

HEALTH & SAFETY PLAN

(Bengart and Memel Site; 1092 Clinto Street, Buffalo, New York)

SECTION 1 – PROJECT DESCRIPTION

- This Health and Safety Plan is for field activities (demolition, asbestos management and disposal, and excavation and disposal of PCB contaminated concrete and soils) that will be completed at the Bengart and Memel property located at 1092 Clinton Street in Buffalo, New York for the NYSDEC. This work is expected to take approximately four weeks. The critical work tasks are described below:

Project Location: The site is located at 1092 Clinton St, Buffalo, New York. A Project Location Map is included as Attachment A.

Project Name: Bengart and Memel – Remediation Services.

Proposed Project Start Date: 11/30/09 **Project/Task No.:** FD900436

1. Contact NYS Dig safely 811 and have utility mark out performed – 72 hrs required for utility companies to respond, prior to any underground work.
2. Contact Gene Melnyk (NYSDEC) 24 hours in advance of site work to gain access to the building and the property.
3. Contact NYS Dig safely 811 and have utility mark out performed.
4. Clear and Grub the site – remove trees and items slated for removal.
5. Place Orange HiViz fencing around the outside excavation/demolition area after the one section of chain link fence is removed during clearing and grubbing.
6. Set up demolition and asbestos exclusion zones, asbestos decontamination trailer and air monitors as needed/required.
7. In advance of site work, ensure that and underground hazards have been identified and/or shut off in the proposed demolition/excavation work areas.
8. Demolish the block building following controlled demolition process and procedures. Load out roofing as ACM materials, and the load out remaining C&D materials to landfill.
9. Dismantle the former groundwater treatment process area. Clean the tanks as needed and send to recycler. Place hazardous materials (carbon) in hazardous excavation areas slated for excavation and disposal.
10. Begin excavation of the site starting on the south side of the site in the Non-Hazardous PCB soil areas first to utilize the sites asphalt for as long as possible

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to avoid tracking soils on City Streets.

11. Sequence excavation from South to North across the site excavating both non-haz and hazardous area. Segregate the areas and direct load soils/fill/asphalt/concrete into trucks.

SECTION 2 – ORGANIZATIONAL STRUCTURE

The organizational structure associated with this project is listed below.

Project Manager – Gary Britt

Field Team Leader – Bill Ewing

Site Health and Safety Coordinator – Bill Ewing

Corporate Environmental Health & Safety Director – Pat Salvador

SECTION 3 – HAZARD ANALYSIS

A job hazard analysis has been conducted for the significant tasks associated with this project. The completed job hazard analysis worksheets are included as Attachment B.

Potential hazards include:

- | | | |
|---|--|---|
| <input checked="" type="checkbox"/> Chemical Exposure | <input checked="" type="checkbox"/> Slips, trips, and falls | <input type="checkbox"/> Radiological |
| <input type="checkbox"/> Trenching/Shoring | <input checked="" type="checkbox"/> Fire/Explosion | <input checked="" type="checkbox"/> Heavy Equipment/Vehicular Traffic |
| <input checked="" type="checkbox"/> Heat/Cold Stress | <input checked="" type="checkbox"/> Overhead Hazards | <input type="checkbox"/> Unstable/Uneven Terrain |
| <input checked="" type="checkbox"/> Electrical | <input checked="" type="checkbox"/> Machinery/Mechanical Equipment | |
| <input checked="" type="checkbox"/> Traffic | | |

SECTION 4 – SITE CONTROL

Site security will be monitored and controlled by the Field Team Leader. His duties will include limiting access to the work area to authorized personnel, setting up an exclusion zone with caution tape, overseeing project equipment and materials, and overseeing work activities. The majority of the site is restricted by a chain link fence, however a section of the fence is destroyed and is to be removed and replaced on the project. At a minimum Orange Hi-Viz fencing will be placed around the site's work activities to demarcate/control access to the work area during the length of the project and be modified as needed daily as the work progresses.

SECTION 5 – PERSONAL PROTECTIVE EQUIPMENT

The level of PPE to be issued during the asbestos work associated with this project is Level C.

- Hard Hat;
- Safety Glasses;
- Respirator
- Asbestos suits – poly tyvek.
- Leather work boots with steel toe;
- Chemical resistant gloves

The level of PPE to be issued during the excavation work associated with this project is Level D.

- Hard Hat;
- Safety Glasses;
- Leather work boots with steel toe;
- Chemical resistant gloves; and
- Reflective orange vest.

No changes to the specified level of PPE shall be made without the approval of the Project Manager and Corporate Environment, Health & Safety Director.

