

July 20, 2018

Mr. Jaspal Walia, P.E.
Environmental Engineer II
New York State Department of Environmental Conservation
Division of Environmental Remediation
270 Michigan Avenue
Buffalo, New York 14203

Re: Queen City Landing (BCP Site: 915304)
Remedial Action Work Plan

Dear Mr. Walia:

On behalf of our client, Queen City Landing, LLC (QCL), Benchmark Environmental Engineering & Science, PLLC (Benchmark) has prepared this Remedial Action Work Plan (RAWP) to provide New York State Department of Environmental Conservation (NYSDEC or Department) the scope of work and procedures for completion of planned remedial activities at 975 and 1005 Fuhrmann Boulevard in the City of Buffalo, New York (Site; see Figures 1 and 2). The RAWP was prepared in accordance with the approved Alternatives Analysis Report¹ (AAR) and the NYSDEC prepared and approved Decision Document² (DD).

The remedial activities will be completed by remedial construction contractors under contract to QCL and/or Benchmark and will be completed in general accordance with 6NYCRR Part 375 and NYSDEC DER-10 guidelines.

SITE BACKGROUND

The Site is proposed to be redeveloped with a mixed residential/commercial use structure. While the Site is now vacant, it was previously occupied by a large manufacturing building, a small office building, two connected parking lots, and a former water treatment facility. The approximately 7.72-acre parcel has a significant amount of fill present that was historically placed into the Outer Harbor to facilitate shipping access. Therefore, the majority of the Site is surrounded by Lake Erie (Buffalo Outer Harbor) and comprised of made-land consisting of construction/structural and urban fill materials.

Demolition of the existing structures occurred to facilitate the performance of the RI under the building and redevelopment of the Site. Redevelopment will include the construction of

¹ "Alternative Analysis Report, Queen City Landing Site, 975 & 1005 Fuhrmann Boulevard, Buffalo, New York. BCP Site No. C915304". Prepared for Queen City Landing LLC. Prepared by Benchmark Environmental Engineering and Science, PLLC. May 2018.

² "Decision Document, Queen City Landing, Brownfield Cleanup Program, Buffalo, Erie County, Site No. C915304. Prepared by NYSDEC. June 2018.

a new multi-story apartment building; covered parking area for residents; surface parking for visitors; roadway; and concrete walkway providing public waterfront access. Commercial use (restaurants) are also planned for construction within the building.

An Interim Remedial Measures (IRM) was completed at the Site from August 2017 through October 2017 which involved the removal of three (3) USTs present in the northwestern portion of the Site and approximately 4,956 tons of associated petroleum contamination (see Figure 3). The IRM was documented in the Benchmark IRM Report³ which was submitted to NYSDEC.

In September 2017 and December 2017, additional investigation activities were completed at the request of NYSDEC to address data validation issues associated with VOC data generated from the initial investigation completed by others and to delineate areas where elevated SVOCs and metals were present. The delineation work was done under an NYSDEC-approved Additional Hotspot Sampling & Soil Disposal Work Plan⁴. The September and December 2017 activities were documented in Benchmark's Remedial Investigation Report⁵. Benchmark's NYSDEC-approved AAR outlined the remedial action objectives (RAOs) and remedial activities for the Site which are discussed below.

REMEDIAL ACTION OBJECTIVES

In developing the RAOs, consideration was given to the reasonably anticipated future use of the Site (i.e., restricted-residential use) and the applicable Standards, Criteria, and Guidance (SCGs). Accordingly, the appropriate RAOs for the Site have been defined as:

Soil/Fill RAOs

RAOs for Public Health Protection

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

RAOs for Environmental Protection

- Prevent migration of contaminants that would result in groundwater or surface water contamination.
- Prevent impacts to biota from ingestion/direct contact with soil/fill causing toxicity or impacts from bioaccumulation through the terrestrial food chain.

³ "Interim Remedial Measures Report, Petroleum Contamination Cleanup, Queen City Landing Site, BCP Site No. C915304, 975 and 1005 Fuhrmann Boulevard, Buffalo, New York (Site)". Prepared for Queen City Landing LLC. Prepared by Benchmark Environmental Engineering and Science, PLLC. January 25, 2018.

⁴ "Additional Hotspot Sampling & Soil Disposal Work Plan, Queen City Landing, BCP Site No. C915304". Prepared for NYSDEC. Prepared by Benchmark Environmental Engineering and Science, PLLC. December 7, 2017.

Groundwater RAOs

RAOs for Public Health Protection

- Prevent ingestion of groundwater containing contaminant levels exceeding drinking water standards.
- Prevent contact with, or inhalation of volatiles, from contaminated groundwater.

RAOs for Environmental Protection

- Restore groundwater aquifer to pre-disposal/pre-release conditions, to the extent practicable.
- Prevent the discharge of contaminants to surface water.
- Remove the source of groundwater contamination.

PROJECT ORGANIZATION AND RESPONSIBILITIES

QCL was accepted into the BCP as a non-responsible party (volunteer) per ECL§27-1405. Benchmark will oversee the brownfield cleanup on behalf of QCL. The NYSDEC Division of Environmental Remediation (Region 9), in consultation with the New York State Department of Health (NYSDOH) shall monitor the remedial actions to verify that the work is performed in accordance with the Brownfield Cleanup Agreement, the approved RAWP, and NYSDEC DER-10 guidance.

PRE-REMEDATION TASKS

Underground Utilities Location

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

Health and Safety Plan Development

A Health and Safety Plan (HASP) was prepared for on-site remedial activities. Benchmark will be responsible for the health and safety of its authorized site workers. Benchmark-TurnKey's HASP is provided for informational purposes in Attachment 1. The remediation contractor will be required to develop a HASP as or more stringent than Benchmark's HASP.

⁵ "Remedial Investigation Report, Queen City Landing Site, 975 & 1005 Fuhrmann Boulevard, Buffalo, New York. BCP Site No. C915304". Prepared for Queen City Landing LLC. Prepared by Benchmark Environmental Engineering and Science, PLLC. May 2018.

Mobilization and Site Preparation

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

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

Access Controls

Public access to the Site is deterred by a chain-link fence which surrounds to Site except for areas adjacent to Lake Erie, which would require boat access. Work areas will be determined based on the planned remedial activities and may be changed throughout the work day to ensure safe operations. Access control will consider site worker and general public safety, and owner access requirements.

Dust Monitoring and Controls

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

Real-time community air monitoring will be performed during intrusive remedial activities at the Site. A CAMP is included with Benchmark's HASP. Particulate and VOC monitoring will be performed along the downwind perimeter of the work area during excavation, grading and soil/fill handling activities in accordance with this plan. Upwind concentrations will be field monitored at the start and periodically throughout the work day. However, Benchmark uses a conservative approach to CAMP and assumes that the upwind concentrations of volatile organics and particulates are zero when performing CAMP. CAMP action levels are set at 5 ppm for total volatile organics and 100 ug/m³ for particulates and are based on downwind concentrations.

