
March 4, 2020

MORRIS WESTCHESTER RETAIL ASSOCIATES, LLC
MORRIS WESTCHESTER JUNIOR RETAIL ASSOCIATES, LLC
c/o THE MORRIS COMPANIES
350 Veterans Boulevard
Rutherford, New Jersey 07070

Attn: Keith Morris
Vice President

RE: DOH and DEC Letter Response #1
Proposed Retail Development
NYS BCP Sites C360116 & 360066
44 and 45 Stew Leonard Drive
City of Yonkers
West Chester County, New York
Project Number: 0650-99-031EC

Dear Mr. Morris;

Dynamic Earth, LLC (Dynamic) previously issued a January 20, 2020 *Geotechnical Investigation Work Plan* which included in the appendix a *Proposed Testing Location Plan* and *Health and Safety Plan (HASP)* for the above referenced site. Subsequent to our initial submission, the New York State (NYS) Department of Environmental Conservation (DEC) has requested clarification on a few items. These items are included below with our responses. In addition, our *Geotechnical Investigation Work Plan* has been updated based on the comments below and is attached herein (dated March 4, 2020).

- A. **DEC:** The work plan mentions planned depths for test pits of 10 to 12 feet below ground surface. Can you provide an estimated aerial extent and volume of soil to be excavated per the Excavation Work Plan, Section C-1 Notification, even if the soil will be returned to the pits?
- **Response to A:** The test pits are typically four feet wide by 15 feet long by 10 to 12 feet deep. As such, we expect that the volume of 31 cubic yards per test pit will be generated.
- B. **DEC:** If soil will likely be stockpiled before being returned to the pits, please add a statement to the paragraph on drilling and test pit excavation using the language found in the Excavation Work Plan, Section C-3 Stockpile Methods. (i.e., "Soil stockpiles will be continuously encircled with a berm and/or silt fence. Hay bales will be used as needed near catch basins, surface waters, and other discharge points. Soil stockpiles will be kept covered at all times with appropriately anchored tarps. Stockpiles will be routinely inspected and damaged tarp covers will be promptly replaced. Stockpiles will be inspected at a minimum once each week and after every storm event.")
- **Response to B:** Please see response to C.
- C. **DEC:** If soil from the test pits will not be stockpiled before being returned, please add a statement on how the soil will be handled in conformance with the Excavation Work Plan.
- **Response to B & C:** Soils generated from exploratory test pits will be temporarily staged and immediately returned to their place of origin following completion of each test pit on the same

day. Stockpiling will not occur. Accordingly, full execution of *Excavation Work Plan, Section C-3 Stockpile Methods* for the proposed test pit and soil boring investigation is not appropriate for this investigation. To prevent contaminant commingling with clean cap material, excavated test pit soils and drill cuttings will be temporarily staged on polyethylene sheeting followed by immediate return to the test pit of origin. In the event of inclement weather (heavy rain events), the temporarily staging areas will be covered with Polyethylene sheeting and appropriately anchored as detailed in the *Excavation Work Plan, Section C-3 Stockpile Methods* as an attempt to mitigate the potential for sediment transportation from the temporary staging.

D. **DEC:** Please reference and add the generic Community Air Monitoring Plan from the Site Management Plan for C360116 as an appendix.

- **Response to D:** This has been referenced in our updated *Geotechnical Investigation Work Plan* included herein and attached as an appendix.

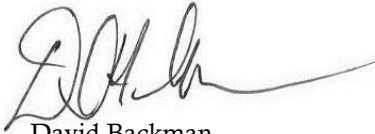
E. **DEC:** It is recommended that CAMP results be submitted weekly, with prompt notification to DOH and DEC should exceedances occur.

- **Response to E:** Dynamic will provide CAMP results weekly and will promptly notify the DOH and DEC if exceedances are detected.

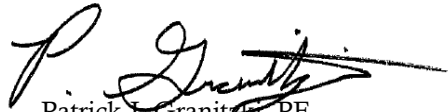
Please let us know if you have any other questions.

Sincerely,

DYNAMIC EARTH, LLC



David Backman
Principal



Patrick J. Granitzki, PE
Principal

Enclosures – Geotechnical Investigation Workplan, Test Location Plan, Health and Safety Plan (HASP)

Cc: Peter Howell, Dynamic Earth, LLC
Jeffrey Schaumburg, Dynamic Earth, LLC

January 30, 2020
Updated: March 4, 2020

MORRIS WESTCHESTER RETAIL ASSOCIATES, LLC
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c/o THE MORRIS COMPANIES
350 Veterans Boulevard
Rutherford, New Jersey 07070

Attn: Keith Morris
Vice President

RE: Geotechnical Investigation Work Plan
Proposed Retail Development
NYS BCP Sites C360116 & 360066
44 and 45 Stew Leonard Drive
City of Yonkers
West Chester County, New York
Project Number: 0650-99-031EC

Dear Mr. Morris;

Dynamic Earth's subsurface exploration work plan related to the proposed geotechnical investigation at the above referenced project is included below.

Project Details:

The site is currently an undeveloped lot, including a relatively heavily wooded area to the western portion of the site. In addition, the site generally includes variable topography with a topographic high point within the north central portion of the site that slopes downward to the north, east and west. We understand that portions of the site were part of a former landfill that has been remediated in accordance with Brownfield Cleanup Agreement (BCA) Site Index Number: C360116 and C360066.

In support of the proposed future site modifications, we will conduct an initial subsurface geotechnical investigation; the purpose of which will be to initially classify the physical characteristics and engineering properties of the subsurface materials. Dynamic's overall work procedure is summarized below and will be conducted in general conformance to the August 2016 Site Management Plan (SMP), prepared by GHD Consulting Services Inc. Following completion of this investigation, the New York State (NYS) Department of Environmental Conservation (DEC) will need to be notified should a buyer interested in the purchase and redevelopment of the site property proceed with the site planning.

Proposed Work Plan:

Our geotechnical investigation will include performing up to 56 soil borings throughout the subject site using truck mounted and/or all-terrain-vehicle (ATV) mounted drilling equipment. The borings will be drilled to planned depths ranging between five feet and 40 feet below the ground surface unless shallow refusal and/or unsuitable soils are encountered. In addition to the soil borings, up to 29 test pits will be excavated throughout the subject site using a track-mounted excavator. The test pits will be excavated to planned depths ranging between 10 feet to 12 feet below the ground surface unless shallow refusal and/or unsuitable soils are encountered.

The test pits are each typically four feet wide by 15 feet long. As such, we expect that the volume of 31 cubic yards per test pit will be generated. Soils generated from exploratory test pits will be temporarily staged and immediately returned to their place of origin following completion of each test pit, on the same day. Stockpiling will not occur. Accordingly, full execution of the *Excavation Work Plan, Section C-3 Stockpile Materials* for the proposed test pit and soil boring investigation is not appropriate for this investigation. To prevent commingling with the clean cap material, excavated test pits and drill cuttings will be temporarily staged on polyethylene sheeting followed by immediate return to the test pit origin. In the event of inclement weather (heavy rain events), the temporarily staging areas will be covered with Polyethylene sheeting and appropriately anchored as detailed in the *Excavation Work Plan, Section C-3 Stockpile Materials* as an attempt to mitigate the potential for sedimentation transportation from the temporary staging.

