the applicable range require corrective action, including moving samples to another storage location if necessary.

3.7.4 Sample Custody

Sample custody is defined by this document as when any of the following occur:

- It is in someone's actual possession.
- It is in someone's view after being in his or her physical possession.

- It was in someone's possession and then locked, sealed, or secured in a manner that prevents unsuspected tampering.
- It is placed in a designated and secured area.

Samples are removed from storage areas by the sample custodian or analysts and transported to secure laboratory areas for analysis. Access to the laboratory and sample storage areas is restricted to laboratory personnel and escorted visitors only; all areas of the laboratory are therefore considered secure. If required by the applicable regulatory program, internal chain-of-custody is documented in a log by the person moving the samples between laboratory and storage areas.

Laboratory documentation used to establish COC and sample identification may include the following:

- Field COC forms or other paperwork that arrives with the sample.
- The laboratory COC.
- Sample labels or tags are attached to each sample container.
- Sample custody seals.
- Sample preparation logs (i.e., extraction and digestion information) recorded in hardbound laboratory books that are filled out in legible handwriting, and signed and dated by the chemist.
- Sample analysis logs (e.g., metals, GC/MS, etc.) information recorded in hardbound laboratory books that are filled out in legible handwriting, and signed and dated by the chemist.
- Sample storage log (same as the laboratory COC).
- Sample disposition log, which documents sample disposal by a contracted waste disposal company.

3.7.5 Sample Tracking

All samples are maintained in the appropriate coolers prior to and after analysis. The analysts remove and return their samples as needed. Samples that require internal COC are relinquished to the analysts by the sample custodians. The analyst and sample custodian must sign the original COC relinquishing custody of the samples from the sample custodian to the analyst. When the samples are returned, the analyst will sign the original COC returning sample custody to the sample custodian. Sample extracts are relinquished to the instrumentation analysts by the preparatory analysts. Each preparation department tracks internal COC through their logbooks/spreadsheets.

Any change in the sample during the time of custody will be noted on the COC (e.g., sample breakage or depletion).

3.7.6 Sample Disposal

A minimum of 30 days following completion of the project, or after a period of time specified by any applicable project requirements, sample disposal is performed in compliance with federal, state, and local regulations. Alternatively, samples may be returned to the client by mutual agreement. All available data for each sample, including laboratory analysis results and any information provided by the client, are reviewed before sample disposal.

All samples are characterized according to hazardous/non-hazardous waste criteria and are segregated accordingly. All hazardous waste samples are disposed of according to formal procedures outlined in TestAmerica's Standard Operating Procedure (SOP). It should be noted that all waste produced at the laboratory, including the laboratory's own various hazardous waste streams, is treated in accordance with all applicable local and Federal laws.

Complete Internal Chain of Custody documentation is maintained for some samples from initial receipt through final disposal. This ensures that an accurate history of the sample from "cradle to grave" is generated. Internal Chain Documentation through disposal is in place at TestAmerica.

3.8 Calibration Procedures and Frequency

This section describes the calibration procedures and the frequency at which these procedures will be performed for both field and laboratory instruments.

3.8.1 Field Instrument Calibration

Quantitative field data to be obtained during soil sampling include screening for the presence of volatile organic constituents using a PID.

FOPs located in Appendix B describe the field instruments used to monitor for these parameters and the calibration methods, standards, and frequency requirements for each instrument. Calibration results will be recorded on the appropriate field forms and in the Project Field Book.

3.9 Analytical Procedures

Groundwater and soil samples collected during this investigation field sampling activities will be analyzed by TestAmerica Analytical Testing Corporation (TestAmerica), 10 Hazelwood Drive, Amherst, New York 14228, (716) 691-2600.

3.9.1 Field Analytical Procedures

Field procedures for collecting and preserving soil samples are described in FOPs located in Appendix B.

3.10 Data Usability Evaluation

Data usability evaluation procedures shall be performed for both field and laboratory operations as described below.

3.10.1 Procedures Used to Evaluate Field Data Usability

Procedures to validate field data for this project will be facilitated by adherence to the FOPs identified in Appendix B. The performance of all field activities, calibration checks on all field instruments at the beginning of each day of use, manual checks of field calculations, checking for transcription errors and review of field log books is the responsibility of the Field Team Leader.

3.10.2 Procedures Used to Evaluate Laboratory Data Usability

Data evaluation will be performed by the third party data validator using the most current methods and quality control criteria from the USEPA's Contract Laboratory Program (CLP) *National Functional Guidelines for Organic Data Review*, and Contract Laboratory Program, *National Functional Guidelines for Inorganic Data Review*. The data review guidance will be used only to the extent that it is applicable to the SW-846 methods; SW-846 methodologies will be followed primarily and given preference over CLP when differences occur. Also, results of blanks, surrogate spikes, MS/MSDs, and laboratory control samples will be reviewed/evaluated by the data validator. All sample analytical data for each sample matrix shall be evaluated. The third party data validation expert will also evaluate the overall completeness of the data package. Completeness checks will be administered on all data to determine whether deliverables specified in this QAPP are present. The reviewer will determine whether all required items are present and request copies of missing deliverables.

4.0 INVESTIGATION SUPPORT DOCUMENTS

4.1 Health and Safety Protocols

A Site-Specific HASP has been prepared 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 C, 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 (CAMP) that describes required particulate and vapor monitoring to protect the neighboring community during intrusive site investigation and remediation activities.

Health and safety activities will be monitored throughout the field investigation and IRM. A member of the field team will be designated to serve as the on-site Health and Safety Officer 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 IRM activities at the Site. A Community Air Monitoring Plan is included with Benchmark's HASP. Particulate and VOC monitoring will be performed along the downwind perimeter of the work area during subgrade excavation, grading and soil/fill handling activities in accordance with this plan. This plan is consistent with the requirements for community air monitoring at remediation sites as established by the NYSDOH and NYSDEC. Accordingly, it follows procedures and practices outlined under NYSDOH's Generic Community Air Monitoring Plan (dated June 20, 2000) and NYSDEC Technical Assistance and Guidance Memorandum (TAGM) 4031: Fugitive Dust Suppression and Particulate Monitoring Program at Inactive Hazardous Waste Sites.

4.2 Citizen Participation Activities

NYSDEC will coordinate and lead community relations throughout the course of the project. Benchmark will support NYSDEC's community relations activities, as necessary. A Citizen Participation Plan has been prepared by Benchmark and submitted to NYSDEC under separate cover. The Citizen Participation Plan will follow NYSDEC's Citizen Participation Plans template for Brownfield Cleanup Program sites entering the BCP at the point of site investigation.

5.0 REPORTING AND SCHEDULE

Upon completion of the IRM fieldwork, a comprehensive IRM closeout report will be completed summarizing the IRM tasks completed as described below. Full details of the IRM activities will be included in the Final Engineering Report (FER).

Work will commence upon NYSDEC approval of the work plan, anticipated February 2017. Benchmark anticipates that the IRM Closeout Report (see below for details on the report) will be submitted to the Department within 60 days.

5.1 IRM Reporting

5.1.1 Project Documentation Forms

A Benchmark scientist or engineer will be on-site on a full-time basis to document IRM activities. Such documentation will include, at minimum, daily reports of IRM activities, community air monitoring results, photographs and sketches. Appendix D contains sample project documentation forms.

5.1.2 IRM Closeout Report

A summary of the IRM activities will be included in the IRM closeout report submitted to the NYSDEC, with full details of the IRM activities included in the Final Engineering Report. At a minimum, the IRM section of the report will include:

- A Site or area planimetric map showing the parcel;
- A map showing the lateral limits of excavation;
- Summaries of unit quantities, lifts and contents (if any), including: volume of soil/fill excavated; disposition of excavated soil/fill and collected post excavation soil samples; volume/type/source of backfill;
- Planimetric map showing location of all verification and other sampling locations with sample identification labels/codes;
- Tabular comparison of verification and other sample analytical results to SCOs. An explanation shall be provided for all results exceeding acceptance criteria; and
- Text describing that the lift removal and excavation activities were performed in accordance with this Work Plan.

6.0 REFERENCES

1. U.S. Environmental Protection Agency, Region II. *CERCLA Quality Assurance Manual, Revision I.* October 1989.

2. U.S. Environmental Protection Agency. National Functional Guidelines for Organic Data Review (EPA-540/R-94-012), 1994a.

3. U.S. Environmental Protection Agency. National Functional Guidelines for Inorganic Data Review (EPA-540/R-94-013), 1994b.

4. U.S. Environmental Protection Agency. *Requirements for Quality Assurance Project Plans for Environmental Data Operations (EPA QA/R-5).* October 1998.

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

6. Benchmark Environmental Engineering and Science, PLLC. *Phase II Site Investigation Report, 2424 Hamburg Turnpike Site, Lackawanna, New York*. January 2014.

7. Benchmark Environmental Engineering and Science, PLLC. *Brownfield Cleanup Application, 2424 Hamburg Turnpike Site, Lackawanna, New York*. August 2015.

8. Benchmark Environmental Engineering and Science, PLLC. *Remedial Investigation/ Alternatives Analysis Report, 2424 Hamburg Turnpike Site, Lackawanna, New York*. September 2016.

TABLES

TABLE 1

CRITERIA FOR USE OF OFF-SITE SOIL

2424 HAMBURG TURNPIKE SITE

LACKAWANNA, NEW YORK

Parameter	Allowable Concentration 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

TABLE 1

CRITERIA FOR USE OF OFF-SITE SOIL

2424 HAMBURG TURNPIKE SITE

LACKAWANNA, NEW YORK

Parameter	Allowable Concentration for Use of Off-Site Soil
Volatile Organic Compounds (mg/kg)	
Trimethylbenzene-1,2,4	3.6
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

2424 HAMBURG TURNPIKE SITE

LACKAWANNA, NEW YORK

Parameter	Allowable Concentration for Use of Off-Site Soil
Metals (mg/kg)	
Arsenic	16
Barium	400
Beryllium	47
Cadmium	7.5
Chromium, Hexavalent[1]	19
Chromium, Trivalent[1]	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

2424 HAMBURG TURNPIKE SITE

LACKAWANNA, NEW YORK

Parameter	Allowable Concentration 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. Allowable concentrations for use of off-site soil are the lesser of Commercial Soil Cleanup Objectives (CSCOs) or Protection of Groundwater SCOs (PGSCOs).
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.

TABLE 2

PROJECT GOALS FOR PRECISION, ACCURACY & COMPLETENESS FOR LABORATORY MEASUREMENTS

IRM WORK PLAN

2424 Hamburg Turnpike Site
Lackawanna, New York

Analytical Method	Precision Goal [1] (RPD) [2]	Accuracy Goal (% R) [3]	Completeness Goal (%)
	Soil	Soil	
CP-51 VOCs via EPA 8260C	± 30	± 50	90
CP-51 SVOCs via EPA 8270D	± 30	± 50	90

Notes:

1. Precision goals vary depending on the compound being analyzed; the precision goals presented are genera
2. RPD = Relative Percent Difference
3. %R = Percent Recovery

TABLE 3

DATA MEASUREMENT UNITS FOR FIELD & LABORATORY PARAMETERS

IRM WORK PLAN

2424 Hamburg Turnpike Site
Lackawanna, New York

Parameter	Units
Concentration of parameter in soil sample	micrograms per kilogram (μg/kg) organic milligrams per kilogram (mg/kg) inorganic
Photoionization Detector (PID)	parts per million by volume (ppmv)

TABLE 4

SAMPLE CONTAINER, VOLUME, PRESERVATION & HOLDING TIME REQUIREMENTS

2424 HAMBURG TURNPIKE SITE
LACKAWANNA, NEW YORK

Matrix	Parameter [1]	Method [1]	Container Type	Minimum Volume	Preservation (Cool to 2-4 °C for all samples)	Holding Time from Sample Date
Soil	CP-51 VOCs	8260B	EnCore Sampler	(3) 5 oz. / 16 oz.	Cool to 2-4 °C, Zero Headspace	14 days
	CP-51 SVOCs	8270C	WMG	16 oz.	Cool to 2-4 °C	14 days extrac./40 days

References:
1. Test Methods for Evaluating Solid Wastes, USEPA SW-846, Update III, 1991.

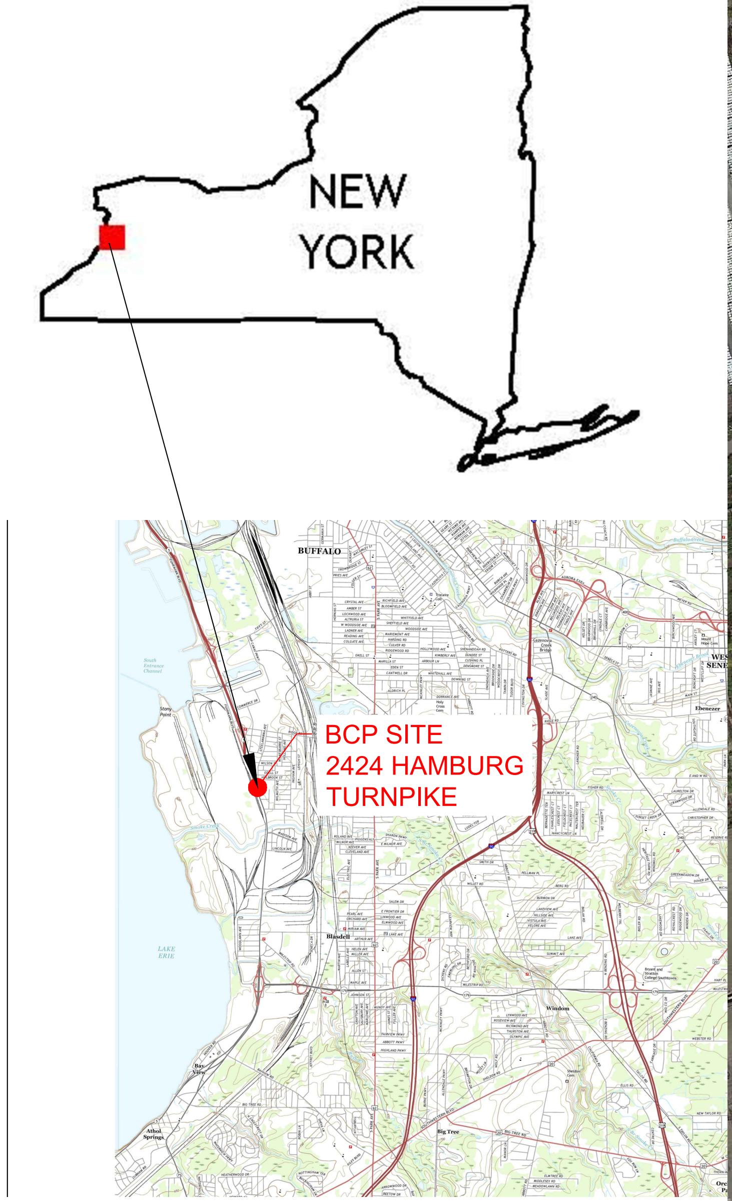
Notes:
1. EPA-approved methods published in Reference 1 above may be used. The list of analytes, laboratory method and the method detection limit for each parameter are included in Tables 1 and 2 of the QAPP.

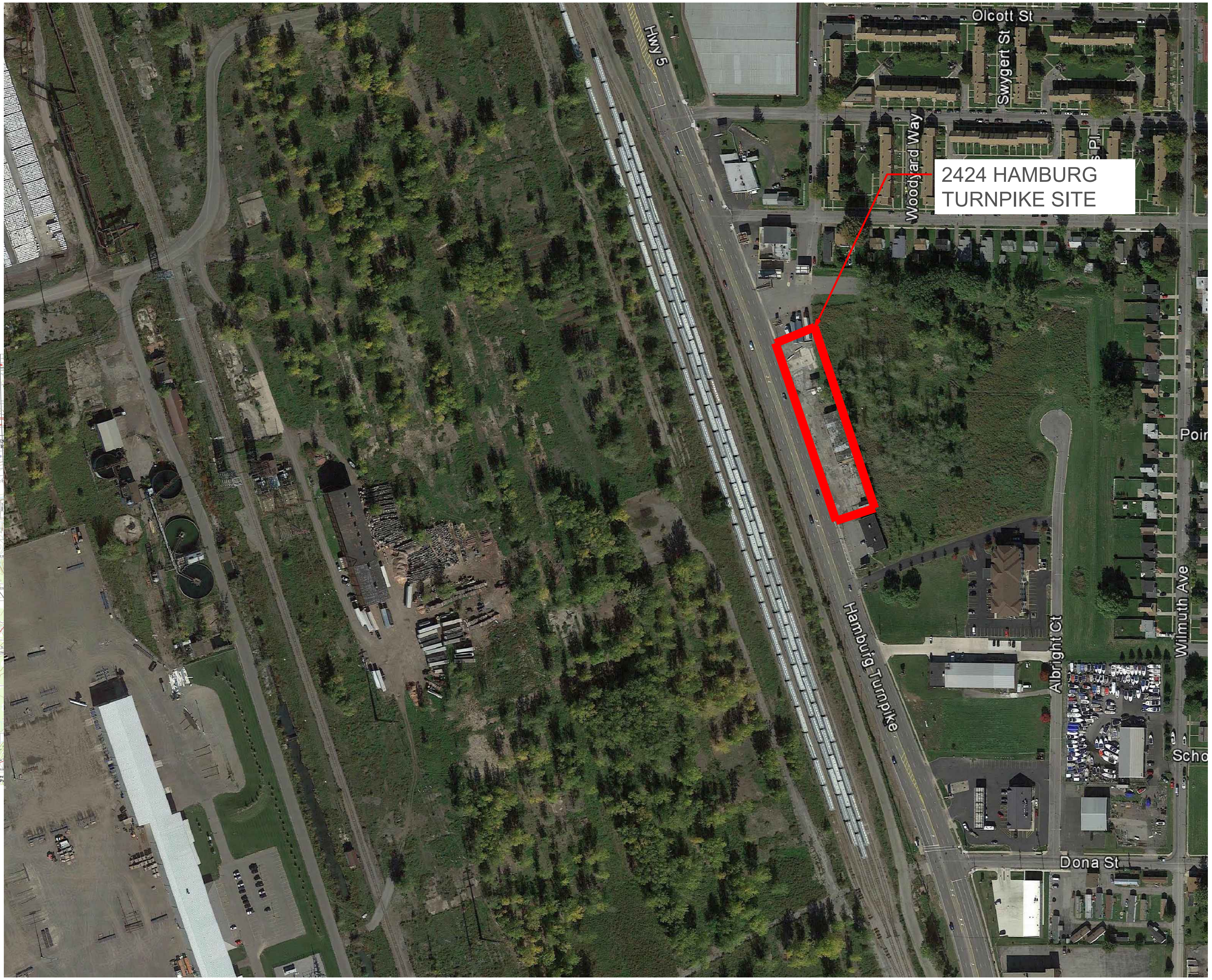
Acronyms:

VOCs = Volatile Organic Compounds
SVOCs = Semi-Volatile Organic Compounds
WMG = Wide Mouth Glass

FIGURES

F:\CAD\Benchmark\2424 Hamburg Turnpike, LLC\Files for DEC\Figure 1; Site Plan Zoomed Out.dwg





AERIAL OF SITE
APPROXIMATE SCALE 1" = 300'

SOURCE: GOOGLE EARTH OCTOBER 2016 IMAGERY

DATE: SEPTEMBER 2016
DRAFTED BY: CCB

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

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

JOB NO.: 0345-015-001

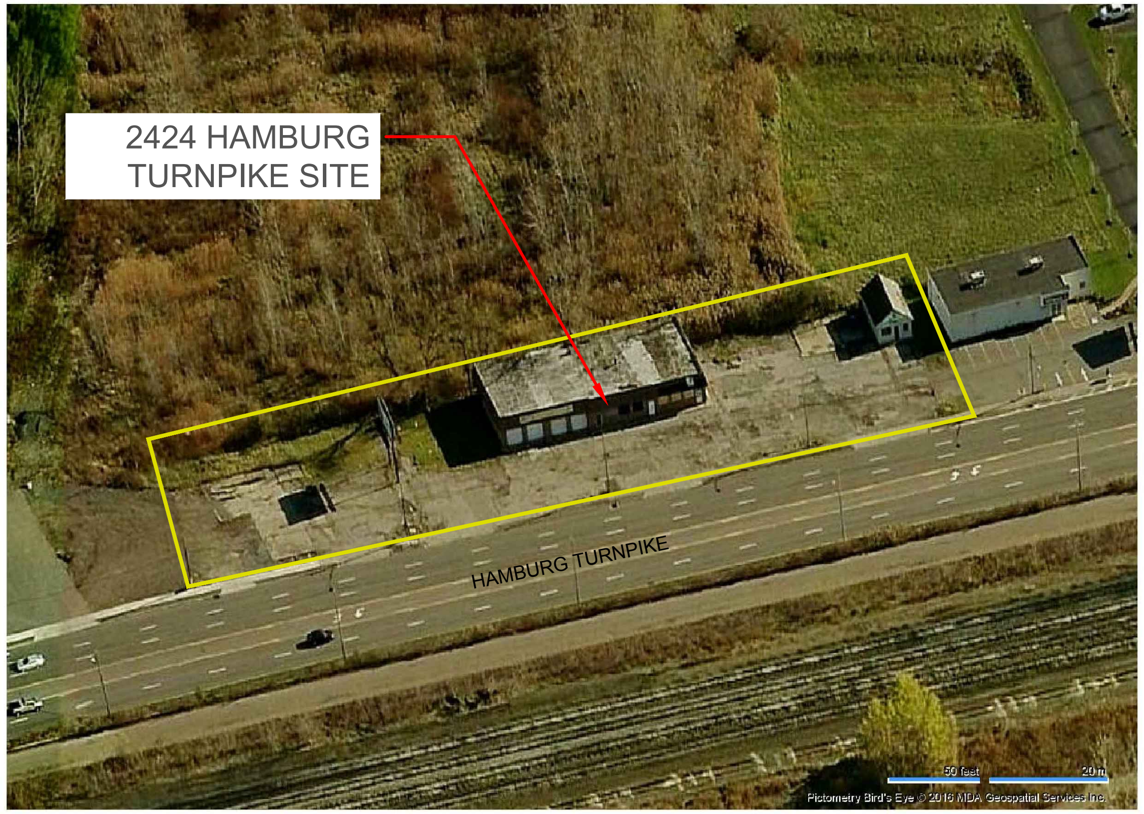
SITE VICINITY AND LOCATION PLAN

2424 HAMBURG TURNPIKE SITE

LACKAWANNA, NEW YORK
PREPARED FOR
2424 HAMBURG TURNPIKE, LLC

FIGURE 1

F:\CAD\Benchmark\2424 Hamburg Turnpike, LLC\Files for DEC\Figure 2: Site Plan.dwg



N

BIRD'S EYE VIEW OF SITE
NTS

SOURCE: BING MAPS CIRCA 2011

AERIAL OF SITE
APPROXIMATE SCALE 1" = 60'

N

SOURCE: GOOGLE EARTH OCTOBER 2016 IMAGERY

DATE: SEPTEMBER 2016
DRAFTED BY: CCB

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

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

JOB NO.: 0345-015-001

SITE PLAN (AERIAL)

2424 HAMBURG TURNPIKE SITE

LACKAWANNA, NEW YORK

PREPARED FOR
2424 HAMBURG TURNPIKE, LLC

FIGURE 2

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

F:\CAD\Benchmark\2424 Hamburg Turnpike, LLC\IRM Work Plan\Figure 3; IRM PLAN.dwg

DATE: JANUARY 2017
DRAFTED BY: NAS

PROPOSED IRM ACTIVITIES

IRM WORK PLAN

2424 HAMBURG TURNPIKE SITE

LACKAWANNA, NEW YORK

PREPARED FOR

2424 HAMBURG TURNPIKE, LLC

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

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

JOB NO.: 0345-015-001

FIGURE 3

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APPENDIX A

RESUMES

PAUL H. WERTHMAN, P.E.
PRESIDENT

EDUCATION

BS (Environmental Engineering) 1975; Rensselaer Polytechnic Institute
ME (Environmental Engineering) 1977; Rensselaer Polytechnic Institute

REGISTRATION

Professional Engineer- New York and Michigan

SUMMARY OF EXPERIENCE

Mr. Werthman has over 35 years of environmental engineering experience in the management, treatment, disposal and recycling/reuse of : solid and hazardous wastes; bulk chemicals and hazardous substances; petroleum; industrial and municipal wastewater; drinking water; non-potable process water; storm water, and; ground water. He has been involved in nearly every aspect of: petroleum and chemical storage, handling, and spill clean-up; hazardous and solid waste management; commercial/industrial development of both brownfield and greenfield properties including planning, permitting, design and construction of infrastructure; environmental, health and safety compliance audits; energy conservation, generation, and transmission; Phase I & II site assessments; waste minimization/pollution prevention; RCRA, CERCLA, state Superfund, brownfields and voluntary cleanup compliance negotiations and program management; environmental facilities siting, planning, permitting, design, construction and operations management; remedial investigation/feasibility studies; cost estimating; value engineering; construction management and quality assurance; treatability studies; risk assessments; remediation and restoration of all environmental media (soil/sediment, water, air, structures); demolition and facility decommissioning, and; related expert witness testimony and litigation support.