Monitoring locations will be evaluated throughout the work day, as described in the CAMP. The CAMP is consistent with the requirements for community air monitoring at remediation sites as established by the New York State Department of Health (NYSDOH) and NYSDEC. Accordingly, it follows procedures and practices outlined under NYSDEC's DER-10 (May 2010) Appendix 1A (NYSDOH's Generic Community Air Monitoring Plan) and Appendix 1B (Fugitive Dust and Particulate Monitoring). CAMP monitoring will occur during all ground intrusive activities prior

to the installation of the cover system, and will include soil/fill excavations, soil/fill handling and grading, test pits, trenching, generation of soil/fill stockpiles or loading of soil/fill stockpiles. CAMP monitoring will also be conducted when future intrusive activities penetrate the 2-foot soil cover system or hardscape cover system noted by the breach of the demarcations layer that will be installed.

During soil cover system placement using NYSDEC-approved imported material, daily field inspections will be made to verify that visible dust is controlled, and measurements will be made with a handheld particulate monitor (TSI AM 510 monitor or equivalent) to verify particulate levels are acceptable.

REMEDIAL ACTIVITIES

As outlined in the NYSDEC-approved AAR and DD, a Track 4 Restricted-Residential Cleanup has been selected as the remedial alternative for the Site. The remedial actions involved with this alternative include the following:

- Removal and proper landfill disposal of the PAH-impacted soil/fill present at Boundary-SS2, estimated at less than 5 cubic yards (see Figure 3).
- Removal and proper landfill disposal of the soil/fill stockpile present in the vicinity of F6, estimated at 240 to 280 tons (see Figure 3).
- Removal and proper landfill disposal of petroleum-impacted soil/fill present in the vicinity of D7, estimated at 300 cubic yards (see Figure 3).
- Confirmatory samples will be collected from these removal activities to confirm the remedial actions have meet the remedial objectives.
- Backfilling of the excavation with material that will meet the requirements of 6NYCRR Part 375-6.7(d) or otherwise NYSDEC-approved material (e.g., crushed concrete greater than 1/8-inch from processing of the former on-site building).

To meet the final grades of the redevelopment plan, the Site grades will need to be raised across the majority of the Site. The Site grades will be raised using existing on-site processed concrete (greater than 1/8-inch in size); existing soil/fill from the northern, southern, and eastern areas that will be excavated along the perimeter of the Site to create space for 2-feet of compliant soil cover or for the concrete walkway and retaining wall; or imported soil/fill material meeting the requirements of 6NYCRR Part 375-6.7(d). The excavated soil /fill material that cannot be reused on-site underneath the 2-foot soil/fill will be disposed off-site at a commercial sanitary landfill.

The cover system will be DER-10 compliant and consist of a 2-foot soil/stone cover system across most of the Site and a concrete walking path and sidewall stabilizing retaining wall (to stabilize fill remaining at depth and protect from erosion and/or sidewall collapse) along the southern portion. A demarcation layer

(e.g., orange plastic netting) will be installed beneath the cover system that will be installed to meet the existing Site grades along the northern and eastern boundaries of the Site.

The proposed cover system is shown on Figure 4 and a conceptual grading plan is shown on Figure 5.

- Preparation and implementation of a Site Management Plan (SMP). The SMP will include the following components: IC/EC Plan; Operations and Maintenance (O&M) Plan; Excavation Work Plan; Site Monitoring Plan; and Environmental Easement.
- Filing an Environmental Easement (EE) with Erie County, which was done on August 30, 2017.

The cleanup criteria for the remedial actions are as follows:

- 6NYCRR Part 375 Restricted Residential Soil Cleanup Objectives (RRSCOs) for soil/fill present in the upper 2 feet of the Site;
- Arsenic - 24 mg/kg;
- Lead - 1,000 mg/kg;
- Chromium – 1,500 mg/kg; and
- Manganese – 10,000 mg/kg.

The soil/fill excavated as part of the remedial activities will be taken to the Tonawanda Landfill for disposal as non-hazardous soil/fill. The waste characterization samples were collected in December 2017, as part of the additional investigation activities completed in December 2017. A waste profile was submitted to the landfill and the material was approved for disposal.

POST-EXCAVATION CONFIRMATORY SAMPLING

As discussed above, there are three (3) soil/fill areas to be addressed as part of the remedial activities that will require soil/fill removal and post-excavation confirmatory sampling. The areas and proposed sampling parameters are as follows:

PAH-impacted Soil/Fill Present at Boundary-SS2

Post-excavation confirmatory samples will be collected from the excavated area and will include sidewalls and bottom to confirm the excavation limits have achieved the RRSCOs or to document the contaminant levels remaining at the property line. A minimum of one (1) sample per 30 linear feet of sidewall and one (1) sample for each 900 square feet of excavation bottom will be collected. Confirmation samples will be analyzed by a NYSDOH ELAP certified analytical laboratory for Part 375 SVOCs via EPA Method 8270. A Category B deliverable package to facilitate data evaluation by a third-party validation expert will be provided.

Soil/Fill Stockpile Present in the Vicinity of F6

Once the existing stockpile is removed, post-excavation confirmatory samples will be collected from the ground surface in the former stockpile area. One (1) sample for each 900 square feet of stockpile footprint will be collected. Confirmation samples will be analyzed by a NYSDOH ELAP certified analytical laboratory for manganese and chromium via EPA Method 6010. A Category B deliverable package to facilitate data evaluation by a third-party validation expert will be provided.

Petroleum-impacted Soil/Fill Present in the Vicinity of D7

Post-excavation confirmatory samples will be collected from the excavated area and will include sidewalls and bottom to confirm the excavation limits have been achieved. A minimum of one (1) sample per 30 linear feet of sidewall and one (1) sample for each 900 square feet of excavation bottom will be collected. Confirmation samples will be analyzed by a NYSDOH ELAP certified analytical laboratory for TCL VOCs via EPA Method 8260 and Part 375 List SVOCs via EPA Method 8270 to confirm the petroleum contamination has been removed. A Category B deliverable package to facilitate data evaluation by a third-party validation expert will be provided.

OFF-SITE TRANSPORTATION AND DISPOSAL OF NON-HAZARDOUS SOIL/FILL

The transportation and disposal of soil/fill from the petroleum-, metals-, and PAH-impacted soil/fill materials generated will be taken to the Tonawanda Landfill for disposal as non-hazardous material. The soil/fill will be transported by licensed haulers. The landfill will provide waste manifests and disposal receipts, which will be submitted in the Final Engineering Report (FER).

ACCEPTABLE BACKFILL MATERIALS

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

- Gravel, rock, or stone, consisting of virgin material, from a permitted mine or quarry may be imported, without chemical testing, if it meets the requirements of DER-10, or as otherwise approved by NYSDEC.
- Recycled concrete greater than 1/8-inch in size, as outlined in the Crushed Concrete Management Plan Addendum⁶.
- Topsoil and clay soil stockpile from Quaker Crossing Plaza. A NYSDEC Request to Import form was submitted in September 2017 and approved by NYSDEC via email on October 3, 2017.
- Imported soil/fill originating from known off-site sources having no evidence of disposal or releases of hazardous substances, hazardous, toxic or radioactive wastes, or petroleum that meets the chemical criteria of Table 1. No off-site

⁶ Crushed Concrete Management Plan Addendum, Queen City Landing (BCP Site: 915304). Prepared for NYSDEC. Prepared by Benchmark Environmental Engineering and Science, PLLC. August 3, 2017.

materials meeting the definition of a solid waste as defined in 6NYCRR, Part 360-1.2(a) shall be used as backfill.