If refusal is encountered shallower than planned depths, the borings and/or test pits will be terminated and possibly offset. If unsuitable soils are encountered, borings may be extended deeper into a suitable bearing stratum. The locations of the proposed borings and test pits are depicted on the attached *Proposed Testing Location Plan*. Depending upon accessibility at the time of our investigation, soil boring and test pit locations may be relocated to areas accessible to our equipment.

The field investigation will be performed in accordance with our *Health and Safety Plan (HASP)* for the subject site. A copy of the HASP is included herein.

The soil borings will be advanced using an outer steel casing (or hollow stem augers) and split spoon sampling at select intervals throughout the depth of the boring. Samples will be delivered and stored at our laboratory for potential testing to develop geotechnical recommendations.

During the drilling and test pit excavations, the upper approximately one to two feet of select fill (if encountered) and underlying documented historical fill will be separated and placed in piles separate from the underlying natural soils on plastic sheeting. While we will attempt to minimize disturbance to the potential demarcation fabric, the borings and test pits will puncture the existing fabric. As such, borings will be backfilled with the cuttings generated and the materials from the lower portion of the boring will initially be used for backfill and using a cementitious grout slurry within the area where the demarcation line where encountered. At test pit locations demarcation fabric will be replaced. During drilling operations, drilling equipment such as augers and samplers will be brushed to remove soils.

If encountered during soil borings and test pits, samples with apparent observed free petroleum product and/or dense or light non-aqueous phase liquid will be drummed and disposed off-site. If such soils are encountered, the drilling augers/sampler and excavation bucket will be power washed at a temporary wash station. The soils/water from the equipment will be captured and drummed. At the completion of the referenced work, field equipment will be power washed prior to demobilization from the site at the location identified as "Temporary Decontamination Area" in the attached *Proposed Testing Location Plan*. Water generated from general washing will be discharged at an area of known/historically documented existing fill.

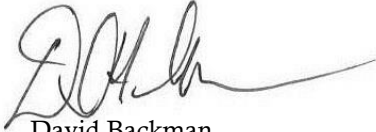
Air monitoring will be performed in accordance with the project's Community Air Monitoring Plan (CAMP) with equipment including an auditory and/or visual alarm for real-time notification and resolution of potential issues. A copy of the project's CAMP is included as an appendix to this letter for reference. A Photoionization Detector (PID) meter will be used to monitor particulate and volatile organic compounds (VOC). Air monitoring and PID readings will be performed continuously when the field investigation penetrates the existing demarcation layer.

Results of the CAMP will be submitted weekly during the field investigation, and prompt notification of the DOH and DEC will be performed if exceedances are detected. At the completion of field activities Community Air Monitoring Data (CAMP), Boring and Test Pit logs with a diagram of their locations, offsite disposal documentation (if applicable) and imported fill documentation (if applicable) will be provided.

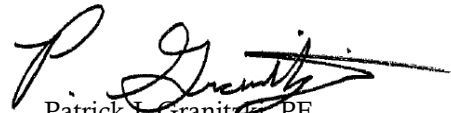
Please do not hesitate to contact us with any questions regarding these matters.

Sincerely,

DYNAMIC EARTH, LLC



David Backman
Principal

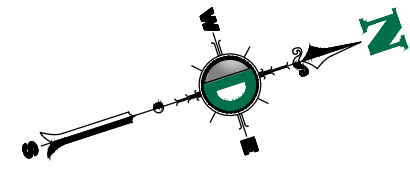


Patrick J. Granitzer, PE
Principal

Enclosures – Test Location Plan, Health and Safety Plan (HASP)

Cc: Peter Howell, Dynamic Earth, LLC
Jeffrey Schaumburg, Dynamic Earth, LLC

Proposed Testing Location Plan



SCALE: N.T.S.

JOB No:

TITLE: **PROPOSED TESTING LOCATION PLAN**

SHEET No:
1
OF 1

DRAWN BY: AP
DESIGNED BY: -
CHECKED BY: PG
DATE: 8/2/2019

PROJECT: **PROPOSED DEVELOPMENT**
44 AND 45 STEW LEONARD DRIVE
CITY OF YONKERS
WEST CHESTER COUNTY, NEW YORK

Rev. # 0 DEC Client Code: 0650

LEGEND:

XX' [Symbol] APPROXIMATE LOCATION AND PROPOSED DEPTH OF PROPOSED BORING LOCATION

XX' [Symbol] APPROXIMATE LOCATION AND PROPOSED DEPTH OF PROPOSED TEST PIT LOCATION

NOTES:
1. THIS PLAN IS NOT FOR CONSTRUCTION AND WAS PREPARED TO ILLUSTRATE TEST LOCATIONS ONLY.



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Health And Safety Plan

HEALTH AND SAFETY PLAN

**Proposed Retail
45 Stew Leonard Drive
Yonkers, New York 10710**

Prepared By:



245 Main Street, Suite 110
Chester, New Jersey 07930

Project #: 0650-98-031EC

March 4, 2020

Health and Safety Plan

Proposed Retail
45 Stew Leonard Drive
Yonkers, New York 10710
0650-98-031EC

March 4, 2020

Emergency Contacts				
Position	Name	Organization	Phone	Cell
Site Supervisor	Christopher Zieger	Dynamic Earth, LLC	(732) 413-5716	(732) 413-5716
Site Health and Safety Supervisor	Kelvin Pittman	Dynamic Earth, LLC	(732) 413-5716	(267) 352-3244
Client Contact	David Backman	Dynamic Earth, LLC	(732) 280-0830	(908) 256-5010
Emergency Response	On-Call	Police/Medical	911	911

Emergency Medical Facility
St. John's Riverside Hospital 967 N Broadway, Yonkers, NY 10701 914-964-4444
<i>Route to emergency medical facility map attached to back of this health & safety plan</i>

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ATTACHMENTS

- ATTACHMENT 1 Job Hazard Analysis Worksheets
- ATTACHMENT 2 Hazardous Substance Profiles and/or MSDS
- ATTACHMENT 3 Figures and Map

Element 1 - Organizational Structure

This HASP element describes lines of authority, responsibility, and communication as they pertain to health and safety functions at this site in compliance with 29 CFR 1910.120(b)(2). This element also details key personnel who are responsible for the development and implementation of the HASP. Additionally, this element includes the general functions and responsibilities of supervisors and site workers, as well as a specific chain of command. **In addition to the provisions described herein, Site workers, visitors and contractors shall comply with any access agreements.**

Dynamic Earth has responsibility only for Dynamic Earth employees during work conducted per this HASP. Dynamic Earth will provide a copy of this HASP to each contractor and subcontractor in accordance with 29 CFR 1910.120(b)(1)(iv) to inform them of site hazards and emergency procedures. All contractors and subcontractors are solely responsible for the safe and healthful performance of all work by each of its employees and/or support personnel who may enter the site. Each contractor and subcontractor shall provide its own HASP as required by 29 CFR 1910.120.