Through Mr. Werthman's experience at over 200 waste disposal, spill, and brownfield sites [including 11 on the National Priorities List (NPL), eight RCRA , and over 50 brownfield and voluntary cleanup sites] he has investigated a broad spectrum of organic, inorganic, and radionuclide contamination in all environmental media (i.e., soil/rock, groundwater, surface water, sediments, biota, building materials and air) from the automotive, iron & steel, primary and secondary metals, mining, electronics, pharmaceutical, chemical, pulp and paper, food processing, leather tanning, brewing, waste management, petroleum and gas production and refining, and coal-fired and renewable electric power industries. His experience in the commercial sector is equally extensive encompassing: petroleum retail storage and distribution; heavy equipment, truck and automobile maintenance and repair shops; laundry and dry cleaners; solid and hazardous waste recycling, treatment, storage and disposal facilities. He has evaluated and successfully implemented cost-saving and innovative in-situ and ex-situ thermal, biological, and physicochemical treatment technologies as well as removal and containment methods for remediation and spill clean-ups.

REPRESENTATIVE PROJECT EXPERIENCE

As Founder, President and Principal Engineer:
June 1998 to Present **Benchmark Environmental Engineering & Science, PLLC**
TurnKey Environmental restoration, LLC

- Expert witness to defendant's counsel in litigation with Orange County Water District, Fullerton, CA for primary drinking water aquifer contamination by chlorinated solvents and emergent organic contaminants. Prepared expert report and provided deposition regarding nature, extent, sources of chlorinated volatile organic compounds in soil and groundwater. Addressed adequacy of previous cleanup by defendant and methods and costs of proposed additional remediation by Plaintiff on behalf of defendant in CA Supreme Court and NYC Bankruptcy Court to support claim settlement.

- Technical consultant to defendant's counsel in litigation over petroleum spill cleanup cost recovery (NYS Supreme Court) related to petroleum underground storage tank at residential property.

- Technical consultant to plaintiff's counsel in litigation over property and sewer tax assessments (two separate actions in NY State Supreme Court) and payments over an extended period related to a substantially inactive and integrated iron and steel manufacturing complex in New York. Provided professional opinions and expert witness testimony regarding: environmental conditions; remedial activities and costs; estimated cost of planned future remedial actions; and related impacts on property value on the nearly 1,100-acre site. Was directly involved in settlement negotiations.

- Technical consultant to defendant's counsel in two separate cost recovery litigations related to remediation of a gasoline and diesel fuel retail filling stations: one on Seneca Indian Nation lands and the other in a suburban commercial area with multiple documented spill and cleanups. Technical issues addressed included: reasonableness of remediation costs; subsurface contaminant migration; appropriateness and/or adequacy of investigation methods, remediation objectives, and remediation actions.

- Prepared expert opinion report on costs related to development and implementation of a Voluntary Cleanup Agreement for a saw mill and former charcoal manufacturing facility in central New York. The work evaluated included site investigation, engineering, excavation, transportation and off-site disposal of contaminated soil/fill, creek bank stabilization, site restoration and monitoring.

- Technical expert in support of plaintiff's counsel in cost recovery and property diminution litigation related to Voluntary Cleanup of a former automobile dealership in Rochester, New York. Portions of the multi-parcel site were formerly used for a gasoline station, auto body repair, automobile lubrication and maintenance, drum and barrel cooperage, coal and pipe storage, and manufactured gas plant. The remediated site was subsequently redeveloped as an urban multi-use thrift and community center with day-care, after school and summer camp programs for children. Technical issues being addressed include: nature and extent of subsurface contaminants; probable contaminant sources and migration pathways; appropriateness of removal and remedial actions; reasonableness of investigation and remediation costs; and allocation of costs.
- Technical consultant and expert witness to two bankrupt defendant iron, steel and coke manufacturing companies against nuisance claim in NYS Supreme Court. Directly participated in settlement negotiations.

- Voluntary clean-up and litigation technical support at an electronics manufacturing facility in Western NY. Responsibilities include: operations and maintenance assistance, monitoring and reporting groundwater pump and treat system; review and prepare technical comments on off-site remedial investigation, feasibility study and remedial action plans prepared by the NYSDEC; and consult with owner attorneys regarding third party litigation and cost recovery actions.

- Serving as Site Manager and Principal Engineer for the investigation, remediation, decommissioning and redevelopment of the former Bethlehem Steel Lackawanna Works. Responsible for managing all aspects of the on-going RCRA Corrective Measures Program on approximately 500 aces of the Site , as well as management of ongoing scrap contractor and demolition operations and voluntary investigation and remediation actions under the NY State Brownfields Cleanup Program on approximately 435 acres of the Site.

- Served as Principal Engineer for PRP group including performance of remedial investigation/ feasibility study, remedial design, remedial construction, and port-remediation operation, maintenance and monitoring at two NPL Superfund sites in western NY. Both sites were impacted by tannery and glue wastes. Remedial actions included waste consolidation, groundwater collection, conveyance and discharge to the POTW, soil and geosynthetic cover systems. One of the sites is being redeveloped as a public park with passive recreation in cooperation with the local municipality. One of the sites has been delisted.

- Planned, supervised, and implemented a comprehensive Remedial Design/Remedial Action Work Plan for the voluntary cleanup of a former integrated steel and coke manufacturing site in Buffalo, NY. The four-year design-build cleanup plan addressed: excavation and on-site treatment or off-site disposal of over 60,000 cubic yards of contaminated soil/fill; a 14-acre containment cell with groundwater collection and physicochemical pretreatment; long-term groundwater monitoring; limited dredging and bank stabilization along the Buffalo River; and a post-remediation soil/fill management plan for site redevelopment.

- Served as Principal Engineer to a municipality for fast-tracked investigation and remediation of the former auto body shop, lumber yard, and telephone company maintenance facility being redeveloped as a community center. The voluntary remediation was performed as a fast-track design-build and included: excavation inside the building, transportation and off-site disposal of impacted soil/fill; verification sampling; in-situ treatment of petroleum-impacted groundwater using oxygen release compounds; groundwater monitoring, and; site restoration.

- Supervised performance of remedial measures at the Peter Cooper Landfill and Markhams Sites, both National Priority Listed sites in Cattaraugus County, NY. Serves as primary technical liaison for PRP committee with USEPA on Unilateral Order.

- Supervised remedial construction and restoration of a 30-acre State-designated wetland adjacent to a closed industrial landfill located in Buffalo, New York. Sediment in the adjacent surface waters were impacted by heavy metals. Key elements of this $ 3 million construction project include: dewatering and surface water diversion; mechanical excavation of approximately 90,000 cubic yards of sediment; on-site landfilling of sediment in a new piggy-back cell; closure and restoration of the clay soil cover system; restoration of wetlands vegetation and related habitat enhancements.

- Developed and supervised implementation of design-build remediation of a New York State Superfund site near Hammondsport, New York. The innovative and cost-efficient approach includes: enhanced barrier soil cover over portions of the site; limited waste relocation and steep slope regrading; soil vapor extraction of chlorinated VOCs in source areas; a downgradient perimeter groundwater extraction well system; phytoremediation using poplar trees; groundwater treatment system using an advanced oxidation process; and stream relocation and erosion protection. The $1.1 million project cut implementation time in half and saved over $5 million compared to the NYSDEC-recommended cleanup plan.

- Provided technical and engineering consulting to group of potential responsible parties regarding investigations and remediation of a residential neighborhood constructed on fill materials containing elevated concentrations of polynuclear aromatic hydrocarbons (PAHs) and inorganics. Developed work plan for soil investigation, removal and off-site disposal of impacted soil/fill including community air monitoring plan and site restoration. Collaborated with other consultant on human health risk assessment including research on background levels of PAHs in urban environments. Developed and implemented interim remedial measures to cover and fence unoccupied lots.

1979 to June 1998 Malcolm Pirnie, Inc.

As Vice President, Project Manager & Project Engineer:

- Planned and negotiated technical details for voluntary cleanup of a petroleum spill site. Implemented fast-track design-build excavation and bioremediation of 17,000 cu yd of contaminated soil, underground storage tank and piping cleaning, removal and disposal for subsequent redevelopment of the 35-acre site.

- Assisted negotiation of a consent order and supervised performance of the RI/FS, remedial design, and remedial construction at the Rochester Fire Academy. Remediation activities included excavation and off-site disposal of soil, ash, and tar materials contaminated with over 50 mg/kg PCBs; excavation and on-site enhanced volatilization of soils contaminated with chlorinated solvents under a temporary enclosure with thermal oxidation of air emissions; excavation and on-site solidification of soils with 1-50 mg/kg PCBs and/or elevated heavy metals; on-site containment of treated soils under a synthetic membrane cover system; asphalt paving over the training grounds area; a groundwater collection trench; and a 40-gpm pretreatment system with shallow-tray air strippers and granular activated carbon adsorbers. The remedial design facilitated continued fire and police training activities both during and after remedial construction. The training and recreation facilities were enhanced through incorporation of flood controls, improved storm drainage and water supply, containment of flammable liquids, wetlands protection, restoration of biking/hiking trails, and landscaping aesthetics. Served as lead technical expert and consultant in construction mediation and arbitration disputes.

- Expert witness for City of Niagara Falls' successful opposition to CECOS Secure Containment Residual Facility No. 6 in NYCRR Part 373 permit adjudication hearings. Provided critical testimony, technical deposition, and technical assistance to legal counsel on construction quality assurance of liner systems, reinforced earth berm, and stormwater management.

- Directed 23-person team in a field investigation of sewers and creeks in the Love Canal area of Niagara Falls, NY. Over 1,000 liquid, sediment and soil core samples were collected and analyzed for a variety of organic and inorganic contaminants including tetrachlorodibenzo-dioxin. Prepared the health and safety plan and performed a remedial investigation, feasibility studies, and risk assessment for approximately 12 miles of contaminated sewers and creeks. Prepared conceptual designs for 5,000-cubic-yard encapsulation facility with clay and synthetic liner, leachate collection, leak detection and liquid waste treatment systems. Presented findings at public hearings.

- Served as Program Manager and Project Officer for Inactive Hazardous Waste Disposal Sites Remedial Standby Contract for New York State Department of Environmental conservation (NYSDEC). Served as lead technical representative on the multi-million dollar 5-year contract performing preliminary site assessments, well decommissioning, RI/FSs, remedial design, and remedial construction oversight at over 20 State Superfund sites.

- Managed all aspects of an award-winning fast-track remediation of a phenolic-contaminated ash disposal site for a New York electric power utility company. The project included installation of temporary surface water and groundwater collection and containment measures; regulatory negotiations of a Consent Order addressing State Pollutant Discharge Elimination System permit limits, NYCRR Part 360 landfill operating permit, and site remediation; evaluation of alternative leachate collection system configurations and construction methods including hydrologic modeling; excavation and rehabilitation of access road and surface drainage systems; bench-scale treatability studies; design, construction management, and operational oversight of on-site bioremediation of soils and ash in a lined cell; and design, construction, and operation of a 100-gpm mobile granular activated carbon stormwater treatment system.

- Provided technical and administrative oversight on supplemental remedial investigations and predesign engineering studies, remedial design, and remediation at the 85-acre Millcreek Superfund Site in Pennsylvania for the U.S. Army Corps of Engineers. Key project elements included: wetland sediment and soil sampling; feasibility evaluation of alternative groundwater collection systems; bench- and pilot-scale groundwater treatability studies for removal of heavy metals, volatiles, and semi-volatiles; value engineering and design of cover system; soil pollutant fate and transport, hydrologic, and groundwater solute transport modeling to derive soil cleanup criteria; design of a multiple-trench groundwater collection system and 100-gpm physico-chemical treatment system; and design of creek channel relocation, surface drainage improvements, and a flood retention structure including wetlands mitigation measures. Provided technical assistance during construction and full-scale performance tests.

- Led Consent Order and funding negotiations and planned and supervised remedial investigations, design, construction, and operation of the Old Bath Landfill remediation project for Steuben County NY. Cost-saving and/or value-adding elements of this award-winning project include: interim remedial measures based on presumptive remedies that expedited construction; a 100-gpm leachate pretreatment facility with two-stage physico-chemical and biological sequencing batch reactors to efficiently manage leachate from all four County landfills; over a mile of gravity-flow leachate and groundwater collection trench; and an enhanced geocomposite cover system only where thickness or permeability of the existing cover was inadequate, which has substantially reduced leachate production and construction costs.

- Planned and supervised RCRA facility investigation and corrective measures study at an organic chemical manufacturing facility encompassing sewers, two landfills, container storage, and seven former solid waste management units. Clean-closed three RCRA surface impoundments and nine tanks.

- Supervised RI/FS at industrial site with PCBs and metals in soils and stream sediment. Provided technical assistance during consent order negotiations and public hearings. Completed remedial design and supervised construction for soil excavation, dredging of stream sediments with on-site dewatering and return water treatment system, riprap and sheet pile bank stabilization. The site is now delisted.

- Developed remediation concept, supervised design and construction of 20-gpm bedrock groundwater collection and treatment system. Innovative design includes blasted bedrock fracture zone and two-phase treatment with advanced oxidation system (UV-peroxide) and low-profile tray-type air stripper. Secured air and SPDES permits. The RI/FS demonstrated no further remediation was necessary.

- Performed bench-scale treatability studies, evaluated alternative physico-chemical treatment methods, and prepared preliminary design and detailed capital and operating cost estimates for removal of heavy metals from a 500-gpm acid mine drainage at an NPL site in Colorado.

- Developed the remedial site plan and assisted in negotiation of a consent order for the cleanup of PCB-contaminated soils at a nonferrous secondary metals yard previously used for electrical transformer reclamation. Prepared construction documents and supervised construction of excavation and secure burial of contaminated soils, groundwater collection and treatment, spill containment and surface runoff control. Performed field demonstration of in-situ PCB destruction processes in conjunction with EPA MERL.

- Technical consultant to PRP attorney representing owner/operator of inactive hazardous waste disposal site on New York State-led remediation. Secured modification to draft Record of Decision and value engineered remedial design, resulting in multi-million-dollar savings in remedial construction and long-term operation and monitoring. Provided technical assistance in negotiation of administrative order that eliminated further capital contribution of the PRP and committed them to operation and maintenance of the consolidated 28-acre landfill.

- Developed and supervised implementation of work plan for voluntary cleanup of active electronics manufacturing and former metal machinery manufacturing site including: design-build implementation of excavation and off-site disposal of petroleum-contaminated soil and on-site pump-and-treat system for petroleum and chlorinated volatile organic contaminants in groundwater; secured necessary air emission and wastewater pretreatment permits; and assisted system startup, operational optimization, monitoring and reporting. Acted as regulatory agency technical liaison on voluntary cleanup agreement and on technical review of off-site RI/FS conducted by New York State, including indoor air quality survey of nearby residential housing.

- Prepared RCRA Part B permit applications for two chemical manufacturing facilities, one Department of Defense facility, one steel manufacturer, and one tannery, encompassing surface impoundments, tank storage, waste pile, drummed storage and a burning pit. This work included conducting complete RCRA groundwater evaluations for three industrial sites one with surface impoundments, and the other two with land disposal facilities including design, construction and evaluation of environmental monitoring systems. Prepared contract documents and provided construction management for construction of an 800-drum covered RCRA storage facility.

- Performed contaminated stormwater drainage evaluation at a large integrated commercial waste disposal site. Samples were collected from the surface water drainage system to identify contaminant sources. Alternative ground- and surface water collection/drainage modifications and treatment alternatives were evaluated to attain compliance with the SPDES discharge permit.

1976-1979 **Calspan Corp. and Frontier Technical Associates**

As Project Engineer & Engineer:

- Designed and supervised construction and operation of a mobile pilot-scale wastewater treatment plant to evaluate the treatability of a variety of wastewaters from the ore mining and milling industry. Developed pretreatment standards and effluent limitation guidelines for inorganic chemical manufacturing and ore mining and milling industries; designed groundwater monitoring systems; and conducted hydrogeologic investigations at abandoned industrial and hazardous solid waste disposal sites. Established and supervised a soils laboratory for physical soils tests.

PRESENTATIONS/PUBLICATIONS

Werthman, P.H., 2010. “Remediation Challenges at the Former Republic Steel and Donner Hanna Coke Plant Site” presented at Erie County Bar Association, Buffalo NY, April.

Werthman, P.H., 2004. "Real Estate and the Environment: New York’s New Brownfield Law," presented at NY State Bar Association, Albany NY, Spring.

Werthman, P.H., 2001. "Voluntary Remediation of the Buffalo River Waterfront," presented at Air & Waste Management Association, Niagara Frontier Section, Buffalo NY, January.

Forbes, T.H. & Werthman, P.H., 2000. "Development of Site-Specific Cleanup Levels for Commercial Redevelopment of a Large Former Steel Works," presented at the Brownfields 2000 Conference, Atlantic City NJ, October.

Werthman, P.H., 1996. “Making ‘Cents’ of Remediation of Contaminated Sites,” presented at NYS Bar Association Seminar, New York NY, November.

Werthman, P.H., 1993. "Creative Solutions Fast-Track Multi-Media Site Remediation," presented at the Fall Meeting of the Hazardous Waste Action Coalition, Phoenix AZ, November.

Werthman, P. H. 1992. "Millcreek Superfund Site Remediation," Presented to Society of American Military Engineers, Great Lakes Regional Conference, Buffalo NY, October.

Werthman, P.H., McManus, A.C., McManus, K.R., McKeown, J.J. and Hague, R., 1991. "Development of Landfill Liner Requirements for the New York Paper Industry," TAPPI Journal, Vo. 74, No. 2, February.

Daley, D., Werthman, P.H., 1990. "The Use of Computer Simulations to Develop Cost-Effective Remedial Designs at a Hazardous Waste Site", Water Pollution Control Federation, 63rd Annual Conference, Washington DC, October.

Cavalieri, R.R., Werthman, P.H., McManus, K.R., and Sonntag, M.L., 1990. "Landfill Leachate Collection System Retrofit Design and Performance - Five Case Studies," Water Pollution Control Federation Specialty Conference, Chicago IL, July.

McManus, A.C., Werthman, P.H and McManus, K.R., 1989. "Evaluation of the Effects of Frost Action on the Permeability of a Compacted Soil," presented at the New York State Association of Solid Waste Management Fall Program, Lake Luzerne NY, October.

Amend, J.R., Bowers, L.H., Iyer, D.R., and Werthman, P.H., 1988. "Treatment of High-Strength Organic Chemical Industry Wastewater in a Sequencing Batch Reactor," presented at the Water Pollution Control Federation 61st Annual Conference, Industrial Waste Symposia, Dallas TX, October.

Werthman, P.H., 1988. "Liability Control Through Waste Minimization: The Audit As a Waste Minimization Tool," presented at the Sixth Annual Greater Buffalo Environmental Conference, Buffalo NY, September.

Werthman, P.H., Lane, T.J., Westendorf, J.R. and Schendel, D.B., 1988. "Industrial Waste Contamination of a Water Treatment Plant Site: A Case Study," presented at the American Water Works Association Annual Conference and Exhibition, Miami FL, June.

Werthman, P.H., Westendorf, J.R. and McManus, A.C., 1984. "Granular Activated Carbon Removal of Priority Pollutants in a Combined Municipal/Industrial Wastewater," presented at the 39th Annual Purdue Industrial Waste Conference, West Lafayette IN, May.

Werthman, P.H., 1982. "VOCs In Groundwater," presented at the Western NY Water Works Conference, October.

Werthman, P.H., 1982. "Monitoring Groundwater Systems," presented at the American Water Works Association-New York Section Meeting.

Werthman, P.H., Westendorf, J.R. and McManus, K.R., 1982. "Residual Management at a Combined Industrial/Municipal Wastewater Treatment Plant," presented at the 14th Mid-Atlantic Industrial Waste Conference, University of Maryland, July.

Werthman, P.H. and Bainbridge, K.L., 1980. "An Investigation of Uranium Mill Wastewater Treatability," presented at the 35th Annual Purdue Industrial Waste Conference, West Lafayette IN, May.

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC
TURNKEY ENVIRONMENTAL RESTORATION, LLC

THOMAS H. FORBES, P.E.
PRINCIPAL ENGINEER

EDUCATION

BS (Chemical Engineering) 1988; State University of New York at Buffalo
Graduate of State University of New York at Buffalo School of Management Center for Entrepreneurial Leadership; 2002
Graduate-level courses in Biological Principles of Engineering and Hazardous Waste Management through the State University of New York at Buffalo Department of Environmental Engineering

REGISTRATION AND AFFILIATIONS

Professional Engineer, New York
Professional Engineer, Ohio
ISO 14000 Certified Lead Auditor - April 1998
Member - American Institute of Chemical Engineers
Member – New York Water Environment Association, Inc.

SUMMARY OF EXPERIENCE

Mr. Forbes has nearly 25 years of environmental engineering experience, with a particular focus on brownfield and hazardous waste site investigation and remediation; petroleum-impacted site remediation; due diligence for environmentally-impaired properties; groundwater and industrial wastewater treatment; and environmental regulatory compliance. Investigations and cleanups Mr. Forbes has directed have included well over 100 sites contaminated with a wide range of materials, including chlorinated solvents, PCBs, dioxins, heavy metals, cyanide, radioactive isotopes, and petroleum contamination. He has evaluated and successfully implemented on a conventional and design-build basis cost-saving and innovative treatment technologies (e.g. in-situ and ex-situ physical-chemical, thermal, and biological treatment) as well as removal and containment methods for remediation.

REPRESENTATIVE PROJECT EXPERIENCE

June 1998 to Present: Benchmark Environmental Engineering & Science, PLLC

- Served as project manager for the investigation and hydrogeological assessment of the 2001 Webster Block site on behalf of the City of Buffalo. Work included a Phase II Site investigation, underground storage tank removal, groundwater pump test, and utility capacity evaluation performed under USEPA Pilot grant.

- Currently managing NYSDEC Brownfield Cleanup Program (BCP) investigation of the former Millard Fillmore Gates Circle hospital complex in Buffalo, NY.

- Project officer for NYSDEC BCP investigation and cleanup of a proposed charter school development site and a separate proposed mixed use residential/commercial site in the City of Buffalo.

- Serving as project manager for remedial investigation, alternatives analysis, and remedial construction to facilitate redevelopment of over 450-acres of former steel manufacturing site property encompassing 33 separate BCP sub-parcel sites in Lackawanna, New York. Contaminants of concern primarily include petroleum organics/solvents and heavy metals.

- Project manager for RI/FS, remedial design and remedial construction at the Sycamore Village Site, a 4-acre NY State Environmental Restoration Program (ERP) site in Buffalo, NY. Responsible for all technical and administrative aspects of the project, involving removal of over 18,000 cubic yards of soil from an impacted residential neighborhood and site restoration.

- Assisted western NY client's legal counsel prepare legal defense related to a multi-PRP suit by Orange County Water District, Fullerton, CA for primary drinking water aquifer contamination by chlorinated solvents and emergent organic contaminants. Served as technical consultant during mediation and settlement discussions; prepared expert report and lead technical arguments on behalf of defendant to support bankruptcy claim dismissal.

- Served as project manager and supervising contractor for design-build remedial activities at the Markhams National Priority List (NPL) site in Dayton, NY. Successfully implemented remedial measures leading to USEPA-designated Preliminary Site Closeout status in October 2008 and delisting in 2009.

- Served as project manager representing multiple potential responsible party (PRP)-led remedial construction activities to address heavy metal and chlorinated solvent impacts at the Peter Cooper Landfill NPL site. Responsible for oversight and coordination of RI/FS planning and implementation activities, lead technical contact with USEPA, and remedial measures design and construction. Achieved site closeout in 2011.

- Served as project manager for design-build cleanup of the Urbana Landfill Site, a Class 2 Hazardous Waste Landfill Site. Designed and successfully implemented a Soil Vapor Extraction system to address source area chlorinated organics in soils, achieving soil cleanup goals with 12 months, Also responsible for design, startup and continued operation of a downgradient perimeter groundwater extraction well system and groundwater remediation utilizing advanced oxidation treatment.

- Assisted in the development of a voluntary cleanup plan for remediation of a 120-acre former steel manufacturing site in Buffalo, NY which was contaminated with volatile organic compounds, heavy metals, poly-nuclear aromatic hydrocarbons. Specific assistance involved design of a soil vapor extraction (SVE) system to address VOC and SVOC source area impacts proximate to a residential neighborhood and development and implementation of a Community Air Monitoring Plan involving quantitative monitoring (Summa Canister and respirable particulate analysis) and qualitative monitoring (field instruments).

- Served as Project Manager for RI/FS and cleanup activities related to solvent releases from a former paint and specialty coatings manufacturing facility in Buffalo, NY. The work, carried out under NY State Superfund program, included insitu treatment of soils and groundwater impacted by chlorinated and non-chlorinated volatile organics and heavy metals.

- Assisted confidential client's legal counsel negotiate a consent decree with New Mexico Environment Department related to cleanup of chlorinated solvent releases to the fractured bedrock aquifer from a former manufacturing operation in Albuquerque, NM. Presently managing insitu groundwater cleanup and monitoring work.