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

GROUNDWATER MANAGEMENT

Water removed from excavations and surface water run-in to excavations during the impacted soil removal will be managed on-site. In general, if water removal from excavations is necessary, it will be discharged on-site and allowed to infiltrate back in to the subsurface on-site. There will be no off-site discharge.

COVER SYSTEM INSTALLATION

A component of the remedy is the use of a cover system, as sampling results indicate that PAHs and metals are present in surface/near-surface soil/fill on-site above Part 375 RRSCOs. Therefore, placement of a cover system is a feasible engineering control to protect human health and the environment. The cover system will be comprised of:

- **Non-Vegetated Areas:** These areas consist of a concrete retaining wall and walking path in the southern portion of the Site.
- **Vegetated Areas:** A minimum of 24 inches of imported backfill, tested and determined to meet RRSCOs will be placed (Quaker Crossing Plaza stockpile). The uppermost approximate 6-inches should be comprised of topsoil capable of sustaining plant growth.
- **Demarcation Layer:** A demarcation layer (e.g., snow fence, plastic mesh, etc.) will be placed beneath the cover system where hardscape (concrete/asphalt) will not be present.

Figure 4 shows typical details of the cover system areas. Cover system thickness will be verified by pre- and post-cover construction elevation surveys.

EMERGENT CONTAMINANT SAMPLING

NYSDEC has requested that QCL complete the emergent contaminants sampling at the Site as part of the State-wide initiative to better understand the risk posed by 1,4-dioxane and per- and polyfluoroalkyl substances (PFAS). Benchmark proposes to conduct the emerging contaminant sampling as part of the remedial action on four (4) monitoring wells at the Site, MW-1, -4, -7, and -8, (see Figure 3).

Sampling equipment, components, and containers will be handled to avoid contact with aluminum foil, low density polyethylene (LDPE), glass, or polytetrafluoroethylene (PTFE, aka. teflon) materials including sample bottle cap liners with a Teflon layer. Clothing to be worn by sampling personnel will be laundered multiple times and will not contain PTFE

material (including GORE-TEX®) or that which has been waterproofed with perfluorinated compounds (PFC) materials.

Groundwater samples will be analyzed by an Environmental Laboratory Accreditation Program (ELAP) certified laboratory which will provide a Category B deliverable package for preparation of a Data Validation Usability Summary Report (DUSR) by a third party data validator.

Samples collected for 1,4-dioxine analysis will be collected into laboratory provided containers: two (2) 500 milliliter (ml) unpreserved amber bottles for each well location. The samples will be analyzed via EPA Method 8270 Selective Ion Monitoring (SIM) mode. The method detection limit (MDL) for the 1,4-dioxane analysis will be no higher than 0.28 micrograms per liter ($\mu\text{g}/\text{l}$), assuming there is no sample matrix interference. The samples have a holding time of 7 days till extraction and 40 days for the extract. Standard turnaround time will be used for the analysis.

Samples collected for PFAS analysis will be collected into laboratory provided containers: three (3) 250 ml plastic bottles preserved with Trizma for each well location. The samples will be analyzed via a modified EPA Method 537 to achieve reporting limits of 2 nanograms per liter (ng/l). The samples have a holding time of 14 days for analysis. Standard turnaround time will be used for the analysis.

The sample results will be tabularized and included provided to NYSDEC in a letter sampling report. An electronic data deliverable (EDD) will also be provided to NYSDEC. The detection limits will be provided within the table in lieu of “non-detect” or “ND” reporting. Any matrix interferences reported for the sampling will also be noted.

SITE MANAGEMENT PLAN

For any BCP site not cleaned up to NYSDEC Part 375 Unrestricted Use SCOs, preparation of a SMP that describes site-specific Institutional Controls and/or Engineering Controls (IC/EC) is a required component of the final remedy. Therefore, as part of the final remedy for the Site, a SMP will be prepared using the latest version of the NYSDEC template (currently August 2015). The site-specific SMP will include the requirement for performing a soil vapor intrusion investigation for any structure built on-site.

FINAL ENGINEERING REPORT

A Final Engineering Report (FER) will be prepared at the conclusion of remedial actions and cover system installation. The FER will be consistent with NYSDEC’s DER-10 requirements.

Benchmark will subcontract for third-party data review of post-excavation verification data by a qualified, independent data validation expert. Specifically, a Data Usability Summary Report (DUSR) will be prepared, with appropriate data qualifiers added to the results and provided with the FER.

CERTIFICATION

I, Thomas H. Forbes, certify that I am currently a NYS registered professional engineer and that this July 2014 Remedial Action Work Plan (RAWP) for the 300 Ohio Street Site (C915257) was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

7-20-18

Date



Please contact us if you have any questions, require additional information, or would like to discuss. QCL is anxious to begin the remedial activities.

Attachments

ec: Gerry Buchheit (QCL)
Craig Slater, Esq. (Slater Law Firm)
Chad Staniszewski (NYSDEC Region 9)

File: 0424-017-001-004

ATTACHMENT 1

Health & Safety Plan

SITE HEALTH AND SAFETY PLAN
for
BROWNFIELD CLEANUP PROGRAM
BCP ACTIVITIES

QUEEN CITY LANDING SITE

BUFFALO, NEW YORK

October 2017

0424-017-001

Prepared for:

QUEEN CITY LANDING, LLC

Prepared by:



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

**QUEEN CITY LANDING SITE
HEALTH AND SAFETY PLAN FOR RI ACTIVITIES**

ACKNOWLEDGEMENT

Plan Reviewed by (initial):

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

Project Manager: _____ Christopher Boron.

Designated Site Safety and Health Officer: _____ Christopher Boron

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
_____	_____	_____
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**QUEEN CITY LANDING SITE
HEALTH AND SAFETY PLAN FOR RI ACTIVITIES**

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ATTACHMENTS

Attachment A	Emergency Response Plan
Attachment B	Hot Work Permit Form
Attachment C	Community Air Monitoring Plan

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 and TurnKey Environmental Restoration, LLC employees (referred to jointly hereafter as “Benchmark-TurnKey”) during Brownfield Cleanup Program (BCP) redevelopment activities at the Queen City Landing Site (Site) located in the City of Buffalo, Erie County, New York. This HASP presents procedures for Benchmark-TurnKey employees who will be involved with BCP redevelopment 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-TurnKey accepts no responsibility for the health and safety of contractor, subcontractor, or other personnel.

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

1.2 Background

The Site is located in Buffalo, Erie County, New York and is identified as the eastern portion of Section 132.06 Block 1 and Lot 1.1 (975 Fuhrmann Boulevard, 7.24 acres) and Section 132.06 Block 1 and Lot 1.2 (1005 Fuhrmann Boulevard, 0.48 acres) on the Erie County Tax Map (see Figure 3). The site is an approximately 7.72-acres and is bounded by commercial property used for boat storage to the north, Lake Erie/Small boat Harbor to the south, Fuhrmann Boulevard to the east, and vacant land/Lake Erie to the west.

