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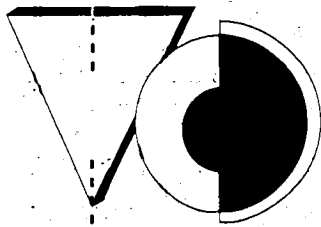
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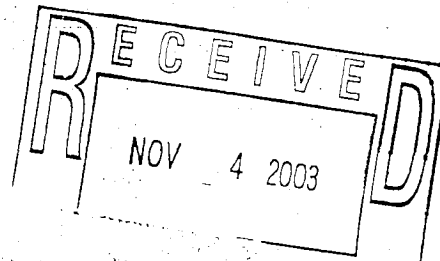
vision
construction inc.

WORK PLAN

FOR

NIAGARA TRANSFORMER CORPORATION

SITE No. 9-15-146
CONTRACT No. D004512
ERIE COUNTY, NEW YORK



Site Description and History

The 3.6-acre site owned by NTC is located at 1747 Dale Road, Between Harlem Road and Interstate 90, in the Town of Cheektowaga, Erie County, New York (latitude 42 54' 15''N, longitude 78 46' 00''). One site structures include an active electrical transformer manufacturing/office facility (main NTC building), a storage warehouse, and tank farm south of the plant.

A cemetery is west of the site, and an undeveloped parcel, which was purchased by NTC in 1983, is east of the site. The properties north of the site along Dale Road are occupied primarily by light industries. A few homes are located northwest of the site on Dale Road; however, the nearest residential area is located approximately 1,000 feet southwest of the site. A rail yard is south of the site.

A gentle slope to the south characterizes the topography of the site. A drainage ditch along the east perimeter of the site, the North/South (N/S) ditch, directs runoff south from the parking lot into another ditch, the East/West ditch, (E/W). The E/W ditch is located between the site's southern perimeter and the rail yard and flows west, eventually discharging into a retention pond.

No record exists of industrial activity on the site prior to NTC purchase and construction of the manufacturing facility in 1958. Until 1980, oils containing PCBs were stored or used on site as insulating fluids in the manufacture of liquid filled transformers.

Under a Consent Order with NYSDEC, NTC conducted an RI/FS that was finalized in September 1993 (Woodward-Clyde 1993).

A Record of Decision (ROD) was signed on December 30, 1993. Based on the results of the Remedial Investigation/Feasibility Study (RI/FS) for the site and the criteria identified in the RI/FS for the evaluation of alternatives, New York State Department of Environment Conservation (NYSDEC) selected a remedy (see the ROD, NYSDEC 1993) to excavate on-site and off-site polychlorinated biphenyl (PCB)-contaminated soils and sediments, to dispose of the PCB contaminated soils and sediments in an appropriate off-site landfill, and to conduct long-term monitoring of groundwater.

Remediation work at the NTC site started in 1996 and was completed in September 1997. On-site soil remediation involved excavation and disposal of primarily the top 4-foot layer of soil, and backfill with clean sandy silt/clay material. Under the paved parking lot south of the main NTC building, approximately 18-20 inches of stone sub-base material was placed above a 2-foot layer of clean soil backfill. Along the N/S and E/W ditches, excavations of contaminated soil extended up to 12 feet. A liner was installed in sections of the N/S and E/W underlying the stone. Soils in the N/S and E/W area that were found to be contaminated above cleanup goals were removed with the exception of two areas; excavation of contaminated soils was ceased at a depth of approximately 2.5 feet in the E/W ditch invert behind the adjacent St. Adalbert's Cemetery. At this latter location, unmarked graves were encountered at approximately 2.5 feet below the original E/W

ditch invert. Based on an agreement between NYSDEC, New York State Department of Health (NYSDOH), and St. Adalbert's Cemetery, remedial work was suspended in this area, and the contaminated unmarked graves were capped with geotextile, sorbent pea gravel, HDPE liner, and soil. The ditch was realigned and shifted to the south. Both hazardous and nonhazardous waste remain at depths greater than 2.5 feet below ground surface (bgs) in the E/W ditch in this area. Excavation was not conducted beneath the NTC building.

Remediation of the retention pond sediments consisted of excavating to a depth of 18 inches below original grade at the east end of the pond, and the balance of the pond to be remediated was excavated to a depth of 12 inches below original grade. All piped discharges to the pond were flushed, cleaned, and inspected. Remedial activities also included remediation of the storm sewer immediately south of Broadway by excavating and disposing of pavement and soils above and adjacent to the sewer pipe, cleaning and disposing of the existing storm pipe, and installing a new storm sewer pipe.

A system of storm sewer pipes was also installed under NTC'S rear parking lot and the driveway, to replace the previous one, that directs storm water from the site to one discharge point at the N/S ditch. The storm sewers were installed approximately at 3.5 to 4 feet below grade.

Recontamination of the N/S ditch containing sediments was reported in late April 1997, after an oily-emulsion containing 300-milligrams per-kilogram (mg/kg) PCB's was found in the concrete tank just upstream of the head of the N/S ditch. In June 1997, an emergency water treatment system (EWTS) was installed at the head of the N/S ditch to treat a portion of the storm water from the site and reduce the potential for recontamination of the previously remediated downstream areas.

The EWTS was installed because recontamination of the ditches was occurring in 1998; roof drains from the main NTC building were cleaned and re-routed to connect to the storm collection system at the site.

No remediation was done in the rail yard south of the site or of ground water. The culvert underneath the railroad was sealed off where it formerly connected to the E/W ditch.

During 1998, NYSDEC conducted additional sampling to identify point sources of PCBs in the site storm water runoff. Potential PCB sources identified by NYSDEC as a result of this study include NTC's manufacturing operations, residual contamination in the soil and groundwater on site, and/or contamination beneath the facility. Based on the 1998 NYSDEC investigation results and recommendations, E & E conducted an additional site investigation to further identify the source of continued PCB release.

Introduction:

The **purpose** of this work plan is to outline methods and procedures. This Project includes abandoning the existing storm sewer, installing a new storm sewer system, installing a storm sewer pipe in the N/S ditch, concrete lining (shotcrete) a portion of the E/W ditch, and excavation and disposal of contaminated sediment and stone from the ditch. The general scope of the work to be performed under this contract shall include but not limited to the following:

1. Preparation of a Work Plan, Health and Safety Plan, and QA/QC Plan as per Section III, Article 5. Minimum requirements for the Work Plan are provided in Paragraph 1.6.
2. Mobilization and demobilization of equipment and material to the site.
3. Place and maintain storm water management controls throughout the project.
4. Excavate contaminated ditch sediment and stone from designated areas, and properly dispose of off site.
5. Abandon in-place the existing subsurface storm sewer system in the south parking lot and driveway, and install low-permeability sub-surface dams along this system.
6. Provide new subsurface storm water piping in the south parking lot and drive way. Connect new piping to existing roof leaders.
7. Pressure grout under a portion of the loading dock slab and restore slab to original condition.
8. Provide an 18-inch profile wall pipe and low-permeability sub-surface dams in the N/S ditch.
9. Provide concrete lining (Shotcrete) of the E/W ditch and install sub-surface dams along E/W ditch.
10. Maintain site safety at all times during construction in accordance with the approved site Health and Safety Plan.
11. Site cleanup and restoration.

The plan includes site maps indication equipment decontamination, contaminated material stockpiling and equipment staging areas. Also included are letters of intent and capacity from intended disposal facilities for off-site disposal of decontamination water, personal protective equipment and solids from the decontamination pad.

Scope of Work

The following tasks are listed in the approximate proposed order of performance, however some tasks may be performed concurrently (refer to the proposed project schedule).

Mobilization

With in 5 days after receipt of notice to proceed, mobilization of materials and heavy equipment to the site will be initiated. The heavy equipment staging area will be

located in the east area of the site, as shown on Figure 1. The 20 CY roll off, job trailer and portable toilet will also be located in this area. The following equipment is anticipated to be used for this project and is proposed to be staged in the east area when on-site and not in operation

- Minimum 35,000# Excavator (JD 160LC or equivalent)
- Rubber Tire Backhoe (Ford 555 equivalent)
- 10 Wheel Dump Truck
- Backhoe with Plate Compactor
- 10 Wheel Concrete Truck
- New Holland Skid Steer
- Vermeer Saw
- Walk Behind Saw
- Mobile Drill Rig
- 4" Centrifugal Pump
- Walk Behind Plate Tamper and/or Roller
- Mobile shot crete and pump rig
- Any Equipment Necessary for Proper Decontamination will be on Site

Cleaning and grubbing will also be performed during mobilization to the site. The amount of required clearing/grubbing is expected to be minimal, with only minor clearing of brush and removal of several small trees to be performed using a chainsaw. The cleared material will be chipped and removed or mowed on site.

A Field Office will be brought on Site and Located at the Temporary Parking Area at Dale Road.

All the Equipment will be secured in the Fenced in Area, or Will Have Temporary Fence Placed Around it At the Work Area.

Construction of Decontamination and Staging Areas

Decontamination Pads:

Heavy equipment that comes into contact with contaminated materials in the Exclusion Zones (EZ) will be decontaminated at the decontamination (decon) pad, which will be the designated contamination reduction zones (CRZ) located on the property adjacent to the existing NTF facility. When the equipment is moved to the CRZ the bucket will be wrapped and taped up in poly. The heavy equipment to be utilized for construction of the decon pads is expected to be a track excavator, dozer, and 10- wheel dump truck. The locations of the proposed EZ and CRZ are shown on Figure 1.

The decon pad will have dimensions of approximately 15 feet x 30 feet, and will be surrounded by a 1 ft high x 1 ft wide berm constructed of sand and gravel. Prior to construction, the ground surface in the designated location will be sloped to a low area to facilitate installation of a sump and collection of rinse waters. A 2"-inch layer of sand will be placed over the native soil, and will be overlain by a 40 mil HDPE liner which

will then be covered with a 2"-inch layer of sand and ¾ steel plates, a 6' chain link fence claped with 10 mil plastic will be used as splash shields and will be installed along two sides of the pad. The liner will extend a minimum of 3ft beyond the limits of the pad and will be held in place using sand bags.

The pad will slope to a low area, excavated to approximately 2 ft below the remainder of the pad, at which location a sump will be installed for collection of rinse waters. The sump will consist of a 55-gallon polyethylene drum, cut in half and with holes drilled in the sides, installed above the liner and surround by crushed stone. Water accumulating in the decon pad sump will be pumped thru a flexible hose that will be plumbed into the existing emergency water treatment system.

Heavy equipment exiting each EZ will be decontaminated at the decon pad (CRZ) by cleaning of loose soil using a spade or shovel and brooms, followed by pressure washing using a minimum 3,000psi pressure washer, if debris is not sufficiently removed using shovels/brooms.

Temporary fencing will be placed at the perimeter of the Excavated StockPile Area & The (CRZ), as shown on attached drawing. The fencing will be 6 ft high chain link fencing, held in place by steel posts.

Staging Areas

The heavy equipment to be utilized for construction of the staging area is expected to be a rubber tire backhoe, dozer and 10-wheel dump truck and excavator. See Figure 1 for location.

This area will be lined, bermed and covered at the end of every day.

Excavated material from the E/W & N/S ditches will be loaded on trucks and taken to the stockpile area. Care will be taken so that the outside of the trucks do not become contaminated. Loading of materials on to trucks will be done over a 40mil liner placed on the ground.

Erosion Control and Temporary Fence

Silt fencing will be installed near the property line, at the downstream perimeter of the site. It will also be placed at the down stream end of all work zones.

Pipe, Catch Basin, Pre-cast Concrete Tank, Installation and Excavation

Entry of personnel into trenches exceeding 5 ft in depth is not anticipated. However, if such entry is necessary the trench walls will be sloped in accordance with the soil type (A, B or C) in accordance with OSHA Part 1926.652, or a trench box will be utilized. Saw cut pavement using a Vermeer Saw or Walk Behind Saw.

A surveyor will come in, set up line and grades and stake out. A survey cut sheet will be made for use on the site.

The crew will come in with a Vermeer Saw or Walk Behind Saw to cut the pavement. The pipe crew will excavate the trench with a hydraulic excavator and place materials on trucks. Excavated material will be segregated and placed in the stock pile area.

Pipe will be Fusion welded above grade and lowered into the trench using a hydraulic excavator. The trench will then be backfilled using a 928 loader and compacted using a 7,000-PSI plate compactor.

Visone will use thermal butt fusion method in accordance with ASTM D-2657 and will be using a McElroy butt fusion machine.

Pressure Testing Method

Clear interior of piping and structures of dirt and superfluous material as work progresses. Maintain swab or drag in piping, and pull past each joint as it is completed.

Inspect interior of piping to determine whether line displacement or other damage has occurred. Inspect after approximately 24 inches of backfill is in place, and again at Substantial Completion of the Project.

1. Submit separate reports for each system inspection.
 - a. Alignment: Less than full diameter of inside of pipe is visible between structures.
 - b. Crushed, broken, cracked, or otherwise damaged piping.
 - c. Infiltration: Water leakage into piping.
2. Replace defective piping using new materials, and repeat inspections until defects are acceptable to ENGINEER.

Piping Tests: Conduct piping test before joints are covered and trench has been partially backfilled. Fill pipeline 24 hours before testing and apply test pressure to stabilize system. Use only potable water:

Hydrostatic Tests: Test at not less than 100psi for 2 hours.

1. Increase pressure in 50-psig increments and inspect each joint between increments. Hold at test pressure for one hour; decrease to 0 psig. Slowly increase again to test pressure and hold for one more hour. Maximum allowable leakage is 2 quarts per hour 100 joints. Remake leakage with new materials and repeat test until leakage is within above limits.

Pressure and submit all reports for testing activities.

Dust Control

Spraying water in areas of excessive dust generation will minimize windburn contamination, if any.