- Currently serving as Project Manager for NY State Voluntary Cleanup efforts for chlorinated solvent cleanup at a former degreasing and electroplating facility in Rochester, NY. Designed and implemented interim remedial measures involving low-profile air stripping and insitu hydrogen infusion.

- Served as Project Manager for multiple EPA Pilot-Grant funded investigations for City of Buffalo Department of Strategic Planning.

- Project manager for remedial investigation, alternatives analysis, and remedial construction to facilitate redevelopment of over 450-acres of former steel manufacturing site property in Lackawanna, New York. Contaminants of concern primarily include petroleum organics and heavy metals.

- Managed design-build cleanup of former New 7th Street Brownfield Cleanup Program Site in Buffalo, New York. The project involved design-build removal of several hundred tons of petroleum-impacted soil and fill material and preparation of related engineering reports resulting in Certificate of Completion issuance.

- Led remedial efforts for petroleum releases at a Western New York refinery and major oil storage facility, achieving site inactivation within 3 months of the release.

- Managed spill site investigation and cleanup work including underground storage tank removal work at numerous petroleum and chemical spill sites in Western New York.

- Led design-build construction of a 5 MGD capacity cooling water pH adjustment system for PVS Chemical Corporation. The project included design of feed forward pH control system, adjustment tank and mixer construction, process and chemical feed piping modifications to neutralize sulfuric acid discharges. Successfully implemented startup and demonstration testing.

- Designed a 75 gpm groundwater treatment system and served as quality assurance officer for remedial efforts at the Steelfields site (former LTV Steel/Hanna Furnace Site), Buffalo, NY. The treatment system removes petroleum-based volatile organic and semi-volatile organic compounds prior to discharge to the Buffalo Sewer Authority.

June 1988 to June 1998 Malcolm Pirnie, Inc.

- Assisted the City of Buffalo Department of Community Development in implementing an emergency PCB-contaminated soil removal effort from a residential neighborhood in Buffalo, NY. Responsibilities included coordination of hazmat excavation contractor and secure landfill, preparation of an emergency excavation and confirmatory sampling plan, and oversight of community air monitoring during the removal work.

- Designed and successfully implemented an innovative groundwater treatment system for the Mercury Aircraft, Inc. Class 2 hazardous waste site in Dresden, New York. Responsibilities included preparation of design plans and specifications for an advanced oxidation process and low profile air stripper, construction oversight and treatment system start-up.

- Performed a Feasibility Study and prepared an Engineering Design Report for remediation of PCB-contaminated soils and sediments at the Columbus McKinnon Corporation, Tonawanda, New York. Responsibilities included detailed evaluation of several remedial processes, completion of design calculations and remedial cost estimates, and preparation of a final report for submission to NYSDEC.

- Assisted in performance of a Feasibility Study for the West Valley Nuclear Demonstration Site. The Feasibility Study evaluated alternatives for remediation of groundwater contaminated with radioactive isotopes from a former containment area release.

- Assisted in the design and performed start-up of a groundwater remediation system for Moog, Inc., an aerospace parts manufacturer. The project, performed on a design-build basis, involved preparation of design plans, securing contractor bids for construction, and start-up of the remediation system, which incorporates filtration and air stripping to remove chlorinated volatile organic contaminants from groundwater.

- Designed and implemented groundwater monitoring well decommissioning procedures for the Love Canal site, Niagara Falls NY. The project was performed on behalf of NYSDEC and included abandoning of monitoring wells no longer used in the Love Canal landfill or in adjoining neighborhoods.

- Prepared an environmental monitoring plan for remediation of PCB-contaminated sediments in the St. Lawrence River along the General Motors, Inc. Powertrain Division facility in Massena, New York.

- Assisted in the performance of a Feasibility Study for remediation of volatile organic, PCB and heavy metal-contaminated soils and ground water at the Rochester Fire Academy, Rochester, New York.

PUBLICATIONS/PRESENTATIONS

Forbes, Thomas H. and Frappa, Richard H. "Innovative Remedial Measures for the Mercury Aircraft Site" Proceedings of the Purdue University 50th Annual Industrial Waste Conference, May 1995.

Frappa, Richard H., Forbes, Thomas H. and McManus, Anne Marie "A Blast to Remediate" Industrial Wastewater, July/August 1996.

Forbes, Thomas H. and McManus, Anne Marie "Advanced Oxidation Technology and Application" Proceedings of the University at Buffalo 28th Mid-Atlantic Industrial and Hazardous Waste Conference, July 1996.

Forbes, Thomas H. et al - "Pay to Throw in Buffalo" Proceedings of 1997 Solid Waste Association of North America annual conference.

Forbes, T.H. & Werthman, P.H. "Development of Site-Specific Cleanup Levels for Commercial Redevelopment of a Large Former Steel Works," presented at the Brownfields 2000 Conference, Atlantic City NJ, October 2000.

Forbes, Thomas H. and Frappa, Richard H. "Innovative Remedial Measures Almost 10 Years Later at the Former Mercury Aircraft Site" Proceedings of the National Groundwater Association Northeast Conference, October 2002.

Forbes, Thomas H. "Ins and Outs of the New York State Brownfield Cleanup Program" Air & Waste Management Association, Niagara Frontier Section, Annual Environmental Seminar (presentation), April 2006.

Forbes, Thomas H. "Brownfield Redevelopment" Proceedings of Half Moon Seminar’s “New York Environmental Compliance for Design Professionals” conference, September 2008.

Forbes, Thomas H. “New York State Brownfield Cleanup Program Update" Air & Waste Management Association Annual Environmental Seminar (presentation), April 2009.

MICHAEL A. LESAKOWSKI
SR. PROJECT MANAGER

SUMMARY OF EXPERIENCE

Michael A. Lesakowski is a Principal and Senior Project Manager with the Benchmark and TurnKey Companies. Mr. Lesakowski has over 15 years experience in the environmental engineering and consulting field at numerous industrial, commercial and hazardous waste sites throughout the northeast United States. Mr. Lesakowski has been involved with all aspects of projects within the New York Brownfield Cleanup Program, New York State Superfund Program and the New York Petroleum Spills Department. Mr. Lesakowski has completed over 1,000 Phase I Environmental Site Assessments and more than 200 Phase II Site Investigations associated with property acquisition and divestiture, including several multi-site portfolio environmental due diligence assignments, working with purchasers and lenders to facilitate multi-million dollar real estate transactions.

Mr. Lesakowski has managed assessments, investigations and remediation projects on properties with a multitude of historic uses (including petroleum refineries, storage terminals, gas stations, automobile dealerships, rail yards, foundries, drycleaners, steel manufacturing, metallurgical plants, metal plating operations, junk yards), media types (including surface and subsurface soil, groundwater, sediments, soil vapor, indoor air, building materials) and contaminants (including volatile organic compounds, semi-volatile organic compounds, PCBs, heavy metals).

From 2010 through 2013, Mr. Lesakowski played a key role in developing a liability transfer arrangement of a former petroleum refinery in Olean, New York. Major tasks included technical review of historic Remedial Investigation data, remedial alternative selection and cost estimating, preparation of technical and liability transfer program proposal and negotiation with ExxonMobil technical and business representatives. The deal involved purchase of three New York Brownfield Cleanup Program (BCP) sites that required a multi-million dollar remedial cleanup, which is currently in process.

Mr. Lesakowski is currently managing fifteen New York BCP sites, one NY Superfund Site, and several New York Spill Sites. Some highlighted projects in western New York currently managed by Mr. Lesakowski include six BCP sites that were part of the historic Socony-Vacuum petroleum refinery in Olean (aka ExxonMobil Legacy Site) the former Trico Building, 300 and 399 Ohio Street BCP Sites proximate the Buffalo River, former Buffalo Gun Club BCP Site in Amherst, Seneca Harbor Hotel in Watkins Glen and the former Batavia Gas Light Company manufactured gas plant (MGP) site.

EDUCATION

Master of Science (Environmental Engineering Science), University of Buffalo, 2008
Bachelor of Science (Biology), State University of New York at Fredonia, 1994

LORI E. RIKER, P.E.

PROJECT MANAGER

EDUCATION

BASc (Civil Engineering) 1992; University of Waterloo, Ontario, Canada
MASc (Environmental Engineering) 1994; University of Guelph, Ontario, Canada

REGISTRATION AND AFFILIATIONS

Professional Engineer, New York
Certified OSHA 40-Hour Hazardous Waste Site Training
Air and Waste Management Association, Member

SUMMARY OF EXPERIENCE

Ms. Riker has 20 years of environmental and civil engineering experience that has focused on industrial regulatory compliance assistance; Phase I environmental site assessments; hazardous waste site investigations and remedial evaluations; detailed design; and construction administration. Ms. Riker's regulatory compliance experience includes: petroleum bulk storage (PBS) and chemical bulk storage (CBS) auditing and the associated spill prevention reporting; Emergency Planning and Community Right-to-Know Act (EPCRA) Tier II and Toxic Release Inventory (Form R) reporting; Title V air permitting (Title V, State facility, minor facility registrations), compliance reporting, and emission statement preparation; Resource Conservation and Recovery Act (RCRA) hazardous waste reporting; storm water permitting and preparing discharge monitoring reports (DMRs), storm water pollution prevention plans (SWPPPs), and Best Management Practices (BMP) Plans; and hazardous waste annual reporting and reduction plans. Ms. Riker's site investigation and remediation experience has been under various New York State Department of Environmental Conservation (NYSDEC) remedial programs including the: Brownfield Cleanup Program (BCP); RCRA Corrective Action Program; and Voluntary Cleanup Program (VCP).

REPRESENTATIVE PROJECT EXPERIENCE

May 2003 to Present	**Benchmark Environmental Engineering & Science, PLLC**
Nov 1997 to May 2002	**Malcolm Pirnie, Inc.**
Feb 1995 to Oct 1997	**ENVIRON Corporation**

- Assisted in the RCRA Corrective Measures Study (CMS) for the Former Bethlehem Steel Coke Oven Division Site located in Lackawanna, NY. Duties included preparing work plans for Interim Corrective Measures (ICMs); reviewing analytical data obtained for the solid waste management units (SWMUs) and water courses; reviewing reports/assessments prepared by other consultants retained by NYSDEC and other agencies; and evaluating numerous slag/fill and groundwater remedial alternatives and recommending a final remedial approach in the CMS Report.
- Assisted former steel manufacturing facility with regulatory compliance during shutdown of operations in Lackawanna, NY. Current activities for former steel manufacturing company in Lackawanna, NY include: SPDES permitting; Industrial Water System compliance, including successfully obtaining a Water Withdrawal Permit for 50 MGD and implementing required upgrades to the water metering system; and preparing annual RCRA Hazardous Waste Reports.

- Assisted with environmental regulatory compliance audits at Gibraltar Steel's NY facilities, and coordinated audits at Gibraltar Steel's other facilities nationwide. The audits covered major existing environmental regulatory programs, as well as applicable local or state regulations and potential upcoming regulatory requirements.
- Assisted in preparing numerous successful NYSDEC BCP applications for former steel plant sites and industrial/commercial properties in western NY. Prepared Remedial Investigation (RI) Work Plans, RI Reports, Remedial Action Work Plans, Final Engineering Reports, and Site Management Plans. Contaminants of concern primarily include petroleum organics/solvents and heavy metals.
- Providing/managing on-going environmental compliance assistance to scrap metal recycling facilities in NY and PA including: permitting, sampling, inspection, and reporting requirements under the Multi-Sector General Permit (MSGP) for Storm Water Associated with Industrial Activity and NYSDEC State Pollutant Discharge Elimination System (SPDES) Permits; PBS inspections and preparing SPCC Plans; EPCRA Tier II reporting; preparing landfill disposal application; preparing Water Treatment Chemical notifications; hazardous waste annual reporting; and air permitting modifications, compliance reporting, and annual emission statement preparation.
- Providing/managing on-going environmental compliance assistance to industrial facilities including: air permit applications and modifications; storm water permitting, BMP Plan/SWPPP preparation, compliance monitoring, and DMR preparation; water withdrawal and sewer metering reports; PBS registration, SPCC Plan preparation, and tank inspection; and annual hazardous waste reporting.
- Providing environmental compliance assistance to NOCO Energy Corp. for its major petroleum distribution terminal and warehouse in Tonawanda, NY and multiple retail gasoline stations in NY and VT. Specific projects include: storm water permitting and preparation of a SWPPP; preparation of Spill Response, Control & Countermeasure (SPCC) Plans and a Spill Prevention Report (SPR); Title V air permitting assistance and emission statement preparation; EPCRA Form R reporting; review of and recommendations for updating the USCG Facility Response Plan; and permitting and conceptual design for upgrades to a PBS warehouse facility.
- Served as the environmental compliance manager for a porcelain insulator manufacturing facility and completed regulatory reporting requirements including TP550 forms, Form R reports, Tier II reports, hazardous waste reports, storm water permitting, and DMRs.
- Performed environmental compliance audits of multiple retail gasoline station and lube oil shops in western NY, focusing on the NYSDEC PBS regulations, and preparing SPCC Plans and an overall BMP Plan.
- Assisted in performing environmental regulatory compliance audits for numerous active industrial facilities. Responsibilities included researching and interpreting applicable environmental regulations, and preparing reports to summarize the findings and prioritize corrective measures.
- Prepared PBS and CBS applications for tank registration under NYSDEC's bulk storage programs and prepared the associated SPCC Plans and SPRs for industrial facilities.
- Assisted in preparing an SPCC Plan for General Electric Company's Tonawanda facility. Work included review of numerous federal and state regulations pertaining to PCB-contaminated oil and waste.

PUBLICATIONS/PRESENTATIONS

- Riker, L. E., McManus, A. C., "Energize Your Business," presented at the Fall Seminar of the New York Water Environment Association, Genesee Valley Chapter, Industrial Issues Committee, Webster NY, November 1, 2001.
- Riker, L. E., McManus, A. C., Sanders, L. A., "Life After Registration: Integrating Environmental Management Systems into Business and Operating Cultures," Proceedings, 94th Annual Conference and Exhibition of the Air & Waste Management Association, Orlando FL, June 26, 2001.
- Riker, L. E., McManus, K. R., Kreuz, D. E., Mistretta, M. V., "Trash to Treasure: Revitalization of Buffalo's Waterfront," presented at a Conference of the New York State Society of Professional Engineers, Erie/Niagara Chapter, Environmental Affairs Committee, Buffalo NY, January 10, 2001.
- Secker, L. E., Talley, J. W., "Bioremediating a Buffalo Brownfield: A Comparison of Bench-Scale Soil Biotreatability Results to Full-Scale Remediation," Proceedings, Thirtieth Mid-Atlantic Industrial & Hazardous Waste Conference, Villanova University, Philadelphia PA, July 12, 1998.

BRYAN W. MAYBACK
SENIOR PROJECT SCIENTIST

EDUCATION

Bachelors of Science (Earth Sciences, Environmental Concentration) 2002; State University of New York, College at Buffalo
Associates in Applied Science (graduated with high distinction), Environmental Technology (1999) Trocaire College, Buffalo, New York

REGISTRATION AND AFFILIATIONS

Hazardous Material Handling 40 hour (OSHA)
Hazardous Material Handling 8 hour Supervisor Training (OSHA)
Environmental Site Assessments for Property Transfer (ASTM Conference)
New York State and EPA Certified Asbestos Air and Project Monitoring Technician
Construction Safety Training 10 hour (OSHA)

SUMMARY OF EXPERIENCE

Since 2002, Bryan Mayback has been involved in various aspects of the environmental field. While with one of the largest due diligence firms in the northeast, Mr. Mayback was involved with hundreds of lenderbased environmental studies. These studies included Phase I and Phase II environmental site assessments in Western New York and throughout the U.S. Mr. Mayback provided project management as well as the completion of the field work, written reports, and final report reviews. He has also provided consulting services for major petroleum companies such as ExxonMobil. Mr. Mayback was involved with large scale excavation projects (removal of up to 15,000 tons of impacted soil and treatment of over 200,000 gallons of groundwater), sensitive receptor surveys, hydrogeologic studies, impact delineation studies, and pilot testing relative to alternative remedial measures (other than soil excavation). He has performed groundwater monitoring activities, including well gauging, purging (bailers and low-flow) and sampling. Through the years, Mr. Mayback has been responsible for the closure/reclassification of many NYSDEC listed spills based on results of remedial activities that he was involved with and proposed.

REPRESENTATIVE PROJECT EXPERIENCE

June 2009 to July 2014: **RJS Environmental, Inc.**
Vice President (2009), President

- **Environmental Due Diligence Projects.** Project Officer and Manager for all Environmental Site Assessment projects including Phase I and intrusive (Phase II) studies, for banks, developers, lawyers, owners, etc. Responsible for client communications, report reviews, and project management ensuring projects are completed on time and within budget.

September 2007 – June 2009 **Groundwater and Environmental Services, Inc**

- **Major Petroleum Companies, NY**. Provided consulting services for ExxonMobil and other major petroleum companies that facilitated active New York State DEC listed spills towards closure. These sites were environmentally challenged properties in differing stages of remediation located mostly in Western New York. As Case Manager/Environmental Scientist provided oversight for various environmental activities, including soil excavation, dewatering/groundwater treatment and discharge, soil boring and monitoring well installation, remedial pilot testing, test pits and product recovery. Also responsible for completion and review of Remedial Action Work Plans, Excavation Reports, Quarterly Site Monitoring Reports, and pilot test reports for submittal to the NYSDEC and ExxonMobil.

November 2002 – September 2007 **Lender Consulting Services**

- As Senior Environmental Analyst, involved in developing hundreds of lender-based Phase I and Phase II environmental site assessments (including site inspections, municipal record reviews, soil/groundwater sampling, and UST removals) in Western New York as well as throughout the U.S. Responsible for review of Environmental Site Assessment Reports, and training and supervising staff involved in site assessments. Communicated property related potential environmental issues and solutions to clients.

Summer 2000 **AFI Environmental**

- As Environmental Specialist, supervised the removal of impacted soil via excavation at a site in Buffalo, New York. Groundwater was treated with activated carbon and discharged to the storm sewer. Also Constructed a remediation field for impacted soil and groundwater; collected soil and groundwater samples for laboratory analysis; and reviewed analytical data and report preparation.

APPENDIX B

FIELD OPERATING PROCEDURES (FOPs)

SUMMARY OF FIELD OPERATING PROCEDURES

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Benchmark FOP No.	Procedure
011.0	Calibration and Maintenance of Portable Photoionization Detector
018.0	Drilling and Excavation Equipment Decontamination Procedures
032.1	Management of Investigation-Derived Waste (IDW)
046.0	Sample Labeling, Storage and Shipment Procedures
047.0	Screening of Soil Samples for Organic Vapors During Drilling Activities
054.0	Soil Description Procedures Using The USCS
063.2	Surface and Subsurface Soil Sampling Procedures
073.1	Real-Time Air Monitoring During Intrusive Activities
076.0	"Before Going Into the Field" Procedure

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

FIELD OPERATING PROCEDURES

Calibration and Maintenance of Portable Photoionization Detector (PID)

FOP 011.1

CALIBRATION AND MAINTENANCE OF PORTABLE PHOTOIONIZATION DETECTOR

PURPOSE

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

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

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

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

ACCURACY

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

CALIBRATION PROCEDURE

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

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

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

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

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

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

Calibrating Without a Correction Factor

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

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

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

Calibrating With a Correction Factor

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

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

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

6. Once the PID settings have been verified, connect the PID probe to the zero air calibration bag (or calibrate to ambient air if conditions permit) and wait for a stable indication.

7. Connect the PID probe to the calibration standard bag. Measure an initial reading of the standard and wait for a stable indication.

8. Keep the PID probe connected to the calibration standard bag, calibrate to applicable concentration (typically 100 ppm with isobutylene) with the standard and wait for a stable indication.

9. Document the calibration results and related information in the Project Field Book and on an **Equipment Calibration Log** (see attached sample), indicating the meter readings before and after the instrument has been adjusted. This is important, not only for data validation, but also to establish

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

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

MAINTENANCE

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

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

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

ATTACHMENTS

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

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

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

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

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

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

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

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

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

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

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

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

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

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

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

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

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

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

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

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

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

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

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

TABLE 1

SUMMARY OF IONIZATION POTENTIALS

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

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

EQUIPMENT CALIBRATION LOG

PROJECT INFORMATION:

Project Name: ______________________ Date: ______________________

Project No.: ______________________

Client: ______________________ Instrument Source: ☐ BM ☐ Rental

METER TYPE	UNITS	TIME	MAKE/MODEL	SERIAL NUMBER	CAL. BY	STANDARD	POST CAL. READING	SETTINGS
☐ pH meter	units		Myron L Company Ultra Meter 6P	606987		4.00		
						7.00		
						10.01		
☐ Turbidity meter	NTU		Hach 2100P Turbidimeter	9706000145[illegible]		< 0.4		
						[illegible]		
						[illegible]		
						800		
☐ Sp. Cond. meter	uS mS		Myron L Company Ultra Meter 6P	[illegible]		______ mS @ 25 °C		
☐ PID	ppm		MinRAE 20[illegible]	[illegible]		open air zero		MIBK response factor = 1.0
						_____ ppm Iso. Gas		
☐ Dissolved Oxygen	ppm		YSI Model 5[illegible]	[illegible]				
☐ Particulate meter	mg/m^3					zero air		
☐ Oxygen	%					open air		
☐ Hydrogen sulfide	ppm					open air		
☐ Carbon monoxide	ppm					open air		
☐ LEL	%					open air		
☐ Radiation Meter	uR/H					background area		
☐								

ADDITIONAL REMARKS: ______________________

PREPARED BY: ______________________ **DATE:** ______________________

Technical Note TN-106

Revised 08/2010

Correction Factors, Ionization Energies*, And Calibration Characteristics

Correction Factors and Ionization Energies

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

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

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

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

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

Example 1:

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

Example 2:

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

Example 3:

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

Conversion to mg/m^3

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

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

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

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

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

Correction Factors for Mixtures

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

$$\text{CFmix} = 1 / (X_1/CF_1 + X_2/CF_2 + X_3/CF_3 + \ldots X_i/CF_i)$$

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

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

TLVs and Alarm Limits for Mixtures

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

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

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

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

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

Calibration Characteristics

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

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

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

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

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

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

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

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

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

Table Abbreviations:

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

Disclaimer:

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

Updates:

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

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

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

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

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

Compound Name	Synonym/Abbreviation	CAS No.	Formula	9.8	C	10.6	C	11.7	C	IE (Ev)	TWA
Ethylbenzene		100-41-4	C_8H_{10}	0.52	+	0.52	+	0.51	+	8.77	100
Ethyl caprylate	Ethyl octanoate	106-32-1	$C_{10}H_{20}O_2$		+	0.52	+	0.51	+		
Ethylenediamine	1,2-Ethanediamine; 1,2-Diaminoethane	107-15-3	$C_2H_8N_2$	0.9	+	0.8	+	1.0	+	8.6	10
Ethylene glycol *	1,2-Ethanediol	107-21-1	$C_2H_6O_2$			16	+	6	+	10.16	C100
Ethylene glycol, Acrylate	2-hydroxyethyl Acrylate	818-61-1	$C_5H_8O_3$			8.2				≤10.6	
Ethylene glycol dimethyl ether	1,2-Dimethoxyethane, Monoglyme	110-71-4	$C_4H_{10}O_2$	1.1		0.86		0.7		9.2	ne
Ethylene glycol monobutyl ether acetate	2-Butoxyethyl acetate	112-07-2	$C_8H_{16}O_3$			1.3				≤10.6	
Ethylene glycol, monothio	mercapto-2-ethanol	60-24-2	C_2H_6OS			1.5				9.65	
Ethylene oxide	Oxirane, Epoxyethane	75-21-8	C_2H_4O			13	+	3.5	+	10.57	1
Ethyl ether	Diethyl ether	60-29-7	$C_4H_{10}O$			1.1	+	1.7		9.51	400
Ethyl 3-ethoxypropionate	EEP	763-69-9	$C_7H_{14}O_3$	1.2	+	0.75	+				ne
Ethyl formate		109-94-4	$C_3H_6O_2$					1.9		10.61	100
Ethylhexyl □acrylate, 2-	Acrylic acid 2-ethylhexyl ester	103-11-7	$C_{11}H_{20}O_2$			1.1	+	0.5	+		ne
Ethylhexanol	2-Ethyl-1-hexanol	104-76-7	C8H18O			1.9				≤10.6	
Ethylidenenorbornene	5-Ethylidene bicyclo(2,2,1)hept-2-ene	16219-75-3	C_9H_{12}	0.4	+	0.39	+	0.34	+	≤8.8	ne
Ethyl (S)-(-)-lactate see also DS-108F	Ethyl lactate, Ethyl (S)-(-)-hydroxypropionate	687-47-8 97-64-3	$C_5H_{10}O_3$	13	+	3.2	+	1.6	+	~10	ne
Ethyl mercaptan	Ethanethiol	75-08-1	C_2H_6S	0.60	+	0.56	+			9.29	0.5
Ethyl sulfide	Diethyl sulfide	352-93-2	$C_4H_{10}S$			0.5	+			8.43	ne
Formaldehyde	Formalin	50-00-0	CH_2O	NR	+	NR	+	1.6	+	10.87	C0.3
Formamide		75-12-7	CH_3NO			6.9	+	4		10.16	10
Formic acid		64-18-6	CH_2O_2	NR	+	NR	+	9	+	11.33	5
Furfural	2-Furaldehyde	98-01-1	$C_5H_4O_2$			0.92	+	0.8	+	9.21	2
Furfuryl alcohol		98-00-0	$C_5H_6O_2$			0.80	+			<9.5	10
Gasoline #1		8006-61-9	m.w. 72			0.9	+				300
Gasoline #2, 92 octane		8006-61-9	m.w. 93	1.3	+	1.0	+	0.5	+		300
Glutaraldehyde	1,5-Pentanedial, Glutaric dialdehyde	111-30-8	$C_5H_8O_2$	1.1	+	0.8	+	0.6	+		C0.05
Glycidyl methacrylate	2,3-Epoxypropyl methacrylate	106-91-2	$C_7H_{10}O_3$	2.6	+	1.2	+	0.9	+		0.5
Halothane	2-Bromo-2-chloro-1,1,1-trifluoroethane	151-67-7	$C_2HBrClF_3$					0.6		11.0	50
HCFC-22 see Chlorodifluoromethane											
HCFC-123 see 2,2-Dichloro-1,1,1-trifluoroethane											
HCFC-141B see 1,1-Dichloro-1-fluoroethane											
HCFC-142B see 1-Chloro-1,1-difluoroethane											
HCFC-134A see 1,1,1,2-Tetrafluoroethane											
HCFC-225 see Dichloropentafluoropropane											
Heptane, n-		142-82-5	C_7H_{16}	45	+	2.8	+	0.60	+	9.92	400
Heptanol, 4-	Dipropylcarbinol	589-55-9	$C_7H_{16}O$	1.8	+	1.3	+	0.5	+	9.61	ne
Hexamethyldisilazane, 1,1,1,3,3,3- *	HMDS	999-97-3	$C_6H_{19}NSi_2$			0.2	+	0.2	+	~8.6	ne
Hexamethyldisiloxane	HMDSx	107-46-0	$C_6H_{18}OSi_2$	0.33	+	0.27	+	0.25	+	9.64	ne
Hexane, n-		110-54-3	C_6H_{14}	350	+	4.3	+	0.54	+	10.13	50
Hexanol, 1-	Hexyl alcohol	111-27-3	$C_6H_{14}O$	9	+	2.5	+	0.55	+	9.89	ne
Hexene, 1-		592-41-6	C_6H_{12}			0.8				9.44	30
HFE-7100 see Methyl nonafluorobutyl ether											
Histoclear (Histo-Clear)	Limonene/corn oil reagent		m.w. ~136	0.5	+	0.4	+	0.3	+		ne
Hydrazine *		302-01-2	H_4N_2	>8	+	2.6	+	2.1	+	8.1	0.01
Hydrazoic acid	Hydrogen azide		HN_3							10.7	
Hydrogen	Synthesis gas	1333-74-0	H_2	NR	+	NR	+	NR	+	15.43	ne
Hydrogen cyanide	Hydrocyanic acid	74-90-8	HCN	NR	+	NR	+	NR	+	13.6	C4.7
Hydrogen iodide *	Hydriodic acid	10034-85-2	HI			~0.6*				10.39	
Hydrogen peroxide		7722-84-1	H_2O_2	NR	+	NR	+	NR	+	10.54	1
Hydrogen sulfide		7783-06-4	H_2S	NR	+	3.3	+	1.5	+	10.45	10
Hydroxypropyl methacrylate		27813-02-1 923-26-2	$C_7H_{12}O_3$	9.9	+	2.3	+	1.1	+		ne
Iodine *		7553-56-2	I_2	0.1	+	0.1	+	0.1	+	9.40	C0.1

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

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

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

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

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

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

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

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FIELD OPERATING PROCEDURES

Drilling and Excavation Equipment Decontamination Procedures

FOP 018.0

DRILLING AND EXCAVATION EQUIPMENT DECONTAMINATION PROCEDURES

PURPOSE

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

PROCEDURE

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

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

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

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

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

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

6. Allow equipment to air dry.

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

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

ATTACHMENTS

none

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FIELD OPERATING PROCEDURES

Management of Investigative-Derived Waste (IDW)

FOP 032.1

MANAGEMENT OF INVESTIGATION-DERIVED WASTE (IDW)

PURPOSE

The purpose of these guidelines is to ensure the proper holding, storage, transportation, and disposal of materials generated from field investigation activities that may contain hazardous wastes. Investigation-derived waste (IDW) includes the following:

- Drill cuttings, discarded soil samples, drilling mud solids, and used sample containers.
- Well development and purge waters and discarded groundwater samples.
- Decontamination waters and associated solids.
- Soiled disposable personal protective equipment (PPE).
- Used disposable sampling equipment.
- Used plastic sheeting and aluminum foil.
- Other equipment or materials that either contain or have been in contact with potentially impacted environmental media.

Because these materials may contain regulated chemical constituents, they must be managed as a solid waste. This management may be terminated if characterization analytical results indicate the absence of these constituents.

PROCEDURE

1. Contain all investigation-derived wastes in Department of Transportation (DOT)-approved 55-gallon drums, roll-off boxes, or other containers suitable for the wastes.

2. Contain wastes from separate borings or wells in separate containers (i.e. do not combine wastes from several borings/wells in a single container, unless it is a container used specifically for transfer purposes, or unless specific permission to do so has been provided by the Benchmark Field Team Leader. Unused samples from surface sample locations within a given area may be combined.

3. To the extent practicable, separate solids from drilling muds, decontamination waters, and similar liquids. Place solids within separate containers.

4. Transfer all waste containers to a staging area. Access to this area will be controlled. Waste containers must be transferred to the staging area as soon as practicable after the generating activity is complete.

5. Pending transfer, all containers will be covered and secured when not immediately attended.

6. Label all containers with regard to contents, origin, date of generation, using Benchmark's IDW container label (sample attached). Use indelible ink for all labeling.

7. Complete the Investigative Derived Waste Container Log (sample attached) as waste containers are labeled in order to track and inventory project waste. Leave a copy of the log with the site manager or fax copy to the owner/operator as necessary.

8. Collect samples for waste characterization purposes, or use boring/well sample analytical data for characterization.

9. For wastes determined to be hazardous in character, **be aware of accumulation time limitations**. Coordinate the disposal of these wastes with the plant manager/owner/operator, if applicable.

10. Upon Property Owner, Project Manager, and/or NYSDEC Project Manager approval, dispose of investigation-derived wastes as follows:

- Soil, water, and other environmental media for which analysis does not detect organic constituents, and for which inorganic constituents are at levels that meet the Site's cleanup objectives, may be spread on the Property or otherwise treated as a non-waste material. Disposal quantity and on-site location will be documented on Project Field Books and in the project report submittal.

- Soil, water, and other environmental media in which organic compounds are detected or metals are present above the Site's cleanup objectives will be disposed off-site in accordance with applicable state and federal regulations. Disposal quantity and off-site location will be documented on Project Field Books and in the project report submittal.

- Personal protective equipment, disposable bailers, and similar equipment may be disposed as municipal waste, unless waste characterization results mandate otherwise.

WASTE STORAGE MANAGEMENT

Hazardous materials generated on site should be temporarily stored in a secure location that is under the control of the owner/operator or does not allow for vandalism (i.e., within a locked building structure or within a locked fenced in area). A waste-staging area should be designated on-site by the Project Manager in conjunction with the owner/operator.

ATTACHMENTS

Investigation Derived Waste Container Log (sample)
Investigation Derived Waste Container Label (sample)

REFERENCES

None

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INVESTIGATION DERIVED WASTE CO

Project Name:　　　　Location:

Project Number:　　　　Personnel:

Container		Contents	Date		Staging Location	Date Sampled	Co
Number	Description		Started	Ended			

Prepared By:

Signed:

IDW Container Label (sample):

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Project Name:
Project Number:

Container I.D.:
Contents/Matrix:
Estimated Quantity:
Date of Generation:
Date of Sample Collection:

Contact Name:
Contact Phone Number:

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FIELD OPERATING PROCEDURES

Sample Labeling, Storage, and Shipment Procedures

FOP 046.0

SAMPLE LABELING, STORAGE & SHIPMENT PROCEDURES

PURPOSE

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

SAMPLE LABELING PROCEDURE

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

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

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

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

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

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

SAMPLE STORAGE PROCEDURE

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

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

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

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

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

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

SAMPLE SHIPPING PROCEDURE

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

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

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

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

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

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

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

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

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

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

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

ATTACHMENTS

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

REFERENCES

None

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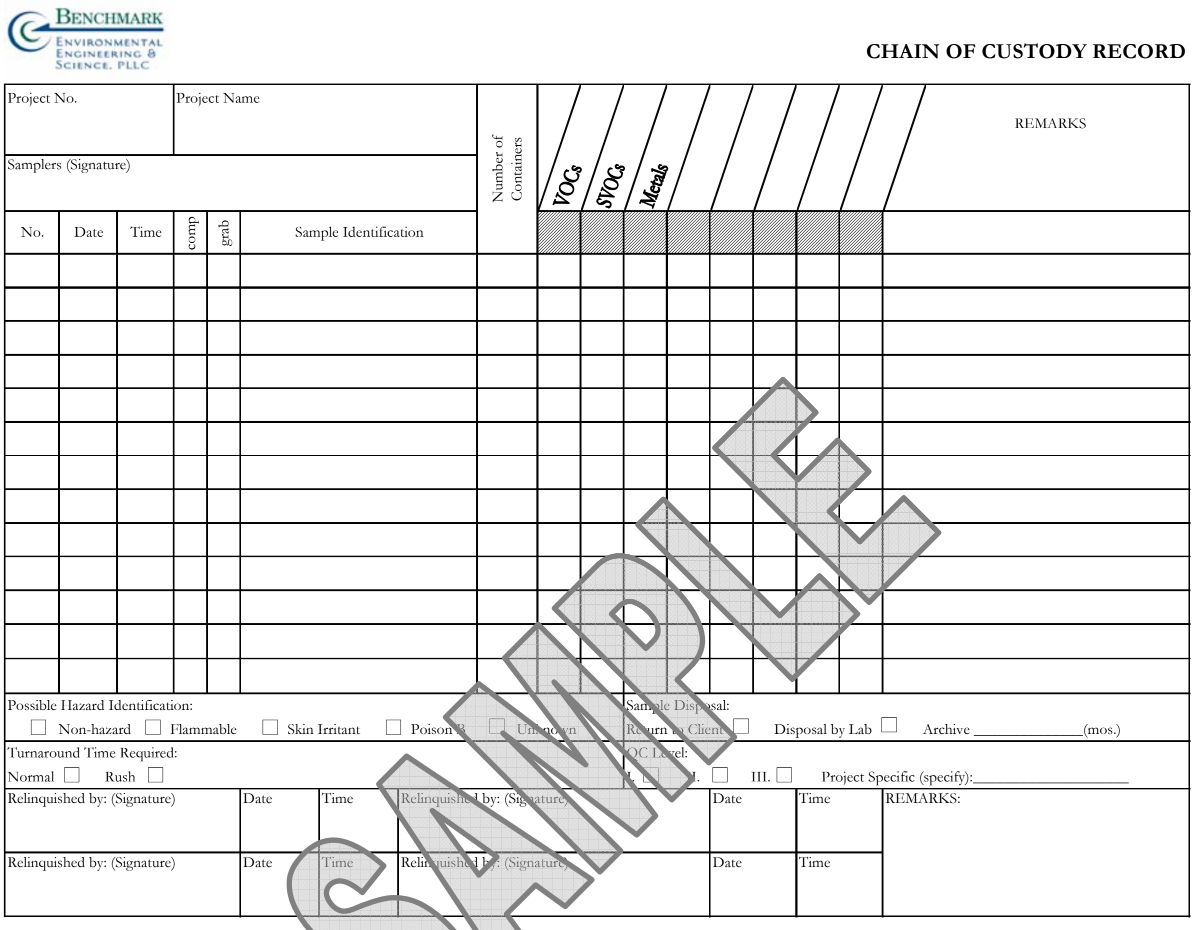
AIR SAMPLE COLLECTION SUMMARY LOG

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

Notes:

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



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CHAIN OF CUSTODY RECORD

Project No.

Project Name

Samplers (Signature)

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

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

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

Turnaround Time Required:
Normal ☐ Rush ☐

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

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

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WIPE SAMPLE COLLECTION SUMMARY LOG

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

Notes:

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

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AIR SAMPLE COLLECTION SUMMARY LOG

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

Notes:

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

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

CHAIN OF CUSTODY RECORD

Project No.	Project Name
Samplers (Signature)	

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

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

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

Turnaround Time Required:
Normal ☐ Rush ☐

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

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

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FIELD OPERATING PROCEDURES

Screening of Soil Samples for Organic Vapors During Drilling Activities

FOP 047.0

SCREENING OF SOIL SAMPLES FOR ORGANIC VAPORS DURING DRILLING ACTIVITIES

PURPOSE

This procedure is used to screen soil samples for the presence of volatile organic constituents (VOCs) using a field organic vapor meter. These meters will be either photoionization detector (PID) or flame-ionization detector (FID) type. This screening is performed at the drilling and sampling location as a procedure for ensuring the health and safety of personnel at the site and to identify potentially contaminated soil samples for laboratory analysis. All soil samples will be field screened to provide a vertical profile of soil contamination by volatile organic substances.

PROCEDURE

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

2. Collect split-spoon (or other sampler) samples in accordance with Benchmark's Split Spoon Sampling Procedure FOP.

3. When the split-spoon or other sampler is opened or accessed, shave a thin layer of material from the entire length of the core.

4. Scan the core visually and with the PID or FID noting stratification, visible staining, or other evidence of contamination.

5. Based on this initial scan of the sample, collect approximately 100 milliliters (ml) of soil using a decontaminated or dedicated stainless steel spatula, scoop, or equivalent. Place this soil into a labeled wide-mouth glass jar approximately ½ to ¾ full and seal with aluminum foil and a screw top cap. Alternatively, the soil may be placed into a clean, re-sealable plastic bag and sealed. Be sure to leave some headspace above the soil sample within the sealed container.

6. Place field screening sample (i.e., jar or bag) in a location where the ambient temperature is at least 70° Fahrenheit.

7. Leave the field screening sample bag for at least 30 minutes, but no more than 60 minutes.

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

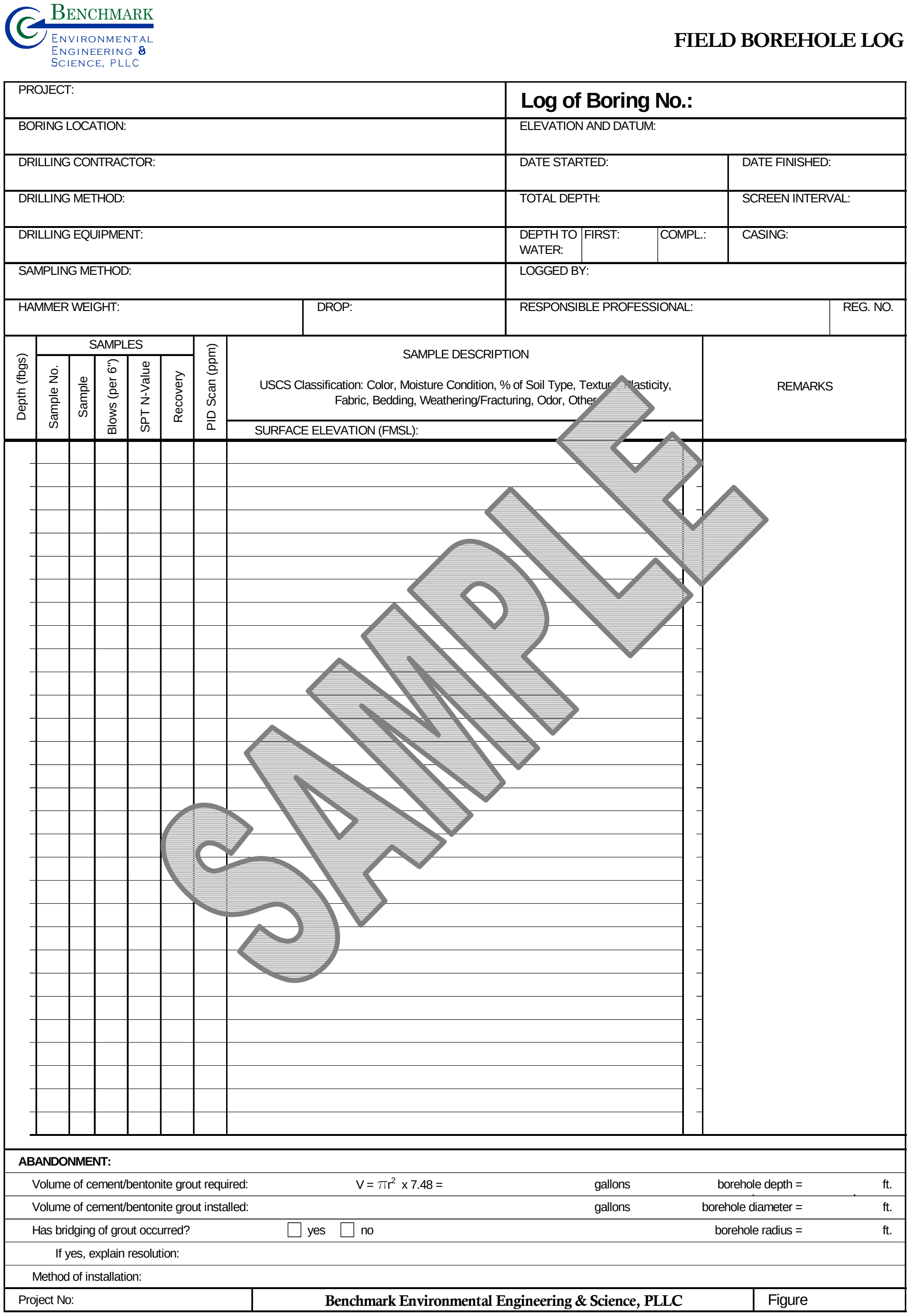
9. Record the maximum reading in parts per million by volume (ppmv) on the Field Borehole Log or Field Borehole/Monitoring Well Installation Log form (see attached samples) (see Documentation Requirements for Drilling and Well Installation FOP), at the depth interval corresponding to the depth of sample collection.

ATTACHMENTS

Field Borehole Log (sample)
Field Borehole/Monitoring Well Installation Log (sample)

REFERENCES

Benchmark FOPs:
010 *Calibration and Maintenance of Portable Flame Ionization Detector*
011 *Calibration and Maintenance of Portable Photoionization Detector*
015 *Documentation Requirements for Drilling and Well Installation*
058 *Split Spoon Sampling Procedures*



FIELD BOREHOLE LOG

PROJECT:		**Log of Boring No.:**	
BORING LOCATION:		ELEVATION AND DATUM:	
DRILLING CONTRACTOR:		DATE STARTED:	DATE FINISHED:
DRILLING METHOD:		TOTAL DEPTH:	SCREEN INTERVAL:
DRILLING EQUIPMENT:		DEPTH TO WATER: FIRST: COMPL.:	CASING:
SAMPLING METHOD:		LOGGED BY:	
HAMMER WEIGHT:	DROP:	RESPONSIBLE PROFESSIONAL:	REG. NO.

Depth (fbgs)	SAMPLES					PID Scan (ppm)	SAMPLE DESCRIPTION USCS Classification: Color, Moisture Condition, % of Soil Type, Texture, Plasticity, Fabric, Bedding, Weathering/Fracturing, Odor, Other SURFACE ELEVATION (FMSL):	REMARKS
	Sample No.	Sample	Blows (per 6")	SPT N-Value	Recovery			

ABANDONMENT:

Volume of cement/bentonite grout required: V = πr^2 x 7.48 = gallons borehole depth = ft.

Volume of cement/bentonite grout installed: gallons borehole diameter = ft.

Has bridging of grout occurred? ☐ yes ☐ no borehole radius = ft.

If yes, explain resolution:

Method of installation:

Project No:	**Benchmark Environmental Engineering & Science, PLLC**	Figure

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FIELD BOREHOLE/MONITORING WELL INSTALLATION LOG

PROJECT:		**Log of Well No.:**			
BORING LOCATION:		ELEVATION AND DATUM:			
DRILLING CONTRACTOR:		DATE STARTED:			DATE FINISHED:
DRILLING METHOD:		TOTAL DEPTH:			SCREEN INTERVAL:
DRILLING EQUIPMENT:		DEPTH TO WATER:	FIRST:	COMPL.:	CASING:
SAMPLING METHOD:		LOGGED BY:			
HAMMER WEIGHT:	DROP:	RESPONSIBLE PROFESSIONAL:			REG. NO.

Depth (fbgs)	SAMPLES					PID Scan (ppm)	SAMPLE DESCRIPTION USCS Classification: Color, Moisture Condition, % of Soil Type, Texture, Plasticity, Fabric, Bedding, Weathering/Fracturing, Odor, Other SURFACE ELEVATION (FMSL):	WELL CONSTRUCTION DETAILS AND/OR DRILLING REMARKS
	Sample No.	Sample	Blows (per 6")	SPT N-Value	Recovery			

Project No:	**Benchmark Environmental Engineering & Science, PLLC**	Figure

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FIELD OPERATING PROCEDURES

Soil Description Procedures Using The Visual-Manual Method

FOP 054.2

SOIL DESCRIPTION PROCEDURES USING THE VISUAL-MANUAL METHOD

PURPOSE

This guideline presents a means for insuring consistent and proper field identification and description of collected soils during a project (via, split-spoon (barrel) sampler, hand auger, test pit etc.). The lithology and moisture content of each soil sample will be physically characterized by visual-manual observation in accordance with ASTM Method D2488, Standard Practice for Description and Identification of Soils (Visual-Manual Procedure). When precise classification of soils for engineering purposes is required, the procedures prescribed in ASTM Method D2487 (Standard Practice for Classification of Soils for Engineering Purposes [Unified Soil Classification System, USCS]) will be used. The method of soil characterization presented herein describes soil types based on grain size, liquid and plastic limits, and moisture content based on visual examination and manual tests. When using this FOP to classify soil, the detail of description provided for a particular material should be dictated by the complexity and objectives of the project. However, more often than not, "after the fact" field information is required later in the project, therefore, every attempt to describe the soil as completely as possibly should be made.

Intensely weathered or decomposed rock that is friable and can be reduced to gravel size or smaller by normal hand pressure should be classified as a soil. The soil classification would be followed by the parent rock name in parenthesis. Projects requiring depth to bedrock determinations should always classify weathered or decomposed bedrock as bedrock (i.e., landfill siting). The project manager should always be consulted prior to making this determination.

PROCEDURE

Assemble necessary equipment and discuss program requirements with drilling contractor.

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

2. Collect desired soil sample in accordance with appropriate Benchmark FOP (i.e., split-spoon sampling, hand augering, test pitting etc.).

3. Shave a thin layer off the entire length of the sample to expose fresh sample.

4. Photograph and scan the sample with a photoionization detector (PID) at this time, if applicable, in accordance with Benchmark's Screening of Soil Samples for Organic Vapors During Drilling Activities FOP.

5. Describe the sample using terminology presented in the Descriptive Terms section below.

6. Record all pertinent information in the Project Field Book and Field Borehole Log (sample attached) or Field Borehole/Monitoring Well Installation Log (sample attached).

7. After the sample has been described, place a representative portion of the sample in new, precleaned jars or self-sealing plastic bags for archival purposes (if required). Label the jar or bag with the sample identification number, sample interval, date, project number and store in a secure location.

8. If the soil is to be submitted to a laboratory for analysis, collect the soil sample with a dedicated stainless steel sampling tool, place the sample into the appropriate laboratory-supplied containers, and store in an ice-chilled cooler staged in a secure location in accordance with Benchmark's Sample Labeling, Storage and Shipment Procedures FOP.

9. All remaining soil from soil sample collection activities shall be containerized in accordance with Benchmark's Management of Investigative-Derived Waste (IDW) FOP and/or the Project Work Plan.