The Site is the former Freezer Queen facility and operated as a warehouse and manufacturer of frozen foods for approximately 75 years, when food operations ceased in 2004. The Site is undergoing redevelopment for a mixed residential and commercial use. The former structures have been demolished and the Site has been covered/grades raised to prepare for redevelopment activities. The Site was re-zoned in 2008 from M3 - Heavy

Industrial to CM – General Commercial and this revised zoning is grandfathered from the terms of the City of Buffalo Green Code. There are no Site occupants at the time of the submittal of this SMP, but after redevelopment the anticipated occupants will be residential along with associated amenities (restaurant, and other commercial entities).

1.3 Parameters of Interest

Previous investigations and remedial actions completed at the Site have identified contaminants at the Site, as follows.

- Polycyclic aromatic hydrocarbons (PAHs) have been identified in some of the soil/fill present in the Site.
- Metal analytes, particularly mercury, have been detected in the soil/fill present at the Site.

1.4 Overview of BCP Redevelopment Activities

Benchmark-TurnKey personnel will be on-site to assist, as necessary, with BCP redevelopment activities that require the implementation of the Site Management Plan. These activities could include:

- 1. Test Pit or Excavations that penetrate the Cover System.**
- 2. Removal of Concrete Foundations.**
- 3. Import of Backfill Materials for use a Fill at the Site requiring Analytical Sampling.**
- 4. Export of Materials from the Site that will require Analytical Sampling.**
- 5. Community Air Monitoring while Excavating Potentially Impacted Materials.**

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

All Benchmark-Turnkey 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-TurnKey Corporate Health and Safety Director is *Mr. Thomas Forbes, P.E.* The Corporate Health and Safety Director is 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-TurnKey'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. Christopher Boron*. The Project Manager has the responsibility and authority to direct all Benchmark-TurnKey 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-TurnKey workers with work assignments and overseeing their performance.
- Coordinating health and safety efforts with the Site Safety and Health Officer (SSHO).
- Reviewing the emergency response coordination plan to assure its effectiveness.
- Serving as the primary liaison with Site contractors and the property owner.

2.1.3 Site Safety and Health Officer

The Site Safety and Health Officer (SSHO) for this Site is *Mr. Christopher Boron*. The qualified alternate SSHO is *Mr. Nathan Munley*. The SSHO reports to the Project Manager. The SSHO is on-site or readily accessible to the Site during all work operations and has the authority to halt Site work if unsafe conditions are detected. The specific responsibilities of the SSHO are:

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

2.1.4 Site Workers

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

2.1.5 Other Site Personnel

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

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

3.0 HAZARD EVALUATION

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

3.1 Chemical Hazards

As discussed in Section 1.3, parameters of interest have been identified through investigation and remedial activities. Table 1 lists exposure limits for airborne concentrations of the parameters of interest in Section 1.3 of this HASP. Brief descriptions of the toxicology of the prevalent COPCs and related health and safety guidance and criteria are provided below.

- **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.

- **Arsenic (CAS #7440-38-2)** is a naturally occurring element and is usually found combined with one or more elements, such as oxygen or sulfur. Inhalation is a more important exposure route than ingestion. First phase exposure symptoms include nausea, vomiting, diarrhea and pain in the stomach. Prolonged contact is corrosive to the skin and mucus membranes. Arsenic is considered a Group A human carcinogen by the USEPA. Exposure via inhalation is associated with an increased risk of lung cancer. Exposure via the oral route is associated with an increased risk of skin cancer.
- **Cadmium (CAS # 7440-43-9)** is a natural element and is usually combined with one or more elements, such as oxygen, chloride, or sulfur. Breathing high levels of cadmium severely damages the lungs and can cause death. Ingestion of high levels of cadmium severely irritates the stomach, leading to vomiting and diarrhea. Long term exposure to lower levels of cadmium leads to a buildup of this substance in the kidneys and possible kidney disease. Other potential long term effects are lung damage and fragile bones. Cadmium is suspected to be a human carcinogen.
- **Chromium (CAS # 7440-47-3)** is a natural inorganic element and is usually combined with one or more elements, such as oxygen, chloride or sulfur. The common forms of chromium are hexavalent (CR+6) and trivalent (CR+3). The hexavalent form is associated with significantly greater potential health impacts than the trivalent form. Hexavalent chromium is an irritant and corrosive to the skin and mucus membranes. Chromium is a potential occupational carcinogen. Acute exposures to dust may cause coughing, wheezing, headaches, pain and fever.
- **Lead (CAS #7439-92-1)** can affect almost every organ and system in our bodies. The most sensitive is the central nervous system, particularly in children. Lead also damages kidneys and the immune system. The effects are the same whether it is breathed or swallowed. Lead may decrease reaction time, cause weakness in fingers, wrists or ankles and possibly affect memory. Lead may cause anemia.
- **Mercury (CAS #7439-97-6)** is used in industrial applications for the production of caustic and chlorine, and in electrical control equipment and apparatus. Over-exposure to mercury may cause coughing, chest pains, bronchitis, pneumonia, indecision, headaches, fatigue and salivation. Mercury is a skin and eye irritant.

With respect to the anticipated BCP redevelopment activities discussed in Section 1.4, 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

Redevelopment activities at the Queen City Landing Site may present the following physical hazards:

- The potential for physical injury during heavy construction equipment use, such as backhoes, excavators and truck traffic.
- 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 redevelopment 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

Benchmark-TurnKey and other construction-related personnel performing BCP-related activities at the Site 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. General construction or other Site personnel that are not expected to be engaged in redevelopment activities involving hazardous waste and/or hazardous substance operations will not be required to have training in accordance with 29 CFR 1910.120(e).

The 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-TurnKey'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/TurnKey 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-TurnKey employees as stipulated under 29 CFR Part 1910.120(f). These exams include initial employment, annual and employment termination physicals for all Benchmark-TurnKey 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-TurnKey. 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-TurnKey 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-TurnKey will maintain and

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

6.0 SAFE WORK PRACTICES

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

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

- Subsurface work will not be initiated without first clearing underground utility services.
- Heavy equipment should not be operated within 20 feet of overhead wires. This distance may be increased if windy conditions are anticipated or if lines carry high voltage. The Site should also be sufficiently clear to ensure the project staff can move around the heavy machinery safely.
- Care should be taken to avoid overhead wires when moving heavy-equipment from location to location.
- Hard hats, safety boots and safety glasses should be worn at all times in the vicinity of heavy equipment. Hearing protection is also recommended.
- The work Site should be kept neat. This will prevent personnel from tripping and will allow for fast emergency exit from the Site.
- Proper lighting must be provided when working at night.
- Construction activities should be discontinued during an electrical storm or severe weather conditions.
- The presence of combustible gases should be checked before igniting any open flame.
- Personnel shall stand upwind of any construction operation when not immediately involved in sampling/logging/observing activities.
- Personnel will not approach the edge of an unsecured trench/excavation closer than 2 feet.