SECTION 6 – ENVIRONMENTAL MONITORING

The Site Health and Safety Coordinator will be responsible for implementing the elements of the environmental monitoring program. The following instruments shall be used to monitor the work environment and workers' breathing zones prior to site entry and continuously during the work.

Asbestos

- OSHA Personal Sampling
- Third Party Monitoring to be hired by owner

Excavation

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- Photo-ionization detector (PID).
- Mie DataRAM – PDR 1000AN – Dust/CAMP Compliance

Continuous monitoring with a PID will take place. VOCs will be monitored within the immediate work area. If the ambient air concentrations of total organic vapors in the work area exceed 5 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 to below 5 PPM over background, then work activities can resume with continued monitoring. If the organic vapor level is above 25 PPM at the perimeter of the work area, intrusive activities must stop. All readings must be recorded and be available for NYSDEC AND NYSDOH personnel to review.

4 PDR's will be set up daily for continuous monitoring in and around the work area with one PDR being placed in the up-wind direction, one in the work area and two in the downwind direction. If the downwind particulate monitoring indicates a particulate level 150 ug/m³ greater than the upwind particulate monitoring, than dust suppression measures must be employed. The PDR's will be set in the data logging mode and all data will be downloaded at the end of each work day and stored in electronic format. All readings must be recorded and be available for NYSDEC AND NYSDOH personnel to review.

SECTION 7 – DECONTAMINATION

The Field Team Leader will be responsible for supervising the proper use and decontamination of PPE. An emergency decontamination will not be required.

Contaminated asbestos PPE will be placed into the asbestos roll-off boxes and disposed of in the landfill. Contaminated soil PPE will be placed into the excavated soil piles and disposed of in the landfill.

SECTION 8 – EMERGENCY RESPONSE PLAN

Emergency Equipment

The following equipment will be maintained for safety and emergency response purposes:

- One ABC fire extinguisher.
- One industrial grade first aid kit.

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- Two eye wash bottles.

Emergency Telephone Numbers

Emergency (Fire, Police, Ambulance) – 911

Sheehan Memorial Hospital – (716) 848 - 2000

Project Manager – Gary Britt – (716) 548-2084

Field Team Leader – Gary Britt – (716) 548-2084

Site Health and Safety Coordinator – Gary Britt – (716) 548-2084

Corporate Environmental Health & Safety Director – Pat Salvador – (315) 412-6887

Fire and Explosion – In the event of a fire or explosion:

1. Notify emergency personnel by calling 911.
2. If possible, isolate the fire to prevent spreading.
3. Evacuate the area.

On Site Injury or Illness – In the event of an injury requiring more than minor first aid, implement appropriate first-aid and immediately call 911. Nearest medical facility is Sheehan Memorial Hospital located at 425 Michigan Ave in Buffalo and is approximately 4 miles from the site. The location and direction to the hospital are included as Attachment C. Once the employee has received first aid, the Field Team Leader shall contact the Project Manager, who will in turn contact the Corporate Environment, Health and Safety Director to report the incident.

SECTION 12 – SPECIAL PRECAUTIONS AND PROCEDURES

Underground Utilities

Since all work is being conducted on private property within a building complex and adjacent to a building far from city streets, Flexo is responsible for informing OP-TECH of any privately owned underground utilities and coordinating their shut down if they exist. OP-TECH will also coordinate an underground utility search through Dig Safely New York at phone # 811 prior to performing excavation activities.

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Excavations

During excavation, OP-TECH will have a competent person on site that can observe the work. Workers are not to enter any excavation greater than 4 ft deep, unless the excavations are benched. Sampling can be conducted using the excavator bucket.

Hazardous Substances

This project involves the potential exposure to asbestos and contaminated soil. Work will be initiated in Level C for asbestos and Level D PPE for excavations. Upgrade to include poly tyvek if groundwater and or soil conditions prevent splashing hazards.

Chemical/Radiological Hazard Evaluation

Waste Media	Hazardous Characteristics
<input checked="" type="checkbox"/> Airborne Contamination	<input type="checkbox"/> Ignitable
<input checked="" type="checkbox"/> Surface Contamination	<input type="checkbox"/> Corrosive
<input checked="" type="checkbox"/> Contaminated Soil	<input type="checkbox"/> Reactive
<input type="checkbox"/> Contaminated Groundwater	<input type="checkbox"/> Explosive
<input type="checkbox"/> Contaminated Surface Water	<input checked="" type="checkbox"/> Toxic (non-radiological)
<input checked="" type="checkbox"/> Solid Waste	<input type="checkbox"/> Radioactive
<input checked="" type="checkbox"/> Liquid Waste	<input type="checkbox"/> Biological