DESCRIPTIVE TERMS

All field soil samples will be described using the Unified Soil Classification System (USCS) presented in Figures 1 and 2 (attached). In addition to ASTM Method D2488, Method D1586, Standard Test Method for Penetration Test and Split-Barrel Sampling of Soils (a.k.a., Standard Penetration Test, STP), when implemented, can also be used to classify the resistance of soils. In certain instances, it is desirable to supplement the USCS classification with a geologic interpretation of the soil sample that is supported by the soil descriptive terms presented in this section. The project manager should be consulted when making any geologic interpretation. Field test methods are provided to assist field personnel in classifying soil and are identified by a bold blue **FTM** and shaded. Classification of sampled soils will use the following ASTM descriptive terms and criteria:

- **Group Name** (USCS, see Figure 2)
- **Group Symbol** (USCS, see Figure 2) – only use if physical laboratory testing has been performed to substantiate. The USCS can be applied to most unconsolidated materials, and is represented by a two-letter symbol, except Peat (Pt).
  - The first letter includes: G (gravel), S (sand), M (silt), C (clay), and O (organic).
  - The second letter includes: P (poorly graded or uniform particle sizes), W (well graded or diversified particle sizes), H (high plasticity), and L (low plasticity).
  - Examples:
    - GW = well graded gravels and gravel-sand mixtures, little or no fines
    - GP = poorly graded gravels and gravel-sand mixtures, little or no fines
    - GM = silty gravels, gravel-sand-silt mixtures

        - GC = clayey gravels, gravel-sand-clay mixtures
        - SW = well graded sands and gravelly sands, little or no fines
        - SP = poorly graded sands and gravelly sands, little or no fines
        - SM = silty sand, sand-silt mixtures
        - SC = clayey sand sand-clay mixtures
        - ML = inorganic silts, very fine sands, rock flour, silty or clayey fine sands
        - CL = inorganic clays of low to medium plasticity, gravelly/sandy/silty/lean clays
        - OL = organic silts and organic silty clays of low plasticity
        - MH = inorganic silts, micaceous or diatomaceous fine sands or silts, elastic silts (very rare)
        - CH = inorganic clays of high plasticity, fat clays
        - OH = organic clays of medium to high plasticity
        - Pt = peat, muck, and other highly organic soils

- **Angularity** (ASTM D2488; Table 1)
    - Angular – particles have sharp edges and relatively planar sides with unpolished surfaces
    - Subangular – particles are similar to angular description but have rounded edges
    - Subrounded – particles have nearly planar sides but have well-rounded corners and edges
    - Rounded – particles have smoothly curved sides and no edges
- **Particle Shape** (ASTM D2488; Table 2)
    - Flat – particles with width/thickness > 3
    - Elongated – particles with length/width > 3
    - Flat and Elongated – particles meet criteria for both flat and elongated
- **Moisture Condition** (ASTM D2488; Table 3)
    - Dry – absence of moisture, dusty, dry to the touch
    - Moist – damp, but no visible water
    - Wet – visible free water, usually soil is below water table
- **Reaction with Hydrochloric Acid (HCL)** (ASTM D2488; Table 4)
    - None – no visible reaction

  - Weak – some reaction, with bubbles forming slowly
  - Strong – violent reaction, with bubbles forming immediately
- **Consistency of Cohesive Soils** (ASTM D2488; Table 5)
  - Very soft – squeezes between fingers when fist is closed; easily penetrated several inches by fist (SPT = 2 or less)
  - Soft – easily molded by fingers; easily penetrated several inches by thumb (SPT = 2 to 4)
  - Firm – molded by strong pressure of fingers; can be penetrated several inches by thumb with moderate effort (SPT = 4 to 8)
  - Stiff – dented by strong pressure of fingers; readily indented by thumb but can be penetrated only with great effort (SPT = 8 to 15)
  - Very stiff – readily indented by thumbnail (SPT = 15 to 30)
  - Hard – indented with difficultly by thumbnail (SPT >30)
- **Cementation** (ASTM D2488; Table 6)
  - Weak – crumbles or breaks with handling or slight finger pressure
  - Moderate – crumbles or breaks with considerable finger pressure
  - Strong – will not crumble or break with finger pressure
- **Structure (Fabric)** (ASTM D2488; Table 7)
  - Varved – alternating 1 mm to 12 mm (0.04 – 0.5 inch) layers of sand, silt and clay
  - Stratified – alternating layers of varying material or color with the layers less than 6 mm (0.23 inches) thick; note thickness
  - Laminated – alternating layers of varying material or color with the layers less than 6 mm (0.23 inches) thick; note thickness
  - Fissured – contains shears or separations along planes of weakness
  - Slickensided – shear planes appear polished or glossy, sometimes striated

  - Blocky – cohesive soil that can be broken down into small angular lumps which resist further breakdown
  - Lensed – inclusion of small pockets of different soils, such as small lenses of sand scattered through a mass of clay; note thickness
  - Homogeneous or Massive – same color and appearance throughout

- **Inorganic Fine-Grained Soil Characteristics** (ASTM D2488; Table 12)

  Several field tests can be performed to determine the characteristics of fine-grained soils (material passing the No. 40 sieve), such as dry strength, dilatency, and toughness. These field testing methods are described below.

  - **Dry Strength** (ASTM D2488; Table 8)

    FTM (Dry Strength): Select enough material and moisten with water until it can be molded or shaped without sticking to your fingers (slightly below the sticky limit) into a ball about 1 inch in diameter. From this ball, form three balls about ½ inch in diameter and allow to dry in air, or sun, or by artificial means (temperature not to exceed 60° C (140° F). Soil containing natural dry lumps about ½ inch in diameter may be used in place of molded balls, however the dry strengths are usually lower. Test the strength by crushing the dry balls or lumps between your fingers using the descriptions below.

    - None – the dry specimen crumbles with the slightest pressure of handling
    - Low – the dry specimen crumbles with some finger pressure
    - Medium – the dry specimen breaks into pieces or crumbles with considerable finger pressure
    - High – the dry specimen cannot be broken with finger pressure. The specimen will break into pieces between the thumb and a hard surface.
    - Very High – the dry specimen cannot be broken between the thumb and a hard surface

  - **Dilatency** (ASTM D2488; Table 9)

    FTM (Dilatency): Place enough material in your hand to form a ball approximately ½ inch in diameter and moisten with water until it can be molded or shaped without sticking to your fingers (slightly below the sticky limit). Smooth the ball in the palm of one hand with the blade of a knife or small spatula. Shake horizontally, striking the side of the hand vigorously against the other several times. Note the reaction of water appearing on the surface of the soil. The soil is said to have given a reaction to this test if, when it is shaken, water comes to the surface of the sample producing a smooth, shiny appearance. Squeeze the sample between the thumb and forefinger and note the reaction as follows:

- None – no visible change in the specimen
- Slow – water slowly appears on the surface of the specimen during shaking and does not disappear or disappears slowly upon squeezing
- Rapid – water quickly appears on the surface of the specimen during shaking and disappears upon squeezing

- **Toughness** (ASTM D2488; Table 10)

  FTM (Toughness): Following the dilatency test above, shape the test specimen into an elongated pat and roll by hand on a smooth surface or between palms into a thread about 1/8 inch in diameter. Fold the sample threads and re-roll repeatedly until the thread crumbles at a diameter of about 1/8 inch (e.g., near the plastic limit). Note the pressure required to roll the thread near the plastic limit as well as the strength of the thread. After the thread crumbles, lump the pieces together and knead the lump until it crumbles. Describe the toughness as follows:

  - Low – only slight pressure is required to roll the thread near the plastic limit. The thread and the lump are weak and very soft.
  - Medium – medium pressure is required to roll the thread to near the plastic limit. The thread and the lump are soft.
  - High – considerable pressure is required to roll the thread to near the plastic limit. The thread and the lump are firm.

Using the results of the dry strength, dilatency, and toughness test described above, classify the soil according to the following:

Soil Symbol	Dry Strength	Dilatency	Toughness
Silt (ML)	None to low	Slow to rapid	Low or thread cannot be formed
Lean clay (CL)	Medium to high	None to slow	Medium
Elastic Silt (MH)	Low to medium	None to slow	Low to medium
Fat Clay (CH)	High to very high	None	Low to medium high

- **Plasticity** (ASTM D2488; Table 11)

  Two field test methods can be used to determine plasticity of fine-grained soils (material passing the No. 40 sieve): the roll or thread test and the ribbon test. Each test is described below.

  FTM (Roll or Thread Test): As with the toughness test above, mix a representative portion of the soil sample with water until it can be molded or shaped without sticking to your fingers (slightly below the sticky limit). Place an elongated cylindrical sample on a nonabsorbent rolling surface (e.g., glass or was paper on a flat surface) and attempt to roll it into a thread approximately 1/8 inch in diameter. The results of this test are defined below (non-plastic to high plasticity).

  FTM (Ribbon Test): Form a roll from a handful of moist soil (slightly below the sticky limit) about ½ to ¾ inches in diameter and about 3 to 5 inches long. Place the material in the palm of your hand and, starting at one end, flatten the roll between your thumb and forefinger to form the longest and thinnest ribbon possible that can be supported by the cohesive properties of the material before breaking. If the soil sample holds together for a length of 6 to 10 inches without breaking, the material is considered to be both highly plastic and highly compressive (Fat Clay, CH). If the soil cannot be ribboned, it is non-plastic (Silt, ML or MH). If it can be ribboned only with difficulty into short lengths, it has low plasticity (Lean Clay, CL). Use the following terms to describe the plasticity of soil:

  - Nonplastic (ML or MH) – a 3 mm (0.12 inches) thread cannot be rolled at any water content
  - Low Plasticity (CL, ML, or MH) – the thread can barely be rolled, and crumbles easily
  - Medium Plasticity (CL) – the thread is easy to roll and not much time is required to reach the plastic limit before crumbling
  - High Plasticity (CH) – it takes considerable time rolling and kneading to reach the plastic limit; the thread can be rolled several times before crumbling

Note: A soil with as little as 20% clay will behave as a clayey soil. A soil needs 45% to over 60% medium to coarse sand to behave as a sandy soil. In a soil with 20% clay and 80% sand, the soil will behave as a clayey soil.

- **Relative Density of Cohesionless (Granular) Soils**
  - Very loose – easily penetrated 30 cm (1.2 inches) with 13 mm (0.5 inch) rebar pushed by hand (SPT = 0 to 4)
  - Loose – easily penetrated several cm with 13 mm (0.5 inch) rebar pushed by hand (SPT = 4 to 10)
  - Medium dense – easily to moderately penetrated with 13 mm (0.5 inch) rebar driven by 2.3 kg (6 pound) hammer (SPT = 10 to 30)
  - Dense – penetrated 0.3 m (1 foot) with difficulty using 13 mm (0.5 inch) rebar driven by 2.3 kg (6 pound) hammer (SPT = 30 to 50)
  - Very dense – penetrated only a few cm with 13 mm (0.5 inch) rebar driven by 2.3 kg (6 pound) hammer (SPT = >50)
- **Color** (use Munsel® Color System, as necessary)
- **Particle Size** (see Figure 3)
  - Boulder – larger than a basketball
  - Cobble – grapefruit, orange, volleyball
  - Coarse Gravel – tennis ball, grape

  - Fine Gravel – pea
  - Coarse Sand – rock salt
  - Medium Sand – opening in window screen
  - Fine Sand – sugar, table salt
  - Fines (silt and clay) – cannot visually determine size (unaided)

- **Gradation**
  - Well Graded (GW, SW) – full range and even distribution of grain sizes present
  - Poorly-graded (GP, SP) – narrow range of grain sizes present
  - Uniformly-graded (GP, SP) – consists predominantly of one grain size
  - Gap-graded (GP-SP) – within the range of grain sizes present, one or more sizes are missing
- **Organic Material** – Organic soils usually have a dark brown to black color and may have an organic odor. Often, organic soils will change color, for example, black to brown, when exposed to the air. Some organic soils will lighten in color significantly when air-dried. Organic soils normally will not have a high toughness or plasticity. The thread of the toughness test will be spongy.
  - PEAT – 50 to 100 percent organics by volume, primary constituent
  - Organic (soil name) – 15 to 50 percent organics by volume, secondary organic constituent
  - (Soil name) with some organics – 5 to 15 percent organics by volume, additional organic constituents
- **Fill Materials** – All soils should be examined to see if they contain materials indicative of man-made fills. Man-made fill items should be listed in each of the soil descriptions. Common fill indicators include glass, brick, dimensioned lumber, concrete, pavement sections, asphalt, metal, plastics, plaster etc. Other items that could suggest fill include buried vegetation mats, tree limbs, stumps etc. The soil description for a fill material should be followed by the term "FILL", i.e., for a sandy silt with some brick fragments the description would be "SANDY

SILT (ML), with brick fragments (Fill)". The size and distribution of fill indicators should be noted. The limits (depth range) of fill material should be determined and identified at each exploration location.

- **Other Constituents/Characteristics**
  - Additional constituents and/or pertinent soil characteristics not included in the previous categories should be described depending on the scope and objectives of the project. Observations that may be discussed include:
    - Oxide staining
    - Odor
    - Origin
    - Presence of root cast
    - Presence of mica
    - Presence of gypsum
    - Presence of calcium carbonate
    - Percent by volume of cobbles & boulders with size description and appropriate rock classification
  - Other pertinent information from the exploratory program should be recorded, if it would be useful from a biddability/constructability perspective. The conditions that should be listed include caving or sloughing, difficulty in drilling and groundwater infiltration.

SOIL DESCRIPTIONS

Generally, soil descriptions collected during most investigations are not intended for civil engineering (construction) purposes, but rather for hydrogeologic and contaminant transport purposes. As such, the ASTM visual-manual assessments are somewhat limited in that they are only performed in order to indicate important information about potential hydraulic properties of a soil. Soil descriptions should be concise, stressing major constituents and characteristics, and should be given in a consistent order and format. The following order is recommended:

- Soil name. The basic name of the predominant grain size and a single-word modifier indicating the major subordinate grain size (i.e., mostly clay with some silt). The feel test can be used to determine the texture of the soil by rubbing some moist soil between your fingers; sand feels gritty, silt feels smooth, and clays feel sticky. The terms representing percentages of grain size to be used include:
    - Trace – particles are present, but estimated to be less than 5%
    - Few – 5 to 10%
    - Little – 15 to 25%
    - Some – 30 to 45%
    - Mostly – 50 to 100%
- Color (using Munsell® charts, as necessary). Color is an important property in identifying organic soils, and within a given locality it may also be useful in identifying materials of similar geologic origin. It the sample contains layers or patches of varying colors (e.g., mottled), this shall be noted and all representative colors shall be described. The color shall be described for moist samples, however if the color represents a dry condition, it must be stated as such in the log. Generally, colors become darker as the moisture content increases and lighter as the soil dries. Examples include:
    - Some fine-grained soils (OL, OH) with dark drab shades of brown or gray, including almost black, contain organic colloidal matter.
    - In contrast, clean, bright looking shades of gray, olive green, brown, red, yellow, and white are associated with inorganic soils.
    - Gray-blue or gray- and yellow-mottled colors frequently result from poor drainage.
    - Red, yellow, and yellowish brown result from the presence of iron oxides.

  - White to pink may indicate considerable silica, calcium carbonate, or aluminum compounds.

- Field moisture condition as dry, moist, or wet;
- Gradation or Plasticity. Granular soils (i.e., sands or gravels) should be described as well-graded, poorly graded, uniform, or gap-graded, depending on the gradation of the minus 3-inch fraction. Cohesive soils (i.e., silts and clays) should be described as non-plastic, low, medium, or high, depending on the results of the manual evaluation for dry strength, dilatency, toughness, and plasticity discussed previously.
- Consistency/Density. An estimate of consistency of a cohesive soil or density of a granular soil, usually based on the SPT results (see Descriptive Terms section of this FOP);
- Soil Structure or Mineralogy. Description of discontinuities, inclusions, and structures, including joints, fissures, and slickensides.
- Odor. Describe the odor if organic or unusual. Soils containing a significant amount of organic material usually have a distinctive odor of decaying vegetation. This is especially apparent in fresh samples, but if the samples are dried, the odor may often be revived by heating a moistened sample. If the odor is unusual (petroleum, chemical, etc.), it should be noted in the log.
- Other important geologic information such as consolidation, gravel size and shape, visible internal structure, root holes, mica, odors, etc.

The first step when describing soil is to determine if the sample is predominantly fine-grained or coarse-grained (see Figures 3 and 4). Coarse-grained soils are relatively easy to identify, however descriptions of fine-grained soils can be more difficult, requiring additional field tests to assist the field geologist arrive at the proper soils classification (see **FTMs** under Descriptive Terms above). These tests are explained in detail in the ASTM Standard D2488 and briefly herein. Generally, the differentiation between silt and clay is based on plasticity and "texture". However, tests for dry strength and dilatency, along with plasticity, can be very helpful and are recommended in the ASTM Standard. If additional tests are performed, in addition to plasticity, to classify the fines, record them with the soil description on the logs. Doing this will assist the reader (i.e., Project Manager) to follow the logic used to describe a soil (e.g., medium plasticity, low dry strength = elastic silt [MH]; not a lean clay [CL]).

Fines described in the classification should be modified by their plasticity (e.g., non-plastic fines, low plasticity fines, etc.) reserving the words "silt" and "clay" for the soil name.

In summary, adhering to the ASTM Standard and the guidelines outlined in this FOP will provide uniformity in soil descriptions provided by all field personnel. Prior to mobilization to the field, field staff should make sure to have laminated copies of the ASTM Standard flow charts and tables as well as this FOP (as necessary). Some examples of complete soil descriptions are as follows:

Coarse-grained Soil

POORLY GRADED FINE SAND w/ SILT: Dark grey, wet, mostly fine sand with some non-plastic fines, some iron-stained mottling, laminated, medium dense

Fine-grained Soil

LEAN CLAY: Dark reddish/brown, moist, mostly fines, medium plasticity, firm, no dilatency, medium dry strength, root holes.

Soil/Fill (option 1) – visual evidence of fill

FILL: Black, moist, mostly fines with some fine sand, slag, cinders, metal, brick, non-plastic, loose when disturbed, strong odor

Soil/Fill (option 2) – no visual evidence of fill, suspected reworked material

FILL (reworked): Black, moist, mostly fines with some fine sand and few coarse angular gravel, non-plastic, hard, loose when disturbed, mild odor

BORING AND MONITORING WELL INSTALLATION LOGS

Currently, Benchmark utilizes WinLoG software to construct subsurface logs and a template of the log is included in this FOP as an example. One of the most important functions of a boring/monitoring well installation log, besides transmitting the soil description, is to indicate where the "data" (soil samples) were collected, giving the reader an idea of how reliable or representative the description is. On each sample log, depths of attempted and recovered or non-recovered interval are shown. Odor, if noted, should be considered subjective and not necessarily indicative of specific compounds or concentrations.

Remember: all field logs should be NEAT, ACCURATE, and LEGIBLE. Don't forget that the well completion diagram completed for each well requires details of the surface completion (i.e., flush-mount, stick-up etc.). It is the responsibility of the field staff to double-check each log (i.e., soil names, classifications, well construction details etc.) prior to implementing into a final report. A registered professional (i.e., professional engineer, PE or professional geologist, PG) must review each log and will be ultimately responsible for its content and accuracy.

REQUIRED EQUIPMENT

- Knife
- Engineer's rule/measuring tape

- Permanent marker
- Pre-cleaned wide-mouth sample jars (typically provided by the driller)
- Pre-cleaned wide-mouth laboratory sample jars (provided by the laboratory)
- Stainless steel sampling equipment (i.e., spoons, spatulas, bowls etc.)
- 10x hand lens
- Hydrochloric acid
- ASTM D2488 flow charts (preferably laminated)
- ASTM D2488 test procedures (Tables 1 through 12) (preferably laminated)
- Camera (disposable, 35 mm or digital)
- Munsell soil color chart (as necessary)
- Project Field Book/field forms

ATTACHMENTS

Figure 1; Field Guide for Soil and Stratigraphic Analysis
Figure 2; USCS Soil Classification Flow Chart (modified from ASTM D2488)
Figure 3; Illustration of Particle Sizes
Figure 4; Grain-Size Scale (Modified Wentworth Scale)

Field Borehole Log (sample)

REFERENCES

American Society for Testing and Materials, 2008a. *ASTM D1586: Standard Test Method for Standard Penetration Test (SPT) and Split-Barrel Sampling of Soils.*

American Society for Testing and Materials, 2010. *ASTM D2487: Standard Practice for Classification of Soils for Engineering Purposes (Unified Soil Classification System).*

American Society for Testing and Materials, 2009a. *ASTM D2488: Standard Practice for Description and Identification of Soils (Visual-Manual Procedure).*

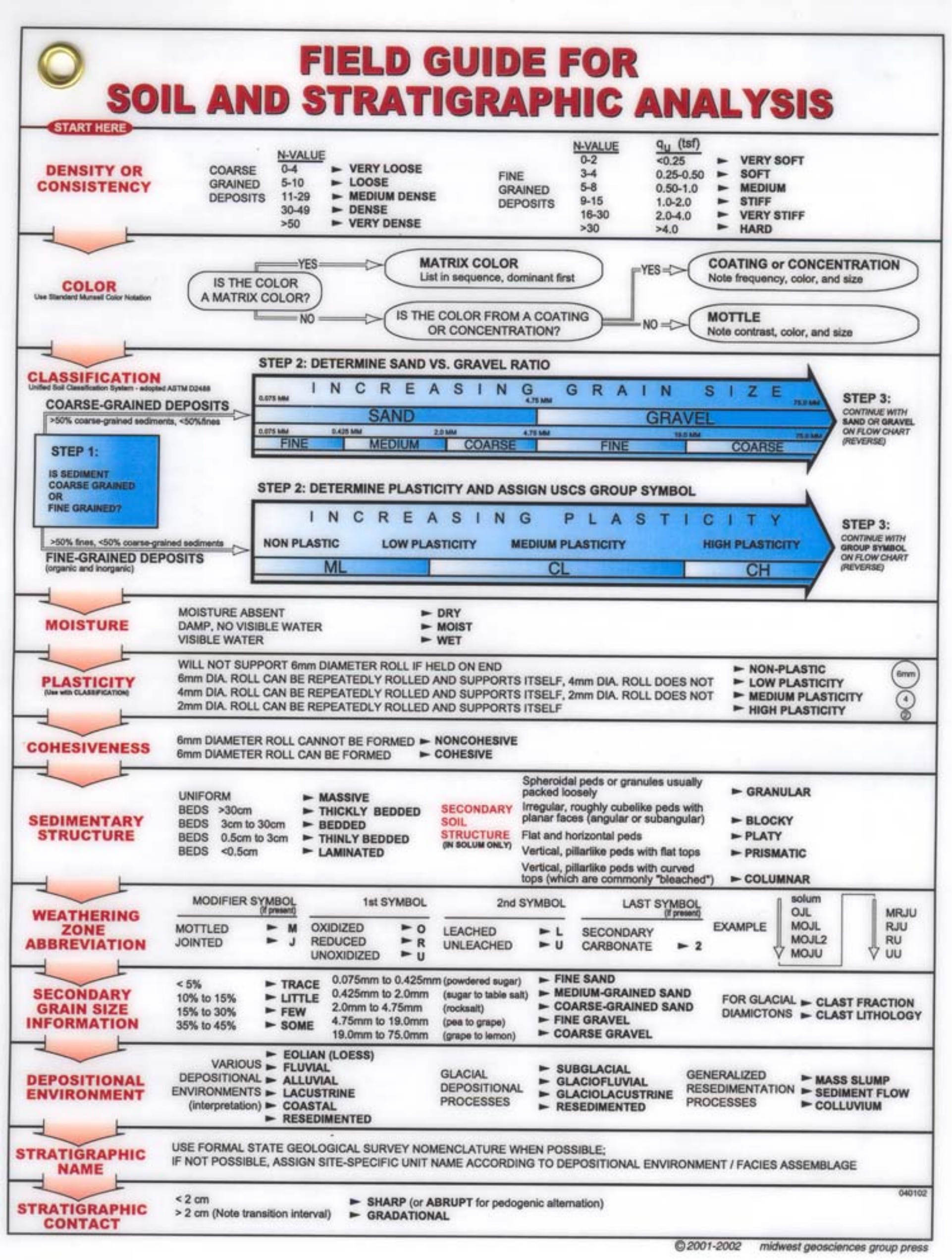
State of California, Department of Transportation, Engineering Service Center, Office of Structural Foundations, August 1996. *Soil & Rock Logging Classification Manual (Field Guide), by Joseph C. de Larios.*

<u>Benchmark FOPs:</u>

010	*Calibration and Maintenance of Portable Flame Ionization Detector*
011	*Calibration and Maintenance of Portable Photoionization Detector*
015	*Documentation Requirements for Drilling and Well Installation*
025	*Hand Augering Procedures*
032	*Management of Investigation-Derived Waste*
046	*Sample Labeling, Storage and Shipment Procedures*
047	*Screening of Soil Samples for Organic Vapors During Drilling Activities*
058	*Split-Spoon Sampling Procedures*
065	*Test Pit Excavation and Logging Procedures*

FIGURE 1

FIELD GUIDE FOR SOIL AND STRATIGRAPHIC ANALYSIS



FIELD GUIDE FOR
SOIL AND STRATIGRAPHIC ANALYSIS

START HERE

DENSITY OR CONSISTENCY

COARSE GRAINED DEPOSITS

N-VALUE	
0-4	► VERY LOOSE
5-10	► LOOSE
11-29	► MEDIUM DENSE
30-49	► DENSE
>50	► VERY DENSE

FINE GRAINED DEPOSITS

N-VALUE	q_u (tsf)	
0-2	<0.25	► VERY SOFT
3-4	0.25-0.50	► SOFT
5-8	0.50-1.0	► MEDIUM
9-15	1.0-2.0	► STIFF
16-30	2.0-4.0	► VERY STIFF
>30	>4.0	► HARD

COLOR
Use Standard Munsell Color Notation

IS THE COLOR A MATRIX COLOR?
YES ▷ MATRIX COLOR — List in sequence, dominant first
NO ▷ IS THE COLOR FROM A COATING OR CONCENTRATION?
YES ▷ COATING or CONCENTRATION — Note frequency, color, and size
NO ▷ MOTTLE — Note contrast, color, and size

CLASSIFICATION
Unified Soil Classification System - adopted ASTM D2488

COARSE-GRAINED DEPOSITS
>50% coarse-grained sediments, <50%fines

STEP 1:
IS SEDIMENT COARSE GRAINED OR FINE GRAINED?