7.0 PERSONAL PROTECTIVE EQUIPMENT

7.1 Equipment Selection

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

Equipment designed to protect the body against contact with known or suspect chemical hazards are grouped into four categories 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 previous investigations and the nature of the redevelopment activities at the Site, the possibility exist that organic vapors and/or particulates may be released to the air during intrusive activities that penetrate the cover system that was installed as part of the BCP remedial work.

8.1.1 On-Site Work Zone Monitoring

Benchmark-TurnKey personnel will conduct routine, real-time air monitoring during intrusive construction activities that involve penetration of the cover system, only. The work area will be monitored at regular intervals using a photo-ionization 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-TurnKey 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 during intrusive construction activities that involve penetration of the cover system, only. 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 that involve the penetration of the cover system include excavation, test pitting, or trenching, and the removal of building foundations and basement floors.

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-TurnKey personnel to monitor organic vapor concentrations as specified in this HASP. Fugitive dust/particulate concentrations will be monitored during major soil intrusion of soil/fill present beneath the cover system 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-TurnKey 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 that involve handling of Site soil/fill located beneath the cover system. Action levels based on the instrument readings shall be as follows:

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

Readings from the field equipment will be recorded and documented on the appropriate Project Field Forms. Instruments will be calibrated 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-TurnKey personnel on-site, the following criteria shall also be adhered to for the protection of downwind receptors consistent with NYSDOH requirements (Appendix C):

o **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 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.

o **AIRBORNE PARTICULATE COMMUNITY AIR MONITORING**

Respirable (PM-10) particulate monitoring will be performed on a continuous basis at the upwind and downwind perimeter of the exclusion zone. The monitoring will be performed using real-time monitoring equipment capable of measuring 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 $150 \text{ ug}/\text{m}^3$ 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 $150 \text{ ug}/\text{m}^3$ 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 $150 \text{ ug}/\text{m}^3$ 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.

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

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 Appendix A of this HASP will immediately be implemented if an emergency release has occurred.

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

9.3 Spill Response

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

- Only those personnel involved in overseeing or performing containment operations will be allowed within the spill area. If necessary, the area will be roped, ribboned, or otherwise blocked off to prevent unauthorized access.

- Appropriate PPE, as specified by the SSHO, will be donned before entering the spill area.
- Ignition points will be extinguished/removed if fire or explosion hazards exist.
- Surrounding reactive materials will be removed.
- Drains or drainage in the spill area will be blocked to prevent inflow of spilled materials or applied materials.

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

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

- 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-TurnKey employees. The Site Safety and Health Officer and/or his or her designee will be responsible for monitoring Benchmark-TurnKey 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 illness 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 next rest period, the following work cycle should be further shortened by 33%.
- Body temperature may be measured orally with a clinical thermometer as early as possible in the resting period. Oral temperature at the beginning of the rest period should not exceed 99.6 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-TurnKey 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 BCP related 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. All personnel entering the Exclusion Zone must wear the prescribed level of personal protective equipment identified in Section 7.
- Contamination Reduction Zone - The zone where decontamination of personnel and equipment takes place. Any potentially contaminated clothing, equipment, and samples must remain in the Contamination Reduction Zone until decontaminated.
- Support Zone - The part of the site that is considered non-contaminated or "clean." Support equipment will be located in this zone, and personnel may wear normal work clothes within this zone.

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

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

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

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

The degree of decontamination required is a function of a particular task and the environment within which it occurs. The following decontamination procedure will remain flexible, thereby allowing the decontamination crew to respond appropriately to the changing environmental conditions that may arise at the Site. All Benchmark-TurnKey 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-TurnKey personnel will conduct decontamination of all tools used for sample collection purposes. It is expected that all tools will be constructed of nonporous, nonabsorbent materials (i.e., metal), which will aid in the decontamination effort. Any tool or part of a tool made of porous, absorbent material (i.e., wood) will be placed into suitable containers and prepared for disposal.

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

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

13.0 CONFINED SPACE ENTRY

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

Confined space entry by Benchmark-TurnKey employees is not anticipated to be necessary to complete the RI 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-TurnKey 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-TurnKey's corporate Health and Safety Director. Benchmark-TurnKey employees shall not enter a confined space without these procedures and permits in place.

14.0 FIRE PREVENTION AND PROTECTION

14.1 General Approach

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

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

14.2 Equipment and Requirements

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

14.3 Flammable and Combustible Substances

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

14.4 Hot Work

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

15.0 EMERGENCY INFORMATION

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

TABLES

TABLE 1
TOXICITY DATA FOR CONSTITUENTS OF POTENTIAL CONCERN

Site Health & Safety Plan
Queen City Landing
Buffalo, New York

Parameter	Synonyms	CAS No.	Code	Concentration Limits ¹		
				PEL	TLV	IDLH
Polycyclic Aromatic Hydrocarbons (PAHs): ppm						
Benz(a)anthracene	<i>none</i>	56-55-3	<i>none</i>	--	--	--
Benzo(a)pyrene	<i>none</i>	50-32-8	<i>none</i>	--	--	--
Benzo(b)fluoranthene	<i>none</i>	205-99-2	<i>none</i>	--	--	--
Benzo(k)fluoranthene	<i>none</i>	207-08-9	<i>none</i>	--	--	--
Chrysene	<i>none</i>	218-01-9	<i>none</i>	--	--	--
Benzo(g,h,i)perylene	<i>none</i>	191-24-2	<i>none</i>	--	--	--
Fluoranthene	<i>none</i>	206-44-0	<i>none</i>	--	--	--
Phenanthrene	<i>none</i>	85-01-8	<i>none</i>	--	--	--
Indeno(1,2,3-cd)pyrene	<i>none</i>	193-39-5	<i>none</i>	--	--	--
Inorganic Compounds: mg/m³						
Arsenic	<i>none</i>	7440-38-2	<i>none</i>	0.5	0.5	50
Cadmium	<i>none</i>	7440-43-9	<i>Ca</i>	0.005	0.01	9
Chromium	<i>none</i>	7440-47-3	<i>none</i>	1.0	0.5	250
Lead	<i>none</i>	7439-92-1	<i>none</i>	0.05	0.15	100
Mercury	<i>none</i>	7439-97-6	<i>C-0.1</i>	0.1	0.05	10

Notes:

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

Explanation:

C-## = Ceiling Level equals the maximum exposure concentration allowable during the work day.

IDLH = Immediately Dangerous to Life or Health.