Heat and Cold Stress

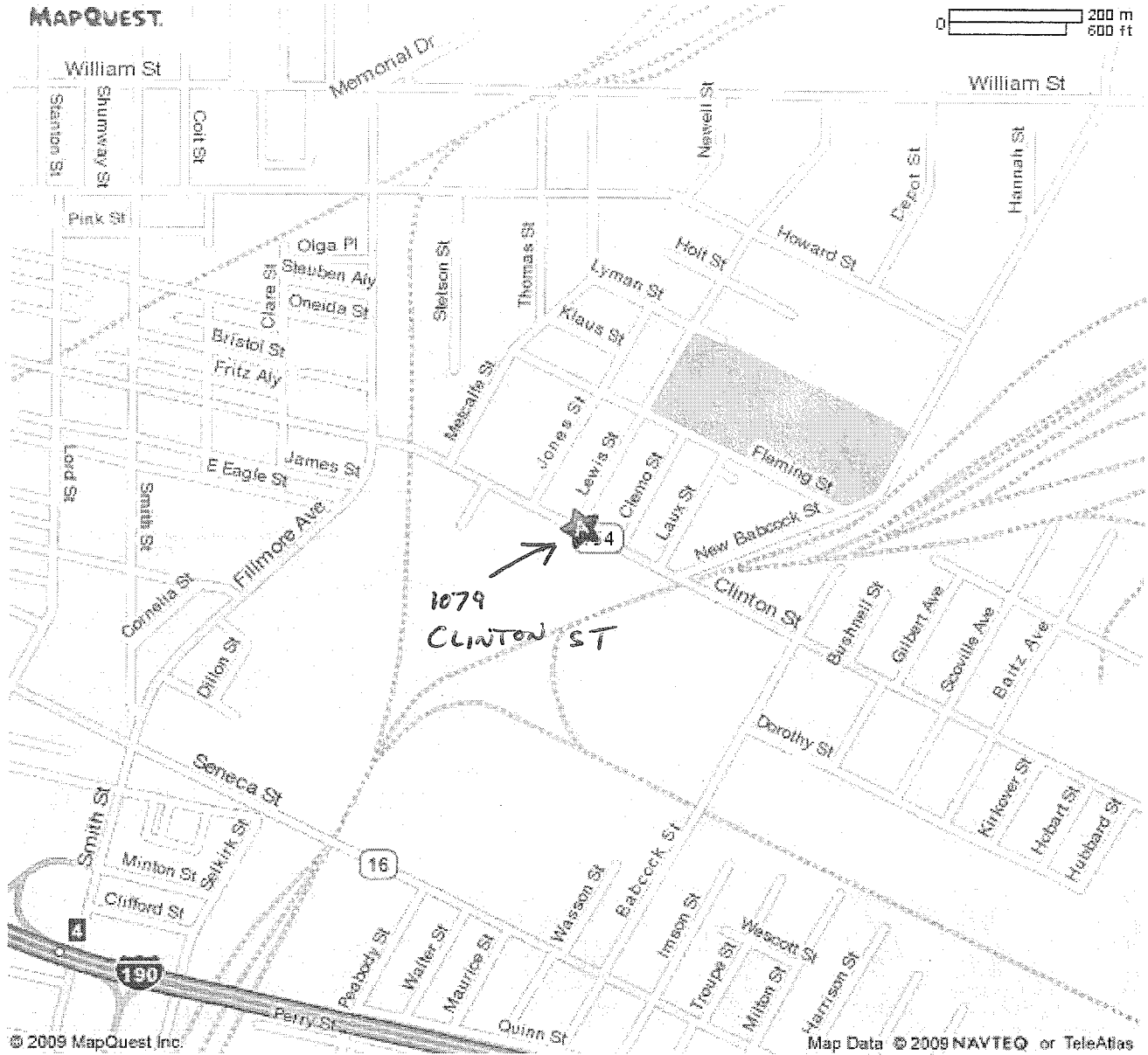
The timing and location of this project may be such that cold stress could pose a threat to the health and safety of site personnel. The Site Health and Safety Coordinator will implement work and rest regimens so that OP-TECH personnel do not suffer adverse effects from cold stress.

Safety Briefing

Prior to the start of work all OP-TECH employees, and any subcontractors, will participate in a "documented" job brief. Each employee working on site shall review this Health & Safety Plan and sign the acknowledgement page included as Attachment D, Pre-job briefs will be completed every day.