Dewatering

water entering the excavation will be collected and pumped using submersible pump from work zone directly into the existing emergency water treatment plant at the site.

If dewatering is necessary, the water will be pumped from the excavation using a gas operated self-priming centrifugal pump, with a 2-inch discharge and pumped to the EWTS. Pipe will be Fusion welded above grade and lowered into the trench using a hydraulic excavator.

Care will be taken not to overload the existing 10gpm system. Additional poly holding tanks may be brought on site as needed.

All pumps used will be flushed out at the end of the project at the CRZ.

Excavation of Non Hazardous Material

Excavation of approximately 225 tons of non-hazardous contaminated material will be loaded directly onto trucks and hauled to EZ site. The heavy equipment used to perform this operation is a hydraulic excavator and 10 wheel dump trucks. After testing this material will be hauled and disposed of contract requirements.

Copies of the state permits from the disposal facilities will be provided to the engineer prior to the start of work.

Certificates of disposal for all non-hazardous contaminated material will be submitted to the engineer. Sec Section 02935 there will be a certified scale at the disposal facility.

We will also be using the certified scale at Jims Truck Plaza, 2125 Walden Ave. Cheektowaga, NY

Any utility excavations left open will be temporarily fenced using 48 HDPE construction fencing.

Sampling

All sampling and analyses on the site will be done in accordance with spec section 02940 off-site disposals, paragraph 3.2 and the procedures spelled out in the sampling plan.

Copies of permits of waste haulers will be provided to the engineer prior to starting work.

Compaction

Our method of compaction of backfill materials will be to place materials in layers and compact with a vibratory compactor, or a hoe pack mounted to a back hoe.

Removal of Existing Storm Sewers

The existing storm sewers to be abandoned in place will be located, excavated down to and sealed off by means of capping the ends or grouting the open ends in accordance with spec section 02630. Then backfilled and paved over.

Traffic Control

Visone will access the site from the existing NTC driveway. We will have a traffic manager on site to control the day-to-day traffic. The use of this driveway and the parking lot will be coordinated with the NTC daily.

Sand /Bentonite

The sand/bentonite mixture will be mixed using power equipment and blended thru a Royer 360 shredder stored at Visone Construction yard (79 Sheldon), to the proper ratio as described in spec section 02300 paragraph 2.1, D. We will be using Quality Inspection Services, Inc to do the hydraulic conductivity testing.

Pressure Grouting

Penn Hall will perform 10 borings at approximately 8' intervals within the loading dock area inside the main NTC building as shown in Contract Drawing. Penn Hall Co. will first perform borings at the outside of the area and work towards the inside of the area to be grouted, performed interior borings last.

Borings will be advanced approximately 6" into formation underlying crushed stone layer. Visone Construction shall record logs for all borings. Boring logs will be submitted to the Engineer. Pressure grout will be injected into crushed stone layer by beauty pools, Inc.

Grout will be brought to within 6-12" of the finished surface and be allowed to set overnight. Visone Construction will backfill the boring with high early strength concrete the following day and provide a smooth finished surface.

We will not perform any borings that cannot be pressure grouted in the same workday. All work will be coordinated with Niagara Transformer Corporation.

All drill cuttings will be handled as hazardous materials and placed in the stockpile area for disposal.

Shotcrete

Visone will sub the placement of the shotcrete work in the east – west ditch to Beauty Pools. Quality Inspection Services, Inc will be doing the core testing of the shotcrete. All of the above work will be done in accordance with spec section 03360 shotcrete. The placement of the shotcrete is not recommended for temperatures below 45 deg . F

Work Experience

Lucian Visone – Company Owner 22 years experience in General Construction
David Visone – Company Owner 28 years experience in General Construction
Fred Wesolowski – Superintendent with Visone has 26 years experience in General Construction.

Our crew size will vary depending on the operations. It should average about three or four workers.

All of our crew members that will be working on this project have had the 40 hour hazardous waste operator training.

The qualifications of Beauty Pools personnel that are doing the shotcrete application will be provided as a shop drawing prior to starting work.

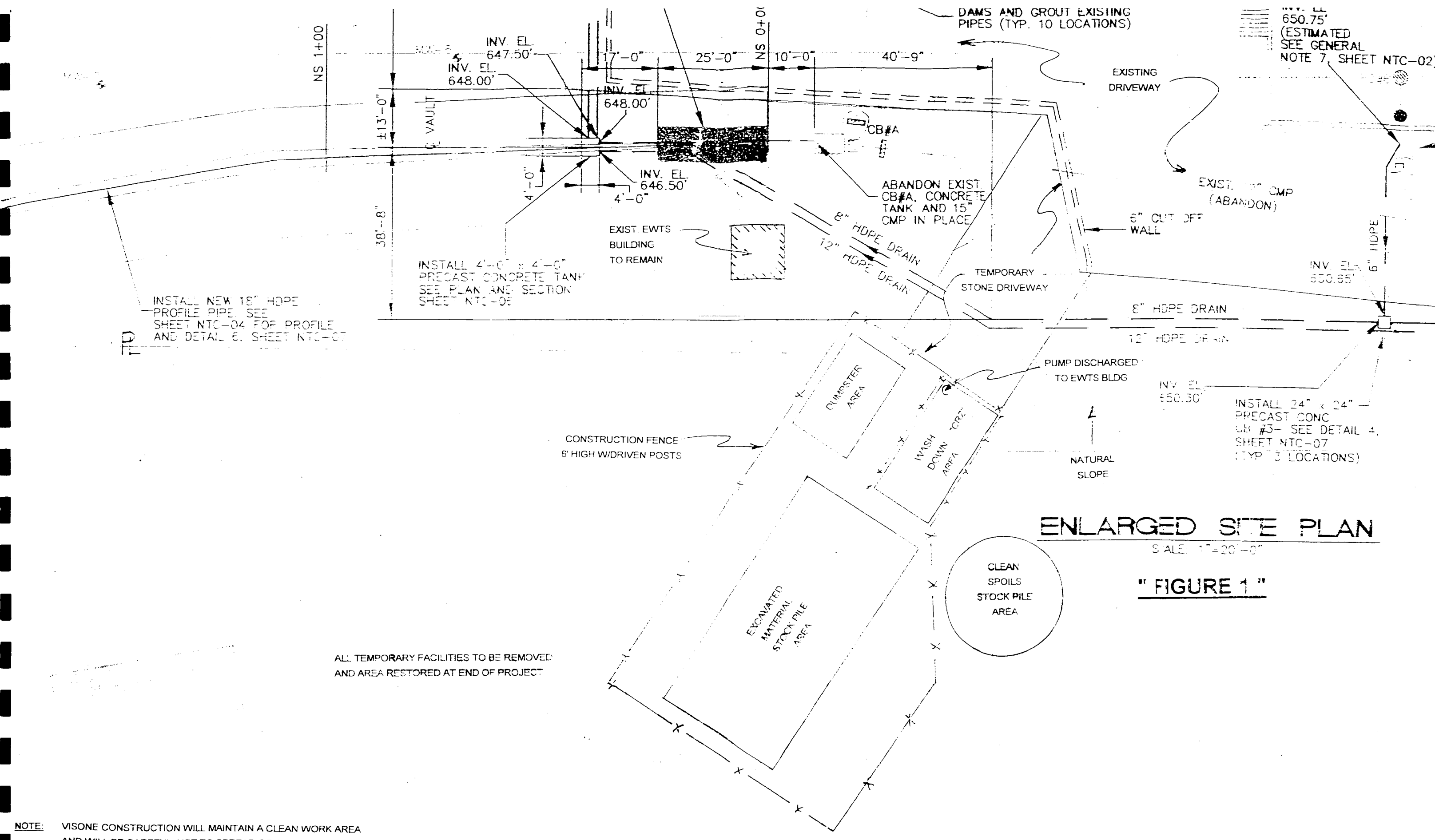
Paving

American Paving and Excavating, Inc will perform the paving work. The personnel at NTC will be able to drive on the new pavement after it has been rolled.

Visone will temporary patches all pavements using cold patch if the black top plants can no longer provide hot black top material.

Security

Visone will have the stock pile and wash down areas fenced in. All equipment will be locked up in the fenced areas. Any excavations that are left opened will be fenced.



650.75'
 (ESTIMATED
 SEE GENERAL
 NOTE 7, SHEET NTC-02)

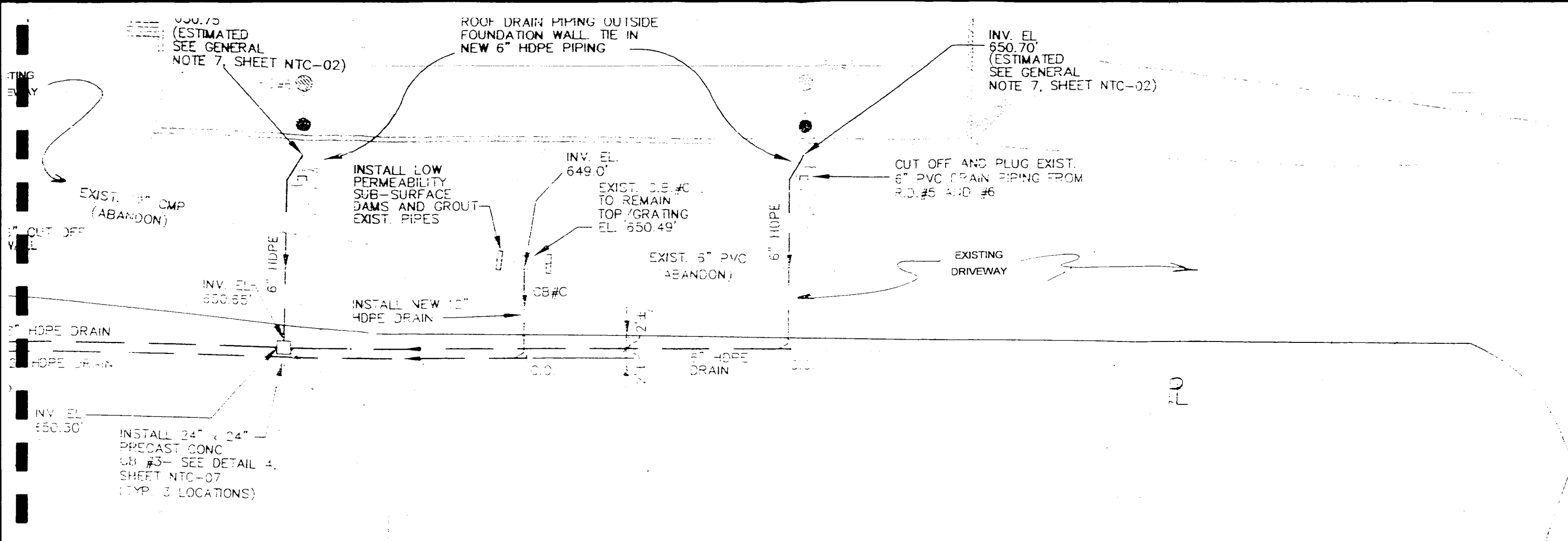
ENLARGED SITE PLAN

SCALE: 1"=20'-0"

"FIGURE 1"

ALL TEMPORARY FACILITIES TO BE REMOVED
 AND AREA RESTORED AT END OF PROJECT

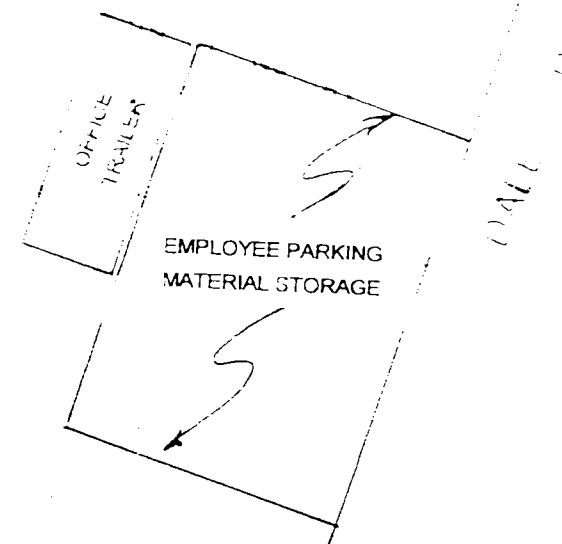
NOTE: VISIONE CONSTRUCTION WILL MAINTAIN A CLEAN WORK AREA
 AND WILL BE CAREFUL NOT TO SPREAD CONTAMINATION WHEN EXCAVATING
 AND TRANSPORTING MATERIALS ON SITE. ANY EQUIPMENT THAT LEAVES THE
 SITE WILL BE DECONTAMINATED.



PROPOSED SITE PLAN

SCALE: 1"=20'-0"

"FIGURE 1"



Visone Construction,
 79 Sheldon Avenue
 Depew, New York 14043
 (716) 681 7331

GREAT LAKES ENVIRONMENTAL
& SAFETY CONSULTANTS, INC.

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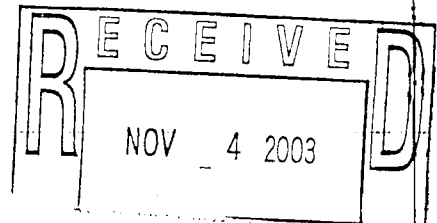
SAMPLING QA/QC PLAN

- FOR -

**Visone Construction, Inc.
79 Sheldon Avenue
Town of Cheektowaga, NY 14043**

**THE FORMER NIAGARA TRANSFORMER CORPORATION SITE
1747 Dale Road
Cheektowaga, NY**

Date: October 30, 2003



- As Prepared By: -

**EVAN J. CASEY, PRESIDENT
GREAT LAKES ENVIRONMENTAL & SAFETY CONSULTANTS, INC.
3556 LAKESHORE RD
BUFFALO, NY 14219**

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1.0 SITE DESCRIPTION/ SCOPE OF WORK

Niagara Transformer Corp. is located at 1747 Dale Road, between Harlem Road and Interstate-90, in the Town of Cheektowaga, New York. The site became the Niagara Transformer Corporation manufacturing facility in 1958, where Polychlorinated Biphenyls (PCB's) were stored and used in transformer assembly processes. The scope of work includes contaminated material removal and disposal and the installation of additional water run-off containment controls.