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

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-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 maximum exposure concentration allowable for 8 hours per day @ 40 hours per week

TABLE 2

**POTENTIAL ROUTES OF EXPOSURE TO THE
CONSTITUENTS OF POTENTIAL CONCERN**

**Site Health & Safety Plan
Queen City Landing
Buffalo, New York**

Activity ¹	Direct Contact with Soil/Fill	Inhalation of Vapors or Dust
Redevelopment Activities That May Penetrate the Cover System		
Test Pit or Excavations that penetrate the Cover System to Remove Soil Beneath	x	x
Removal of Concrete Foundations	x	x
Import of Backfill Materials for use a Fill at the Site requiring Analytical Sampling	x	x
Export of Materials from the Site that will require Analytical Sampling	x	x
Community Air Monitoring while Excavating Potentially Impacted Materials	x	x

Notes:

1. Activity as described in Section 1.4 of the Health and Safety Plan.

TABLE 3

**REQUIRED LEVELS OF PROTECTION
FOR BCP REDEVELOPMENT TASKS**

**Site Health & Safety Plan
Queen City Landing
Buffalo, New York**

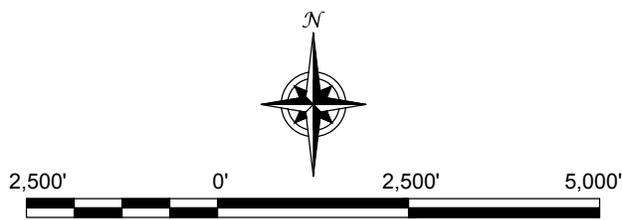
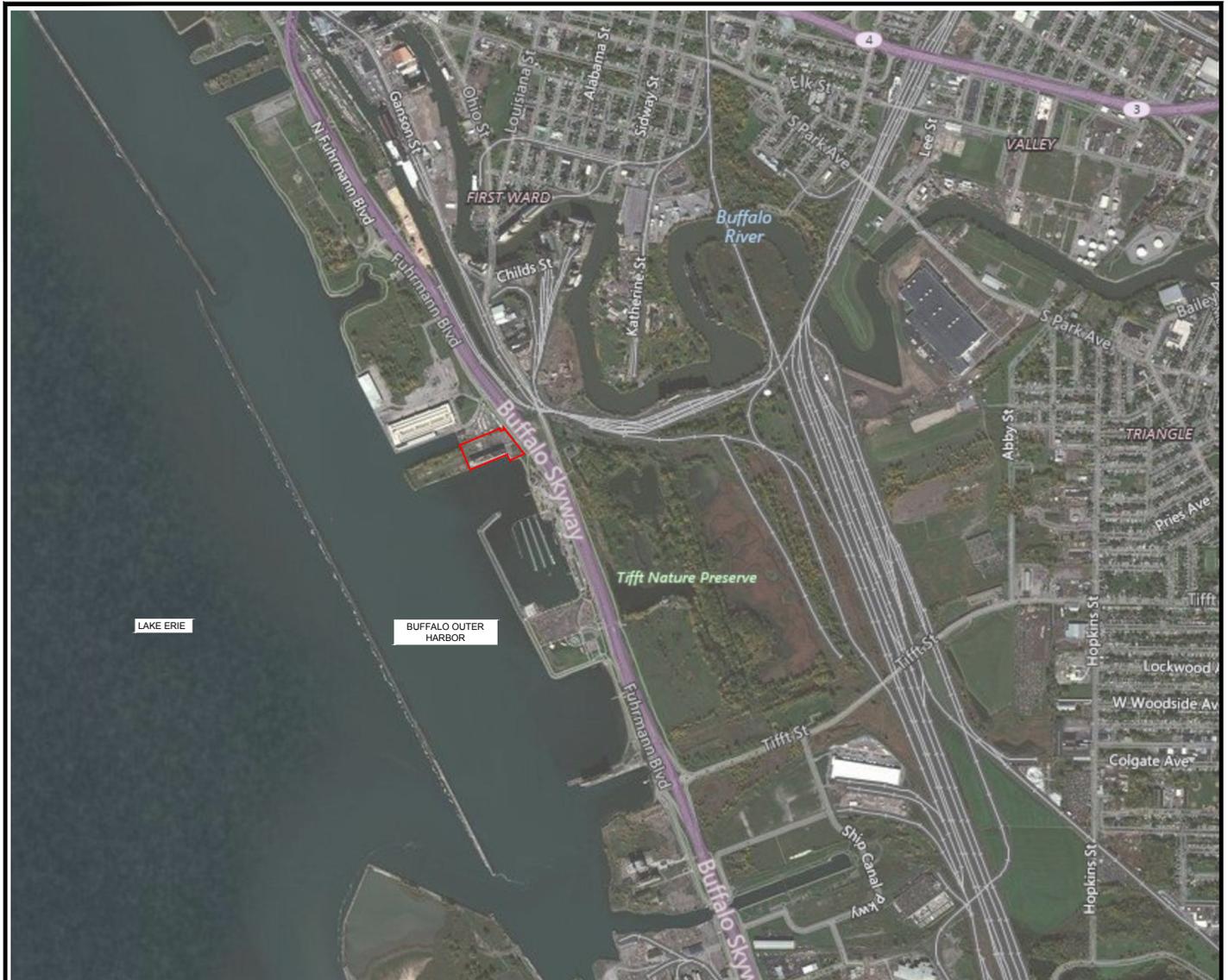
Activity	Respiratory Protection¹	Clothing	Gloves²	Boots^{2,3}	Other Required PPE/Modifications^{2,4}
Remedial Investigation Tasks					
Test Pit or Excavations that penetrate the Cover System to Remove Soil Beneath	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	HH SGSS
Removal of Concrete Foundations	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	SGSS
Import of Backfill Materials for use a Fill at the Site requiring Analytical Sampling	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	SGSS
Export of Materials from the Site that will require Analytical Sampling	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	HH SGSS
Community Air Monitoring while Excavating Potentially Impacted Materials	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 equipped 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. SSSHO 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 SSSHO (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

FIGURE 1



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

LEGEND:

 BCP SITE BOUNDARY

*BASEMAP ADAPTED FROM BING MAPS



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

SITE LOCATION AND VICINITY MAP

SITE MANAGEMENT PLAN
BROWNFIELD CLEANUP PROGRAM

QUEEN CITY LANDING SITE
BCP SITE NO. 915304
BUFFALO, NEW YORK

PREPARED FOR
QUEEN CITY LANDING, LLC

PROJECT NO.: 0424-017-001

DATE: OCTOBER 2017

DRAFTED BY: RFL

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LEGEND:

BCP SITE BOUNDARY

NOTES:

- 1. AERIAL IMAGE FROM GOOGLE EARTH PRO 2015.



SCALE: 1 INCH = 150 FEET
 SCALE IN FEET
 (approximate)



SITE LAYOUT MAP

SITE MANAGEMENT PLAN
 BROWNFIELD CLEANUP PROGRAM

QUEEN CITY LANDING SITE
 BCP SITE NO. C915304
 BUFFALO, NEW YORK

PREPARED FOR

QUEEN CITY LANDING, LLC



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

JOB NO.: 0424-017-001

FIGURE 2

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ATTACHMENT A

EMERGENCY RESPONSE PLAN

EMERGENCY RESPONSE PLAN
for
BROWNFIELD CLEANUP PROGRAM
ACTIVITIES

QUEEN CITY LANDING SITE
BUFFALO, NEW YORK

October 2017

0424-017-001

Prepared for:

QUEEN CITY LANDING, LLC

Prepared by:



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

QUEEN CITY LANDING SITE
HEALTH AND SAFETY PLAN FOR BCP ACTIVITIES
APPENDIX A: EMERGENCY RESPONSE PLAN

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Figure A-1 Hospital Route Map

1.0 GENERAL

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

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

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

2.0 PRE-EMERGENCY PLANNING

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

Type of Emergency:

1. Medical, due to physical injury

Source of Emergency:

1. Slip/trip/fall

Location of Source:

1. Non-specific

3.0 ON-SITE EMERGENCY RESPONSE EQUIPMENT

Emergency procedures may require specialized equipment to facilitate worker rescue, contamination control and reduction, or post-emergency clean up. Emergency response equipment available on the Site is listed below. The equipment inventory and storage locations are based on the potential emergencies described above. This equipment inventory is designed to meet on-site emergency response needs and any specialized equipment needs 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	1 (minimum)	All heavy equipment and 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: *Christopher Boron*

Work: (716) 856-0599

Mobile: (716) 846-2726

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

Work: (716) 856-0599

Mobile: (716) 864-1730

Site Safety and Health Officer (SSHO): *Christopher Boron*

Work: (716) 856-0599

Mobile: (716) 864-2726

Alternate SSHO: *Nathan Munley*

Work: (716) 856-0635

Mobile: (716) 289-1072

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:

975 and 1005 Fuhrmann Boulevard

Buffalo, New York 14203

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 (*Christopher*

Boron or *Nathan Munley*) 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 Buffalo General Hospital:

- Travel south along Fuhrmann Boulevard for 1.0 mile
- Turn left on Tift Street and travel 3.7 miles
- Turn right on McKinley Parkway and travel for 0.1 miles
- Turn left onto Lorraine Avenue and travel (0.2 miles)
- Hospital on the right (565 Abbott Rd, Buffalo, NY 14220)

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

ATTACHMENT B

HOT WORK PERMIT FORM

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

ATTACHMENT C

NYSDOH GENERIC COMMUNITY AIR MONITORING PLAN

Appendix 1A

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 $150 \text{ mcg}/\text{m}^3$ 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 $150 \text{ mcg}/\text{m}^3$ 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 $150 \text{ mcg}/\text{m}^3$ 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 1B

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° C (14 to 122° 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:

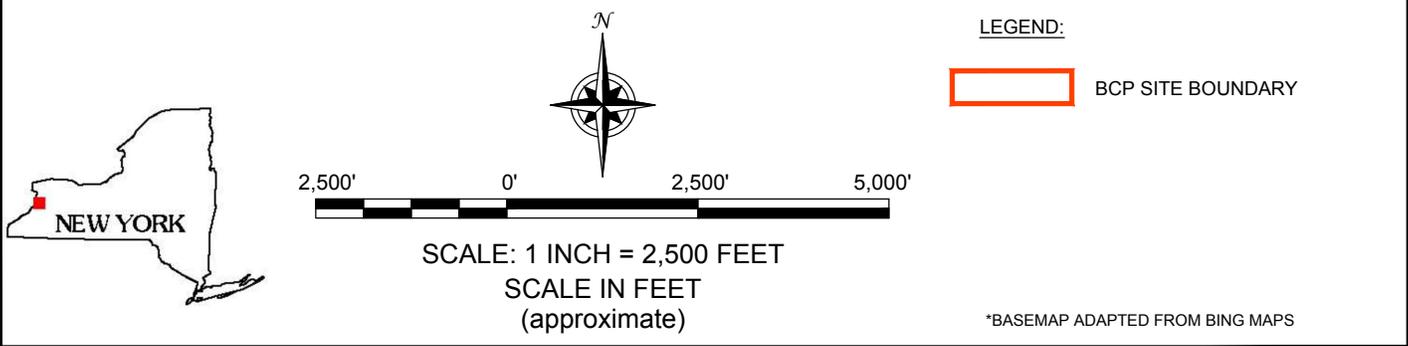
- (a) Applying water on haul roads;
- (b) Wetting equipment and excavation faces;
- (c) Spraying water on buckets during excavation and dumping;
- (d) Hauling materials in properly tarped or watertight containers;
- (e) Restricting vehicle speeds to 10 mph;
- (f) Covering excavated areas and material 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.

FIGURES

FIGURE 1



 <p>BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC</p> <p>2558 HAMBURG TURNPIKE SUITE 300 BUFFALO, NY 14218 (716) 856-0599</p>	<h2>SITE LOCATION AND VICINITY MAP</h2> <p>REMEDIAL ACTION WORK PLAN</p> <p>QUEEN CITY LANDING SITE BCP SITE NO. 915304 BUFFALO, NEW YORK</p> <p>PREPARED FOR QUEEN CITY LANDING, LLC</p>
<p>PROJECT NO.: 0424-017-001</p>	
<p>DATE: JUNE 2018</p>	
<p>DRAFTED BY: RFL</p>	

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LEGEND:

 BCP SITE BOUNDARY

NOTES:

- 1. AERIAL IMAGE FROM GOOGLE EARTH PRO 2017.



SCALE: 1 INCH = 150 FEET
SCALE IN FEET
(approximate)



SITE PLAN (AERIAL PHOTOGRAPH)

REMEDIAL ACTION WORK PLAN
QUEEN CITY LANDING SITE
BCP SITE NO. C915304
BUFFALO, NEW YORK
PREPARED FOR
QUEEN CITY LANDING, LLC



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

JOB NO.: 0424-017-001

FIGURE 2

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LEGEND:

- BCP SITE BOUNDARY
- APPROXIMATE LIMITS OF THE PETROLEUM EXCAVATION
- F-2 ■ INVESTIGATION LOCATIONS COMPLETED BY OTHER
- SS-2 NORTH ■ OFF-SITE INVESTIGATION LOCATION (DEC 2017)
- TP-D7-SOUTH-1 ■ ON-SITE TEST PIT INVESTIGATION LOCATION (DEC 2017)
- MW-8 ◆ GROUNDWATER MONITORING WELL FOR EMERGENT CONTAMINANT SAMPLING





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

JOB NO.: 0424-017-001

AREAS OF IRM AND REMEDIAL ACTION

REMEDIAL ACTION WORK PLAN
 QUEEN CITY LANDING SITE
 BCP SITE NO. C915304
 BUFFALO, NEW YORK
 PREPARED FOR
 QUEEN CITY LANDING, LLC

FIGURE 3

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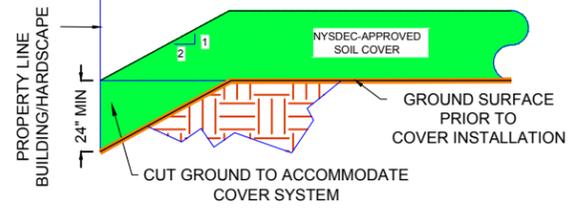


COVER SYSTEM DETAILS

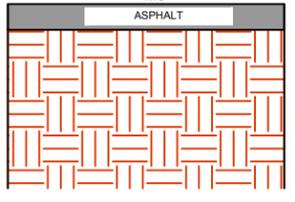
VEGETATED SOIL COVER SYSTEM DETAIL



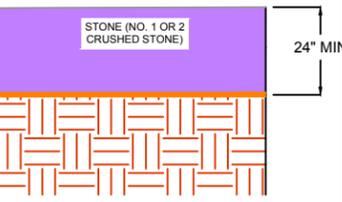
TIE-IN DETAIL



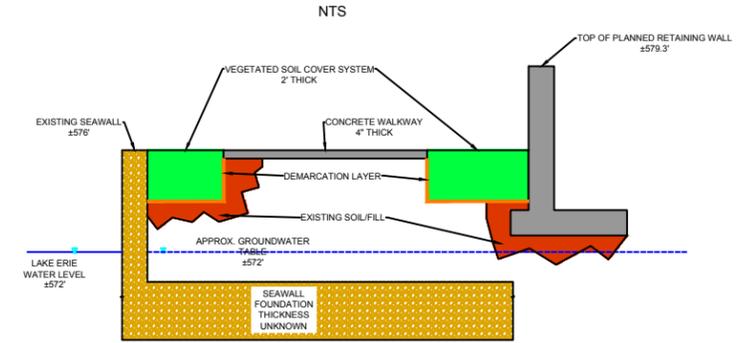
EXISTING ASPHALT DRIVE COVER SYSTEM DETAIL