Site Supervisor

As required by 29 CFR 1910.120(b)(2)(i)(A), Christopher Zieger is the Site Supervisor and is responsible for directing all hazardous waste operations. All other site personnel report directly to the Site Supervisor unless otherwise noted. The Site Supervisor may delegate all or part of these duties to a qualified designee. The Site Supervisor is directly responsible for:

- Ensuring the pre-entry briefing and/or tailgate-safety meeting are held prior to initiating any site activity, and at such other times as necessary to ensure that employees are apprised of site hazards;
- Ensuring that all work activities conducted are consistent with this HASP and making any modifications as necessary;
- Verifying all Job Hazard Analyses and ensuring that ongoing Hazard Analysis is conducted at this site;
- Overseeing the training program and ensuring that employees are trained for all tasks or operations they are asked to perform;
- Updating the Site Control Program as needed;
- Granting site workers site and zone access approval;
- Registering all site visitors;
- Establishing and maintaining security measures for this site;
- Directing how each work zone is adjusted;
- Notified if emergency assistance is needed;
- Notified when any hazardous-substance spill occurs;
- Evaluating confined spaces and responsible for the confined space permit program;
- Responsible for the Lock Out/Tag Out (LOTO) program;
- Monitoring site activities as they pertain to health and safety at this site;
- Stopping any unsafe acts that pose an immediate or imminent health and safety hazard to anyone at this site;
- Ensuring that all elements of this HASP are followed and correctly implemented;

- Ensuring all personnel are apprised of their responsibilities and are fulfilling their requirements;
- Updating the Site Health and Safety Supervisor and other applicable personnel as to changes or work progress reports that may pertain to health and safety functions at this site.

Qualified alternate(s) for the Site Supervisor are:

- Spencer Spurlock
- Alicia Plinio

Site Health and Safety Supervisor

As required by 29 CFR 1910.120(b)(2)(i)(B), Kelvin Pittman is the Site Health and Safety Supervisor who has the responsibility and authority for all functions that may pertain to health and safety at this site. This is the individual located on a hazardous waste site that is responsible to Christopher Zieger, the Site Supervisor, and has the authority and knowledge necessary to implement the HASP and verify compliance with applicable safety and health requirements. The Site Health and Safety Supervisor is directly responsible for:

- Providing a copy of this HASP to each contractor and subcontractor;
- Notified if emergency assistance is needed;
- Supervising PPE use on this site;
- Approving any changes in PPE used on this site;
- Notified when any hazardous-substance spill occurs;
- Evaluating the quality and safety of response activities after every emergency incident or evacuation of this site;
- Providing site workers with notifications and training on changes to the emergency response plan;
- Performing initial monitoring to identify and evaluate any hazardous atmospheres during confined space operations;
- Implementing the thermal stress program;
- Authorizing the hot-work plan and cutting and welding operations;
- Inspecting the hot-work permit area before work is authorized;
- Developing and implementing the HASP;
- Monitoring site activities as they pertain to health and safety at this site;
- Stopping any unsafe acts that pose an immediate or imminent health and safety hazard to anyone at this site;
- Ensuring that all elements of this HASP are followed and correctly implemented;
- Verifying compliance of Dynamic Earth employees with respect to this HASP and reporting deviations to Christopher Zieger, the Site Supervisor;
- Setting up decontamination lines and the solutions appropriate for the type of chemical contamination on site;
- Controlling the decontamination of all equipment, personnel and samples from the contaminated areas;
- Providing for the disposal of contaminated clothing and materials;

- Ensuring that all required decontamination equipment is available and in working order;
- Providing for collection, storage and disposal of decontamination waste (e.g., rinse water, contaminated sediment, etc.);
- Evaluating site incidents including spills, releases of hazardous substances, fires, or explosions;
- Determining the appropriate response including site evacuations;
- Implementing the Emergency Response Plan;
- Coordinating emergency response activities on this site;

Qualified alternate(s) for the Site Health and Safety Supervisor are:

- Spencer Spurlock
- Kelvin Pittman

General Site Workers

General Site Workers are responsible for complying with this HASP, using the proper personal protective equipment (PPE), reporting unsafe acts and conditions to appropriate supervisory personnel, and following the work, safety and health instructions of Christopher Zieger, Site Supervisor and Kelvin Pittman, Site Health and Safety Supervisor. General Site Workers report directly to Christopher Zieger, the Site Supervisor. General Site Workers at this site are listed in the Contact Summary Table at the end of this element.

The following types of workers are considered General Site Workers at this site:

- Equipment Operators
- General Laborers

Specific Limited Task Workers

Specific Limited Task Workers are responsible for complying with this HASP, using the proper PPE, reporting unsafe acts and conditions to appropriate supervisory personnel, and following the work, safety and health instructions of Christopher Zieger, Site Supervisor and Kelvin Pittman, Site Health and Safety Supervisor. Specific Limited Task Workers report directly to Christopher Zieger, Site Supervisor. Specific Limited Task Workers at this site are listed in the Contact Summary Table at the end of this element.

The following types of workers are considered Specific Limited Task Workers at this site:

- Geologists
- Groundwater Samplers
- Land Surveyors
- Geophysical Surveyors

Contractors and Subcontractors

Each contractor and subcontractor shall designate a Contractor Site Representative. The Contractor Site Representative will interface directly with Christopher Zieger, the Site Supervisor/the Site Health and Safety Supervisor, with regards to all areas that relate to this HASP and safe and healthful performance of work conducted by the contractor and/or subcontractor workforce. Contractor Site Representatives for this site are listed in the Contact Summary Table at the end of this element.

Local/State/Federal Agency Representative

Local, state, and/or federal agencies are responsible for ensuring the site is in compliance with appropriate regulatory requirements, permits, and/or legal ruling(s). Local/State/Federal Agency Representatives for this site are listed in the Contact Summary Table at the end of this element.

Client Contact

The Client Contact is the party responsible for the site or the commissioning site work owner. The Client Contact is listed in the Contact Summary Table at the end of this element.

The organizational structure shall be reviewed and updated as necessary to reflect the current status of site operations.

Contact Summary Table

Position	Name	Organization	Phone	Email
Site Supervisor	Christopher Zieger	Dynamic Earth, LLC	(732) 413-5716	ctieger@dynamic-earth.com
Site Health and Safety Supervisor	Kelvin Pittman	Dynamic Earth, LLC	(732) 413-5716	ctieger@dynamic-earth.com
General Site Workers	To be Determined	Dynamic Earth, LLC	NA	NA
Specific Limited Task Workers	To be Determined	To be Determined	NA	NA
Contractor Site Representative	To be Determined	To be Determined	NA	NA
Agency Representative	Various	NYSDEC	NA	NA
Client Contact	David Backman	Dynamic Earth, LLC	(908) 280-0830	dbackman@dynamic-earth.com

Element 2 - Hazard Analysis

This HASP element describes the safety and health hazards associated with site work and the control measures selected to protect workers in compliance with *29 CFR 1910.120(b)(4)(ii)(A)*. This is accomplished by creating a specific Job Hazard Analysis for each task and operation to be conducted at the work site.

The purpose of the Job Hazard Analysis is to identify and, to the extent practicable, quantify the health and safety hazards associated with each site task and operation, and to evaluate the risks of each hazard to workers. With this information, appropriate control methods are selected to eliminate the identified risks if possible, or to effectively control them. The control methods are documented in each task-specific Job Hazard Analysis.

This element of the HASP includes:

- Site Description;
- Hazard Notification Process;
- Site Tasks and Hazard Analysis;
- Job Hazard Analysis Worksheets (included in Attachment 1);
- Hazardous Substance Profiles (included in Attachment 2);

All incidents, injuries, illnesses, and near misses of incidents shall be reported to Kelvin Pittman, the Site Health and Safety Supervisor, or designated alternate.

Job Hazard Analyses contained in this HASP have been developed by Kelvin Pittman, the Site Health and Safety Supervisor. Christopher Zieger, the Site Supervisor, is the individual responsible for reviewing and "verifying" that all Job Hazard Analyses are complete and to ensure that ongoing hazard analyses are conducted at this site.

