EMERGENCY RESPONSE PLAN for BROWNFIELD CLEANUP PROGRAM

ARCELORMITTAL TECUMSEH REDEVELOPMENT SITE

LACKAWANNA, NEW YORK

March 2008 0071-007-350

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

TABLE OF CONTENTS

1.0	GENERAL	1
2.0	Pre-Emergency Planning	2
3.0	ON-SITE EMERGENCY RESPONSE EQUIPMENT	3
4.0	EMERGENCY PLANNING MAPS	4
5.0	EMERGENCY CONTACTS	5
6.0	EMERGENCY ALERTING & EVACUATION	6
7.0	EXTREME WEATHER CONDITIONS	8
8.0	EMERGENCY MEDICAL TREATMENT & FIRST AID	9
9.0	EMERGENCY RESPONSE CRITIQUE & RECORD KEEPING	. 10
10.0	EMERGENCY RESPONSE TRAINING	. 11

LIST OF FIGURES

Figure A-1 Hospital Route Map



1.0 GENERAL

This report presents the site-specific Emergency Response Plan (ERP) referenced in the Site-Wide Health and Safety Plan (HASP) prepared for BCP investigation and remedial activities conducted at the ArcelorMittal Tecumseh Redevelopment Site (former Bethlehem Steel Lackawanna Works), Lackawanna, New York. This appendix of the Site-Wide 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.

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2.0 Pre-Emergency Planning

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

Type of Emergency:

- 1. Medical, due to physical injury
- 2. Fire

Source of Emergency:

- 1. Slip/trip/fall
- 2. Fire

Location of Source:

1. Non-specific

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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
Spill Response Kit	2	Benzol Yard ICM Treatment Building; Wastewater Treatment Plant Garage (Phase III parcel)
First Aid Kit	3	Site Vehicle; Benzol Yard ICM Treatment Building; Field Office in Coke Oven Office Building
Chemical Fire Extinguisher	2 (minimum)	All heavy equipment and Site Vehicle

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





4.0 EMERGENCY PLANNING MAPS

An area-specific map of the Tecumseh Redevelopment 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 TurnKey personnel field vehicle.

A-4



5.0 EMERGENCY CONTACTS

The following identifies the emergency contacts for this ERP.

Emergency Telephone Numbers:

Project Manager: Patrick T. Martin

Work: (716) 856-0599 Mobile: (716) 867-2860

Corporate Health and Safety Director: Thomas H. Forbes

Work: (716) 856-0599 Mobile: (716) 864-1730

Site Safety and Health Officer (SSHO): Richard L. Dubisz

Work: (716) 856-0635 Mobile: (716) 998-4334

Alternate SSHO: Thomas Behrendt

Work: (716) 856-0635 Mobile: (716) 818-8358

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:

ArcelorMittal Tecumseh Redevelopment, Inc

1951 Hamburg Turnpike

Lackawanna, New York 14218

Site Phone Number: (Insert Cell Phone or Field Trailer):

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6.0 EMERGENCY ALERTING & EVACUATION

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

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

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

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





SITE-WIDE HEALTH AND SAFETY PLAN ARCELORMITTAL TECUMSEH REDEVELOPMENT SITE

APPENDIX A: EMERGENCY RESPONSE PLAN

Behrendt or **Richard Dubisz**) so that appropriate action can be initiated. Contractors and subcontractors on this site have coordinated their emergency response plans to ensure that these plans are compatible and that source(s) of potential emergencies are recognized, alarm systems are clearly understood, and evacuation routes are accessible to all personnel relying upon them.





7.0 EXTREME WEATHER CONDITIONS

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

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

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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 Mercy Hospital.
- <u>Inhalation</u>: Move to fresh air and, if necessary, transport to Mercy Hospital.
- <u>Ingestion</u>: Decontaminate and transport to Mercy 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 Mercy Hospital via ambulance. The SSHO will supply available chemical specific information to appropriate medical personnel as requested.

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

Directions to Mercy Hospital (see Figure A-1):

The following directions describe the best route to Mercy Hospital:

- From Gate 2, proceed onto the Hamburg Turnpike (SR 5).
- Proceed east on Hamburg Turnpike (SR 5) to the Tifft Street Exit and turn right onto Tifft Street.
- Take Tifft Street east crossing South Park Avenue and McKinley Parkway. Bear left on Edgewood Avenue.
- Turn right on Abbott Road and Mercy Hospital will be on right hand side. Follow signs to emergency room (ER).

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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.

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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.



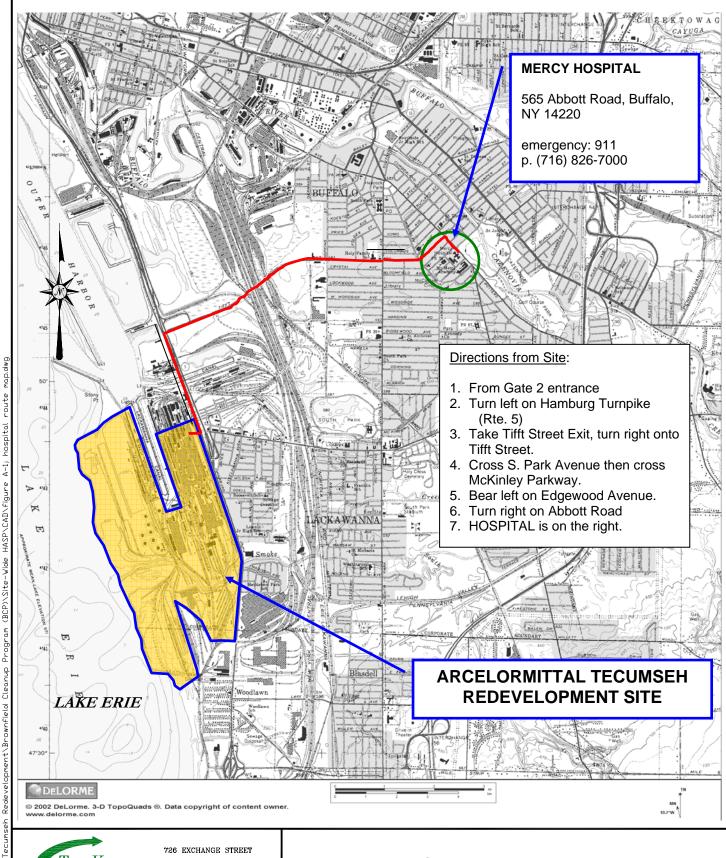


FIGURES





FIGURE A-1





726 EXCHANGE STREET SUITE 624 BUFFALO, NEW YORK 14210 (716) 856-0635

PROJECT NO.: 0071-007-350

DATE: JANUARY 2008

DRAFTED BY: AJZ

HOSPITAL ROUTE MAP

SITE-WIDE HEALTH AND SAFETY PLAN (HASP)

ARCELOR MITTAL TECUMSEH REDEVELOPMENT SITE LACKAWANNA, NEW YORK

PREPARED FOR

TECUMSEH REDEVELOPMENT, INC.