2.0 PURPOSE

- A. This plan specifies requirements for handling, transport and disposal of contaminated materials.
- B. This plan specifies sampling procedures and all necessary sampling on site including soil characterization sampling, water sampling for waste water treatment, and air sampling for worker exposure.
- B. Niagara Transformer will be the generator and will sign all manifests and bills of lading.
- C. Visone Construction will coordinate the transportation and disposal of all contaminated soil generated on this job in accordance with all applicable Federal, State, and local regulations, laws, codes, and ordinances governing the handling, transportation, and disposal of excavated debris.
- D. Visone Construction will obtain all local, State, and Federal permits required for the transport and disposal of all contaminated soil.
- E. Visone Construction will ensure that Waste Management, Inc., the chosen Treatment, Storage and Disposal Facility (TSDF) will have all certifications and permits as required by local, State, and Federal regulatory agencies to receive and dispose of all contaminated soil.

3.0 EXECUTION

The responsibilities of Visone Construction regarding stockpiling, loading and transportation and disposal of materials excavated will include, but are not necessarily limited to the following

- A. Stockpiling of contaminated soils will likely be necessary for sampling and also to stage the material during the disposal approval interim. However, if approved by the disposal facility, direct loading into roll-offs or trucks may also be a possibility.
- B. Provide, deliver, and remove from the site, at the locations coordinated by Visone Construction, all roll-off containers and tractors with trailers of up to 20 cubic yard capacity.
- C. Provide enough trucks and/or containers, distributed over the course of the work day, to allow for consistent transportation and disposal of all contaminated soil.
- D. Provide an on-site coordinator for the duration of the project. Duties of the on-site coordinator will include: the procedures for installing the cover over the stockpiles, containers/trailers; handling all paperwork and placards for transportation and disposal of all contaminated soil; and coordinating the supply and handling of stockpiles, containers/trailers for Visone Construction.



- E. Provide access for truck traffic from loading areas.
- F. Load containers/trailers with all contaminated soil to the legal maximum permitted weight.
Visone Construction will use reasonable care when loading containers/trailers to ensure containers/trailers are not damaged.
- G. Portable certified scales will be used to weigh trucks entering and leaving the site.
- H. Coordinate the day to day delivery and removal of containers and truck traffic.

3.0 HANDLING OF WASTE MATERIALS

- A. Stockpiles or staged material will be placed on a minimum of 30 mil or equivalent plastic ground cloth, and will be covered by 6 mil polyethylene sheeting or equivalent to protect against leaching or runoff of contaminants. For as long as the stockpiles exist (not to exceed 60 days without approval) the top sheeting will be weighted, and measures will be taken to minimize tearing. Grading of the surrounding surface will also be conducted to provide for drainage away from the pile.
- B. Wastewater generated or accumulated stormwater will be directed to the on site wastewater treatment facility. Sampling will be conducted as necessary to ensure treatment plant compatibility.
- C. Dust control measures shall be employed, as needed, to minimize the generation of dust.
- D. If necessary, staging of excavated material will involve the selection of an appropriate area. The area will be used only when direct loading of excavated debris into trucks is not possible.

4.0 SAMPLING REQUIREMENTS

The purpose of sampling and analysis on this site is to characterize excavated soil and waste generated from the construction operations.

Soil samples will be taken to characterize whether the excavated material will be considered Hazwaste (above 50 ppm PCBs) or Non-Hazwaste (below 50 ppm PCBs). Compositing samples will be taken from stockpiled excavated soil.

One sample of water and one sample of sediment will be taken from the cemetery sump. Water samples will be taken from the waste-water treatment system as needed.

TABLE 1
Analysis Method, Samples, QA/QC and Holding Time

<u>Analysis</u>	<u>Method</u>	<u>Samples/Matrix</u>	<u>QA/QC samples</u>	<u>Holding Time</u>
PCBs	8082	10 Soils	1 Matrix Spike Dup 1 Matrix Spike Blank 1 Fl dup/10 samples	14 days from sampling to extraction 40 days for analysis
PCBs	8082	1 Water (from Cemetery Sump) 1-10 Water (waste water treatment system)	1 Matrix Spike Dup 1 Matrix Spike Blank 1 Fl dup/10 samples	7 days from sampling to extraction 40 days for analysis
PCBs	8082	1 Sediment (from Cemetery Sump)	1 Matrix Spike Dup 1 Matrix Spike Blank 1 Fl dup/10 samples	14 days from sampling to extraction 40 days for analysis

5.0 SAMPLING PROTOCOL

- A. A pre-cleaned stainless steel spoon will be used to obtain a representative sample. Dedicated sampling equipment will be used for this project. If any equipment requires cleaning, it will be washed with an Alconox detergent and rinsed with water and DI water prior to use. All equipment will be replaced prior to use.
- B. The sample will be placed in labeled sample container provide by the laboratory. All sample information will be recorded in the field logbook. A chain-of-custody will be completed which includes sample identification with the date and time collected. The sampler shall sign-off on the chain-of-custody, place it inside the cooler with the samples, a temperature blank and ice and secure the cooler with a custody seal for shipment to the laboratory.
- C. Soil and sediment samples will be collected in 1-4oz glass jar/ sample. Water samples will be collected in 1 liter amber glass jars.
- D. All samples will be refrigerated at 4° C after collection.
- E. The samples will be shipped to the laboratory for receipt within 48 hours of day of sample collection.
- F. Analysis for disposal facility (CWM) approval will be conducted by Wastestream Technologies. ELAP status and other related information is enclosed in Attachment C.

6.0 TREATMENT, STORAGE & DISPOSAL FACILITY (TSDF)

- A. The Waste Management, Inc. (CWM) will be the primary TSDF for contaminated soils generated from this project.

SEE ATTACHMENT "C" FOR PERMITTED TSD FACILITY

7.0 DISPOSAL OF CONTAMINATED SOIL

- A. Landfilling at CWM of all contaminated material will be the method of disposal/treatment.
- B. Hazardous waste contaminated material will be brokered by CWM to an approved Haz-waste facility.
- C. Waste characterization results, certificates of disposal/ hazardous wastes manifests for all material disposed of off site will be maintained on file.
- D. Visone Construction will dispose of contaminated soil in accordance with all Federal, State, and local regulations.
- E. Visone Construction will provide to the Engineer copies of all weight slips, Both tare and gross, for every load weighed and disposed of at the accepted TSD facility. The slips will be tracked by the original manifest document number that was assigned by the Engineer at the site.

8.0 QA/QC

The attached information addresses the QA/QC measures of the laboratory.

9.0 Air Sampling

The following is the summer of air monitoring that will be conducted on site. Vapor emission response plans are found in the Health and Safety Plan.

REAL TIME MONITORING

Real - time monitoring will be used to determine if an upgrade or downgrade of PPE is necessary and to implement any engineering controls, protocols, or emergency procedures.

Real - Time Monitoring Equipment

- a. GLE will provide all personnel, equipment, facilities and supplies to implement the AMP.
- b. Equipment to be used for real-time monitoring will include organic vapor photo ionizers (PID), real-time aerosol particulate monitors, explosimeter/oxygen meters, and a Thermo Electron or Victoreen (or equivalent) Radiation detector.

- c. A PID will be available for exclusion zone operations. Real-time monitoring will be done for exclusion zone operations prior to personnel entering and while work is ongoing.
- d. All instruments will be calibrated daily according to the users manuals.
- e. A meteorological station will be on site for the recording of air temperature, wind velocity and wind direction, etc.

Real - Time Monitoring Sampling Frequency

- a. Real - Time Monitoring/sampling at the work zone will be conducted on a continuous basis including but not limited to any intrusive work or treatment involving contaminated materials to determine air quality for the purpose of PPE level requirement.
- b. A background level will be established before the start of each shift every day by monitoring for 10-15 minutes upwind of the work zone. New background levels will be established as the wind direction changes. Variations to established background levels will be reported ASAP.
- c. Real - time monitoring will be conducted around each active hazardous operation prior to personnel entering these areas.
- d. The air at half the distance to the work site perimeter locations will be monitored including an upwind and downwind location. Downwind readings half the distance to the work site perimeter will be conducted at a minimum of twice a day or whenever action levels are exceeded.
- e. If downwind particulates are detected at levels in excess of 150 ug/m³ or 2.5 times the established background level at the work zone, a re-measurement of upwind background levels will be taken using the same equipment.
- f. If work zone particulate levels reach 100 ug/m³ above background, monitoring will be conducted at mid point between work zone and downwind perimeter with dust controls implemented.
- g. Upwind background measurements will be taken hourly until the downwind work zone measurement is less than 100 ug/m³ above the upwind level.
- h. If at any time the measured particulate level at the work zone is more than 150 ug/m³ over background concentrations, work will be suspended at the site, followed by the implementation of engineering controls before work resumes.

DOCUMENTATION MONITORING

- a. Air monitoring equipment will be operated by GLE personnel who are trained, and skilled, in the use of this equipment (see attached experience information).
- b. GLE air monitoring personnel will document and direct Visone Construction regarding contamination levels, to determine if appropriate PPE is in use, assist in the establishment of engineering controls, and perform emergency procedures if action levels are encountered.
- c. Documentation monitoring will be conducted as specified or required by 29 CFR 1910 at the perimeter at a minimum of four locations (one upwind and three downwind). The four locations will be chosen according to site activities and expected wind direction.
- d. Perimeter locations will be established and marked with paint or flagged. Each will be located at six feet above ground surface.
- e. Documentation samples will be collected twice a week at regularly scheduled intervals and at the initiation of a new phase of on-site work.
- f. At the end of the week, meteorological data will be reviewed, and one upwind and two downwind samples will be selected to be analyzed. Also, a set (minimum -of one sample for each analysis or contaminant of concern) of "high risk" worker samples will be analyzed.
- g. Samples selected for analyzation will be submitted to the laboratory at the end of each workweek. Laboratory QA/QC Manual and certifications attached.
- h. Total nuisance dust will be collected using a PVC collection filter and personnel sampling pump and analyzed gravimetrically according to NIOSH Method 0500. Air samples will be collected and analyzed for VC - NIOSH Method 1007, and for metals - NIOSH Method 7300 or equal.

PERSONAL MONITORING

"High risk" workers are those workers most likely to encounter contamination on a particular task. These workers will wear appropriate collection media for select contaminants to assess worker exposure. Samples will be collected in accordance with 29 CFR 1910.

PERIMETER / COMMUNITY PROTECTION PLAN

- a. The real - time monitoring and documentation sampling described above in this document will be used to determine whether off-site emissions, as a result of site work, poses a threat to the surrounding community.
- b. If physical conditions (i.e. dust in the air, smell) or above sampling results warrant than real-time monitoring for volatile compounds in addition to the particulate levels already being monitored will be monitored at the downwind perimeter

If total organic vapor levels exceed 5 ppm above background levels work activities shall be halted at the Vapor Emission Response Plan (below) shall be followed.

ATTACHMENT A
FIELD SAMPLING PERSONNEL EXPERIENCE

Evan J. Casey

GREAT LAKES ENVIRONMENTAL & SAFETY CONSULTANTS, INC.

Buffalo, NY

President:

Director of company dedicated to servicing small to medium sized businesses in the Environmental and Safety areas in order for them to achieve and maintain compliance with Federal, State, and Local Regulations, as well as minimizing liability.

PROFESSIONAL BACKGROUND:

(1991-1994)

Manager Environmental and Safety Services

Provided in depth Industrial Hygiene and Environmental Programming for clients. Supervised and directed engineers and technicians in developing engineering projects, environmental permits and regulatory submissions. Developed and implemented Training and Safety programs including, Hearing Conservation, Respiratory Protection, Waste Management and Environmental Compliance Programs. Provided training and Curriculum development in Industrial and Construction (Environmental) arenas, including all levels of HAZWOPER training courses.

Activities on Construction related projects relating to Industrial Hygiene and environmental services extended to providing monitoring on welding and cutting operations; confined space entry surveillance; underground storage tanks, asbestos removal projects, as well as pertinent training.

(1989-1991)

Safety Manager

Provided technical assistance on Safety and Environmental accounts. Developed safety programs pertaining to Occupational Safety and Health for a wide range of clients including Industrial, Municipal, and Construction.

Environmental projects included representation of clients at Potentially Responsible Party (PRP) Steering Committees and Legislative Boards, Environmental Sampling for Soil, Water, and Air Contaminants. Performed Environmental Phase I and Phase II Audits. Training Projects included the development of a full Hazardous Waste Site worker Curriculum and Emergency Response Curriculums

(1989-1990)

Environmental Scientist/ Marketing Assistant

Participated in Field Investigation Work associated with RI/FS projects for NJDEP and DERP programs under the U.S. Army Corps of Engineers. Involved in the Safety and Environmental Programming aspects of many Industrial & Waste Site clients. Safety Officer on waste sites and in routine sampling expeditions on various projects (Industrial & Construction), many types of instrumentation and techniques were used in the course of assessing occupational exposures.



Involved in projects such as Environmental Impact studies where wildlife and fisheries studies took place; Archeological Searches (Health and Safety); marketing asbestos management abatement services and wetland delineations.

(1985-1989)

Health Physics Technician, Industrial Hygienist

Conducted environmental and occupational surveys at radiologically and chemically contaminated sites under direction of the U.S. Department of Energy and Bechtel National Inc. for the F.U.S.R.A.P. and RI/FS studies of hazardous waste sites.