Site Description

The site is an approximately 16.1-acre undeveloped parcel located at 45 Stew Leonard Drive in the City of Yonkers, New York. This Health & Safety Plan (HASP) has been prepared with the understanding that portions of the Site historically were used as a landfill for fly ash, municipal garbage/waste, etc. Based on documents provided for review, Lots 4 and 7 of the Site were part of a Brownfield Redevelopment Agreement with the New York State Department of Environmental Conservation (NYSDEC).

Source information for preparing the above site description is from the following document(s):

- Brownfields Redevelopment Agreement

Hazard Notification Process

The information in the Job Hazard Analysis Worksheets, Hazardous Substance Profiles, and Safety Data Sheets (SDS) is made available to all employees who could be affected in the scope of their work at this site. This shall be done prior to beginning work activities.

New, or modifications to existing, Job Hazard Analysis Worksheets, Hazardous Substance Profiles, or SDS are communicated during routine briefings.

Consistent with *29 CFR 1910.120(i)*, this information will also be made available to contractors and subcontractors.

Kelvin Pittman, the Site Health and Safety Supervisor, is the person responsible for providing site information, this HASP, and any modifications to this HASP to contractors and/or subcontractors working on this site.

Phases, Site Tasks and Hazard Analysis

Onsite Phases, Site Tasks and/or Operations

This HASP applies to the following Phases of work at this site:

- Site Investigation

This HASP will apply to the following Tasks and/or Operations that will be accomplished on this site:

- Decontamination;
- Drilling;
- Excavation;
- Inspection;
- Sampling – soil and groundwater.

Detailed information regarding site work locations, phases, tasks, and/or operations are included in the Job Hazard Analysis Worksheets, which are discussed later in this Element.

Chemical Hazards

Exposure to chemical hazards should always be avoided. When working around chemical hazards it is important to be protected by administrative and/or engineered controls or, if administrative and/or engineered controls are not practicable or fully protective, by use of proper personal protective equipment (PPE). A direct reading instrument must be used, as necessary, to establish potential worker exposure.

Below is a list of chemical hazards that may be encountered on this site.

Chemical Name	OSHA PEL (mg/m ³)	NIOSH REL (mg/m ³)	IDLH (mg/m ³)
CHLORDANE	0.5	0.5	100
PCB	1	0.001	5
CHROMIUM	1	0.5	250
DDT	1	0.5	500
LEAD METAL	0.05	0.05	100
NICKEL METAL	1	0.015	10

OSHA PEL. OSHA sets permissible exposure limits (PELs) to protect workers against the health effects of exposure to hazardous substances. PELs are regulatory limits on the amount or concentration of a substance in the air. They may also contain a skin designation. PELs are enforceable. OSHA PELs are based on an 8-hour time weighted average (TWA) exposure.

ACGIH[®]; TLV[®]-TWA. ACGIH[®] develops threshold limit values (TLVs[®]) as exposure guidelines. The TLV[®]-TWA concentration for a conventional 8-hour workday and a 40-hour workweek, to which it is believed that nearly all workers may be repeatedly exposed, day after day, for a working lifetime without adverse effect. *See ACGIH policy statement below.*

ACGIH[®] TLV[®]-STEL. A short-term exposure limit (STEL) 15-minute TWA exposure that should not be exceeded at any time during a workday, even if the 8-hour TWA is within the TLV[®]-TWA. The TLV[®]-STEL is the concentration to which it is believed that workers can be exposed continuously for a short period of time without suffering from 1) irritation, 2) chronic or irreversible tissue damage, 3) dose-rate-dependent toxic effects, or 4) narcosis of sufficient degree to increase the likelihood of accidental injury, impaired self-rescue, or materially reduced work efficiency. The TLV[®]-STEL will not necessarily protect against these effects if the daily TLV[®]-TWA is exceeded. The TLV[®]-STEL is not a separate, independent exposure guideline; rather, it supplements the TLV[®]-TWA where there are recognized acute effects from a substance whose toxic effects are primarily of a chronic nature. Exposures above the TLV[®]-TWA up to the TLV[®]-STEL should be less than 15 minutes, should occur less than four times per day, and there should be at least 60 minutes between successive exposures in this range. An averaging period other than 15 minutes may be recommended when this is warranted by observed biological effects. *See ACGIH policy statement below.*

ACGIH[®] TLV[®]-C. The ceiling (C) concentration that should not be exceeded during any part of the working exposure. If instantaneous measurements are not available, sampling should be conducted for the minimum period of time sufficient to detect exposures at or above the ceiling value. *See ACGIH policy statement below.*

IDLH. Immediately dangerous to life or health (IDLH) is a regulatory value defined as the maximum exposure concentration in the workplace from which one could escape within 30 minutes without any

escape-impairing symptoms or any irreversible health effects. This value should be referred to in respirator selection.

ACGIH® Policy Statement. *These values are intended for use in the practice of industrial hygiene as guidelines or recommendations to assist in the control of potential workplace health hazards and for no other use. These values are not fine lines between safe and dangerous concentrations and should not be used by anyone untrained in the discipline of industrial hygiene. It is imperative that the user of these values read the Introduction to each section of the TLV®/BEI® Book and be familiar with the Documentation of the TLVs® and BEIs® before applying the recommendations. ACGIH® disclaims liability with respect to the use of the TLVs® and BEIs®. See <http://www.acgih.org/TLV/PolicyStmnt.htm> for more information.*

For more information on:

- PELs go to <http://www.cdc.gov/niosh/pel88/pelstart.html> or <http://www.osha.gov/SLTC/pel/>
- IDLH go to <http://www.cdc.gov/niosh/idlh/idlhintr.html>
- ACGIH® TLVs® go to <http://www.acgih.org/TLV/>

NOTE - More specific chemical information is available in the Hazardous Substance Profiles included in Attachment 2 of this HASP.

Physical Hazards

Below is a list of physical hazards that may be encountered during work activities at this site. Personal awareness, strict adherence to all safety requirements, and the use of proper PPE when applicable will help keep this work site safe.

- Cold Weather Operations;
- Drilling Rig Operations;
- Excavation/Trenching Operations;
- Hand Tool Use;
- Heavy Equipment Operation;
- Heavy Manual Lifting/Moving;
- High Pressure Water Use;
- Inclement Weather - Lightning and High Winds;
- Inclement Weather - Snow, rain, and other precipitation;
- Noise (Sound Pressure Level), dBA;
- Poor Housekeeping;
- Repetitive Motion;
- Sharp Objects;
- Slips/Trips/Falls;
- Traffic - On or Near Site;
- Utilities (electrical, gas, water, etc.) – Overhead;
- Utilities (electrical, gas, water, etc.) – Underground;

Biological Hazards

Below is a list of biological hazards that may be encountered during work activities at this site. Personal awareness, strict adherence to all safety requirements, and the use of proper PPE when applicable will help keep this work site safe.

- Lyme Disease – Ticks;
- Rabies - Small Mammals;
- Skin Contact Dermatitis - Poison Plants (Ivy, Oak, and/or Sumac).

Radiological Hazards

Job hazard analysis indicates that workers are not expected to encounter radiological hazards at this site for the phases, tasks and/or operations and work locations covered by this HASP.

Job Hazard Analysis Worksheets

Each site-specific Job Hazard Analysis Worksheet is included in Attachment 1. A single Job Hazard Analysis Worksheet may be used for multiple locations provided that the task or operation, and hazards and control measures, are the same in each location.