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ATTACHMENT A
PROJECT LOCATION MAP



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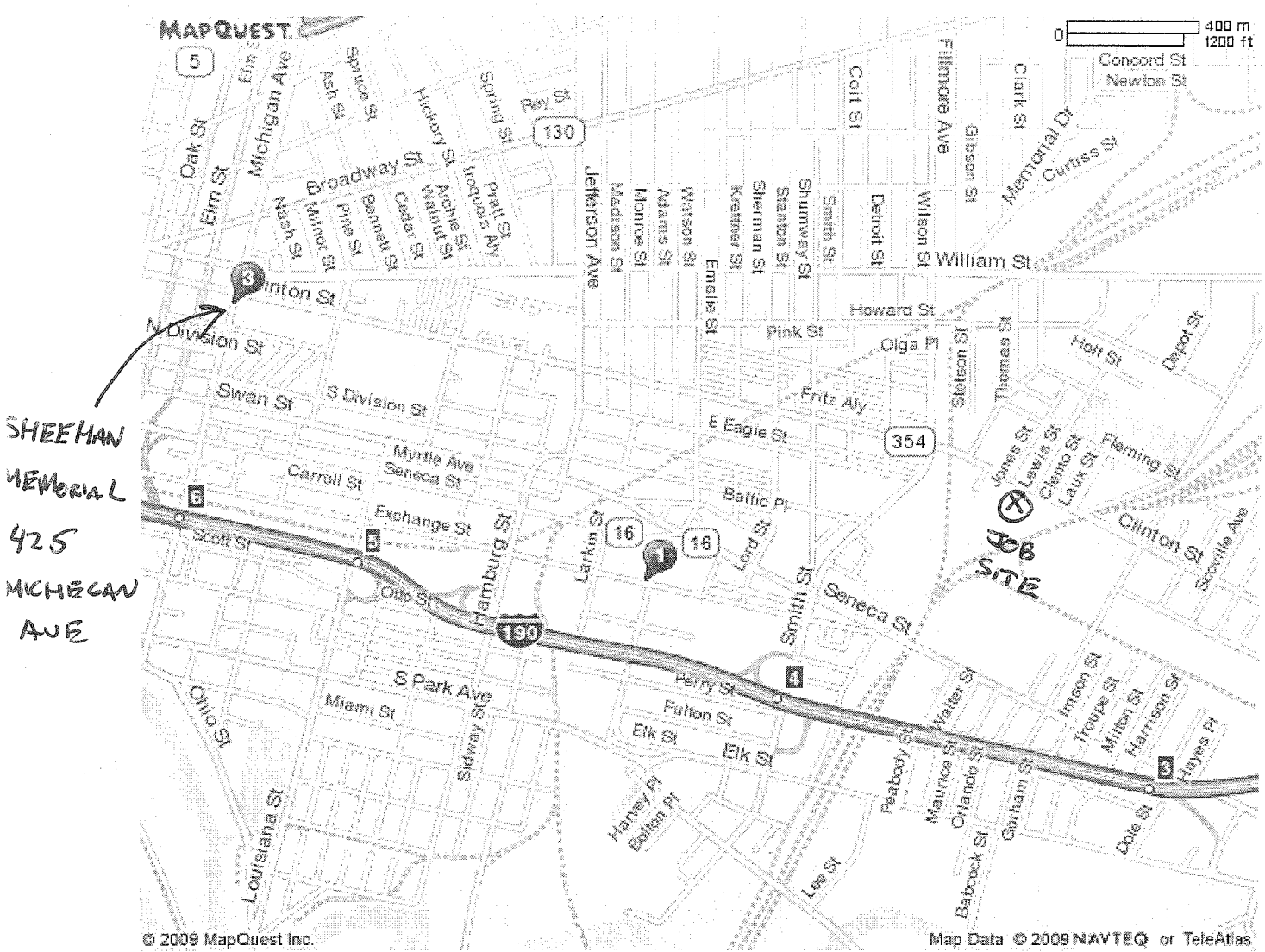
ATTACHMENT B
JOB HAZARD ANALYSIS WORKSHEETS