STONE COVER SYSTEM DETAIL



DETAIL A-A'



PROPOSED COVER SYSTEM

REMEDIAL ACTION WORK PLAN
 QUEEN CITY LANDING SITE
 BCP SITE NO. C915304
 BUFFALO, NEW YORK
 PREPARED FOR
 QUEEN CITY LANDING, LLC

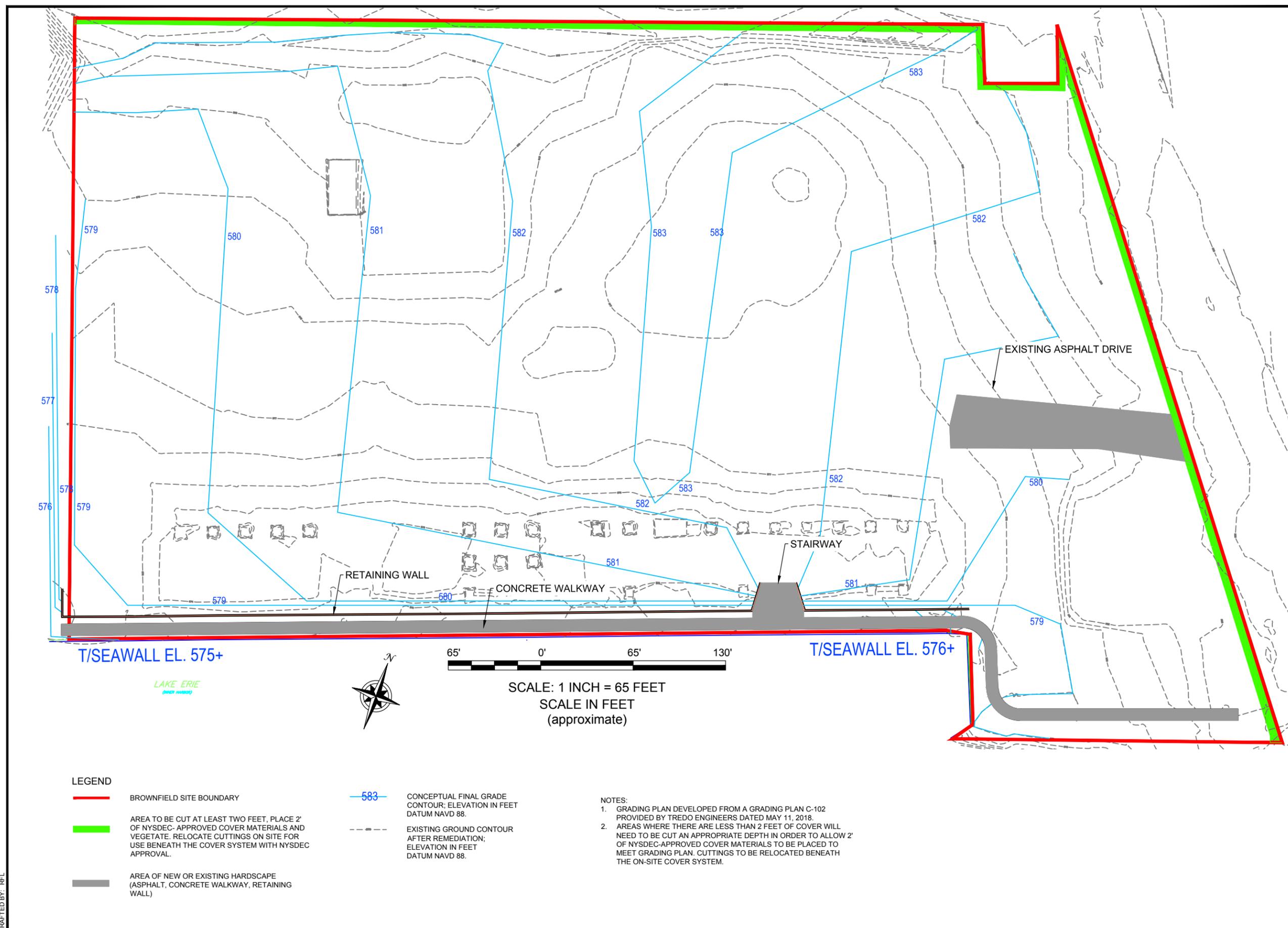
FIGURE 4

BENCHMARK
 ENVIRONMENTAL
 ENGINEERING &
 SCIENCE, PLLC

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

JOB NO.: 0424-017-001

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LEGEND

- BROWNFIELD SITE BOUNDARY
- AREA TO BE CUT AT LEAST TWO FEET, PLACE 2' OF NYSDEC-APPROVED COVER MATERIALS AND VEGETATE. RELOCATE CUTTINGS ON SITE FOR USE BENEATH THE COVER SYSTEM WITH NYSDEC APPROVAL.
- AREA OF NEW OR EXISTING HARDSCAPE (ASPHALT, CONCRETE WALKWAY, RETAINING WALL)
- 583— CONCEPTUAL FINAL GRADE CONTOUR; ELEVATION IN FEET DATUM NAVD 88.
- - - - EXISTING GROUND CONTOUR AFTER REMEDIATION; ELEVATION IN FEET DATUM NAVD 88.

NOTES:
 1. GRADING PLAN DEVELOPED FROM A GRADING PLAN C-102 PROVIDED BY Tredo ENGINEERS DATED MAY 11, 2018.
 2. AREAS WHERE THERE ARE LESS THAN 2 FEET OF COVER WILL NEED TO BE CUT AN APPROPRIATE DEPTH IN ORDER TO ALLOW 2' OF NYSDEC-APPROVED COVER MATERIALS TO BE PLACED TO MEET GRADING PLAN. CUTTINGS TO BE RELOCATED BENEATH THE ON-SITE COVER SYSTEM.

DATE: JUNE 2018
 DRAFTED BY: RFL

CONCEPTUAL GRADING PLAN

REMEDIAL ACTION WORK PLAN
 QUEEN CITY LANDING SITE
 BCP SITE NO. C915304
 BUFFALO, NEW YORK
 PREPARED FOR
 QUEEN CITY LANDING, LLC

BENCHMARK
 ENVIRONMENTAL
 ENGINEERING &
 SCIENCE, PLLC
 2558 HAMBURG TURNPIKE
 SUITE 300
 BUFFALO, NY 14218
 (716) 856-0599

JOB NO.: 0424-017-001

FIGURE 5

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