Each Job Hazard Analysis Worksheet lists the following information:

- Phase description;
- Specific task or operation;
- Specific location for task or operation;
- Hazard analysis date(s) of task or operation;
- Task or operation date(s);
- Person responsible for developing Job Hazard Analysis;
- Person responsible for reviewing the Job Hazard Analysis;
- Chemical, physical, biological and radiological hazards for each task or operation;
- Specific control measures for each task or operation;
- Required permit(s), if any;

The Job Hazard Analysis Worksheet should be kept updated as information changes and previous copies should be retained.

Hazardous Substance Profiles

Hazardous Substance Profiles for each chemical hazard identified at the site are included in Attachment 2 of this HASP. The Hazardous Substance Profiles are designed to assist with "chemical guidelines" in which further information may be needed, including but not limited to an SDS. This information is not intended to replace an SDS, rather to augment one. The user should verify the contents to be accurate and up to date prior to use.

Element 3 - Training Program

The site safety and health Training Program is designed to provide workers with the training necessary to work safely on this site in compliance with *29 CFR 1910.120(b)(4)(ii)(B)*. Training requirements for this site are based on the Job Hazard Analysis, contained in Attachment 1 this HASP, and relevant OSHA requirements. Employees who have not been trained to a level required by their job function and responsibility are not permitted to participate in or supervise field activities.

At this site, Christopher Zieger, the Site Supervisor, oversees the Training Program and is responsible for ensuring that employees are trained for all tasks or operations they are asked to perform.

This Training Program is consistent with the requirements of *29 CFR 1910.120(e)* and addresses the following site-specific information:

- Initial HAZWOPER Training;
- Required Supervised Field Experience;
- Site Specific Training for Site Workers;
- Site Briefings for Visitors and Workers;
- Management and Supervisor Training;
- Qualification of Trainers;
- Training Certification;
- Emergency Response Training;
- Refresher Training;
- Equivalent Training;
- Training Records;

Initial HAZWOPER Training

Initial training requirements for site workers are based on the worker's potential for exposure and compliance with the requirements of *29 CFR 1910.120(e)(3)*.

General Site Workers (such as equipment operators, general laborers and supervisory personnel) engaged in hazardous substance removal or other activities that expose, or potentially expose, them to hazardous substances and health hazards shall receive a minimum of 40 hours of instruction off site, and a minimum of three days of actual field experience under direct supervision of a trained, experienced supervisor as per *29 CFR 1910.120(e)(3)(i)*.

Specific Limited Task Workers on site only occasionally for a specific limited task (such as, but not limited to, groundwater piezometer installation/sampling, surveying, or geophysical surveying) and who are unlikely to be exposed over permissible exposure limits and published exposure limits shall receive a minimum of 24 hours of instruction off site, and a minimum of one day of actual field experience under direct supervision of a trained, experienced supervisor as per *29 CFR 1910.120(e)(3)(ii)*.

Other workers regularly on site who work in areas that have been monitored and fully characterized, indicating that exposures are under permissible exposure limits and published exposure limits where respirators are not necessary, and the characterization indicates that there are no health hazards or the

possibility of an emergency developing, shall receive a minimum of 24 hours of instruction off site, and a minimum of one day of actual field experience under direct supervision of a trained, experienced supervisor as per *29 CFR 1910.120(e)(3)(iii)*.

Required Supervised Field Experience

In accordance with *29 CFR 1910.120(e)(3)(i), (ii), and (iii)*, site workers on this site shall provide documentation of having received the appropriate number of days (either 1 or 3) of supervised field experience under the direct supervision of a trained, experienced supervisor, or must receive the appropriate number of days of supervised field experience at this site.

Site-Specific Training for Site Workers

In addition to the initial HAZWOPER training requirements outlined above, site workers shall be trained on the following site-specific elements:

- Names of personnel and alternates responsible for site safety and health;
- Health, safety and other hazards present;
- Use of specific personal protective equipment (PPE) detailed in Elements 2 and 6 of this HASP;
- Standard work practices by which the employee can minimize risks from the hazards detailed in Element 2 of this HASP;
- Safe use of administrative and/or engineering controls and equipment detailed in Element 2 of this HASP;
- Medical surveillance requirements detailed in Element 4 of this HASP;
- The site control plan detailed in Element 5 of this HASP;
- The spill containment program detailed in Element 8 of this HASP;
- Decontamination procedures detailed in Element 9 of this HASP;
- The emergency response plan detailed in Element 10 of this HASP;
- Thermal stress issues as detailed in Element 13 of this HASP;
- Lead, in accordance with *29 CFR 1910.1025* and *CCR Title 8 1532.1*;
- Working safely around heavy equipment;

Site Briefings for Visitors and Workers

A site-specific briefing shall be provided to visitors who enter this site beyond the designated entry point. For visitors, the site-specific briefing shall include information about site hazards, the site layout including work zones and places of refuge, the emergency alarm system and emergency evacuation procedures, and other pertinent safety and health requirements, as appropriate.

Site workers shall review this HASP and shall be provided a site-specific briefing prior to the commencement of work. Additional briefings shall be provided, as necessary, to notify employees of changes to this HASP. This includes, but is not limited to:

- Changes or revisions to this HASP;
- Changes in site conditions;
- Changes in the work schedule/plan;

- Additional hazards discovered;
- Accidents or incidents that occurred at this work site;

On-Site Management and Supervisor Training

In addition to the initial training requirements as described above, on-site management and supervisors directly responsible for, or who supervise employees engaged in hazardous waste operations, shall receive at least eight additional hours of specialized training at the time of job assignment in accordance with *29 CFR*

Training received by management and supervisors includes:

- Employer's safety and health program;
- Personal protective equipment program;
- Spill containment program;
- Health hazard monitoring procedures and techniques;
- Management of hazardous waste site clean-up operations;
- Management of the site work zones;

Qualification of Trainers

Only instructors qualified in accordance with *29 CFR 1910.120(e)(5)* are used to train workers for this site. Qualified instructors have either completed a training program for the subjects they are expected to teach or have the academic credentials and instructional experience necessary for teaching the subjects.

Training Certification

Site workers including on-site management and supervisors who have received and completed the necessary training and field experience are certified. Any person who has not been certified is prohibited from engaging in hazardous waste operations on this site.

Emergency Response Training

Emergency response training is addressed in Element 10 of this HASP, Emergency Response Plan.

Refresher Training

Site workers, including on-site management and supervisors, shall receive annual HAZWOPER refresher training consistent with the requirements of *29 CFR 1910.120(e)(8)*.

Equivalent Training

This site does not accept prior academic training or job site experience in lieu of HAZWOPER initial training for workers and supervisors.