JENNIFER SKOP

GREAT LAKES ENVIRONMENTAL & SAFETY CONSULTANTS, INC.

PROFESSIONAL EXPERIENCE EHS COMPLIANCE SPECIALIST/INDUSTRIAL HYGIENE TECHNICIAN

August '97 to Present

Provide technical assistance on Safety and Environmental accounts. Develop safety programs pertaining to Occupational Safety and Health for a wide range of clients including Industrial, Municipal, and Construction.

Activities range from field sampling to complete compliance management projects concerning Industrial and Construction Environmental management.

Safety related projects include General Safety issues such as Lockout Tagout, Noise Surveys, and Air Contaminant Monitoring, simulated OSHA inspections at industrial facilities.

Industrial Hygiene Projects ranged from In-Door Air Quality Investigations to Noise Surveys in facilities ranging from Fossil Fuel Power Facilities to construction operations. In all cases strict NIOSH protocols were adhered to for the Industrial Hygiene work.

Environmental projects included sampling for Soil, Water, and Air Contaminants. Participation in many on-site situations such as Underground Storage Tank Removal, and EPA/SARA permitting and reporting.

Training Projects included the development of New York State grant for Occupational Safety training Programs such as Back Injury Prevention, Emergency Evacuation, Hearing Conservation, and more.

1995 - 1997

Waste Stream Technology, Buffalo, NY

Laboratory Technician

Prepared solids, wastes, soils, and aqueous samples for acid digestion for metals analysis.

Performed various wet chemistry procedures.

Maintained detailed scientific database for procedures.

Utilized computerized data entry system.

EDUCATION:

B.S. in Environmental Studies, 1994

State University of New York at Buffalo

ATTACHMENT B
LABORATORY INFORMATION

**NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER**

Antonia C. Novello, M.D., M.P.H., Dr.P.H.



Expires 12:01 AM June 16, 2003
Issued April 11, 2003

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 602 Public Health Law of New York State

DR. BRIAN S. SCHEPART
WASTE-STREAM TECHNOLOGY
302 GROTE STREET
BUFFALO NY 14207 United States

NY Lab Id No: 11179
EPA Lab Code: NY00068

*is hereby APPROVED as an Environmental Laboratory in conformance with the
National Environmental Laboratory Accreditation Conference Standards for the category*
ENVIRONMENTAL ANALYSES SOLID AND HAZARDOUS WASTE
All approved analytes are listed below:

Characteristic Testing

E.P. Toxicity	SW-846 1910
Ignitability	SW-846 1010
	SW-846 1020
Reactivity	SW846 Ch7, Sec. 7.3
TCLP	FED REG 1911

Chlorophenoxy Acid Pesticides

2,4,5-T	SW-846 8151A
2,4,5-TP (Silvex)	SW-846 8151A
2,4-D	SW-846 8151A
Dicamba	SW-846 8151A

Chlorinated Hydrocarbon Pesticides

4,4-DDD	SW-846 8081A
alpha-BHC	SW-846 8081A
Chlordane Total	SW-846 8081A
Dieldrin	SW-846 8081A
Endosulfan I	SW-846 8081A
Endosulfan sulfate	SW-846 8081A
Endrin aldehyde	SW-846 8081A
Heptachlor epoxide	SW-846 8081A
Lindane	SW-846 8081A

Haloothers

Bis (2-chloroisopropyl) ether	SW-846 8270C
Bis(2-chloroethoxy)methane	SW-846 8270C

Metals I

Barium, Total	SW-846 6010B
Cadmium, Total	SW-846 6010B
Chromium, Total	SW-846 6010B
Lead, Total	SW-846 6010B
Nickel, Total	SW-846 6010B
Silver, Total	SW-846 6010B

Chlorinated Hydrocarbons

1,2,4-Trichlorobenzene	SW-846 8270C
2-Chloronaphthalene	SW-846 8270C
Hexachlorobenzene	SW-846 8270C
Hexachlorobutadiene	SW-846 8270C
Hexachlorocyclopentadiene	SW-846 8270C
Hexachloroethane	SW-846 8270C

Metals II

Antimony, Total	SW-846 6010B
Arsenic, Total	SW-846 6010B
	SW-846 7060A
Selenium, Total	SW-846 6010B

Miscellaneous

Hydrogen Ion (pH)	SW-846 8040B
-------------------	--------------

Serial No.: 18409

Property of the New York State Department of Health. Valid only at the address shown.
Must be conspicuously posted. Valid certificates have a raised seal and may be
verified by calling (516) 485-6670.

DOH-9317 (3/87)



NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER

Antonia C. Novello, M.D., M.P.H., Dr.P.H.



Expires 12:01 AM June 16, 2003
Issued April 11, 2003

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

DR. BRIAN S. SCHEPART
WASTE-STREAM TECHNOLOGY
302 GROTE STREET
BUFFALO NY 14207 United States

NY Lab Id No: 11179
EPA Lab Code: NY00068

is hereby APPROVED as an Environmental Laboratory in conformance with the
National Environmental Laboratory Accreditation Conference Standards for the category
ENVIRONMENTAL ANALYSES SOLID AND HAZARDOUS WASTE
All approved analytes are listed below:

Miscellaneous

Hydrogen Ion (pH)	SW-846 9045C
Lead In Dust Wipes	APP. 14.2, HUD JUNE 1995
Sulfide (as S)	SW-846 8030B
	SW-846 8034

Polychlorinated Biphenyls

PCB-1254	SW-846 8082
PCB-1260	SW-846 8082

Polynuclear Aromatic Hydrocarbons

Acenaphthylene	SW-846 8270C
Benzo(b)fluoranthene	SW-846 8270C
Benzo(ghi)perylene	SW-846 8270C
Chrysene	SW-846 8270C
Dibenzo(a,h)anthracene	SW-846 8270C
Fluorene	SW-846 8270C
Naphthalene	SW-846 8270C
Phenanthrene	SW-846 8270C

Nitroaromatics and Isophorone

2,4-Dinitrotoluene	SW-846 8270C
2,6-Dinitrotoluene	SW-846 8270C
Isophorone	SW-846 8270C
Nitrobenzene	SW-846 8270C

Phthalate Esters

Benzyl butyl phthalate	SW-846 8270C
Bis(2-ethylhexyl) phthalate	SW-846 8270C
Diethyl phthalate	SW-846 8270C
Dimethyl phthalate	SW-846 8270C
Di-n-butyl phthalate	SW-846 8270C
Di-n-octyl phthalate	SW-846 8270C

Polychlorinated Biphenyls

PCB-1016	SW-846 8082
PCB-1221	SW-846 8082
PCB-1232	SW-846 8082
PCB-1242	SW-846 8082
PCB-1248	SW-846 8082

Priority Pollutant Phenols

2,4,6-Trichlorophenol	SW-846 8270C
2,4-Dichlorophenol	SW-846 8270C
2,4-Dimethylphenol	SW-846 8270C
2,4-Dinitrophenol	SW-846 8270C
2-Chlorophenol	SW-846 8270C
2-Methyl-4,6-dinitrophenol	SW-846 8270C
2-Nitrophenol	SW-846 8270C
4-Chloro-3-methylphenol	SW-846 8270C
4-Nitrophenol	SW-846 8270C
Pentachlorophenol	SW-846 8270C

Serial No.: 18409

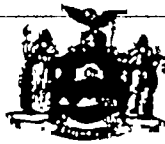
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Must be conspicuously posted. Valid certificates have a raised seal and may be
verified by calling (518) 485-5570.

OH-3917 (3/97)



NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER

Antonia C. Novello, M.D., M.P.H., Dr.P.H.



Expires 12:01 AM June 16, 2003
Issued April 11, 2003

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

DR. BRIAN S. SCHEPART
WASTE STREAM TECHNOLOGY
302 GROTE STREET
BUFFALO NY 14207 *United States*

NY Lab Id No: 11179
EPA Lab Code: NY00068

*is hereby APPROVED as an Environmental Laboratory in conformance with the
National Environmental Laboratory Accreditation Conference Standards for the category
ENVIRONMENTAL ANALYSES SOLID AND HAZARDOUS WASTE
All approved analytes are listed below.*

Priority Pollutant Phenols:

Phenol

SW-846 B270C

Serial No.: 18409

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DOH-3317 (3/97)



**NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER**
Antonia C. Novella, M.D., M.P.H., Dr.P.H. Commissioner



Expires 12:01 AM April 01, 2003
Issued April 22, 2002
Revised July 05, 2002

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE
Issued in accordance with and pursuant to section 502 Public Health Law of New York State

DR. BRIAN S. SCHEPART
WASTE STREAM TECHNOLOGY
302 GROTE STREET
BUFFALO NY 14207 USA

NY Lab Id No: 11179
EPA Lab Code: NY00068

*is hereby APPROVED as an Environmental Laboratory for the category
ENVIRONMENTAL ANALYSES SOLID AND HAZARDOUS WASTE
All approved subcategories and/or analytes are listed below:*

Chlorinated Hydrocarbon Pesticides

4,4 -DDE	SW-846 8081A
4,4 -DDT	SW-846 8081A
Aldrin	SW-846 8081A
beta-BHC	SW-846 8081A
delta-BHC	SW-846 8081A
Endosulfan II	SW-846 8081A
Endrin	SW-846 8081A
Heptachlor	SW-846 8081A
Methoxychlor	SW-846 8081A
Toxaphene	SW-846 8081A

Polynuclear Aromatic Hydrocarbons

Indeno(1,2,3-cd)pyrene	SW-846 8270C
Pyrene	SW-846 8270C

Purgeable Aromatics

1,2-Dichlorobenzene	SW-846 8021B
	SW-846 8260B
1,3-Dichlorobenzene	SW-846 8021B
	SW-846 8260B
1,4-Dichlorobenzene	SW-846 8021B
	SW-846 8260B
Benzene	SW-846 8021B
	SW-846 8260B
Chlorobenzene	SW-846 8021B
	SW-846 8260B
Ethyl benzene	SW-846 8021B
	SW-846 8260B
Toluene	SW-846 8021B
	SW-846 8260B
Total Xylenes	SW-846 8021B
	SW-846 8260B

Metals II

Chromium VI	SW-846 7196A
Mercury, Total	SW-846 7471A

Miscellaneous

Cyanide, Total	SW-846 9014
	SW-846 9010B
Lead In Paint	Method Not Specified

Polynuclear Aromatic Hydrocarbons

Acenaphthene	SW-846 8270C
Anthracene	SW-846 8270C
Benzo(a)anthracene	SW-846 8270C
Benzo(a)pyrene	SW-846 8270C
Fluoranthene	SW-846 8270C

Purgeable Halocarbons

1,1,1-Trichloroethane	SW-846 8260B
1,1,2,2-Tetrachloroethane	SW-846 8260B
1,1,2-Trichloroethane	SW-846 8260B

Serial No.: 16487

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DOH-3317 (3/97)

**NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER**

Antonia C. Novello, M.D., M.P.H., Dr.P.H. Commissioner



Expires 12:01 AM April 01, 2003
Issued April 22, 2002
Revised July 05, 2002

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**DR. BRIAN S. SCHEPART
WASTE STREAM TECHNOLOGY
302 GROTE STREET
BUFFALO NY 14207 USA**

NY Lab Id No: 11179
EPA Lab Code: NY00068

*is hereby APPROVED as an Environmental Laboratory for the category
ENVIRONMENTAL ANALYSES SOLID AND HAZARDOUS WASTE
All approved subcategories and/or analytes are listed below:*

Purgeable Halocarbons

1,1-Dichloroethane	SW-846 8260B
1,1-Dichloroethene	SW-846 8260B
1,2-Dichloroethane	SW-846 8260B
1,2-Dichloropropane	SW-846 8260B
<hr/>	
2-Chloroethylvinyl ether	SW-846 8260B
Bromodichloromethane	SW-846 8260B
Bromoform	SW-846 8260B
Bromomethane	SW-846 8260B
Carbon tetrachloride	SW-846 8260B
Chloroethane	SW-846 8260B
Chloroform	SW-846 8260B
Chloromethane	SW-846 8260B
cis-1,3-Dichloropropene	Method Not Specified
Dibromochloromethane	SW-846 8260B
Dichlorodifluoromethane	SW-846 8260B
Methylene chloride	SW-846 8260B
Tetrachloroethane	SW-846 8260B
trans-1,3-Dichloropropene	Method Not Specified
Trichloroethane	SW-846 8260B
Trichlorofluoromethane	SW-846 8260B
Vinyl chloride	SW-846 8260B

Serial No.: 16487

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verified by calling (518) 485-6570.

DOH-3317 (3/97)

ATTACHMENT C

TREATMENT, STORAGE, DISPOSAL FACILITY INFORMATION



GENERAL INFORMATION

Name of Facility: CWM Chemical Services, L.L.C.
Model City Facility

Physical Address: 1550 Balmer Road
Model City, NY 14107

Mailing Address: P.O. Box 200
1550 Balmer Road
Model City, NY 14107

Phone: (716) 754-8231
Fax: (716) 754-0211

Parent Corporation: Waste Management, Inc.
1001 Fannin, Suite 4000
Houston, TX 77002
(713) 512-6200

RCRA Status: Part B Approved

US EPA ID# NYD049836679

Hours of Operation:
Administrative Monday - Friday 8:00a.m. - 5:00p.m.
Operations Monday - Friday 6:00a.m. - 6:00p.m.
(Seasonal)

Management Staff Qualifications

Richard Sturges – District Manager

Mr. Sturges has over 10 years of experience with Waste Management, the majority in Landfill Management. Most recently, managing construction and engineering activities at Chaffee Landfill.