>50% fines, <50% coarse-grained sediments
FINE-GRAINED DEPOSITS
(organic and inorganic)

STEP 2: DETERMINE SAND VS. GRAVEL RATIO

INCREASING GRAIN SIZE

STEP 3:
CONTINUE WITH SAND OR GRAVEL ON FLOW CHART (REVERSE)

STEP 2: DETERMINE PLASTICITY AND ASSIGN USCS GROUP SYMBOL

INCREASING PLASTICITY

STEP 3:
CONTINUE WITH GROUP SYMBOL ON FLOW CHART (REVERSE)

MOISTURE

MOISTURE ABSENT ► DRY
DAMP, NO VISIBLE WATER ► MOIST
VISIBLE WATER ► WET

PLASTICITY
(Use with CLASSIFICATION)

WILL NOT SUPPORT 6mm DIAMETER ROLL IF HELD ON END ► NON-PLASTIC
6mm DIA. ROLL CAN BE REPEATEDLY ROLLED AND SUPPORTS ITSELF, 4mm DIA. ROLL DOES NOT ► LOW PLASTICITY
4mm DIA. ROLL CAN BE REPEATEDLY ROLLED AND SUPPORTS ITSELF, 2mm DIA. ROLL DOES NOT ► MEDIUM PLASTICITY
2mm DIA. ROLL CAN BE REPEATEDLY ROLLED AND SUPPORTS ITSELF ► HIGH PLASTICITY

COHESIVENESS

6mm DIAMETER ROLL CANNOT BE FORMED ► NONCOHESIVE
6mm DIAMETER ROLL CAN BE FORMED ► COHESIVE

SEDIMENTARY STRUCTURE

UNIFORM ► MASSIVE
BEDS >30cm ► THICKLY BEDDED
BEDS 3cm to 30cm ► BEDDED
BEDS 0.5cm to 3cm ► THINLY BEDDED
BEDS <0.5cm ► LAMINATED

SECONDARY SOIL STRUCTURE (IN SOLUM ONLY)

Spheroidal peds or granules usually packed loosely ► GRANULAR
Irregular, roughly cubelike peds with planar faces (angular or subangular) ► BLOCKY
Flat and horizontal peds ► PLATY
Vertical, pillarlike peds with flat tops ► PRISMATIC
Vertical, pillarlike peds with curved tops (which are commonly "bleached") ► COLUMNAR

WEATHERING ZONE ABBREVIATION

MODIFIER SYMBOL (if present)		1st SYMBOL		2nd SYMBOL		LAST SYMBOL (if present)	
MOTTLED	► M	OXIDIZED	► O	LEACHED	► L	SECONDARY CARBONATE	► 2
JOINTED	► J	REDUCED	► R	UNLEACHED	► U		
		UNOXIDIZED	► U				

EXAMPLE
solum
OJL
MOJL
MOJL2
MOJU

MRJU
RJU
RU
UU

SECONDARY GRAIN SIZE INFORMATION

< 5% ► TRACE
10% to 15% ► LITTLE
15% to 30% ► FEW
35% to 45% ► SOME

0.075mm to 0.425mm (powdered sugar) ► FINE SAND
0.425mm to 2.0mm (sugar to table salt) ► MEDIUM-GRAINED SAND
2.0mm to 4.75mm (rocksalt) ► COARSE-GRAINED SAND
4.75mm to 19.0mm (pea to grape) ► FINE GRAVEL
19.0mm to 75.0mm (grape to lemon) ► COARSE GRAVEL

FOR GLACIAL DIAMICTONS ► CLAST FRACTION
► CLAST LITHOLOGY

DEPOSITIONAL ENVIRONMENT

VARIOUS DEPOSITIONAL ENVIRONMENTS (interpretation)
► EOLIAN (LOESS)
► FLUVIAL
► ALLUVIAL
► LACUSTRINE
► COASTAL
► RESEDIMENTED

GLACIAL DEPOSITIONAL PROCESSES
► SUBGLACIAL
► GLACIOFLUVIAL
► GLACIOLACUSTRINE
► RESEDIMENTED

GENERALIZED RESEDIMENTATION PROCESSES
► MASS SLUMP
► SEDIMENT FLOW
► COLLUVIUM

STRATIGRAPHIC NAME

USE FORMAL STATE GEOLOGICAL SURVEY NOMENCLATURE WHEN POSSIBLE;
IF NOT POSSIBLE, ASSIGN SITE-SPECIFIC UNIT NAME ACCORDING TO DEPOSITIONAL ENVIRONMENT / FACIES ASSEMBLAGE

STRATIGRAPHIC CONTACT

< 2 cm ► **SHARP** (or **ABRUPT** for pedogenic alternation)
> 2 cm (Note transition interval) ► **GRADATIONAL**

040102

FIGURE 2

USCS SOIL CLASSIFICATION FLOW CHART (MODIFIED FROM ASTM D2488)

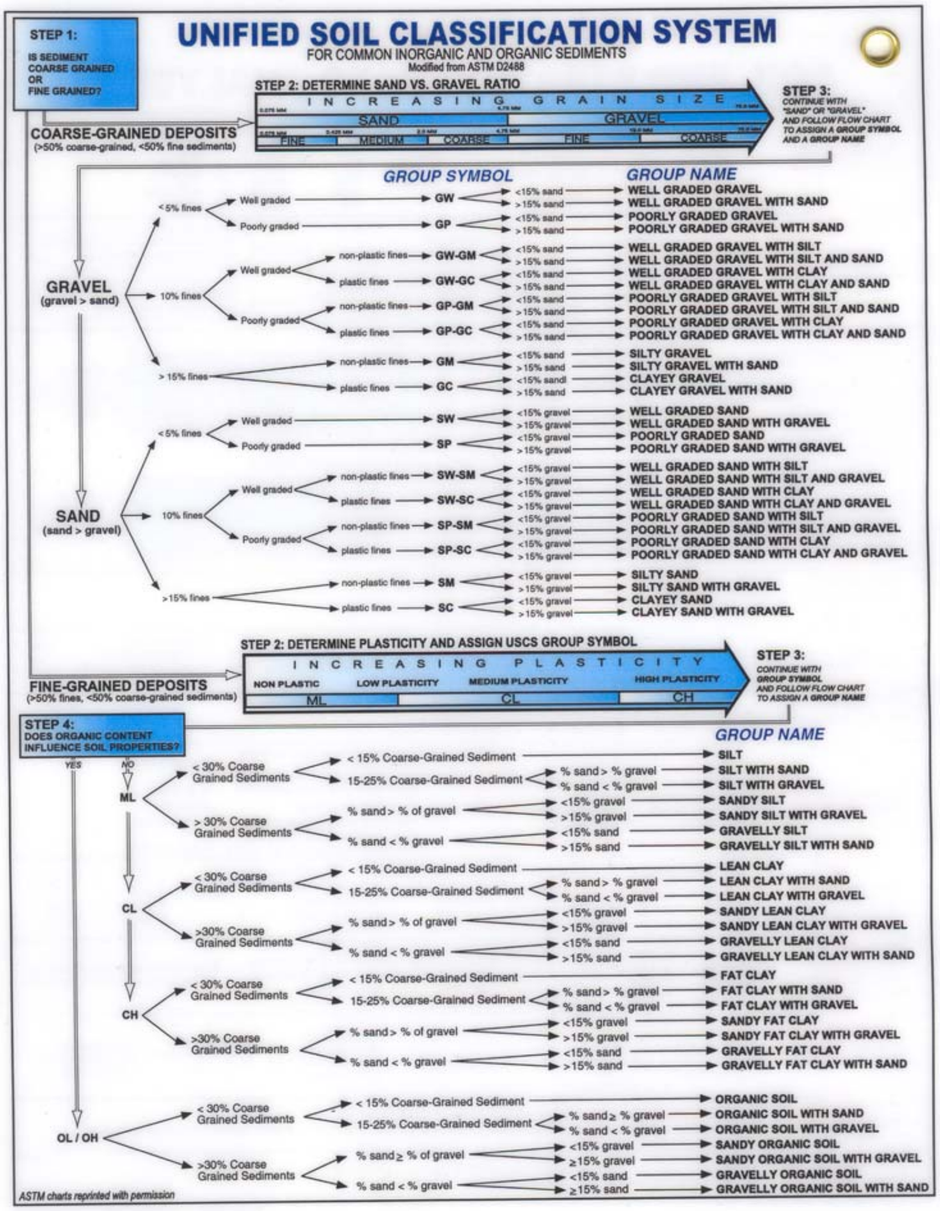


FIGURE 3

ILLUSTRATION OF PARTICLE SIZES

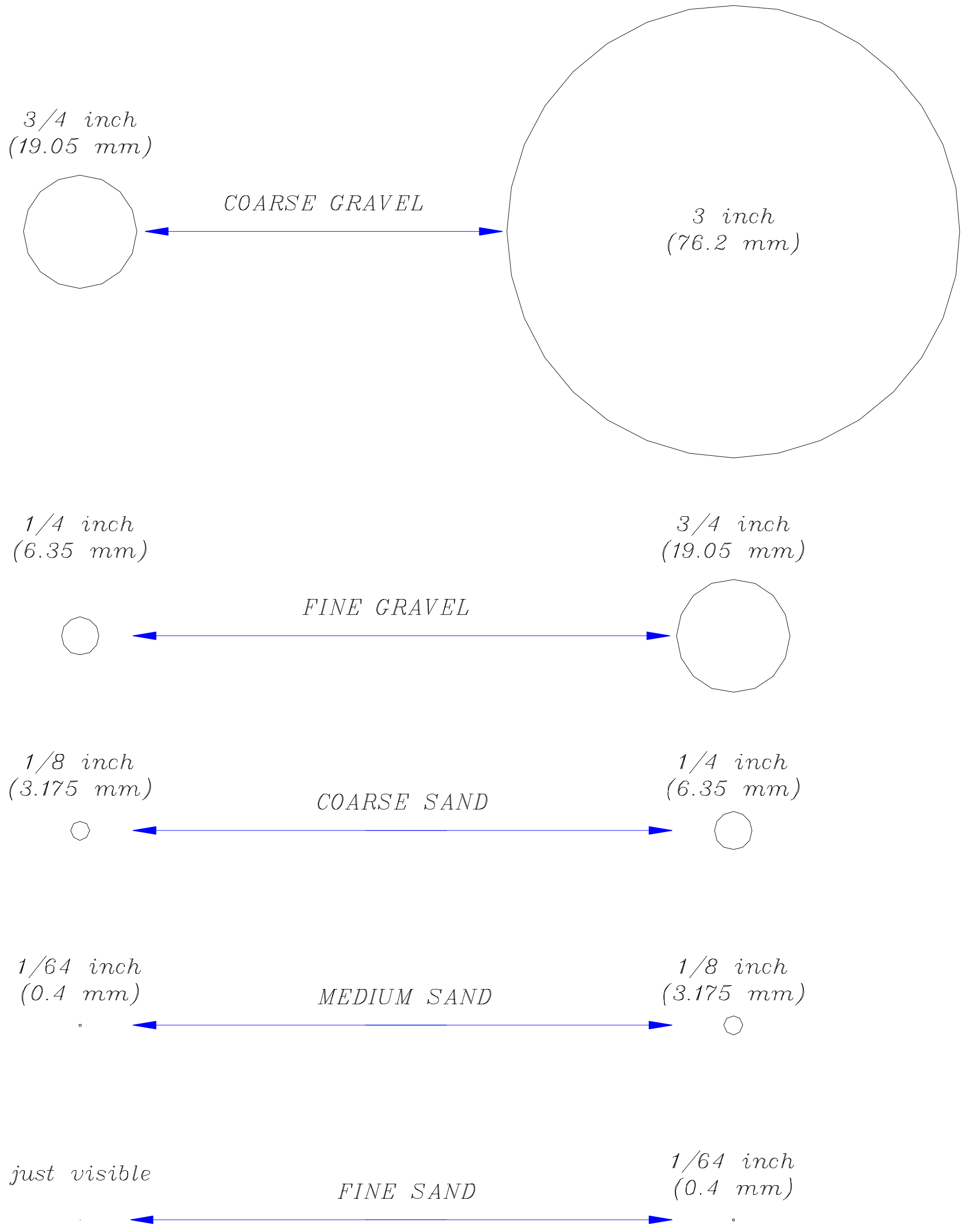


FIGURE 4

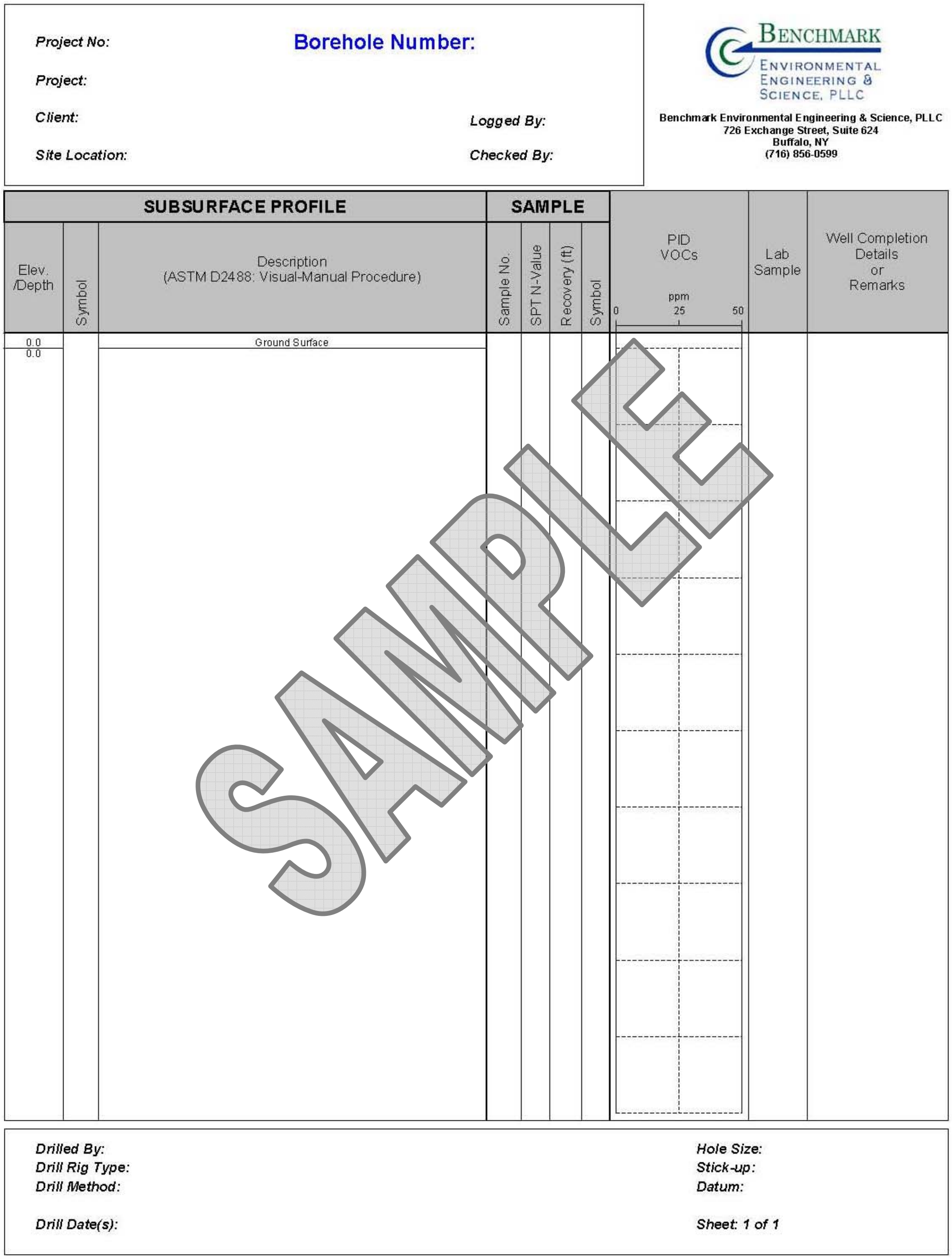
GRAIN-SIZE SCALE (MODIFIED WENTWORTH SCALE)

Grain size refers to the physical dimensions of particles of rock or other solid. This is different from the crystallite size, which is the size of a single crystal inside the solid (a grain can be made of several single crystals). Grain sizes can range from very small colloidal particles, through clay, silt, sand, and gravel, to boulders. Size ranges define limits of classes that are given names in the Wentworth scale used in the United States. The Krumbein *phi* (φ) scale, a modification of the Wentworth scale created by W. C. Krumbein, is a logarithmic scale computed by the equation: $\varphi = -\log_2(\text{grain size in mm})$.

φ scale	Size range (metric)	Size range (approx. inches)	Aggregate name (Wentworth Class)
< −8	> 256 mm	> 10.1 in	Boulder
−6 to −8	64–256 mm	2.5–10.1 in	Cobble
−5 to −6	32–64 mm	1.26–2.5 in	Very coarse gravel
−4 to −5	16–32 mm	0.63–1.26 in	Coarse gravel
−3 to −4	8–16 mm	0.31–0.63 in	Medium gravel
−2 to −3	4–8 mm	0.157–0.31 in	Fine gravel
−1 to −2	2–4 mm	0.079–0.157 in	Very fine gravel
0 to −1	1–2 mm	0.039–0.079 in	Very coarse sand
1 to 0	½–1 mm	0.020–0.039 in	Coarse sand
2 to 1	¼–½ mm	0.010–0.020 in	Medium sand
3 to 2	125–250 µm	0.0049–0.010 in	Fine sand
4 to 3	62.5–125 µm	0.0025–0.0049 in	Very fine sand
8 to 4	3.90625–62.5 µm	0.00015–0.0025 in	Silt
> 8	< 3.90625 µm	< 0.00015 in	Clay
<10	< 1 µm	< 0.000039 in	Colloid

In some schemes "gravel" is anything larger than sand (>2.0 mm), and includes "granule", "pebble", "cobble", and "boulder" in the above table. In this scheme, "pebble" covers the size range 4 to 64 mm (−2 to −6 φ).

SOIL DESCRIPTION PROCEDURES USING THE VISUAL-MANUAL METHOD



Project No:

Borehole Number:

Project:

Client:

Logged By:

Site Location:

Checked By:

Benchmark Environmental Engineering & Science, PLLC
726 Exchange Street, Suite 624
Buffalo, NY
(716) 856-0599

SUBSURFACE PROFILE			SAMPLE				PID VOCs	Lab Sample	Well Completion Details or Remarks
Elev. /Depth	Symbol	Description (ASTM D2488: Visual-Manual Procedure)	Sample No.	SPT N-Value	Recovery (ft)	Symbol	ppm 0 25 50		
0.0 0.0		Ground Surface							

Drilled By:
Drill Rig Type:
Drill Method:

Drill Date(s):

Hole Size:
Stick-up:
Datum:

Sheet: 1 of 1

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FIELD OPERATING PROCEDURES

Surface and Subsurface Soil Sampling Procedures

FOP 063.2

SURFACE AND SUBSURFACE SOIL SAMPLING PROCEDURES

PURPOSE

This procedure describes the methods for sampling surface soil and subsurface soil samples for physical and chemical laboratory analysis during intrusive activities such as test pitting, hand augering, drilling, surface soil sampling etc. Typical health and safety related issues should be addressed in the Project Health and Safety Plan.

PRE-SAMPLING PROCEDURES

1. Review project objectives and the Project Health and Safety Plan (HASP).
2. Conduct tailgate health and safety meeting with project team and/or subcontractor(s) by completing the Tailgate Safety Meeting Form (sample attached).
3. Calibrate air-monitoring equipment in accordance with the appropriate Benchmark's Field Operating Procedures or manufacturers recommendations for calibration of field meters.
4. Commence intrusive activities in accordance with specific Benchmark FOPs (test pitting, hand augering, drilling etc.) or as directed by the Project Work Plan.
5. Conduct air monitoring as required by the HASP, Project Work Plan or Benchmark's FOP Real-Time Air Monitoring During Intrusive Activities. Record all results on the Real Time Air Monitoring Log (sample attached).
6. Decontaminate all <u>non-dedicated</u> stainless steel (or Pyrex glass) equipment in accordance with Benchmark's Non-disposable and Non-dedicated Sampling Equipment Decontamination procedures.
7. Collect soil samples in accordance with the following sections.

SURFACE SOIL/FILL SAMPLING PROCEDURES

Collection of surface soil/fill samples facilitates the evaluation of potential health risks to current site receptors that may be exposed to soil/fill via direct contact, incidental ingestion, or inhalation of airborne particulates. The following procedure is in accordance with NYSDEC sampling protocol of surface soil/fill material.

1. Collect all soil samples using dedicated (or decontaminated non-dedicated) sampling tools (i.e., spoons, trowels, bowls etc.), preferably constructed of stainless steel.

2. If the sample area is vegetated, then collect the surface soil sample from 0 to 2 inches below ground surface (bgs) following removal of the sod.

3. If there is no soil present within the sample area (i.e., only slag, concrete, mixed with fines), excavate an area 12 inches by 12 inches by 6 inches deep, screen the material to less than 1/8 inch (No. 4 sieve), and submit the screened material for analysis. If there is not enough material to completely fill the sample jar, then expand the excavation 3 inches in all four directions screening the additional material. Expand the excavation in this manner until sufficient sample volume is obtained. Volatile organic analysis of surface soil/fill utilizing this method will yield negatively biased results and should not be performed.

SURFACE/SUBSURFACE SOIL SAMPLING PROCEDURES

1. Collect all soil samples using dedicated (or decontaminated non-dedicated) sampling tools (i.e., spoons, trowels, bowls etc.), preferably constructed of stainless steel.

   Surface soil samples are typically collected from 0 to 6 inches below ground surface (bgs). Subsurface soils are typically sampled from varying depths greater than 6-inches bgs based on field observations and as directed by the Project Work Plan.

2. Transfer samples for chemical (VOC, SVOC, Metals etc.) and physical (i.e., Atterberg Limits, Grain Size, Permeability etc.) analytical testing by direct grab (i.e., directly from the bucket of the excavation equipment, split-spoon sampler, hand auger etc.) using the dedicated (or decontaminated non-dedicated) sampling tools into appropriate laboratory-supplied containers and seal. The chemical or physical laboratory selected to perform the analysis should determine minimum sample volume for analysis.

3. Prepare collected samples in accordance with Benchmark's FOP: Sample Labeling, Storage and Shipment Procedures. Do not allow the chemical soil samples to freeze during storage and shipping. It should be noted, ice is not required for physical soil samples and all physical soil samples should be kept at the collected soil moisture by securing with a tight sealing lid. Do not allow physical soil samples to gain or lose moisture from the collected soil moisture prior to analysis.

4. Record all sampling details (i.e., depth and location) in the Project Field Book; appropriate Benchmark log sheets depending on method of intrusion (i.e., drilling, test pitting, hand augering etc.); and on the Soil/Sediment Sample Collection Summary Log (sample attached).

PARAMETER-SPECIFIC PROCEDURES

1. <u>Volatile Organic Compound (VOCs)</u>: Transfer sufficient soil volume to fill the laboratory-supplied container (typically 4 ounces) by packing the soil sample with the sampling tool to the top of the container leaving no headspace. At no time should a gloved hand (i.e., latex, nitrile etc.) be used to pack the sample into the sample container as the sample may be compromised via cross-contamination.

2. <u>All Other Parameters</u>: All other parameters include, but are not limited to, Semi-VOCs (SVOCs), polychlorinated biphenyls (PCBs), herbicides, pesticides, total metals etc. Transfer sufficient soil volume to fill the laboratory-supplied container by packing the soil sample with the sampling

tool to the top of the container. Unless otherwise indicated by the laboratory or the Project Work Plan, the sample jar for all other parameters does not have to be packed completely leaving no headspace as with the VOC containers.