Training Records

Written certificates and up-to-date records of site-specific training for each site worker, including on-site management and supervisors, are retained. A sign-off sheet indicating that each worker has received a copy of this HASP and understands its contents is also retained. These records are stored at the following location:

Dynamic Earth, LLC Offices

Texas (Austin) - 901 Mopac Expressway South | Barton Oaks Plaza One | Suite 300 | Austin, TX 78746 | PH: (512) 646-2646

Texas (Dallas) – 714 S. Greenville Avenue | Suite 100 | Allen, TX 75002 | PH (972) 534-2100

New Jersey (Chester) - 245 Main Street | Suite 110 | Chester, NJ 07930 | PH: (908) 879-7095 | Fax: (908) 879-0222

New Jersey (Lake Como) - 1904 Main Street | Lake Como, NJ 07719 | PH: (732) 280-0830 | Fax: (732) 974-3521

New Jersey (Newark) - 50 Park Place | Mezzanine Level | Newark, NJ 07102 | PH: (973) 755-7200

New Jersey (Toms River) - 8 Robbins Street | Toms River, NJ 08753 | PH: (732) 280-0830 | Fax: (732) 974-3521

Pennsylvania (Newtown) - 790 Newtown Yardley Road | Suite 425 | Newtown, PA 18940 | PH: (267) 685-0276 | Fax: (267) 685-0361

Florida (Delray Beach) – 100 NE 5th Ave | Suite B2 | Delray Beach, FL 33483 | PH: (561) 921-8570

Element 4 - Medical Surveillance Program

The Medical Surveillance Program is designed to medically monitor worker health to ensure that personnel are not adversely affected by site hazards in compliance with *29 CFR 1910.120(b)(4)(ii)(D)*.

Medical surveillance is not required at this site due to:

- There is No potential for worker exposure to hazardous substances at levels above OSHA permissible exposure limits or other published limits for 30 days or more per year, without regard to use of respiratory protection.
- Employees Do not wear a respirator for 30 days or more a year or as required by *29 CFR 1910.134*.

Any worker who is injured, becomes ill, or develops signs or symptoms of possible over-exposure to hazardous substances or health hazards on this site shall receive a medical examination as soon as possible after the occurrence, with follow-up examinations provided as required by the attending physician. Physical Exams shall be consistent with *29 CFR 1910.120(f)*.

Element 5 - Site Control Program

This Site Control Program is designed to minimize the spread of hazardous substances from contaminated areas to areas that have not been contaminated in compliance with *29 CFR 1910.120(b)(4)(ii)(F)*. Additionally, the Site Control Program is intended to identify and isolate contaminated areas of the site, to facilitate emergency evacuation and medical care, to prevent unauthorized entry to the site, and to deter vandalism and theft.

This Site Control Program includes the elements specified in *29 CFR 1910.120(d)* and provides the following site-specific information:

- Site Map (included in Attachment 3);
- Site Access Procedures;
- Site Security;
- Site Work Zones;
- Use of the Buddy System;
- Both Internal (on-site) and External (off-site) Communications;
- Medical Assistance;

Christopher Zieger, Site Supervisor, is responsible for ensuring the Site Control Program is updated as needed.

Site Map

A site maps indicating the site perimeter, entry and exit points, work zones, emergency equipment storage locations, and evacuation routes and places of safe assembly will be made available to Site personnel.

Site Access Procedures

For the safety of all personnel, access to this site is restricted to only those site workers who have access approval from Christopher Zieger, Site Supervisor. To further reduce the potential for chemical exposure, site workers shall only enter into zones in which they have access approval from Christopher Zieger, Site Supervisor.

During hours of site operation, site entry and exit is authorized only at the point(s) identified on the attached map. Entry and exit at these points is controlled by:

- Fencing

During hours that the site is not operating, access to the site is controlled by:

- Fencing

For accountability purposes, all visitors to the site must register with Christopher Zieger, Site Supervisor. Visitors are not required to be escorted. Visitors are expected to comply with the requirements of this HASP. Visitors who will enter contaminated areas of the site must provide adequate documentation that they have the required training and medical evaluation as required by this HASP. Visitors shall receive a site-specific briefing about protecting themselves from site hazards, recognizing site zones, and following emergency evacuation procedures. Visitors shall have the required personal protective equipment (PPE) for the areas that they will visit.

Site Security

Christopher Zieger, Site Supervisor, is responsible for establishing and maintaining site security measures for this site.

Site security at this site is maintained to prevent unauthorized entry; limit the spread of contamination; prevent exposure of unauthorized and unprotected people to site hazards; and minimize vandalism and theft.

Site security is provided at this site by:

- Fences;
- Existing cap material.

Internal and External Communications

Internal on-site communication will be handled on this site by:

- Face to face.

External off-site communication will be handled on this site by:

- Cell phone.

Medical Assistance

Medical assistance at this site is addressed in Element 10, Emergency Response Plan.

Use of the Buddy System

While working in the hazardous areas, workers use the buddy system. The buddy system is a system of organizing employees into work groups in such a manner that each employee of the work group is designated to be observed by at least one other employee in the work group. The purpose of the buddy system is to provide rapid assistance to employees in the event of an emergency.

The responsibilities of workers using the buddy system include:

- Remaining in close contact with other buddies;
- Providing assistance to other buddies as needed or requested;
- Observing other buddies for signs of heat stress or other difficulties;
- Periodically checking the integrity of buddy's PPE;
- Notifying Christopher Zieger, Site Supervisor, if emergency assistance is needed;

Element 6 - Personal Protective Equipment

Personal protective equipment (PPE) will be used at this site to protect employees from biological, chemical and physical hazards in compliance with *29 CFR 1910.120(b)(4)(ii)(C)*. This includes hazards associated with, but not limited to, entry operations, decontamination processes, and routine site tasks and operations.

With employee safety being the number one priority, site health hazards will be eliminated or reduced to the greatest extent possible through administrative and/or engineering controls and safe work practices. Where hazards are still present, a combination of administrative and/or engineering controls, work practices, and PPE will be used to protect employees.

Christopher Zieger, Site Health and Safety Supervisor, is responsible for PPE use on this site. The following topics are addressed in this element:

- PPE Selection Criteria;
- Site-Specific PPE;
- Training In Use of PPE;
- Minimum Standards for PPE;
- Hearing Conservation;
- PPE Maintenance & Storage;
- Using PPE at this Site;

PPE Selection Criteria

PPE shall be selected and used to protect site workers from the hazards and potential hazards they are likely to encounter, as identified during the site characterization and Job Hazard Analysis (see Attachment 1). A PPE ensemble shall be assigned to each work task or operation.

PPE selection shall be based upon many factors. Initial PPE ensembles shall be selected based on the anticipated route(s) of entry of the hazardous substances on site and their concentration. Ensemble materials shall be selected using permeation data supplied by individual manufacturers. Materials providing the greatest duration of protection shall be used. Tear and seam strength of the PPE shall also be considered to ensure ensemble durability while work is performed.

When necessary, multiple layers of protection shall be used to accommodate the range of hazards that may be encountered. All PPE shall be properly fitted.

PPE selection criteria shall also include:

- Level of PPE required (Level A, B, C, or D);
- PPE components;
- Chemical suit and glove compatibility.

Other factors that influence the above selection criteria include:

- Work mission and duration;
- Climatic considerations;
- Personal tolerances.

Any changes in PPE selection must be approved by Christopher Zieger, Site Health and Safety Supervisor.

All PPE ensembles shall be consistent with Appendix B of *29 CFR 1910.120*, and used in accordance with manufacturers' recommendations.

The following criteria were used to select PPE levels at this site:

Level D Protection was selected due to the following:

- There is no potential for unexpected inhalation or contact with hazardous levels of any chemical

Site-Specific PPE

Level D Ensemble

Specific Level D ensemble components for the phases, tasks, and locations at this site are listed in the applicable Job Hazard Analysis Worksheet(s) included in Attachment 1 of this HASP.

Training In Use of PPE

Employees receive general training regarding proper selection, use and inspection of PPE during initial HAZWOPER training and subsequent refresher training. Site-specific PPE requirements, including task-specific PPE, ensemble components, cartridge and canister service times, and inspection and maintenance procedures, as applicable, shall be communicated as identified in Element 3, Training Program.