Bob Stadelmaier – Sales Manager

Mr. Stadelmaier is a graduate of the State University of New York College at Buffalo with a L.A. Degree in Chemistry. He has more than 30 years of private sector Environmental Industry experience in the marketing, selling, technical, environmental and operating disciplinary, including 21 years in Executive Management. Mr. Stadelmaier joined CWM in December 2000 and is responsible for Sales Management.

Janet McMahon – Service Manager

Ms. McMahon is a graduate of Lycoming College with a BA degree in Accounting. She has worked for CWM for over 20 years, 16 as a Controller and 2 years as Transportation General Manager, before becoming the Service Manager with responsibilities for Customer Service, Outside Sales, Inside Sales and Transportation.

Becky Zavatz – Environmental Engineering Manager

Ms. Zavatz is a graduate of Duke University with a BSE in Civil/Environmental Engineering. She has over 11 years experience in the hazardous waste industry, preceded by 2 years in the aluminum industry and 2 years in environmental consulting. She joined CWM in 1989 and has had a variety of engineering, compliance and operations responsibilities.

Jill Knickerbocker – Technical Manager

Ms. Knickerbocker is a graduate of Canisius College with a BS degree in Chemistry. She also holds a Masters Degree in Chemistry from Buffalo State College. She has 21 years of experience in the field of hazardous waste treatment and disposal, including ten years as the Laboratory Manager at the Model City facility.

FACILITY/PROGRAM NUMBER:
 NYD 049836679
 1-LS -- RMO-1
 NY-00721061

PERMIT
 Under the Environmental Conservation Law (ECL)

11/16/93
 EXPIRATION DATE: All Permits
 5 years after issuance

TYPE OF PERMIT (Check All Applicable Boxes)
 New Renewal Modification Permit to Construct Permit to Operate

- | | | |
|---|---|--|
| <input type="checkbox"/> Article 15, Title 5:
Protection of Water | <input checked="" type="checkbox"/> Article 17, Titles 7, 8:
SPDES | <input checked="" type="checkbox"/> Article 27, Title 9; 6NYCRR 373:
Hazardous Waste Management |
| <input type="checkbox"/> Article 15, Title 15:
Water Supply | <input checked="" type="checkbox"/> Article 19:
Air Pollution Control | <input type="checkbox"/> Article 34:
Coastal Erosion Management |
| <input type="checkbox"/> Article 15, Title 15:
Water Transport | <input type="checkbox"/> Article 23, Title 27:
Mined Land Reclamation | <input type="checkbox"/> Article 36:
Floodplain Management |
| <input type="checkbox"/> Article 15, Title 15:
Long Island Wells | <input type="checkbox"/> Article 24:
Freshwater Wetlands | <input type="checkbox"/> Articles 1, 3, 17, 19, 27, 37;
6NYCRR 380: Radiation Control |
| <input type="checkbox"/> Article 15, Title 27:
Wild, Scenic and Recreational
Rivers | <input type="checkbox"/> Article 25:
Tidal Wetlands | <input type="checkbox"/> Other: _____ |
| <input checked="" type="checkbox"/> 6NYCRR 608:
Water Quality Certification | <input type="checkbox"/> Article 27, Title 7; 6NYCRR 360:
Solid Waste Management | |

PERMIT ISSUED TO CAM Chemical Services, Inc.		TELEPHONE NUMBER 716-754-8231
ADDRESS OF PERMITTEE PO Box 200, Model City, NY 14107		
CONTACT PERSON FOR PERMITTED WORK Mr. John Stanulonis, General Manager		TELEPHONE NUMBER () ()
NAME AND ADDRESS OF PROJECT/FACILITY Model City Facility, 1550 Balmer Road, Model City, NY 14107		
Southeastern section of 630 acre Model City Site		
LOCATION OF PROJECT/FACILITY Niagara		
COUNTY Niagara	TOWN/CITY/VILLAGE Porter & Lewiston	WATERCOURSE/WETLAND NO. Federal Wetlands & Twelvemile Creek
DESCRIPTION OF AUTHORIZED ACTIVITY As part of the Residual Management Unit-1 (RMO-1) Project: (1) construct and operate a 47.1 acre landfill with a 2.8 MCY (net) capacity for disposal of solid and hazardous wastes, (2) construct and operate a leachate lift station, (3) construct air emission sources consisting of the landfill leachate collection manways and leachate lift station vent, (4) fill 7.1 acres of federally regulated wetlands, and (5) discharge varying quantities of settled stormwater (non-leachate runoff) to a ditch leading to Twelvemile Creek. The conditions and requirements of Permit 90-87-0476 issued to the Permittee on 6/16/89, as amended, are hereby incorporated by referenced and made part of this permit.		NYTM COORDINATES E 177.1 N 4793.1

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified (See Reverse Side) and any Special Conditions included as part of this permit.

PERMIT ADMINISTRATOR Steven J. Daleski	ADDRESS N.Y.S. D. E. C. Region 9 Office 270 Michigan Ave., Buffalo, N.Y. 14203-2999
AUTHORIZED SIGNATURE <i>Steven J. Daleski</i>	DATE 11/16/93
Page 1 of _____	



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

NYD049836479

SCA Chemical Waste Services

P.O. Box 200

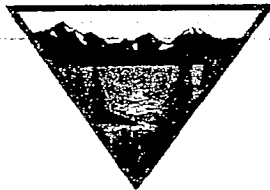
Model City, NY 14107 Attn: Paul Iapki

INSTALLATION ADDRESS

1550 Palmer Road
Model City, NY 14107

GREAT LAKES ENVIRONMENTAL
& SAFETY CONSULTANTS, INC.

RECEIVED 11/5/03
BY AMM



HEALTH AND SAFETY PLAN

- FOR -

VISONE CONSTRUCTION COMPANY INC.

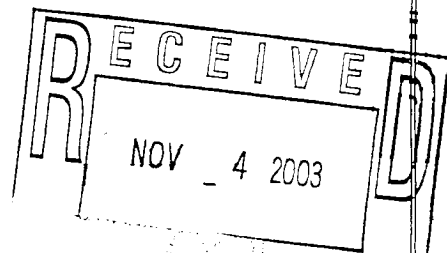
- CONCERNING -

REMEDIAL CLEANUP

- AT -

THE NIAGARA TRANSFORMER SITE

- AS PREPARED BY -



EVAN CASEY, PRESIDENT
GREAT LAKES ENVIRONMENTAL AND SAFETY CONSULTANTS INC.
3556 LAKESHORE ROAD
BUFFALO, NEW YORK 14219

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STATEMENT OF COMMITMENT AND POLICY

The personal health and safety of all employees of Visone Construction Company (Visone Construction) is of primary importance. The control of occupational injuries and illnesses is so important that it is given precedence over operating productivity whenever necessary. To the greatest degree possible, management will provide all mechanical and physical facilities required for personal safety and health in keeping with the highest standards.

Visone Construction will maintain a safety and health program conforming to the best proven practices of organizations in our business. To be successful, such a program must embody the proper attitudes toward injury and illness control on the part of both supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also between each employee and his fellow workers. Only through such a cooperative effort can a safety record in the best interest of all be established and preserved.

Our objective at Visone Construction is a safety and health program that will minimize and control the number of disabling injuries and illnesses, not merely in keeping with, but surpassing, the best experience of other operations similar to ours. Our goal is to become a leader in the control of losses to match our record and reputation in construction and construction management.

Ed Dominiac

Great Lakes Environmental - Onsite Safety Supervisor

Visone Construction Co., Inc. -- Safety Manager

1.0 INTRODUCTION

1.1 Purpose

The purpose of this health and safety plan (HASP) is to establish minimum standards, practices, and procedures related to personnel protection and safety during remedial construction activities at the former Niagara Transformer Site. This plan:

- Responsibilities for onsite remedial construction personnel
- Serves as a minimum standard for the remedial contractor and all subcontractors
- Defines the potential hazardous and associated risks that may exist at the site
- Describes action levels for the use and upgrading of personal protective equipment (PPE)
- Identifies the proper use of work zones to be delineated during the conduct of potential hazardous activities at the site.

The provisions of this plan are mandatory for all onsite personnel performing related remedial construction operations, monitoring, and maintenance. Visitors to the site will check with the Safety Officer (SO) to learn which sections of this HASP will affect them.

All on-site personnel who engage in project activities must be familiar with this plan and comply with its requirements. All visitors must be accompanied by authorized personnel while onsite. The SO will ensure that all visitors have been briefed on site safety and security, and have been provided with temporary identification.

1.2 Site Description

The 3.6 acre site owned by Niagara Transformer Corporation (NTC) is located at 1747 Dale Road, Town of Cheektowaga, Erie County, New York. On-site structures include an active electrical transformer manufacturing/office facility (main NTC building) and a storage warehouse south of the plant.

Surrounding properties: north is light industrial; south is a rail yard; east is an undeveloped parcel; west is a cemetery. Most notable is a residential area approximately 1,000 feet southwest of the site.

Until 1980, oils containing PCBs were stored or used on site as insulating fluids in the manufacture of liquid-filled transformers.

In 1990 oil seepage was reported to NYSDEC who analyzed the leachate. The remedial action objectives established by the NYSDEC for both on and off site work are as follows:

- on-site soil/sediment (top 12 inches): 1 mg/kg
- on-site soil/sediment (below 12 inches): 10 mg/kg
- off site soil/sediment: 1 mg/kg

Remediation of the NTC site started in 1996 and was completed in 1997. Recontamination of the site was reported in April 1997, after an oily emulsion containing 300 mg/kg PCB's was found in the concrete tank just upstream of the head of the N/S ditch. An emergency water treatment system was installed to address the problem of recontamination of the ditches on site.

In 1998 additional sampling was conducted by the NYSDEC. The site engineer has conducted an additional investigation of the site to identify the source of continued PCB release. The current site work will address the findings of this investigation.

2.0 SCOPE OF WORK

The general summary of work to be performed for this project will include but not be limited to the following:

- Mobilization and demobilization of equipment and material to the site.
- Place and Maintain storm water management controls throughout the site.
- Excavate contaminated ditch sediment and stone from designated area, and properly dispose of off site.
- Abandon in-place the existing subsurface storm sewer system in the south parking lot and driveway, and install low-permeability sub-surface dams along this system.
- Provide new subsurface storm water piping in the south parking lot and driveway. Connect new piping to existing roof leaders.
- Pressure grout under a portion of the loading dock slab and restore slab to original condition.
- Provide an 18-inch profile wall pipe and low-permeability sub-surface dams in the N/S ditch.
- Provide concrete lining (Shotcrete) of the E/W ditch and install sub-surface dams along E/W ditch.
- Maintain site safety at all times during construction in accordance with the approved site Health and Safety Plan.
- Site Cleanup and Restoration

3.0 HEALTH & SAFETY ORGANIZATION

RESPONSIBILITIES – (see attached resumes for the experience of the HSC, SO, and HST)

1. Health and Safety Coordinator (HSC):
 - a. Responsibility for the overall development and implementation of the HASP.
 - b. Responsibility for the initial training of on-site workers with respect to the contents of the HASP.
 - c. Availability during normal business hours for consultation by the SO, and
 - d. Availability to assist the SO in follow-up training and if changes in site conditions occur.
2. Safety Officer (SO):
 - a. Implement, enforce, and monitor the HASP.
 - b. Preconstruction indoctrination and periodic training of all on-site personnel in regard to this safety plan and other safety requirements to be observed during construction, including:

1. Potential hazards
 2. Personal hygiene principles
 3. Personal protective equipment (PPE)
 4. Respiratory protection equipment usage and fit testing.
 5. Emergency procedures dealing with fire and medical situations, and]
 6. Conduct update meetings in regard to health and safety.
3. Health & Safety Technician (HST):
- a. Be familiar with the operation, maintenance and calibration of monitoring equipment used during this project.
 - b. A HST shall be assigned to each work crew or task in potentially hazardous areas.
4. Employees
- a. Prior to the start of work on this project, Visone Construction workers will be HAZWOPER trained. (see attached certificates)
 - b. All employees are required to correct and/or report any unsafe job conditions and/or any unsafe act to their foreman. Suggestions for improving job safety are welcome. All suggestions and recommendations will be given careful consideration by Management. Superintendents and general foremen will cooperate fully in putting into effect all practical suggestions that will reduce job hazards.
 - c. Each employee must comply with the safety requirements set forth in this booklet, along with the safe practices and methods inherent to the craft. Safety will be an integral part of each job and each employee shall be responsible for the safety phase of his work just as much as he is for any other phase. Employees should exercise good judgment in carrying out the safety program. Appropriate disciplinary action will be taken for violations.

4.0 HAZARDS ASSESSMENT

4.1 **CONFINED SPACE ENTRY PROCEDURE**

1. Inform all affected employees that the space is being entered.
2. The **space** shall be considered a permit-required confined space until the pre-entry procedures demonstrates otherwise.
3. Perform Lockout and Tagout procedures as applicable
4. Pump out any standing water with a submersible pump, if applicable.
5. The **atmosphere** in the space must be tested to determine whether dangerous air contamination and/or oxygen deficiency exists. Perform internal atmosphere testing using a calibrated direct-reading instrument in the following order:
 - i. Oxygen concentration
 - ii. Flammable Gases and Vapors
 - iii. Carbon Monoxide
6. If the permit space poses no actual or potential atmospheric hazards and if all the hazards within the space are eliminated without entry into the space, then the permit space may be reclassified as a non-permit confined space for as long as the hazards remain eliminated.

Note: Control of atmospheric hazards through forced air ventilation does not constitute elimination of the atmospheric hazards.