ATTACHMENTS

Tailgate Safety Meeting Form (sample)
Soil/Sediment Sample Collection Summary Log (sample)
Real Time Air Monitoring Log (sample)

REFERENCES

Benchmark FOPs:

006	*Calibration and Maintenance of Combustible Gas/Oxygen Meter*
010	*Calibration and Maintenance of Portable Flame Ionization Detector*
011	*Calibration and Maintenance of Portable Photoionization Detector*
040	*Non-disposable and Non-dedicated Sampling Equipment Decontamination*
046	*Sample Labeling, Storage and Shipment Procedures*
073	*Real-Time Air Monitoring During Intrusive Activities*

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

TAILGATE SAFETY MEETING FORM

Project Name: Date: Time:

Project Number: Client:

Work Activities:

HOSPITAL INFORMATION:

Name:

Address: *City:* *State:* *Zip:*

Phone No.: *Ambulance Phone No.*

SAFETY TOPICS PRESENTED:

Chemical Hazards:

Physical Hazards: Slips, Trips, Falls

PERSONAL PROTECTIVE EQUIPMENT:

Activity: *PPE Level:* A B C D

Activity: *PPE Level:* A B C D

Activity: *PPE Level:* A B C D

Activity: *PPE Level:* A B C D

Activity: *PPE Level:* A B C D

New Equipment:

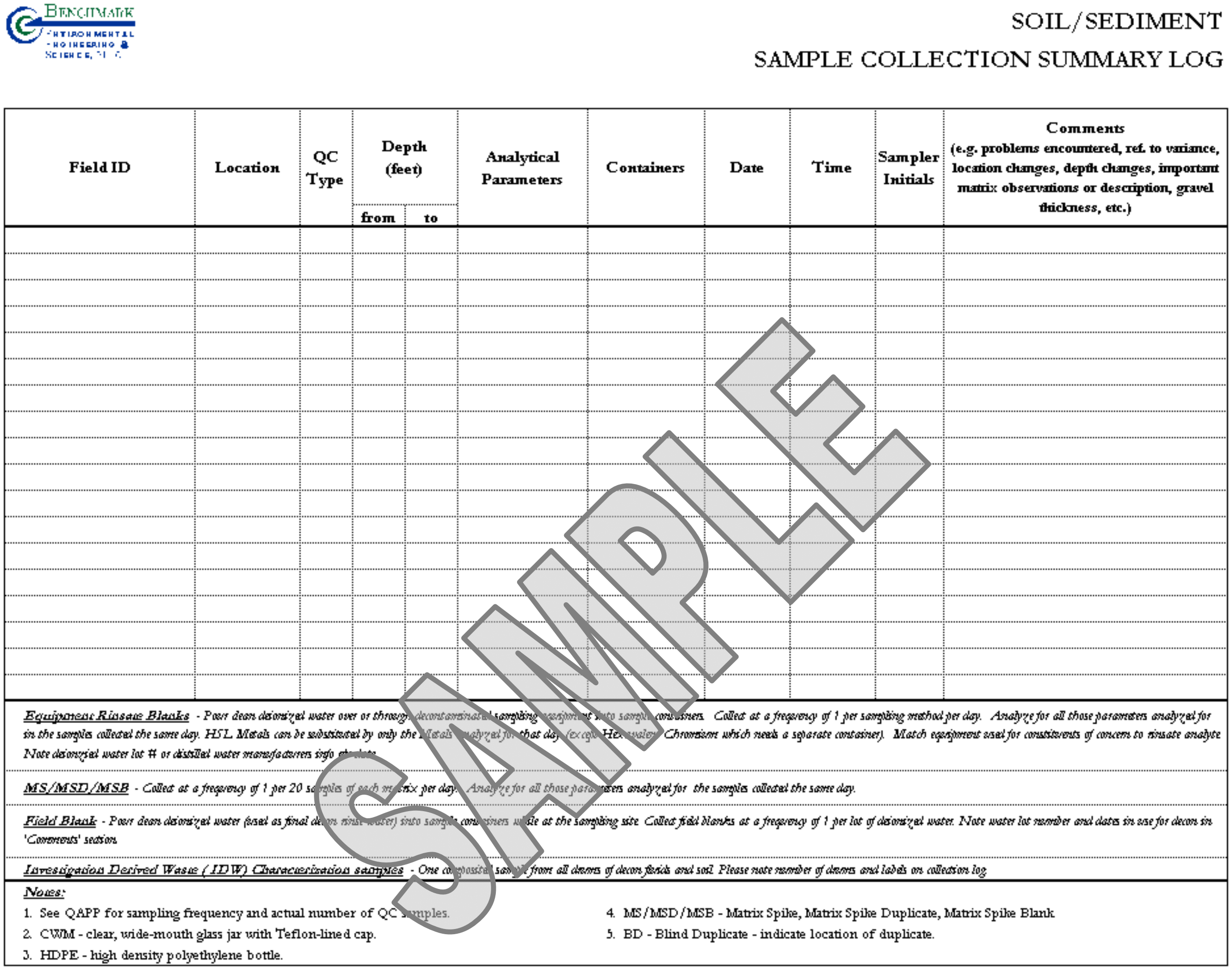
Other Safety Topic (s): Environmental Hazards (aggressive fauna)

Eating, drinking, use of tobacco products is prohibited in the Exclusion Zone (EZ)

ATTENDEES

Name Printed	Signatures

Meeting conducted by:



SOIL/SEDIMENT
SAMPLE COLLECTION SUMMARY LOG

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

Equipment Rinsate Blanks - *Pour clean deionized water over or through decontaminated sampling equipment into sample containers. Collect at a frequency of 1 per sampling method per day. Analyze for all those parameters analyzed for in the samples collected the same day. HSL Metals can be substituted by only the Metals analyzed for that day (except Hexavalent Chromium which needs a separate container). Match equipment used for constituents of concern to rinsate analyte. Note deionized water lot # or distilled water manufacturers info and date.*

MS/MSD/MSB - *Collect at a frequency of 1 per 20 samples of each matrix per day. Analyze for all those parameters analyzed for the samples collected the same day.*

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

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

Notes:

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

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REAL TIME AIR MONITORING LOG

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

WEATHER CONDITIONS:

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

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

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

Prepared By: Date:

Benchmark
Environmental
Engineering &
Science, PLLC

Field Operating Procedures

Real-Time Air Monitoring During Intrusive Activities

FOP 073.2

REAL-TIME AIR MONITORING DURING INTRUSIVE ACTIVITIES PROCEDURE

PURPOSE

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

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

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

MONITORING & MITIGATION PROCEDURE

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

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

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. "Periodic" monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence

ORGANIC VAPORS

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

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

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

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

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

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

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

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

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

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

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

Major Vapor Emission Response Plan

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

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

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

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

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

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

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

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

AIRBORNE PARTICULATES

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

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

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

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter (μg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 μg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.
- If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 μg/m^3 above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 μg/m^3 of the upwind level and in preventing visible dust migration.
- All readings must be recorded and be available for State (DEC and DOH) personnel to review.

Visual Assessment

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

Supplemental Dust Suppression

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

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

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

COMBUSTIBLE GASES & OXYGEN

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

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

Combustible Gas:

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

- If sustained combustible gas levels at the downwind perimeter of the site persist at levels in excess of 25% LEL, work activities must be halted, the source of explosion hazards identified, corrective actions taken to abate emissions and monitoring continued. Following combustible gas mitigation, work activities can resume provided that the sustained total organic vapor level 200 feet downwind of the exclusions zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less, (but in no case less than 20 feet) is below a sustained value of 10% LEL.

Oxygen:

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

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

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

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

ATTACHMENTS

Real-Time Air Monitoring Log (sample)

REFERENCES

<u>TurnKey FOPs:</u>

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

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

REAL TIME AIR MONITORING LOG

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

WEATHER CONDITIONS:

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

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

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

Prepared By: Date:

Benchmark
Environmental
Engineering &
Science, PLLC

FIELD OPERATING PROCEDURES

"Before Going Into The Field" Procedure

FOP 076.0

"BEFORE & AFTER"
PROJECT PROCEDURES FOR FIELD PERSONNEL

PURPOSE

This procedure describes the required field and office activities to be preformed "before and after" project assignments by field personnel. Field activities may include, but are not limited to, drilling oversight, excavation contractor oversight, matrix sample collection (e.g., soil, sediment, groundwater, surface water, wipe, and/or air), third party oversight, and site reconnaissance to name a few. Office activities may include, but are not limited to, photocopying field book entries, completing all field forms, tabulating collected field and laboratory data, and preparation of report text.

The primary goal of this procedure is to eliminate delays and unnecessary budgetary "strain" due to a lack of preparedness and knowledge of the site by the field team members. This procedure also seeks to streamline the preparation and transfer of field information/data from field personnel to the Project Manager upon field work completion.

PROJECT ASSIGNMENT

During the initial meeting with the Project Manager, several questions should be raised by the field team member and answered by the Project Manager. A pad of paper and pen should be in hand to record all pertinent job information. At a minimum, the following questions should be answered:

1. *What is the job number?*
2. *Who is the client and the on-site representative (if applicable)?*
3. *What is the name of the project?*
4. *What are the job responsibilities and how should they be accomplished?*
5. *How much time do I have to complete the assigned tasks?*
6. *Are there any project required documents? What are they?*

Any deviation from the above questions should be approved by the Project Manager prior to contravention, not at the end of the day or following the project completion.

"BEFORE" CHECKLISTS

Checklists should be developed and used so that all of the required steps prior to going into the field are undertaken. A good checklist will include:

- Adequate review of the documents listed in this FOP

- Any documents, equipment, and supplies presented in this FOP

- Providing adequate notification to the laboratory (so that holding times are not exceeded) and to the owner of the site and the primary regulatory agency (usually in writing) that a round of sampling is to commence in order to facilitate sampling and allow for a sampling audit or split sampling.

- Specifying and documenting the equipment maintenance and calibration undertaken prior to going into the field relative to the sampling event.

- Checking and calibrating the equipment.

- Listing the documents, equipment, and supplies required to collect samples at the site as presented in this FOP.

Prior to going into the field, sampling personnel should reacquaint themselves with the sampling plan. The review is undertaken so that the required specific protocol such as sampling from the least to the most contaminated wells, knowing where quality control samples are to be taken, knowing the disposition of purge water, etc., is understood and followed.

The amount of equipment maintenance and calibration required prior to going into the field should be clearly specified in the presampling equipment maintenance and calibration checklists, which are based on the manufacturer's recommendations, sampling objectives, and prior experience. Maintenance and calibration performed before sampling must be documented to provide evidence that the equipment was adequately maintained and calibrated and to keep a permanent record of equipment servicing and performance.

A list of all the documents, equipment, and supplies required for the sampling event should be prepared and used. It can be frustrating and time consuming to forget equipment and supplies, so some up-front preparation is warranted. The following sections provide a list of the documentation, equipment, and supplies, which should assist in preparing a site-specific equipment and supply checklist. Once prepared, the checklist and project requirements should be reviewed with the Project Manager.

"BEFORE" DOCUMENTATION SUMMARY

Prior to going into the field, the field team should review and understand all of the project documents including, but not limited to:

- The Health and Safety Plan (HASP)
- The Site Analytical Plan (SAP), Sampling Plan, or similar document
- The Quality Assurance Project Plan (QAPP)
- The Work Plan
- Project specific Field Operating Procedures and field forms
- Site Maps
- Equipment operation manuals
- Chain-of-Custody forms
- Shipping labels and custody seals
- Any reference materials (i.e., conversion tables, volume calculation, etc.). The Pocket Ref, Third Edition by Thomas Glover is a great source for the field.

If at any time, the field team does not understand the project required protocol, procedures, sample locations, etc.; the Project Manager should be consulted for clarification.

"BEFORE" EQUIPMENT SUMMARY

Prior to going into the field, the field team should review the following equipment checklist, noting that project specific equipment may not be included in this list:

- Water level indicator
- Pumps, sample tubing, flow controllers, power cord(s), batteries, compressors, generators, etc.
- Bailers (disposable, PVC, stainless steel, glass), rope
- Flow-through cell
- Field meters with adequate calibration solutions (pH/Eh meter, conductivity meter, dissolved oxygen meter, turbidity meter, batteries, etc.)
- Garden hose
- Explosive gas meter and/or photoionization detector (PID) with calibration supplies
- Complete set of hand tools including a sharp knife, screw drivers, pliers, hacksaw, flashlight, large pipe wrench, hammer, bolt cutters, and replacement locks
- Fish hook with weight and string
- Field filtering equipment and supplies
- Decontamination supplies, such as scrub brushes, Alconox®, distilled water, potable water, 5-gallon bucket, paper towels, aluminum foil
- 5-gallon bucket(s)
- Measuring cup
- Sample bottles/containers (with extras) and preservatives
- Stainless steel spoons, trowels, shovels
- Shipping containers (i.e., coolers)
- Clipboard
- Calculator
- Water resistant clock or watch with second hand
- First aid kit

“BEFORE” SUPPLIES SUMMARY

Prior to going into the field, the field team should review the following supplies checklist, noting that project specific supplies may not be included in this list:

- Laboratory grade non-phosphate detergent (Alconox®)
- Appropriate personal protective equipment appropriate to the contaminants of concern, such as nitrile gloves, Tyvek, boots, hardhat, safety glasses, hearing protection, etc.
- Bags of ice
- Plastic garbage bags
- Plastic sheeting
- Sufficient quantities of potable and laboratory grade deionized water for cleaning and equipment blanks
- Methanol
- Isopropyl alcohol
- Clean rags and paper towels
- Electrical tape, duct tape, and wide transparent tape
- Hand soap
- Regular, ballpoint, and indelible pens
- Hollow braid polyethylene rope

After providing adequate notification (lab, state and/or federal agencies), performing the presampling maintenance and calibration, obtaining the site and well keys, and packing the supplies and equipment, the field activities are ready to be performed.

“AFTER” – PROJECT FILE REVIEW & CREATION

It is the responsibility of each field crew member to review his/her own field notes and time sheet for accuracy and completeness. All errors to the field notes should be corrected, dated, and initialed for Project Manager review. Once reviewed by the field team member, the Project Field Book, all field forms, photographs, chain-of-custodies etc. must be photocopied, scanned (if required), downloaded, etc. and then given to the Project Manager in an organized file folder in a timely manner. Avoiding delay during this step is critical, especially when there are severe time constraints for the project.

REFERENCES

1. Wilson, Neal. *Soil Water and Ground Water Sampling*, 1995

APPENDIX C

SITE-SPECIFIC HEALTH AND SAFETY PLAN

SITE HEALTH AND SAFETY PLAN
for
BROWNFIELD CLEANUP PROGRAM
IRM ACTIVITIES

2424 HAMBURG TURNPIKE SITE

BUFFALO, NEW YORK

January 2017 B0345-015-001

Prepared for:

2424 HAMBURG TURNPIKE, LLC

2424 HAMBURG TURNPIKE SITE
HEALTH AND SAFETY PLAN FOR IRM 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: Lori Riker, P.E.

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

2424 HAMBURG TURNPIKE SITE
HEALTH AND SAFETY PLAN FOR IRM ACTIVITIES

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2424 HAMBURG TURNPIKE SITE
HEALTH AND SAFETY PLAN FOR IRM ACTIVITIES

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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 Benchmark Environmental Engineering & Science, PLLC in association with TurnKey Environmental Restoration, LLC and employees (referred to jointly hereafter as "Benchmark") during Interim Remedial Mesaure (IRM) activities at the 2424 Hamburg Turnpike Site (Site) located in the City of Lackawanna, Erie County, New York. This HASP presents procedures for Benchmark employees who will be involved with IRM field activities; it does not cover the activities of other contractors, subcontractors or other individuals on the Site. These firms will be required to develop and enforce their own HASPs as discussed in Section 2.0. Benchmark accepts no responsibility for the health and safety of contractor, subcontractor or other personnel.

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

1.2 Background

The BCP Site consists of a 1.04 acre property, located in a highly developed mixed use industrial, commercial and residential area of the City of Lackawanna, Erie County, New York. Erie County Real Property identifies the Site as 2424 Hamburg Turnpike (SBL 141.59-5-2).

The Site is currently unoccupied with two vacant commercial buildings consisting of a former automobile service building with four repair bays and eight (8) in-ground hydraulic lifts and one (1) shed. The Site also includes asphalt paved areas as well as concrete slabs suspected to have been associated with former on-Site structures.

Previous environmental investigations completed at the Site have revealed evidence of environmental contamination related to the former uses of the Site. Elevated levels of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), primarily polycyclic aromatic hydrocarbons (PAHs), have been detected on-Site at concentrations exceeding regulatory guidelines..

1.3 Known and Suspected Environmental Conditions

Previous investigations have confirmed that the history of being utilized as a gasoline station and automotive repair facility has impacted the Site, which will require remediation prior to redevelopment.

TurnKey completed a Phase II Environmental Investigation consisting of ten (10) soil borings (SB-1 through SB-10), three of which were converted into temporary one-inch diameter monitoring wells (SB-4/TMW-1, SB-5/TMW-2 and SB-7/TMW-3), to assess subsurface conditions on-Site, including the area of potential contamination discovered during utility upgrade activities along Hamburg Turnpike (Spill No. 1204435) and areas proximate to the in-ground lifts within the service building and the four underground anomalies identified during the geophysical survey. Sample locations from the previous study are shown on Figure 3.

Elevated PID readings above background (0.0 ppm) and petroleum odors were identified in seven (7) of the ten (10) soil borings (SB-4 through SB-10) with the highest PID reading noted as 1,098 ppm at SB-6 (2-4'). In addition, approximately one-inch of floating petroleum product was noted in a monitoring well, TMW-1, completed north of the former UST excavation area.

Six soil samples were analyzed by the laboratory for Target Compound List (TCL) plus CP-51 VOCs and CP-51 SVOCs and two groundwater samples were analyzed for TCL plus CP-51 VOCs. The following bullet points summarize laboratory analytical results:

- Petroleum VOCs were detected at concentrations above CP-51 and/or Part 375 Protection of Groundwater, Unrestricted and/or Restricted Residential Use SCOs in all six soil samples.
- Three soil samples exhibited SVOC concentrations above CP-51 and/or Part 375 Protection of Groundwater, Unrestricted, Restricted Residential, Commercial and/or Industrial Use SCOs.
- Both groundwater samples exhibited petroleum VOCs at concentrations above Class GA Groundwater Quality Standards (GWQS) with the more significant concentrations (16,333 micrograms per liter (ug/L) total VOCs)

identified at TMW-2. Due to the presence of product at TMW-1, concentrations exceeding GWQS are assumed to be present.

1.4 Parameters of Interest

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

- **Volatile Organic Compounds (VOCs)** – VOCs present at elevated concentration may include 1,2,4- and 1,3,5-trimethylbenzene, isopropylbenzene, n-propylbenzene, benzene, toluene, ethylbenzene and xylenes. These VOCs are typically associated with petroleum products.

- **Semi-Volatile Organic Compounds (SVOCs) –** SVOCs present at elevated concentrations may include polynuclear aromatic hydrocarbons (PAHs), which are byproducts of incomplete combustion and impurities in petroleum products.

1.5 Overview of IRM Activities

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

Interim Remedial Measures Activities

1. **IRM Lift Removal:** Benchmark will remove the seven in-ground lifts from within the automotive repair portion of the existing building.

2. **Excavation:** Benchmark will excavate GCS encountered during in-ground lift removal activities.

3. **Post Excavation Sampling:** Benchmark will collect post excavation samples from within the area of the In-ground lifts.

4. **Backfill:** Benchmark will backfill the excavation with non-impacted on-Site soil or clean imported fill material.

2.0 ORGANIZATIONAL STRUCTURE

This section of the HASP describes the lines of authority, responsibility and communication as they pertain to health and safety functions at the Site. The purpose of this chapter is to identify the personnel who impact the development and implementation of the HASP and to describe their roles and responsibilities. This chapter also identifies other contractors and subcontractors involved in work operations and establish the lines of communications among them for health and safety matters. The organizational structure described in this chapter is consistent with the requirements of 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

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

2.1.1 Corporate Health and Safety Director

The Benchmark Corporate Health and Safety Director is ***Mr. Thomas H. Forbes, P.E.*** The Corporate Health and Safety Director responsible for developing and implementing the Health and Safety program and policies for Benchmark 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 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 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 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 ***Ms. Lori Riker***. The qualified alternate SSHO is ***Mr. Bryan Mayback.*** The SSHO reports to the Project Manager. The SSHO is on-site or readily accessible to the Site during work operations and has the authority to halt Site work if unsafe conditions are detected. The specific responsibilities of the SSHO are:

- Managing the safety and health functions for Benchmark personnel on the Site.
- Serving as the point of contact for safety and health matters.
- Ensuring that Benchmark field personnel working on the Site have received proper training (per 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

In addition to Benchmark 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 Contractors 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, groundwater, and sub-slab vapors. 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) due to historic use as a petroleum refinery. 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. **Petroleum Hydrocarbons:**

   - **1,2,4-Trimethylbenzene (CAS #95-63-6)** is a common gasoline additive. Acute exposure predominantly results in skin irritation and inhalation causes chemical pneumonitis. Symptoms include headache, dizziness, fatigue, muscular weakness, drowsiness.

   - **1,3,5-Trimethylbenzene (CAS #108-67-8)** is a colorless, odorless flammable liquid. The substance is irritating to the eyes, the skin and the respiratory tract . If this liquid is swallowed, aspiration into the lungs may result in chemical pneumonitis. The substance may cause effects on the central nervous system.

- **Isopropylbenzene (CAS #98-82-8)** is a colorless, gasoline-like odor flammable liquid. Acute exposure typically results in irritation of the eyes, mucous membranes and upper respiratory tract. Can be absorbed through the skin. Possible central nervous system depressant. Symptoms may include irritation, dizziness, nausea, lack of coordination and narcosis.

- **N-Propylbenzene (CAS #103-65-1)** is a colorless to pale yellow flammable liquid. Inhalation or contact may irritate or burn skin and eyes. In case fire, smoke-vapor may produce irritating, corrosive and/or toxic gases. Vapors may cause dizziness or suffocation.

- **Ethylbenzene (CAS #100-41-4)** is a component of automobile gasoline. Over-exposure may cause kidney, skin liver and/or respiratory disease. Signs of exposure may include dermatitis, irritation of the eyes and mucus membranes, headache. Narcosis and coma may result in more severe cases.

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

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

2. **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 IRM 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

IRM field activities at the 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 IRM operations 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

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

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

5.0 MEDICAL MONITORING

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

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

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

- Occupational/medical history review.
- Physical exam, including vital sign measurement.
- Spirometry testing.
- Eyesight testing.
- Audio testing (minimum baseline and exit, annual for employees routinely exposed to greater than 85db).
- EKG (for employees >40 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, Benchmark will maintain and preserve medical records for a period of 30 years following termination of employment. Employees are provided a copy of the physician's post-exam report, and have access to their medical records and analyses.

6.0 SAFE WORK PRACTICES

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

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

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

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

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

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

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

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

OSHA requires the use of certain PPE under conditions where an immediate danger to life and health (IDLH) may be present. Specifically, OSHA 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 exist 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

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

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

8.1.2 Off-Site Community Air Monitoring

In addition to on-Site monitoring within the work zone(s), 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 in the Generic Community Air Monitoring Plan and attached as Appendix C. Ground intrusive activities include soil/piping 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 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 Benchmark personnel:

- Total atmospheric concentrations of unidentified vapors or gases ranging from 0 to 1 ppm above background on the PID) - Continue operations under Level D (see Appendix A).

- Total atmospheric concentrations of unidentified vapors or gases yielding sustained readings from >1 ppm to 5 ppm above background on the PID (vapors not suspected of containing high levels of chemicals toxic to the skin) - Continue operations under Level C (see Appendix A).

- Total atmospheric concentrations of unidentified vapors or gases yielding sustained readings of >5 ppm to 50 ppm above background on the PID - Continue operations under Level B (see Attachment 1), re-evaluate and alter (if possible) construction methods to achieve lower vapor concentrations.

- Total atmospheric concentrations of unidentified vapors or gases above 50 ppm on the PID - Discontinue operations and exit the work zone immediately.

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

- Less than 50 mg/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 from the field equipment will be recorded and documented on the appropriate Project Field Forms. 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 Benchmark personnel on-site, the following criteria shall also be adhered to for the protection of downwind receptors consistent with NYSDOH requirements (Appendix C):

- **ORGANIC VAPOR PERIMETER MONITORING:**
  - If the sustained ambient air concentration of organic vapors at the downwind perimeter of the exclusion zone exceeds 5 ppm above background for the 15-minute average, work activities will be temporarily halted and monitoring continued. If the sustained organic vapor decreases below 5 ppm over background, work activities can resume with continued monitoring.
  - If the sustained ambient air concentration of organic vapors at the downwind perimeter of the exclusion zone are greater than 5 ppm over background but less than 25 ppm for the 15-minute average, activities can resume provided that: the organic vapor level 200 feet downwind of the working site or half the distance to the nearest off-site residential or commercial structure, whichever

is less, but in no case less than 20 feet, is below 5 ppm over background; and more frequent intervals of monitoring, as directed by the Site Health and Safety Officer, are conducted.

- If the sustained organic vapor level is above 25 ppm at the perimeter of the exclusion zone for the 15-minute average, the Site Health and Safety Officer must be notified and work activities shut down. The Site Health and Safety Officer will determine when re-entry of the exclusion zone is possible and will implement downwind air monitoring to ensure vapor emissions do not impact the nearest off-site residential or commercial structure at levels exceeding those specified in the ***Organic Vapor Contingency Monitoring Plan*** below. All readings will be recorded and will be available for New York State Department of Environmental Conservation (DEC) and Department of Health (DOH) personnel to review.

o **ORGANIC VAPOR CONTINGENCY MONITORING PLAN:**

- If the sustained organic vapor level is greater than 5 ppm over background 200 feet downwind from the work area or half the distance to the nearest off-site residential or commercial property, whichever is less, all work activities must be halted.