Because chemical exposure levels present do not create a substantial possibility of immediate death, immediate serious illness or injury, or impair the ability to escape, positive pressure self-contained breathing apparatus or positive-pressure air-line respirators equipped with an escape air supply are not required.

Minimum Standards for PPE

If the preliminary site evaluation did not produce sufficient information to identify the hazards or suspected hazards of the site, an ensemble providing equivalent to Level B PPE shall be provided as minimum protection, and direct reading instruments, in accordance with Element 7 of this HASP, will be used as appropriate for identifying IDLH conditions.

Hearing Conservation

Site workers shall use hearing protection to protect against noise exposures equal to or exceeding an 8-hour time-weighted average sound level of 85 dBA. In areas where noise exposure meets or exceeds this level, noise is listed as a physical hazard in the Job Hazard Analysis Worksheet and hearing protection PPE for the tasks or operation in these areas is included as one of the control measures. Site workers are required to use hearing protection and participate in a Hearing Conservation Program.

Hearing conservation PPE shall be used on this site in accordance with the applicable Job Hazard Analysis Worksheet in Attachment 1.

PPE Maintenance & Storage

To ensure that PPE continues to provide the anticipated protection, this site uses specific procedures for PPE inspection, cleaning, maintenance, and storage based upon manufacturers' guidelines. Adherence to these procedures is tracked with written inspection records.

Using PPE at This Site

Workers using PPE at this site shall have the proper training and fit testing, as applicable. PPE shall be inspected prior to, during, and after each use.

Element 7 - Environmental Monitoring

This element of the HASP describes how site worker exposures to hazardous substances will be monitored in compliance with *29 CFR 1910.120(b)(4)(ii)(E)*.

This element addresses:

- Air Monitoring Procedures;
- Initial Monitoring Procedures;
- Periodic Monitoring;
- Direct-Reading Instrument Monitoring Procedures;

Air Monitoring Procedures

Exposures to airborne hazardous substances shall be fully characterized throughout site operations to ensure that exposure controls are effectively selected and modified as needed. Air monitoring shall be used to identify and quantify airborne levels of hazardous substances and safety and health hazards to determine the appropriate level of site worker protection needed on site. Air monitoring procedures shall be consistent with OSHA requirements in *29 CFR 1910.120(c)(6)*.

Air monitoring shall be conducted using direct-reading instruments. Air monitoring includes:

- Initial monitoring prior to the beginning of site activities to identify conditions that may cause death or serious harm and to permit preliminary selection of site controls;
- Periodic monitoring throughout site operations when conditions and site worker exposures may change rapidly;

Initial Monitoring Procedures

Upon initial entry, representative air monitoring shall be conducted to identify any IDLH condition, exposure over permissible exposure limits or published exposure levels, exposure over a radioactive material's dose limits, or other dangerous condition such as the presence of flammable atmospheres or oxygen-deficient environments.

Periodic Monitoring

Periodic monitoring shall be conducted when the possibility of an IDLH condition or flammable atmosphere has developed, or when there is indication that exposure may have risen over permissible exposure limits or published exposure levels since previous monitoring was conducted. Situations where it shall be considered that the possibility exposures have risen are as follows:

- When work begins on a portion of the site that has not been previously monitored;
- When contaminants other than those previously identified are being handled;
- When a different type of operation is initiated;
- When a change in environmental conditions exist;

- When site workers handle leaking drums or containers, or work in areas with obvious liquid contamination;
- When site workers report or exhibit signs of exposure.

Direct-Reading Instrument Monitoring Procedures

Direct-reading instrument monitoring will be used on this site as follows:

- Dust;
- Volatile Organic Compounds (VOCs).

Monitoring equipment calibration and maintenance procedures on this site are:

For particulate monitoring, a TSI 8530 DustTRAK II aerosol monitor, capable of real time measurement of airborne particulate concentrations between 0.001 and 400 milligrams per cubic meter (mg/m³), shall be used at the upwind and downwind boundaries of the work areas where shallow fill and soil excavation and regrading is to be performed. If the particulate level at the downwind boundary of the work area was 0.1 mg/m³ greater than background for the 15-minute average, or if airborne particulate was observed leaving the work area, then particulate suppression techniques shall be employed. Work activities continued with particulate suppression techniques in place, provided that downwind particulate levels did not exceed 0.15 mg/m³ above background and that no visible particulate matter was migrating from the work area.

If particulate suppression techniques do not reduce downwind particulate levels to less than 0.15 mg/m³ above background, work was stopped and a re-evaluation of activities occurred. Work will resume provided that the re-evaluated particulate suppression measures were successful in reducing the downwind particulate concentration to less than 0.15 mg/m³ above background, for the 15-minute average, and no visible particulate matter was migrating from the work area.

Though not anticipated, VOCs shall be evaluated during cap disruption activities. A MiniRae-3000 or equivalent will be staged in the vicinity/downwind of the work to be conducted. In the event that VOC concentrations exceed 50.0 parts per million by volume, work shall cease until concentrations subside to concentrations below 50.0 parts per million by volume.

Element 8 - Spill Containment Program

This element describes the potential for hazardous substance spills at this site and procedures for controlling and containing such spills in compliance with *29 CFR 1910.120(b)(4)(ii)(J)* and *29 CFR 1910.120(j)(1)(viii)*. The purpose of the Spill Containment Program is to ensure that spill containment planning is conducted and appropriate control measures are established.

The Spill Containment Program addresses the following site-specific information:

- Potential for Spills and Available Controls;
- Initial Notification and Response;
- Spill Evaluation and Response;
- Post-Spill Evaluation;

Potential for Spills and Available Controls

An evaluation was conducted to determine the potential for hazardous substance spills at this site. This evaluation indicates that there is no potential for a hazardous substance spill of sufficient size to require containment planning, equipment, and procedures.

For that reason, no spill containment program is implemented at this site.

Test Pit Soil Controls

Soils generated from exploratory test pits will be temporarily staged and immediately returned to their place of origin following completion of each test pit on the same day. Stockpiling will not occur. Accordingly, full execution of *Excavation Work Plan, Section C-3 Stockpile Methods* for the proposed test pit investigation is not appropriate for this investigation. To prevent contaminant commingling with clean cap material, excavated test-pit soils will be temporarily staged on polyethylene sheeting followed by immediate return to the test pit of origin. In the event of inclement weather (heavy rain events), the temporarily staging areas will be covered with Polyethylene sheeting and appropriately anchored as detailed in the *Excavation Work Plan, Section C-3 Stockpile Methods* as an attempt to mitigate the potential for leaching.

Element 9 - Decontamination

This HASP element describes procedures for decontaminating site workers and equipment when exiting the Exclusion Zone in compliance with *29 CFR 1910.120(b)(4)(ii)(G)*. This element also describes disposal of waste from decontamination processes. Site decontamination procedures are designed to achieve a safe, logical removal or neutralization of contaminants that may accumulate on site workers and/or equipment. Kelvin Pittman, the Site Health and Safety Supervisor, is responsible for decontamination procedures at this site.

These procedures are intended to minimize site worker contact with contaminants and protect against the transfer of contamination to clean areas of the site and away from the site. They may also extend the useful life of personal protective equipment (PPE) by reducing the amount of time that contaminants contact and permeate or otherwise affect the surfaces of PPE.

Decontamination procedures shall be communicated to site workers, and implemented before any site workers or equipment are permitted to enter areas on site where potential for exposure to hazardous substances exists.