7. The **reclassification** to a non-permit space shall be documented by a written certification that contains the date, location of the confined space, basis for determining that all hazards have been eliminated, and signature of the Entry Supervisor making that determination.
8. Record **atmospheric testing results**. If the test results are not acceptable, then the confined space must be ventilated by forced air ventilation until acceptable entry conditions are reached. Repeat atmospheric testing.
9. If it **is** necessary to enter the permit space to eliminate hazards, then entry operations shall be performed using the permit-required confined space procedures. Rescue Team must be notified to arrange services.
10. If **chemicals** are used in the confined space, or if any welding and cutting are to be performed, then entry shall take place under the permit required entry procedures and continuous ventilation with continuous air monitoring is required.
11. **Check** and set up equipment and have entrants wear appropriate personal protective equipment.
12. **Double-check** that acceptable entry conditions have been met.
13. **Verify** all necessary Lockout and Tagout procedures have been performed.
14. **Complete** recording all necessary information on the "Reclassify Permit Space Work Worksheet".
15. Entry Supervisor shall review the "Reclassify Permit Space Workstation" and the atmospheric testing results with entrants.
16. Post **caution** tape and/or orange safety cone at the entrance to the space to warn others of potential hazards and to ensure that only authorized personnel enter the space.
17. **Authorized** entrants may now enter the confined space and perform assigned work.
18. If **hazards** arise within the non-permit space during entry operations, the all entrants must exit the space and it must be re-evaluated by an Entry Supervisor before entry operations can resume.
19. **Reclassify** Permit Space Worksheets must be forwarded to the Maintenance Director to be filed and kept for audit purposes.

The recommended specific safety practices for working around heavy equipment (e.g., backhoes, bulldozers, excavators, etc.) are as follows:

4.2 HEAVY EQUIPMENT OPERATION

- Owner/Operator shall inspect equipment daily and keep a weekly documented log. All discrepancies will be corrected before placing equipment in service.
- **Keep** blades, buckets, and other heavy equipment fully lowered when not in use. Parking brakes must be engaged. After work hours, bucket may be elevated if the locking pin is in place.
- **Chock** or block the wheels of equipment parked on inclines and at end of the day. Set parking brake. Never get off or on moving equipment.
- Never use equipment on unstable or unsafe inclines.
- **Use** hand signals, radios (as appropriate), and line of sight confirmation to communicate effectively with operator. Make sure everyone is in the clear prior to starting up or moving any part of the equipment.
- **Never** leave heavy equipment unattended while it is in operation. Stay in a position where you have ready access to control levers. Stay clear of lifting loads. Utilize competent riggers, spotters, and operators.
- **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.

4.3 EXCAVATING AND TRENCHING

Trenching and excavation training will be addressed in the daily safety meetings when applicable. The following OSHA requirements will be followed during excavating and trenching activities:

- Personnel will not approach the edge of an unsecured trench/excavation closer than 2 feet
- Prior to any excavation operations, all underground utilities, if any must be located and marked.
- All trenches over 5 feet deep, and those less than 5 feet deep in unstable soil, shall be provided with adequate shoring or the trench should be sloped back to the angle of repose.
- A stairway, ladder, ramp or other safe means of egress must be located in trench excavations that are four feet or more in depth so as to require no more than 25 ft. of lateral travel for employees.
- Guardrail systems, fences or barricades must be provided to protect employees who are 6 feet or more in depth from an excavation that is not readily seen.
- Daily inspections must be conducted prior to the start of work and as needed throughout the shift.
- Inspections must be made after every rainstorm or other hazard-increasing occurrence.
- Employees must not work in excavations with accumulated water or in excavations in which water is accumulating, unless adequate precautions have been made to protect the employee.

4.4 SLIP/TRIP/FALL INJURIES

Slip, trip, and fall injuries can be reduced by avoiding slippery surfaces, wearing slip resistant footwear, practicing good housekeeping, and working with a low center of gravity and making slow and deliberate movements.

4.5 HEAT AND COLD STRESS

Heat stress may occur even in moderate temperatures when personnel protective clothing is in use. Symptoms of heat stress are heat rash, heat cramps, heat exhaustion and stroke.

When ambient temperatures exceed 70 degrees Fahrenheit, the Site Safety and Health Officer shall begin monitoring employees for signs of heat stress.

Heat Stress may be combated through proper training, fluid intake, acclimatization and work/rest regime.

Harmful affects of working in the cold include frostbite and Hypothermia. Frostbite occurs when parts of the body freeze. Toes, fingers earlobes and noses are most susceptible to frostbite. Hypothermia occurs when the body is no longer capable of maintaining its core temperature. Hypothermia can result in hallucination, sleepiness, irregular heartbeat, unconsciousness and death.

When ambient temperatures fall below 45 degrees Fahrenheit the site safety and health officer shall begin monitoring employees for signs and symptoms of cold stress.

Cold stress is combated with layers of warm dry clothes and an outer layer of water and wind proof clothing, drinking water liquids, changing wet clothes, and taking breaks in warm areas.

4.6 WEATHER

Severe rain, snow, or electrical storms can cause hazards. Work may need to be stopped when weather conditions create unsafe driving hazards. Outside work will be suspended during electrical storms.

4.7 LIFTING

The following are proper lifting techniques that should be followed.

- Inspect the work area prior to lifting for trip hazards.
- Set feet solidly and well apart, with one foot slightly ahead of the other.
- Crouch as close to the load as possible, with the legs bent.
- Keep back as straight as possible.
- Do not twist or turn during lifting.

- Think about what you are lifting and the best tactics before attempting to lift a bulky or heavy burden.

4.8 ELECTRICAL

Utility clearances will be obtained prior to excavation.

OSHA standards and NYS High Voltage Proximity Act will be followed when employees or the equipment they operate could come in contact with energize electrical systems.

Any time work is being performed on equipment capable of storing and releasing energy all work will be completed in accordance with 29 CFR 1910.147 Lockout/Tagout.

4.9 NOISE

In accordance with the Hearing Conservation Regulations (29 CFR 1910.95), hearing protection will be provided where sound pressure levels exceed 85 dB A scale. The Site Safety Officer shall identify areas of high noise that require hearing protection.

4.10 SPILL PREVENTION / Clean-up

Inspections of the contaminated soils area and any chemical or oil storage are must be conducted daily.

Any chemicals, liquid or oil stored on site will be stored in an area providing secondary containment. (i.e. Spill Containment Pallets)

A spill kit is located in the job trailer.

Spill Response procedures are located in the Emergency Response Plan located as an appendix to this plan.

Spill containment and clean-up must be included in the safety training for all personnel on site.

5.0 TRAINING

Site Workers

- All personnel performing remedial cleanup 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. This training includes an initial 40-hour Hazardous Waste Site Worker Protection Course, an 8-hour Annual Refresher Course subsequent to the initial 40-hour training, and 3 days of actual field experience under the direct supervision of a trained, experienced supervisor. Additional site-specific training shall also be provided by the SO prior at the start of field 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.

Site Training

- Site workers are given a copy of the HASP and provided HAZWOPER training, and a site-specific briefing prior to the start 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 SO prior to initiating field activities.
- Supplemental health and safety briefings will also be conducted by the SO 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 work activities. Conditions for which the SO may schedule additional briefings include, but are not limited to: a change in site conditions (viz., based on monitoring results); changes in the work schedule/plan; newly discovered hazards; and safety incidents occurring during site work.

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

Site Visitors

The SO will provide a site-specific briefing to all site visitors and other unfamiliar personnel who enter the site beyond the site entry point. The site-specific briefing will provide information about site hazards, the site lay-out 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.

6.0 MEDICAL SURVEILLANCE

Medical monitoring examinations are provided to employees as stipulated under 29 CFR Part 1910.120(f). These exams include initial employment, annual and employment termination physicals for all Visone 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 Biomed, Inc., an occupational health care provider. Medical evaluations include an evaluation of the workers' ability physically perform the work and use respiratory protective equipment and establish baseline medical data. The examination is specific to the hazards on this site and will include:

- Occupational/medical history review.
- Physical exam.
- Examination of the skin for chronic disorders.
- Women should be advised of the potential adverse effects of PCBs on the unborn child or a nursing child.
- Liver function test.
- Medical certification of physical requirements (viz., sight, musculoskeletal, cardiovascular) for safe job performance and to wear respiratory protection equipment.

In conformance with OSHA regulations, Visone 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.

7.0 WORK AREAS

Work zones around the areas designated for construction activities will be established by Visone and SO on a daily basis and communicated to all employees and other site users in the form of daily safety meetings. It shall be the SO's responsibility to ensure that all site workers are aware of the work zone boundaries and to enforce proper procedures in each area. The zones will include:

- Exclusion Zone ("Hot Zone") - The area where contaminated materials may be exposed, excavated or handled and all areas where contaminated equipment or personnel may travel. The zone will be delineated by flagging tape. All personnel entering the Exclusion Zone must wear the prescribed level of personal protective equipment identified in this HASP.
- 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.

Access of non-essential personnel to the Exclusion and Contamination Reduction Zones will be strictly controlled. 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 SO.

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

8.0 STANDARD OPERATING PROCEDURES AND ENGINEERING CONTROLS

All Visone 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 SO. 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 Visone's occupational physician. Alcoholic beverage and illegal drug intake are strictly forbidden during the work day.
- 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 employees, as requested and required.
- Should confined space entry be necessary (sampling cemetery pump station), etc.), Visone Construction's SOP for entry is as follows:

8.1 WORK AREA COMMUNICATIONS

A 10-foot working limit shall be established around heavy machinery during all operations, when possible. Machinery that has a large swing radius (i.e. back hoe) will require employees to stay 10-feet away from the swing radius of the machinery. Ground personnel should not be working within the 10-foot working limit if the operator has not specifically recognized and verbally authorized the ground task. Ground personnel must understand that 10-foot working limit changes as the equipment moves.

The procedure for equipment approach is as follows:

- Ground personnel intending to enter within the 10-foot working radius of heavy equipment should stand in the direct line of the operator and place his/her hand over their head in a fist with their palm facing the operator (signal for shut down). Ground personnel will not enter the 10-foot working limit until the heavy equipment operator recognizes the request and powers down the heavy equipment. Ground personnel and SO shall carry an Air horn.
- Operators must recognize a ground employee requesting permission to approach. The operator will move the equipment to a safe location, lower all implements (Booms, Buckets, Grapples, etc.), lower the engine speed to the idle position, apply safety brakes, open the cab door and wave ground personnel to the machinery.

9.0 PERSONAL PROTECTIVE EQUIPMENT

The purpose of personal protective equipment (PPE), including clothing, is to shield or isolate individuals from the chemical, and physical hazards they may encounter at the site. Based upon current information regarding both the contaminants suspected to be present and the various tasks that are included in the

remedial activities, the minimum required Levels of Protection for these tasks are identified in Table 7-1. Table 7-2 defines the Site Specific personal protective equipment (PPE) requirements. Protection may be upgraded or downgraded depending on monitoring data (compared with action levels) and site conditions, as determined by the SO. All changes must be noted in the HSP and documented

Specific protection garments are selected on the basis of a variety of criteria. In general, the greater the hazard, the greater the level of PPE. No single combination of protective equipment and clothing is capable of protecting against hazards, and PPE must be used in conjunction with other protective measures (i.e., engineering and administrative controls). The use of PPE can, in itself, create significant worker hazards, such as heat stress, physical and psychological stress, and impaired vision, mobility and communication. Use of PPE is required by OSHA regulations in 29 CFR Part 1910 and reinforced by U.S. Environmental Protection Agency (EPA) regulations and American National Standards Institute (ANSI) standards and guidelines.

Level of Protection	Respiratory Protection	Protective Clothing	Gloves	Boots	Other Required PPE
Level D	None required	Work Uniform or Tyvek coverall	Latex inner	Latex outer with steel-toed safety boot inner ¹	Hardhat, Safety goggles ²
Modified Level D	None required	Chemical/splash resistant-suit	Latex inner, Nitrile outer	Latex outer with steel-toed safety boot inner	Hardhat, Safety goggles
Level C	Full-face air purifying respirator with organic vapor/ acid gas/P-100 cartridge	Chemical/splash resistant-suit	Latex inner, Nitrile outer	Latex outer with steel-toed safety boot inner	Hardhat
Level B	Pressure-demand, full-face self-contained breathing apparatus (SBCA) or pressure-demand supplied-air respirator with escape SCBA	Hooded chemical/splash resistant-suit	Latex inner, Nitrile outer	Latex outer with steel-toed safety boot inner	Hardhat

¹ Latex outer boot is required for intrusive work with contaminated soils. SSSHO may downgrade to steel-toed safety shoes if contact will be limited to cover/replacement soils.

² Safety glasses with side shields may be substituted for safety goggles whenever contact with contaminated liquids is not anticipated.

10.0 AIR MONITORING

10.1 REAL - TIME AIR MONITORING

Real - time monitoring will be used to determine if an upgrade or downgrade of PPE is necessary and to implement any engineering controls, protocols, or emergency procedures.

Real - Time Monitoring Equipment

- a. GLE will provide all personnel, equipment, facilities and supplies to implement the AMP.
- b. Equipment to be used for real-time monitoring will include organic vapor photo ionizers (PID), real-time aerosol particulate monitors, explosimeter/oxygen meters, and a Thermo Electron or Victoreen (or equivalent) Radiation detector.
- c. A PID will be available for exclusion zone operations. Real-time monitoring will be done for exclusion zone operations prior to personnel entering and while work is ongoing.
- d. All instruments will be calibrated daily according to the users manuals.
- e. A meteorological station will be on site for the recording of air temperature, wind velocity and wind direction, etc.

Real - Time Monitoring Sampling Frequency

- a. Real - Time Monitoring/sampling at the work zone will be conducted on a continuous basis including but not limited to any intrusive work or treatment involving contaminated materials to determine air quality for the purpose of PPE level requirement.
- b. A background level will be established before the start of each shift every day by monitoring for 10-15 minutes upwind of the work zone. New background levels will be established as the wind direction changes. Variations to established background levels will be reported ASAP.
- c. Real - time monitoring will be conducted around each active hazardous operation prior to personnel entering these areas.
- d. The air at half the distance to the work site perimeter locations will be monitored including an upwind and downwind location. Downwind readings half the distance to the work site perimeter will be conducted at a minimum of twice a day or whenever action levels are exceeded.