- If, following the cessation of the work activities or as the result of an emergency, sustained organic levels persist above 5 ppm above background 200 feet downwind or half the distance to the nearest off-site residential or commercial property from the work area, then the air quality must be monitored within 20 feet of the perimeter of the nearest off-site residential or commercial structure (20-foot zone).

- If efforts to abate the emission source are unsuccessful and if sustained organic vapor levels approach or exceed 5 ppm above background within the 20-foot zone for more than 30 minutes, or are sustained at levels greater than 10 ppm above background for longer than one minute, then the ***Major Vapor Emission Response Plan*** (see below) will automatically be placed into effect.

o **MAJOR VAPOR EMISSION RESPONSE PLAN:**

Upon activation, the following activities will be undertaken:

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

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

3. Frequent air monitoring will be conducted at 30-minute intervals within the 20-foot zone. If two (2) sustained successive readings below action levels are measured, air monitoring may be halted or modified by the Site Health and Safety Officer.

The following personnel are to be notified in the listed sequence 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.

- **AIRBORNE PARTICULATE COMMUNITY AIR MONITORING**

  Respirable (PM-10) particulate monitoring will be performed on a continuous basis at the upwind and downwind perimeter of the exclusion zone. The monitoring will be performed using real-time monitoring equipment capable of measuring PM-10 and integrating over a period of 15-minutes for comparison to the airborne particulate action levels. The equipment will be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration will be visually assessed during all work activities. All readings will be recorded and will be available for NYSDEC and NYSDOH review. Readings will be interpreted as follows:

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

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

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

9.0 SPILL RELEASE/RESPONSE

This chapter of the HASP describes the potential for and procedures related to spills or releases of known or suspected petroleum and/or hazardous substances on the Site. The purpose of this Section of the HASP is to plan appropriate response, control, countermeasures 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 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:

- The Environmental Service Group of NY, Inc.: (716) 695-6720
- Environmental Products and Services, Inc.: (716) 447-4700
- Op-Tech: (716) 873-7680

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

10.1 Heat Stress Monitoring

Personal protective equipment may place an employee at risk of developing heat stress, a common and potentially serious illnesses often encountered at construction, landfill, waste disposal, industrial or other unsheltered sites. The potential for heat stress is dependent on 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 Benchmark employee will be permitted to continue wearing semi-permeable or impermeable garments when his/her oral temperature exceeds 100.6 degrees Fahrenheit.

10.2 Cold Stress Monitoring

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

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

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

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

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

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

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

4) Bodily freezing

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

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

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

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

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

- Education of workers to recognize the symptoms of frostbite and hypothermia.
- Workers should dress warmly, with more layers of thin clothing as opposed to one thick layer.
- Personnel should remain active and keep moving.
- Personnel should be allowed to take shelter in a heated 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 employees and other Site users by the SSHO. It shall be each Contractor's Site Safety and Health Officer's responsibility to ensure that Site workers are aware of the work zone boundaries and to enforce proper procedures in each area. The zones will include:

- Exclusion Zone ("Hot Zone") - The area where contaminated materials may be exposed, excavated or handled and all areas where contaminated equipment or personnel may travel. Flagging tape will delineate the zone. Personnel entering the Exclusion Zone must wear the prescribed level of personal protective equipment identified in Section 7.

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

- Support Zone - The part of the site that is considered non-contaminated or "clean." Support equipment will be 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 investigation and construction activities involving disruption or handling of Site soils or groundwater:

- Exclusion Zone: 50 foot radius from the outer limit of the sampling/construction activity.

- Contaminant Reduction Zone: 100 foot radius from the outer limit of the sampling/construction activity.

- Support Zone: Areas outside the Contaminant Reduction Zone.

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

The SSHO will maintain a Health and Safety Logbook containing the names of Benchmark workers and their level of protection. The zone boundaries may be changed by the SSHO as environmental conditions warrant, and to respond to the necessary changes in work locations on-site.

12.0 DECONTAMINATION

12.1 Decontamination for Benchmark Employees

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

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

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

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

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

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

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

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

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

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

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

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

13.0 CONFINED SPACE ENTRY

OSHA 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 Benchmark employees is not anticipated to be necessary to complete the IRM 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 Benchmark employees cannot be avoided through reasonable engineering measures, task-specific confined space entry procedures will be developed and a confined-space entry permit will be issued through Benchmark's corporate Health and Safety Director. Benchmark employees shall not enter a confined space without these procedures and permits in place.

14.0 FIRE PREVENTION AND PROTECTION

14.1 General Approach

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

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

14.2 Equipment and Requirements

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

14.3 Flammable and Combustible Substances

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

14.4 Hot Work

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

15.0 EMERGENCY INFORMATION

In accordance with OSHA 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 1.

16.0 REFERENCES

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

TABLES

TABLE 1

TOXICITY DATA FOR CONSTITUENTS OF POTENTIAL CONCERN

2424 Hamburg Turnpike Site
Lackawanna, New York

Parameter	**Synonyms**	**CAS No.**	**Code**	**Concentration Limits** [1]		
				PEL	**TLV**	**IDLH**
Volatile Organic Compounds (VOCs): ppm						
Benzene	Benzol, Phenyl hydride	71-43-2	Ca	1	0.5	500
Ethylbenzene	Ethylbenzol, Phenylethane	100-41-4	*none*	100	100	800
Toluene	Methyl benzene, Methyl benzol	108-88-3	C-300	200	50	500
Xylene, Total	o-, m-, p-isomers	1330-20-7	*none*	100	100	900
Semi-volatile Organic Compounds (SVOCs) [2] ***: ppm***						
Acenaphthene	*none*	83-32-9	*none*	--	--	--
Acenaphthylene	*none*	208-96-8	*none*	--	--	--
Anthracene	*none*	120-12-7	*none*	--	--	--
Benzo(a)anthracene	*none*	56-55-3	*none*	--	--	--
Benzo(a)pyrene	*none*	50-32-8	*none*	--	--	--
Benzo(b)fluoranthene	*none*	205-99-2	*none*	--	--	--
Benzo(ghi)perylene	*none*	191-24-2	*none*	--	--	--
Benzo(k)fluoranthene	*none*	207-08-9	*none*	--	--	--
Chrysene	*none*	218-01-9	*none*	--	--	--
Dibenzo(a,h)anthracene	*none*	53-70-3	*none*	--	--	--
Fluoranthene	*none*	206-44-0	*none*	--	--	--
Fluorene	*none*	86-73-7	*none*	--	--	--
Indeno(1,2,3-cd)pyrene	*none*	193-39-5	*none*	--	--	--
Naphthalene	Naphthalin, Tar camphor, White tar	91-20-3	*none*	10	10	250
Phenanthrene	*none*	85-01-8	*none*	--	--	--
Pyrene	*none*	129-00-0	*none*	--	--	--

Notes:

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

Explanation:
Ca = NIOSH considers constituent to be a potential occupational carcinogen.
C-## = Ceiling Level equals the maximum exposure concentration allowable during the work day.
IDLH = Immediately Dangerous to Life or Health.
ND indicates that an IDLH has not as yet been determined.
TLV = Threshold Limit Value, established by American Conference of Industrial Hygienists (ACGIH), equals the maximum exposure concentration allowable for 8 hours/day @ 40 hours/week.
TLVs are the amounts of chemicals in the air that almost all healthy adult workers are predicted to be able to tolerate without adverse effects. There are three types.
TLV-TWA (TLV-Time-Weighted Average) which is averaged over the normal eight-hour day/forty-hour work week. (Most TLVs.)
TLV-STEL or Short Term Exposure Limits are 15 minute exposures that should not be exceeded for even an instant. It is not a stand alone value but is accompanied by the TLV-TWA.
TLV-C or Ceiling limits are the concentration that should not be exceeded during any part of the working exposure.
Unless the initials "STEL" or "C" appear in the Code column, the TLV value should be considered to be the eight-hour TLV-TWA.
PEL = Permissible Exposure Limit, established by OSHA, equals the maximium exposure conconcentration allowable for 8 hours per day @ 40 hours per week

TABLE 2

POTENTIAL ROUTES OF EXPOSURE TO THE CONSTITUENTS OF POTENTIAL CONCERN

2424 Hamburg Turnpike Site
Lackawanna, New York

Activity [1]	Direct Contact with Soil/Fill	Inhalation of Vapors or Dust	Direct Contact with Groundwater
IRM Tasks			
1. Lift Removal	x	x	
2. Soil Excavation	x	x	x
3. Subsurface Soil Sampling	x	x	x

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

TABLE 3

REQUIRED LEVELS OF PROTECTION FOR RI TASKS

2424 Hamburg Turnpike Site
Lackawanna, New York

Activity	Respiratory Protection [1]	Clothing	Gloves [2]	Boots [2, 3]	Other Required PPE/Modifications [2, 4]
IRM Tasks					
1. Lift Removal	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	HH SGSS
2. Soil Excavation	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	SGSS
3. Subsurface Soil Sampling	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	HH SGSS

Notes:

1. Respiratory equipment shall conform to guidelines presented in Section 7.0 of this HASP. The Level C requirement is an air-purifying respirator equiped with organic compound/acid gas/dust cartridge.
2. HH = hardhat; L= Latex; L/N = latex inner glove, nitrile outer glove; N = Nitrile; S = Saranex; SG = safety glasses; SGSS = safety glasses with sideshields; STSS = steel toe safety shoes.
3. Latex outer boot (or approved overboot) required whenever contact with contaminated materials may occur. SSHO may downgrade to STSS (steel-toed safety shoes) if contact will be limited to cover/replacement soils.
4. Dust masks shall be donned as directed by the SSHO (site safety and health officer) or site safety technician whenever potentially contaminated airborne particulates (i.e., dust) are present 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\Benchmark\2424 Hamburg Turnpike, LLC\HASP\Figure 1; Site Location and Vicinity Map.dwg

FIGURE 1

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BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

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

PROJECT NO.: 0345-015-001

DATE: DECEMBER 2015

DRAFTED BY: KRR

SITE LOCATION & VICINITY MAP

HEALTH AND SAFTEY PLAN

2424 HAMBURG TURNPIKE SITE

LACKAWANNA, NEW YORK

PREPARED FOR

2424 HAMBURG TURNPIKE, LLC

DISCLAIMER:
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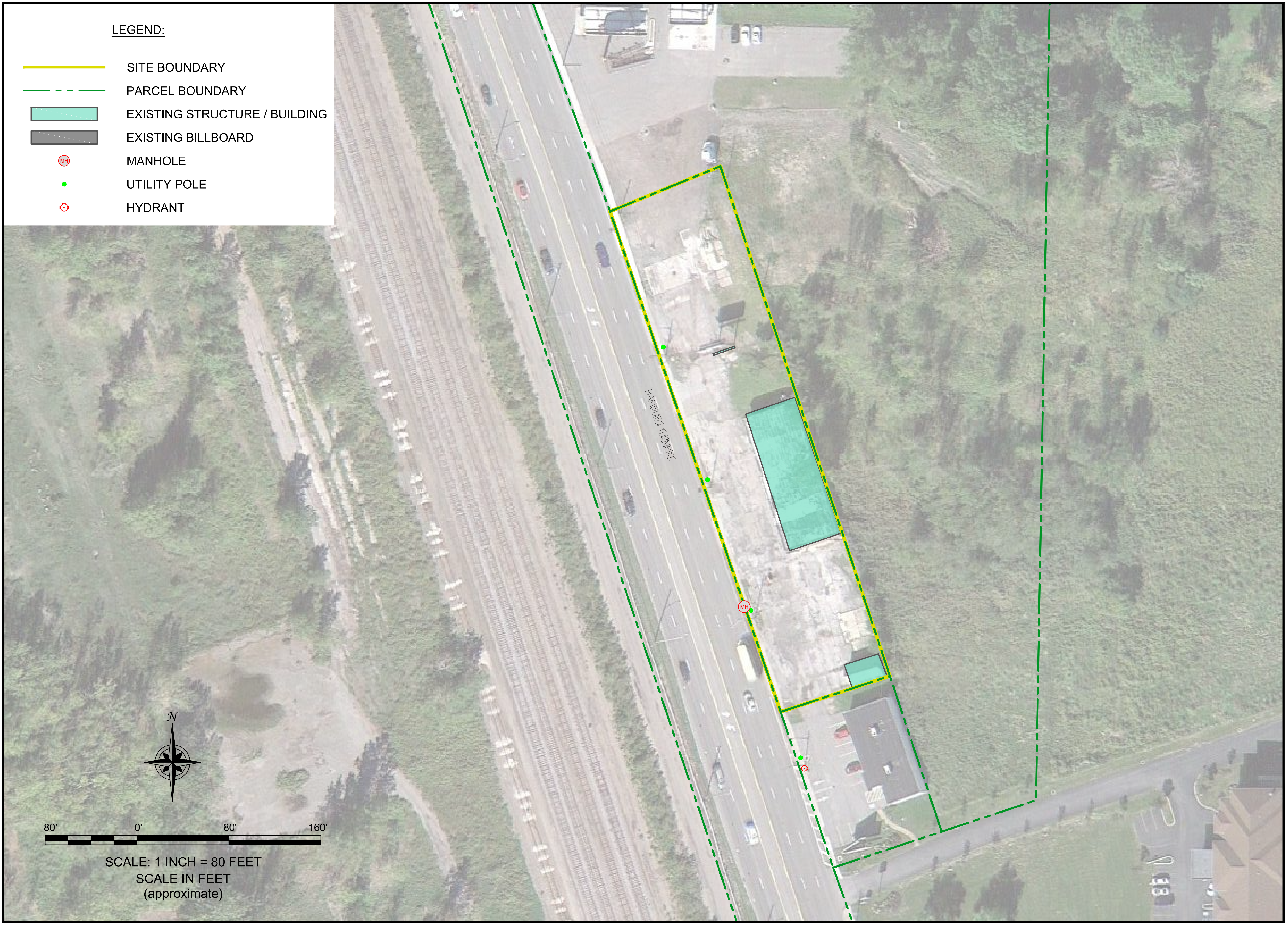
F:\CAD\Benchmark\2424 Hamburg Turnpike, LLC\HASP\Figure 2; Site Plan.dwg



DATE: DECEMBER 2015
DRAFTED BY: KRR

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JOB NO.: 0345-015-001

SITE PLAN

HEALTH AND SAFETY PLAN
2424 HAMBURG TURNPIKE SITE
LACKAWANNA, NEW YORK
PREPARED FOR
2424 HAMBURG TURNPIKE, LLC

FIGURE 2

ATTACHMENT A

EMERGENCY RESPONSE PLAN

EMERGENCY RESPONSE PLAN for BROWNFIELD CLEANUP PROGRAM IRM ACTIVITIES

2424 HAMBURG TURNPIKE SITE
LACKAWANNA, NEW YORK

December 2015 0345-015-001

Prepared for:

2424 HAMBURG TURNPIKE, LLC

2424 HAMBURG TURNPIKE SITE
HEALTH AND SAFETY PLAN FOR IRM ACTIVITIES
APPENDIX A: EMERGENCY RESPONSE PLAN

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LIST OF FIGURES

1.0 GENERAL

This report presents the site-specific Emergency Response Plan (ERP) referenced in the Site Health and Safety Plan (HASP) prepared for Interim Remedial Measures (IRM) activities at the 2424 Hamburg Turnpike Site in Lackawanna, 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.

<u>Type of Emergency</u>:
1. Medical, due to physical injury

<u>Source of Emergency</u>:
1. Slip/trip/fall

<u>Location of Source</u>:
1. Non-specific

3.0 ON-SITE EMERGENCY RESPONSE EQUIPMENT

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

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

Emergency Equipment	Quantity	Location
First Aid Kit	1	Site Vehicle
Chemical Fire Extinguisher	2 (minimum)	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: emergency evacuation routes, a place of refuge, an assembly point, and the locations of key site emergency equipment. Site zone boundaries will be shown to alert responders to known areas of contamination. There are no major topographical features, however the direction of prevailing winds/weather conditions that could affect emergency response planning are also marked on the map. The map will be posted at site-designated place of refuge and inside the Benchmark personnel field vehicle.

5.0 EMERGENCY CONTACTS

The following identifies the emergency contacts for this ERP.

Emergency Telephone Numbers:

Project *Manager: Michael Lesakowski*
Work: (716) 856-0599
Mobile: (716) 848-0599

Corporate Health and Safety Director: *Thomas H. Forbes, P.E..*
Work: (716) 856-0599
Mobile: (716) 983-3143

Site Safety and Health Officer (SSHO): *Lori Riker, P.E.*
Work: (716) 856-0635
Mobile: (716) 870-1165

Alternate SSHO: *Bryan Mayback*
Work: (716) 856-0635
Mobile: (716) 289-1072

BUFFALO MERCY HOSPITAL (ER):	(716) 826-7000
FIRE:	911
AMBULANCE:	911
BUFFALO POLICE:	911
STATE EMERGENCY RESPONSE HOTLINE:	(800) 457-7362
NATIONAL RESPONSE HOTLINE:	(800) 424-8802
NYSDOH:	(716) 847-4385
NYSDEC:	(716) 851-7220
NYSDEC 24-HOUR SPILL HOTLINE:	(800) 457-7252

The Site location is:

2424 Hamburg Turnpike
Lackawanna, New York 14218
Site Phone Number: (Insert Cell Phone or Field Trailer): ____________________

6.0 EMERGENCY ALERTING & EVACUATION

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

Personnel exiting the site will gather at a designated assembly point. To determine that everyone has successfully exited the site, personnel will be accounted for at the assembly site. If any worker cannot be accounted for, notification is given to the SSHO (***Lori Riker*** or ***Bryan Mayback***) 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 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 Hospital.

- Ingestion: Decontaminate and transport to Hospital.

Personal Injury:

Minor first-aid will be applied on-site as deemed necessary. In the event of a life threatening injury, the individual should be transported to Hospital via ambulance. The 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 Mercy Hospital (see Figure 1):

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

- Travel north along Hamburg Turnpike (Route 5) (1.5 miles)
- Travel east along Ridge Road (2.5 miles)
- Turn left onto Abbott Road (1.5 miles)
- Hospital on the left (565 Abbott Road)

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:

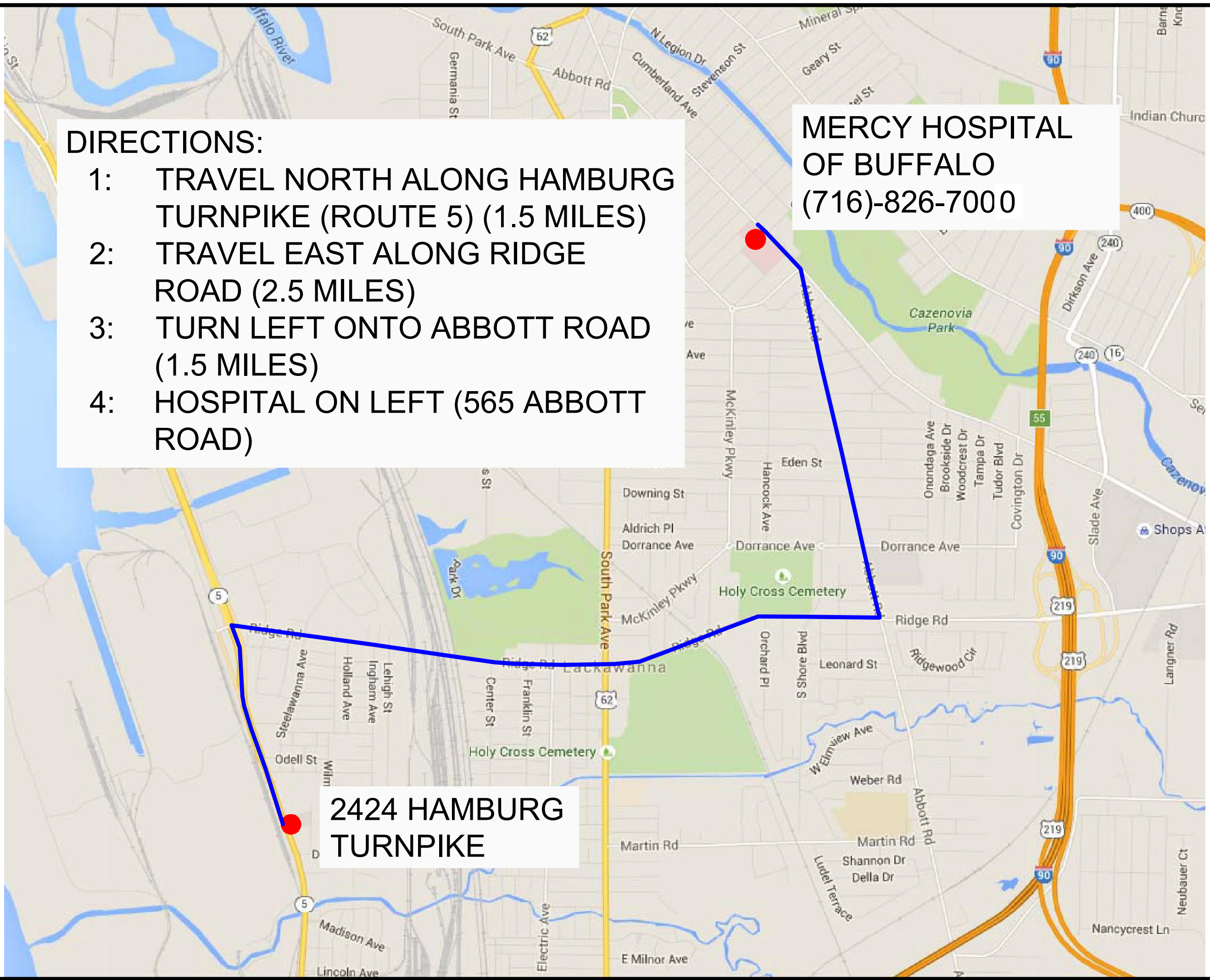
- Occupational injuries and illnesses.
- Accident investigations.
- Reports to insurance carrier or State compensation agencies.
- Reports required by the client.
- Records and reports required by local, state, federal and/or international agencies.
- Property or equipment damage.
- Third party injury 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\Benchmark\2424 Hamburg Turnpike, LLC\HASP\Figure A-1; Hospital Rout Map.dwg



DIRECTIONS:

1: TRAVEL NORTH ALONG HAMBURG TURNPIKE (ROUTE 5) (1.5 MILES)

2: TRAVEL EAST ALONG RIDGE ROAD (2.5 MILES)

3: TURN LEFT ONTO ABBOTT ROAD (1.5 MILES)

4: HOSPITAL ON LEFT (565 ABBOTT ROAD)

MERCY HOSPITAL
OF BUFFALO
(716)-826-7000

2424 HAMBURG
TURNPIKE

N

SCALE : 1" - 4000'

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

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

PROJECT NO.: 0345-015-001

DATE: DECEMBER 2015

DRAFTED BY: KRR

HOSPITAL ROUTE MAP

HEALTH AND SAFETY PLAN

2424 HAMBURG TURNPIKE SITE

LACKAWANNA, NEW YORK

PREPARED FOR

2424 HAMBURG TURNPIKE, LLC

FIGURE A-1

ATTACHMENT B

HOT WORK PERMIT FORM

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HOT WORK PERMIT

PART 1 - INFORMATION

Issue Date:

Date Work to be Performed: Start: Finish (permit terminated):

Performed By:

Work Area:

Object to be Worked On:

PART 2 - APPROVAL

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

Will working be on or in: Finish (permit terminated):

1. Metal partition, wall, ceiling covered by combustible material? yes no
2. Pipes, in contact with combustible material? yes no
3. Explosive area? yes no

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

PART 3 - REQUIRED CONDITIONS**

(Check all conditions that must be met)

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

Other precautions:

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

SIGNATURES

Orginating Employee: Date:

Project Manager: Date:

Part 2 Approval: Date:

ATTACHMENT C

NYSDOH GENERIC COMMUNITY AIR MONITORING PLAN

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 D

PROJECT DOCUMENTATION FORMS

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INSPECTOR'S DAILY REPORT

	Page		of

CONTRACTOR:	JOB NO.:
CLIENT:	DATE:

LOCATION:		DAY: Su M Tu W Th F Sa	
WEATHER:	TEMP: °F	START:	END:

WORK PERFORMED:

TEST PERFORMED:	QA PERSONNEL:
	SIGNATURE:

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INSPECTOR'S DAILY REPORT

(CONTINUED)

Page ___ of ___

CONTRACTOR:	JOB NO.:
CLIENT:	DATE:

MEETINGS HELD & RESULTS:

CONTRACTOR'S WORK FORCE AND EQUIPMENT

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

REMARKS:

REFERENCES TO OTHER FORMS:

SAMPLES COLLECTED:

Sample Number:

Approx. Location of Stockpile:

No. of Stockpile

Date of Collection:

Weather:

Field Observations:

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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

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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

APPENDIX E

ELECTRONIC COPY