JOB HAZARD ANALYSIS WORKSHEET

Project Description:	Bengart & Memel, Remediation	
Task Description:	Excavation and Disposal of Soils	Task Duration (days): 10
Specific Location of Task:	1079 Clinton Street, Buffalo, New York	
Job Hazard Analysis Performed By:	Gary Britt	Date: 11/17/09
POTENTIAL HAZARDS DURING THIS TASK (PLEASE SEE REVERSE FOR ITEMS TO CONSIDER)		
Summary of Hazards	Critical Issues	
Potential contact with soil, sediment and water contaminated with polychlorinated biphenyls (PCBs) Physical hazard – tight access to the site Physical hazard – traffic – trucks on/off the site off of Clinton Ave Excavation hazards	Monitor site conditions and breathing space with a photo-ionization detector (PID) and dust (PDR's) Remove fence and regrade entrance to get trucks in Work out system with trucks to only allow one on-site at a time. No workers to enter excavations greater than 4 ft deep w/o benching and/or shoring. Place fencing around excavations.	
MEASURE(S) TO CONTROL OR ELIMINATE HAZARDS DURING THIS TASK		
Engineering Controls	Administrative Controls	PPE Requirements (Level A, B, C, D)
Maintain a distance of greater than 10 feet from excavator bucket Improve access to the site – excavator Orange Hi-Viz Fencing around excavations	Contact UFPO for utility clearance prior to start of work Monitor work space with a PID Follow OP-TECH Health and Safety Plan	Level D and leather gloves Upgrade to Poly Tyvek if contact with groundwater is encountered.
Decontamination Procedures for People and Equipment:	Remove soils from excavator by hand using shovels and brooms. Wash hands prior to eating and/or drinking.	
Required Permit(s):	Excavation Permit – 4 ft deep excavations	
Specific Training Requirements:	HAZWOPER 40 Hour Training	

Have We Considered		
Personal Protective Equipment	People	Environment
Hard hat Face shield Safety glasses with side shields Hearing protection Fire resistant clothing Gloves (leather, rubber, impact, Kevlar) Personal flotation device Safety shoes with metatarsal guards Welding gloves and face shield Respirator and proper cartridge Splash goggles Safety harness and lanyard Inspection of PPE	Worker fatigue Other work groups in the area Public safety Safe lifting techniques Climbing ladders Work platforms and surfaces Potential chemical hazards <ul style="list-style-type: none"> • Skin contact - burns • Ingestion • Inhalation • Absorption 	Condition adjacent structures Weather conditions Lighting conditions Access and egress (terrain) Water bodies Spills and leaks Dust Proximity to electrical hazards Heat and cold stress Heavy objects High noise levels Lead, Asbestos, Mercury, Chemicals Overhead hazards
Electrical Safety – LO/TO	Tools	Crane and Hoist Lifting
Equipment locked and tagged Start/stop switch tried GFCI tested Arc flash protection required Grounding and bonding completed Extension cords inspected High voltage gloves tested and inspected Jewelry removed Voltage testers available	Proper tool for the job Tools inspected and in good condition Properly grounded Pinch points identified Rotating equipment guarded Sparks contained Air hoses secured Ring buoy	Crane certification Crane operator trained and certified Load chart verified Boom angle verified Chain fall inspected Rigging equipment inspected Proper rigging technique Overhead line clearance greater than 10 feet Tag lines in place
Permits	Fall Protection	Hot Work
Excavation Confined space Safe work (client required) Hot work	Barricades in place Harnesses and lanyards inspected Hole covers in place and marked	Permit completed and posted Fire watch assigned Permit closed
Emergency Equipment	Housekeeping	Excavation
Fire Extinguisher First Aid Kit Safety Shower Eye Wash Station MSDS location Decontamination area Emergency telephone numbers posted	Slip/trip/fall hazards identified Materials stored properly Adequate trash containers Trash cleaned up Scrap piles removed Exits and stairs clear Rebar safety caps in place Aisle ways clear	Underground utilities evaluated New Jersey "One Call" verified New York Dig Safely Verified Properly barricaded Adequate night lighting Means of entry/exit laterally every 25 feet Inspected by competent person Is the excavation a confined space Proper trenching, shoring and sloping
Confined Space	Stand By Personnel	Welding
Entrants and attendants are trained Permit completed Entrants and attendants sign in and out Rescue team confirmed Tripod and life lines Communication procedure established Atmospheric testing performed Periodic or continuous monitoring Adequate ventilation	Confined space attendant Supplied air bottle watch Fire watch Electrical safety watch Traffic or railway flagman	Flash protection for surrounding area Combustibles within 35 feet removed Face shields Grounding of equipment Dedicated fire watch assigned Fire extinguisher and fire blanket Spark containment Sewers and trenches covered Floor above and floor below evaluated

ATTACHMENT C
LOCATION OF NEAREST HOSPITAL



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ATTACHMENT D EMPLOYEE ACKNOWLEDGEMENT

I acknowledge that I have reviewed the information in this Site Specific Health and Safety Plan and I understand the site hazards as described and agree to comply with the contents of this Plan.

EMPLOYEE	COMPANY	SIGNATURE	DATE