- e. If downwind particulates are detected at levels in excess of 150 ug/m³ or 2.5 times the established background level at the work zone, a re-measurement of upwind background levels will be taken using the same equipment.
- f. If work zone particulate levels reach 100 ug/m³ above background, monitoring will be conducted at mid point between work zone and downwind perimeter with dust controls implemented.
- g. Upwind background measurements will be taken hourly until the downwind work zone measurement is less than 100 ug/m³ above the upwind level.
- h. If at any time the measured particulate level at the work zone is more than 150 ug/m³ over background concentrations, work will be suspended at the site, followed by the implementation of engineering controls before work resumes.

10.2 DOCUMENTATION MONITORING

- a. Air monitoring equipment will be operated by GLE personnel who are trained, and skilled, in the use of this equipment (see attached experience information).
- b. GLE air monitoring personnel will document and direct Visone Construction regarding contamination levels, to determine if appropriate PPE is in use, assist in the establishment of engineering controls, and perform emergency procedures if action levels are encountered.
- c. Documentation monitoring will be conducted as specified or required by 29 CFR 1910 at the perimeter at a minimum of four locations (one upwind and three downwind). The four locations will be chosen according to site activities and expected wind direction.
- d. Perimeter locations will be established and marked with paint or flagged. Each will be located at six feet above ground surface.
- e. Documentation samples will be collected twice a week at regularly scheduled intervals and at the initiation of a new phase of on-site work.
- f. At the end of the week, meteorological data will be reviewed, and one upwind and two downwind samples will be selected to be analyzed. Also, a set (minimum -of one sample for each analysis or contaminant of concern) of "high risk" worker samples will be analyzed.
- g. Samples selected for analyzation will be submitted to the laboratory at the end of each workweek. Laboratory QA/QC Manual and certifications attached.
- h. Total nuisance dust will be collected using a PVC collection filter and personnel sampling pump and analyzed gravimetrically according to NIOSH Method 0500. Air samples will be collected and analyzed for VC - NIOSH Method 1007, and for metals - NIOSH Method 7300 or equal.

10.3 PERSONAL MONITORING

"High risk" workers are those workers most likely to encounter contamination on a particular task. These workers will wear appropriate collection media for select

contaminants to assess worker exposure. Samples will be collected in accordance with 29 CFR 1910

10.4 PERIMETER / COMMUNITY PROTECTION PLAN

- a. The real-time monitoring and documentation sampling described above in this document will be used to determine whether off-site emissions, as a result of site work, poses a threat to the surrounding community.
- b. If physical conditions (i.e. dust in the air, smell) or above sampling results warrant than real-time monitoring for volatile compounds in addition to the particulate levels already being monitored will be monitored at the downwind perimeter
- c. If total organic vapor levels exceed 5 ppm above background levels work activities shall be halted at the Vapor Emission Response Plan (below) shall be followed.

10.5 VAPOR EMISSION RESPONSE PLAN

- a. If the organic vapor levels exceed 5 ppm above background levels work activities shall be halted and a sample shall be taken at 200 feet downwind of the perimeter of the work site or half the distance to the nearest residential or commercial structure, whichever is less. If levels at the downwind location are below 5 ppm over background levels and the original perimeter sample that exceeded 5 ppm over background did not exceed 25 ppm above background work may resume.
- b. If the organic vapor level is above 25 ppm over background levels at the perimeter work area activities shall remain shut down. Down wind air monitoring shall continue to ensure that emissions do not impact the nearest residential or commercial structures.
- c. If the organic vapor levels 200 feet downwind of the perimeter or half the distance to the nearest residential or commercial property (whichever is less) exceed 5 ppm above background levels all work activities must remain halted. A sample must be taken within 20-feet of the nearest residential or commercial structure (20-foot zone).
- d. If organic levels in the 20-foot zone are approaching 5 ppm above background levels and persist for more than 30 minutes or if the vapor level in the 20-foot zone exceeds 10 ppm the Major Vapor Emission Response Plan shall immediately go into effect.

10.6 MAJOR VAPOR EMISSION RESPONSE PLAN

STEP 1 Contact all Emergency Response Contacts:

Fire Department:	911 (716) 685-1238
Police Department:	911 (716) 686-3500
Ambulance:	911
Chemical Emergency Advice (CHEMTREC):	1-800-424-9300

New York State Department of Health: (518) 402-7680
 NYSDOH, Field Office: (716) 847-4500
 NYSDEC Regional Office (Region 9): (716) 851-7220
 NYSDEC Div. of Environmental Remediation, Albany (518) 402-9814
 Contractor
 Engineer

STEP 2

SO should call local police and coordinate notification and evacuation of the surroundings community if necessary.

STEP 3

Air monitoring should be conducted at 30-minute intervals within the 20-foot zone. If two successive readings below 10 ppm are measured, air monitoring may be halted or modified.

10.7 REPORTING

- a. GLE will submit a log copy of real-time air monitoring results for each workday, by 10:00 am the following workday as a part of the Daily Work Report. The monitoring log will contain but not be limited to; location, time, type and value of each reading and/or sampling event. The Daily Work Report will also include work performed, level of protection, safety related problems, and corrective action implementation.
- b. Within 7 days of documentation sample shipment to the laboratory, GLE will submit a written copy for documentation air monitoring results for the previous week.
- c. GLE will include with daily and weekly reporting a scaled map of monitoring area depicting sample locations. Other information to be included: date, time, wind direction, meteorological data, analytical results, and any controls implemented.
- d. Results submitted for personal (worker) sampling will be included but not be limited to; worker identity, date, task performed, analytical results and applicable standards.
- e. Additionally there will be a constant logging of field notes throughout the project. They will contain values of calibration (associated with sampling equipment), weather conditions, work area(s), working conditions, any problems that arise, and work progress. These factors due have influence of data received (or inputted) for the sampling procedures at hand.

10.8. ACTION LEVELS

Parameter	Action Level
Aerosol Particulate	150 ug/m ³ or 2.5 times the established background level at the work zone
Organic Vapor	5 ppm Above Background Levels - at perimeter work site (downwind should be checked) 25 ppm Above Background Levels - at perimeter work site (work halted)

	5 ppm Above Background Levels - 200 feet downwind from perimeter worksite or half the distance to the nearest residential or commercial structure
	10 ppm Above Background Levels- in (20-foot zone, 20 feet from nearest commercial or residential structure)
	5 ppm above background levels - for 30 min or more in 20-foot zone
Oxygen	Less than 19.5%
LEL	10%
Radiation	100 cpm (counts per minute)

11.0 DECONTAMINATION

11.1 Decontamination of site personnel

The degree of decontamination required is a function of a particular task and the environment within which it occurs. Specific personnel decontamination procedures shall be adopted to achieve the goal of removing contamination prior to entering the "support" or clean zone. Procedures will be directed by the SO. Generally it is anticipated that most work involving large pieces of construction equipment will be complete in Modified Level "D" or Level "D". Workers conducting operations in work zones requiring higher levels of protection, particularly laborers will require more stringent decontamination procedures than personnel not directly in contact with contaminants. The following are decontamination procedures that will remain flexible to the changing environmental conditions which may arise at the site. All personnel leaving the work area will pass through a contamination reduction zone where they will remove their PPE and thoroughly wash/rinse exposed skin with water and biodegradable soap before leaving the project site.

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: Scrape gross contamination from boot and outer gloves. Wash outer boots and gloves with soap and water solution. Rinse with water. 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 at the shower facility provided at the site. All personnel will be required to shower before leaving the site.

All materials generated during decontamination will be sent to the on-site waste water treatment plant.

11.2 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."

11.3 Decontamination of Heavy Equipment

Construction equipment, operated in contaminated work zones must be decontaminated prior to leaving the site. Decontamination will take place within a designated equipment and materials decontamination area. The equipment will be decontaminated to the satisfaction of the SO in the following manner:

- The construction equipment will be scraped clean of gross contamination using a track spade or shovel. A pressure wash unit capable of providing a nozzle pressure of 150 psi will be utilized to remove dirt and residue from the equipment in all areas of contact with the contaminated materials. Pressure washing may be supplemented with detergents as appropriate to remove dirt and residues.
- Shields and belly pans will be removed and cleaned.
- Degreasing will take place only if required.
- Verification "wipe" samples will be collected from equipment known to have contacted PCB contaminated material. Once analyzed, and results prove that the decontamination efforts were successful; the equipment will be released for uncontrolled use.

The Safety Officer will certify, in writing, that each piece of construction equipment has been decontaminated prior to removal from site. Personnel engaged in vehicle decontamination will wear Modified Level "D" with a full face-shield. Any expendable equipment which is unable to be decontaminated to the satisfaction of the SO will be disposed of. At the completion of the project, the decontamination area will be completely cleaned and removed.

11.4 Decontamination of Other Equipment

All materials and equipment will be decontaminated prior to release from the area. Field decontamination will be dependent on the location and extent of contamination. Dry methods are much preferred over wet methods so not to damage the equipment. One or more of the following methods may be used:

- Wiping with foam cleanser and paper towels or rags, (whenever possible);

- Scraping and brushing;
- Wiping with pre-moistened, non-alcohol based wipes;
- Spraying potable water at low pressures;
- Spraying potable water at high pressures and high temperatures; and
- Rinsing with water

12.0 WASTE MANAGEMENT

Wastes will be managed and characterized with sufficient accuracy to permit proper segregation, containment, storage, shipment, and disposal in full compliance with EPA, and DOT regulations. The waste will be characterized and disposed of by a license professional waste disposal company according to guidelines, necessary for transferring waste to holding or storage areas and providing information useful for characterization. Liquid wastes will be taken care off through the on site waster water treatment plant.

Waste Storage Areas

Areas that contain PCB waste shall be delineated with red barricade tape and the appropriate label so that only authorized individuals are allowed to enter. Polyethylene sheeting will cover the floor of the waste storage area. The waste storage area must be able to restrict the discharge of potential contamination (i.e., wastewater). Waste storage areas will be posted with the words "Caution Hazardous Waste". The SO shall ensure that waste is stored in a manner that will minimize personnel exposure and environmental impact during handling, packaging, storage, and ultimate disposal, as well as meet applicable regulatory requirements.

Storage of all waste and materials awaiting disposition should include the following when necessary and possible:

- Protection from elements;
- Primary and secondary containment for liquids;
- Proper posting and control of the storage areas; and
- Regular documented inspections.

13.0 Spill Containment and Response Plan

ATTACHMENTS

EMERGENCY RESPONSE PLAN

ATTACHMENT

EMERGENCY RESPONSE PLAN

1.0 GENERAL

This is the site-specific Emergency Response Plan. This chapter of the Health and Safety Plan describes potential emergencies at the Niagara Transformer Site, procedures for responding to those emergencies, roles and responsibilities during emergency response, and training that workers must receive in order to follow emergency procedures. This plan 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 emergency response plan 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 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.

Visone will contact the local fire department and/or emergency personnel who would respond to any incidents at the NTC site to inform them of the work taking place, and potential chemical hazards and procedures to be performed by Visone in the event of an emergency.

Type of Emergency:	Source of Emergency:	Location of Source:
Medical	Slip/trip/fall	Non-specific
	Allergic Reaction (i.e., spiders, plants, snakes, rodents, stinging/biting insects)	
	Heat/Cold Stress	
	Struck by injuries (i.e., heavy equipment, falling object)	
	Excavation Cave-in	
	Cuts and lacerations	
	Chemical Exposure	
	Lifting/Carrying	
	Vehicle Traffic	
	Tools	
	Hot Work	
	Electrical	
	Lightening	
Fire/Explosion	Hot Work	
	Electrical	
	Lightening	
	Explosive atmosphere with in removed piping or an excavation	

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 stocked on this 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 PPE required and stocked for emergency response is also listed below. During an emergency, the Emergency Response Coordinator is responsible for specifying the level of PPE required for emergency response. At a minimum, personal protective equipment used by emergency responders will comply with Section 9, 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.

<u>Emergency Equipment</u>	<u>Quantity</u>	<u>Location</u>
1. Spill Response Kit	1	Field Trailer
2. First Aid Kit	1	Field Trailer
3. Fire Extinguisher	1 (minimum)	Field Trailer and all heavy equipment

<u>Emergency PPE</u>	<u>Quantity</u>	<u>Location</u>
1. Full-face respirator 2 (minimum)	Field Trailer	
2. Chemical-resistant suits	4 (minimum)	Field Trailer

4.0 EMERGENCY PLANNING MAPS

Due to the vast size of the site and likely performance of the work on an area-specific basis, area-specific maps of the site will be developed prior to initiation of field activities. The maps will be clearly marked with critical on-site emergency planning information. Emergency evacuation route(s), places of refuge, assembly point(s), and the locations of key site emergency equipment are identified. Site zone boundaries are shown to alert responders to known areas of contamination. Major topographical features and the direction of prevailing winds/weather conditions that could affect emergency response planning are also marked on the map(s). The map is to be posted at site entry points and at strategic locations throughout the work site.

5.0 ON-SITE AND OFF-SITE SAFETY PERSONNEL AND EMERGENCY CONTACTS

In the event of an emergency on the above named project, the following individuals are to be contacted:

<u>Name</u>	<u>Cell Phone #</u>	<u>Home Phone</u>
Lou Visone, Visone Const.	207-2021	634-1615
Dave Visone, Visone Const.	207-2022	632-7868
Fred Wosolouski, Visone Const.	207-2027	685-9008
Evan Casey, Great Lakes Env.	863-2011	627-5443
Mike Cruden, NYSDEC	(518) 402-9812	

Fire Department:	911 (716) 685-1238
Police Department:	911 (716) 686-3500
Ambulance:	911
Chemical Emergency Advice (CHEMTREC):	1-800-424-9300
New York State Department of Health:	(518) 402-7680
NYSDOH, Field Office:	(716) 847-4500
NYSDEC Regional Office (Region 9):	(716) 851-7220 Emergency Telephone

The site location is 1747 Dale Road, Town of Cheektowaga, Erie County, New York

SITE PHONE: (Insert Cell Phone or Field Trailer) _____

6.0 EMERGENCY ALERTING AND 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 radios (Talk-about) 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 the Site Safety Officer to ensure that 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 Chapter 10 of this HASP are followed to the extent practical without compromising the safety and health of site personnel. 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 Site Safety Officer to review evacuation routes and procedures as necessary and to inform all site workers of any changes.

Personnel exiting the site 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 SSO 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 Spill Response Procedures

SPILL RESPONSE PROCEDURES

STEP 1

A. Spill is to be reported to the Site Safety Officer immediately upon discovery.

B. A determination is to be made whether a spill is manageable.

A manageable spill is a minimal amount of fuel, chemical or contaminated soil that can be quickly cleaned up by an individual by using resources on site.

C. All ignition sources, such as flames, flares, electric sparks, etc., are to be removed from the area, to prevent fire or explosion.

STEP 2

The source of the spill is to be determined and shut down (valves, hose, caps, etc.). The objective at this point is to contain the spill and stop spreading

STEP 3

A. Containment efforts are to be taken. Use of absorbent paper, vermiculite, or other absorbent material is to be used. The spill kit is located in the job trailer.

B. Determine whether oil was released to the environment (soil, surface water, etc.).

STEP 4

Governmental agencies will be notified under the following circumstances;

A. Report to the NYSDEC Spill Hotline at (800) 457-7362 within 2 hours of discovery unless each of the following are true:

- (i) the spill is known to be less than 5 gallons; and
- (ii) the spill is contained and under the control of the spiller; and
- (iii) the spill has not and will not reach the State's water or any land; and
- (iv) the spill is cleaned up within 2 hours of discovery.

- B. Report spill to the National Response Center at (800) 424-8802 as soon as you know that the spill has reached the environment.
- C. If a release enters an on-site sanitary sewer, the appropriate supervisor will report to the following governmental agencies in addition to the NYSDEC and National Response Center.

Local Fire Department 911 (in a hazmat situation or fire)

STEP 5

- A. Dispose of materials used in the clean up. An authorized waste handling company will handle transportation of all contaminated materials.
- B. A drainage discharge report form must be completed and filed with the plant manager.

8.0 EXTREME WEATHER CONDITIONS

In the event of adverse weather conditions, the Site Safety Officer in conjunction with the Project Manager and any subcontractor's 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 (viz., 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)

9.0 EMERGENCY MEDICAL TREATMENT AND FIRST AID

Personnel Exposure:

The following general guidelines will be used in instances where chemical exposure is expected:

- Eye or 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.
- Inhalation: Move to fresh air and, if necessary, transport to Mercy Hospital.
- Ingestion: Identify item swallowed. Decontaminate and transport to Mercy Hospital.

Personal Injury:

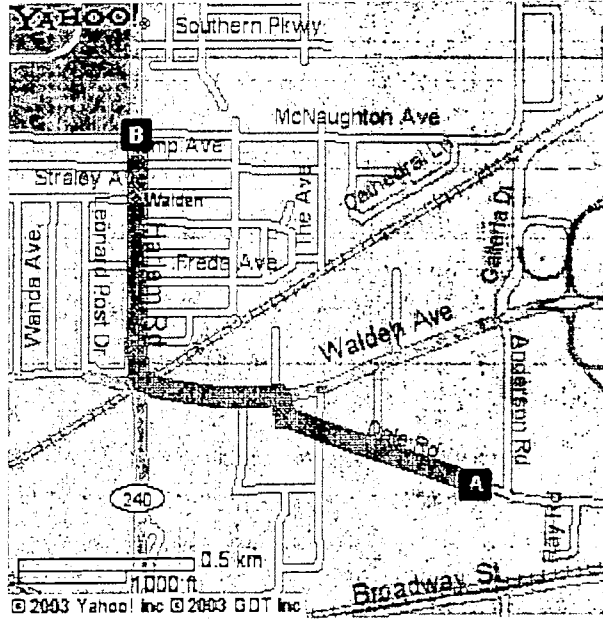
Minor first-aid will be applied on-site. If a worker, supervisor or SSO determine that medical treatment is needed, the worker will be transported to Mercy Hospital. In the event of a life threatening injury, the individual should be transported to Mercy Hospital via ambulance. The SSO will supply chemical specific information to appropriate medical personnel.

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 SSO to ensure that the expended items are replaced.

Directions to Hospital :

St Joseph Hospital
2605 Harlem Rd, Cheektowaga, NY 14225
Phone: (716)-891-2400

1. Start at 1747 DALE RD, CHEEKTOWAGA on DALE RD going towards UNNAMED STREET - go 0.4 mi
2. Turn **L** on WALDEN AVE - go 0.2 mi
3. Continue on RAMP - go < 0.1 mi
4. Continue on HARLEM RD - go 0.4 mi
5. Arrive at St. Joseph Hospital 2605 HARLEM RD, CHEEKTOWAGA



10.0 EMERGENCY RESPONSE CRITIQUE AND RECORDKEEPING

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

- 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.

11.0 EMERGENCY RESPONSE TRAINING

All persons who enter this worksite, including visitors, receive a site-specific briefing about anticipated emergency situations and the emergency procedures by the Contractor's SSO. The SSO will have basic first-aid and CPR training. 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.

MAP DEPICTING WORK AREAS

See Contract Documents

LABORATORY INFORMATION

SITE RECORDS AND DOCUMENTATION

Site Security Log Entry/Exit

Project Name:	<i>Niagara Transformer Site</i>
Project Location:	<i>1747 Dale Road, Town of Cheektowaga, Erie County, New York</i>
Date:	

	NAME	COMPANY	TIME IN	TIME OUT	REASON
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
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22					
23					
24					

ATTACHMENT
FIELD PERSONNEL EXPERIENCE

Evan J. Casey

GREAT LAKES ENVIRONMENTAL & SAFETY CONSULTANTS, INC.

Buffalo, NY

President:

Director of company dedicated to servicing small to medium sized businesses in the Environmental and Safety areas in order for them to achieve and maintain compliance with Federal, State, and Local Regulations, as well as minimizing liability.

PROFESSIONAL BACKGROUND :

(1991-1994)

Manager Environmental and Safety Services

Provided in depth Industrial Hygiene and Environmental Programming for clients. Supervised and directed engineers and technicians in developing engineering projects, environmental permits and regulatory submissions. Developed and implemented Training and Safety programs including, Hearing Conservation, Respiratory Protection, Waste Management and Environmental Compliance Programs. Provided training and Curriculum development in Industrial and Construction (Environmental) arenas, including all levels of HAZWOPER training courses.

Activities on Construction related projects relating to Industrial Hygiene and environmental services extended to providing monitoring on welding and cutting operations; confined space entry surveillance; underground storage tanks, asbestos removal projects, as well as pertinent training.

(1989-1991)

Safety Manager

Provided technical assistance on Safety and Environmental accounts. Developed safety programs pertaining to Occupational Safety and Health for a wide range of clients including Industrial, Municipal, and Construction.

Environmental projects included representation of clients at Potentially Responsible Party (PRP) Steering Committees and Legislative Boards, Environmental Sampling for Soil, Water, and Air Contaminants. Performed Environmental Phase I and Phase II Audits. Training Projects included the development of a full Hazardous Waste Site worker Curriculum and Emergency Response Curriculums

(1989-1990)

Environmental Scientist/ Marketing Assistant

Participated in Field Investigation Work associated with RI/FS projects for NJDEP and DERP programs under the U.S. Army Corps of Engineers. Involved in the Safety and Environmental Programming aspects of many Industrial & Waste Site clients. Safety Officer on Wastesites and in

routine sampling expeditions on various projects (Industrial & Construction), many types of instrumentation and techniques were used in the course of assessing occupational exposures.

Involved in projects such as Environmental Impact studies where wildlife and fisheries studies took place; Archeological Searches (Health and Safety); marketing asbestos management abatement services and wetland delineations.

(1985-1989)

Health Physics Technician, Industrial Hygienist

Conducted environmental and occupational surveys at radiologically and chemically contaminated sites under direction of the U.S. Department of Energy and Bechtel National Inc. for the F.U.S.R.A.P. and RI/FS studies of hazardous waste sites.

Heidi Reisman, CIH certification no. 7444CP, expires 6/1/2008

Personal Summary

More than 13 years' experience in industrial hygiene and occupational safety, health, and environmental protection. Strong educational, training, and development skills; conducts courses in hazard communication, respiratory protection, blood-borne pathogens, confined space, HAZWOPER, lead control, hearing conservation, air quality, and ergonomic job analysis. Incorporates effective managerial abilities. Excels in interpersonal communications with personnel at all levels. Maintains a positive work environment.

Lead Paint Removal and Complex Steel Structure Experience

Massachusetts Highway	HASP and Lead Program Review	2001
Black Rock Lower Lock Operating Gate	HASP and Lead Program Review	2001
Tops Construction	Job-site Safety and Health Inspections	1998-2000
OSC - Demolition of Buffalo Airport Center	HASP Review and Job-site Safety and Health Inspections	1999
Gateway - William Street Post Office	Job-site inspections and exposure monitoring of lead paint	1998
	Removal from parcel conveyer	
Local 395, Steamfitters	Job-site Safety and Health Inspections	1996
Amstar	OSHA Lead Safety Training	1996

Professional Qualifications

- Created and implemented 16 health and safety programs currently considered as "standards" for both construction and general industry.
- Facilitated an aggressive health and safety program, which reduced employers' worker compensation costs by 75%.
- Performed industrial hygiene surveys encompassing sound level, noise dosimetry, ionizing radiation, air sampling, ventilation, indoor air quality, ergonomics, and confined space analyses, recommending necessary engineering and administrative controls as well as personal protective equipment for identified health hazards.
- Oversaw and ensured correction of unacceptable shortcuts on the contractor's behalf with environmental regulatory compliance for a large-scale asbestos project at no cost to the client.
- Developed and implemented a wartime training program for Public Health and Bioenvironmental Engineering offices, maintaining proper training of personnel responsible for field sanitation, weapons effects recommendation, personal protective equipment, patient decontamination, and medical facility support.
- Coordinated a 19-member team involved in the decontamination of personnel injured during nuclear, biological, and chemical warfare, ensuring rapid medical treatment.
- Led a young and inexperienced team of Industrial Hygienists for the United States Air Force; developed innovative, stringent procedures, creating a benchmark model of responsibility for future teams.
- Managed an extensive hazardous material control program ensuring proper procurement, use and disposal of over 1800 hazardous materials.

Professional History

<u>Consultant</u>	Ferro Electronics, Inc.	1999 to present
<u>Consultant</u>	Dresser-Rand Wellsville Operation	1999 to present
<u>Instructor</u>	Safety and Health Training Center, Buffalo, NY	1998 to present
<u>Instructor</u>	Environmental Education Associates, Buffalo, NY	1997 to present
<u>Bioenvironmental Engineer</u>	New York Air National Guard, Niagara Falls, NY	1996 to present
<u>Certified Industrial Hygienist</u>	Orsborn Services, Inc., Buffalo, NY	1994 to present
<u>Bioenvironmental Engineer</u>	United States Air Force, Rome, NY	1988 to 1994

Academic Credentials

Bachelor of Science in Civil Engineering
United States Air Force Academy - 1988

Bioenvironmental Engineering Course
USAF School of Aerospace Medicine - 1989

Additional Training:

EPA/NYS Asbestos Inspector, EPA/NYS Asbestos Management Planner, EPA/NYS Asbestos Supervisor, Pollution Prevention Workshop, Bioenvironmental Engineering Readiness Course, 40-hour HAZWOPER, USHUD Lead Based Paint Training

Jennifer Skop

GREAT LAKES ENVIRONMENTAL & SAFETY CONSULTANTS, INC.
Buffalo, NY

PROFESSIONAL EXPERIENCE

EHS COMPLIANCE SPECIALIST/INDUSTRIAL HYGIENE TECHNICIAN

August '97 to Present

Provide **technical** assistance on Safety and Environmental accounts. Develop safety programs pertaining to Occupational Safety and Health for a wide range of clients including Industrial, Municipal, and Construction.

Activities **range** from field sampling to Complete compliance management projects concerning Industrial and Construction Environmental management.

Safety **related** projects include General Safety issues such as Lockout Tagout, Noise Surveys, and Air Contaminant Monitoring, simulated OSHA inspections at industrial facilities.

Industrial Hygiene Projects ranged from In-Door Air Quality Investigations to Noise Surveys in facilities ranging from Fossil Fuel Power Facilities to construction operations. In all cases strict NIOSH protocols were **adhered** to for the Industrial Hygiene work.

Environmental projects included **sampling** for Soil, Water, and Air Contaminants. Participation in many on-site situations such as Underground Storage Tank Removal, and EPA/SARA permitting and reporting.

Training **Projects** included the development of New York State grant for Occupational Safety training Programs such as Back Injury Prevention, Emergency Evacuation, Hearing Conservation, and more.

1995 - 1997

Waste Stream Technology, Buffalo, NY

Laboratory Technician

Prepared **solids**, wastes, soils, and aqueous samples for acid digestion for metals analysis.
Performed various wet chemistry procedures.

Maintained **detailed** scientific database for procedures.
Utilized **computerized** data entry system.

EDUCATION:

B.S. in Environmental Studies, 1994
State University of New York at Buffalo



ATTACHMENT

Emergency Response Plan