Emergency decontamination procedures are detailed in Element 10, the Emergency Response Plan of this HASP.

The decontamination procedures described below are designed to meet the requirements of *29 CFR 1910.120(k)* and include site-specific information about:

- General and Specific Decontamination Procedures for Personnel and PPE;
- General and Specific Decontamination Procedures for Equipment;
- Location and Type of Site Decontamination Procedures;
- Disposal of Residual Waste from Decontamination;
- Monitoring the Effectiveness of Decontamination Procedures;

General and Specific Decontamination Procedures for Site Workers and PPE

All site workers and PPE leaving a contaminated area shall be appropriately decontaminated. General decontamination guidelines for site workers and PPE include:

- Protective clothing is decontaminated, cleaned, laundered, maintained and/or replaced as needed to ensure its effectiveness.

Specific decontamination on this site for site workers and PPE shall be conducted as outlined in the Job Hazard Analysis Worksheets in Attachment 1.

General and Specific Decontamination Procedures for Equipment

All contaminated clothing and equipment leaving a contaminated area shall be appropriately disposed of or decontaminated.

General decontamination guidelines for equipment include:

- Particular attention is given to decontaminating tires, scoops, and other parts of heavy equipment that are directly exposed to contaminants and contaminated soil.

Specific decontamination for equipment on this site shall be conducted as outlined in the Job Hazard Analysis Worksheets in Attachment 1.

Location and Type of Site Decontamination Procedures

Decontamination shall be performed in areas that will minimize the exposure of uncontaminated site workers or equipment to contaminated site workers or equipment. Decontamination on this site shall be conducted in the Contamination Reduction Zone. The Contamination Reduction Zone acts as a buffer between the Exclusion Zone and Support Zone. The location and design of decontamination stations minimize the spread of contamination beyond these stations.

Disposal of Waste from Decontamination

Procedures for disposal of decontamination waste shall meet applicable local, State, and Federal regulations.

Monitoring the Effectiveness of Decontamination Procedures

Decontamination procedures shall be monitored by Kelvin Pittman, the Site Health and Safety Supervisor, to determine effectiveness. If procedures are found to be deficient, appropriate steps shall be taken to correct any deficiencies.

Element 10 - Emergency Response Plan

This HASP element describes the site-specific Emergency Response Plan in compliance with *29 CFR 1910.120(b)(4)(ii)(H)*. Specifically the Emergency Response Plan addresses potential emergencies at this site, procedures for responding to these emergencies, roles and responsibilities during emergency response, and training. This element 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 shall be available for inspection and copying by site workers, their representatives, OSHA personnel, and other governmental agencies with relevant responsibilities as required by *29 CFR 1910.120(l)(1)(i)*.

In accordance with *29 CFR 1910.120(l)(3)(ii)*, this Emergency Response Plan is a separate element of the HASP.

This Emergency Response Plan, which is consistent with the requirements of *29 CFR 1910.120(l)*, 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;
- Site Security and Control;
- Evacuation Routes and Procedures;
- Emergency Decontamination Procedures;
- Emergency Medical Treatment and First Aid;
- Emergency Alerting and Response Procedures;
- Critique of Response and Follow-Up;
- Personal Protective Equipment (PPE) and Emergency Equipment;

Pre-Emergency Planning

This Emergency Response Plan is compatible and integrated with the disaster, fire and/or emergency response plans of local, state, and federal agencies.

This Emergency Response Plan shall be reviewed periodically and amended as necessary to keep it current with new or changing site conditions or information. This Plan shall be rehearsed regularly as part of the overall training program for site operations.

This site has been evaluated for potential emergency occurrences based on site hazards, the tasks within the work plan, the site topography, and prevailing weather conditions.

Based on this evaluation, the following potential emergencies have been identified:

Type of Emergency	Location(s) of Emergency	Source of Emergency
Lightning	Site-Wide	Excavation
Medical Emergency	Site-Wide	Excavation
Collision	Site-Wide	Excavation
Heat stress/worker collapses	Site-Wide	Heat

Personnel Roles, Lines of Authority, and Communication

Anyone may activate the Emergency Response Plan; however, Christopher Zieger, Site Health and Safety Supervisor, is responsible for implementing the Emergency Response Plan and coordinating emergency response activities on this site. Christopher Zieger, (or designated alternate) also provides specific direction for emergency action based upon information available regarding the incident and response capabilities, initiates emergency procedures including protection of the public, and ensures appropriate authorities are notified.

In the event of an emergency, site workers participate in emergency response activities on a limited basis as outlined below:

Activities	Personnel Permitted to Participate
Coordinate communication with persons off site	All
First aid	All
Notifications	All

Site workers who are not permitted to participate in emergency response activities will be evacuated.

The on-site supervisor and designated alternates, if any, responsible for coordinating site emergency response and evacuation efforts are listed below:

Title	Name	Contact Number
Site Health and Safety Supervisor	Christopher Zieger	(732) 413-5716
Site Health and Safety Supervisor Alternate	Spencer Spurlock	(732) 280-0830

The on-site supervisor, or a designated alternate, shall be on site whenever site tasks and/or operations are underway.

Additionally, off-site emergency response organizations listed in the Emergency Response Contact Information list may also be requested to respond to site emergencies. These organizations are appropriately trained, staffed, and equipped to provide emergency response to this site.

These organizations are contacted at least annually to verify the accuracy of phone numbers and contact names.

Communication on this site will be conducted by the following methods:

- Cell phone

Key Site Personnel

Position	Name	Organization	Phone	Email
Site Supervisor	Christopher Zieger	Dynamic Earth, LLC	(732) 413-5716	czieger@dynamic-earth.com
Site Health and Safety Supervisor	Kelvin Pittman	Dynamic Earth, LLC	(267)352-3244	kpittman@dynamic-earth.com
Contractor Site Representative	To be determined	To be determined	-	-
Agency Representative	Not Applicable	NYSDEC	-	-
Client Contact	David Backman	Dynamic Earth, LLC	(732) 280-0830	dbackman@dynamic-earth.com

Emergency Response Contact Information

Organization	Contact	Address/Location	Phone
Police/Medical	On-Call	NA	911

Emergency Recognition and Prevention

Emergency recognition and prevention is of the utmost importance on this site. In addition to the minimum training requirements outlined in Element 3, all workers shall receive periodic briefings that cover potential site emergencies and techniques that may be used to prevent such emergencies.

Safe Distances and Places of Refuge

Safe distances and places of refuge used in emergencies shall be shown on the site map and all site workers and site visitors shall be briefed as to these locations.

Site Security and Control

In case of an on-site emergency, site security and control for this site shall be provided by:
Fencing

Evacuation Routes and Procedures

Site workers shall always be made aware of evacuation routes and procedures. Appropriate primary and alternate evacuation routes and assembly areas shall be marked on the site map and updated as needed. The routes and assembly areas will be determined by conditions at the time of the evacuation based on wind direction, the location of the hazard source, and other factors as determined by rehearsals and input from onsite personnel.

If an evacuation notice is given, site workers will leave the worksite with their respective buddies, if possible, by way of the nearest exit. Emergency decontamination procedures detailed later in this element will be followed, to the extent practicable, without compromising the safety and health of site workers.

Personnel exiting the site shall gather at a designated assembly point. To determine if everyone has successfully exited the site, personnel will be accounted for at the assembly site. If any worker cannot be accounted for, notification shall be given to Kelvin Pittman, the Site Health and Safety Supervisor, 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 site workers.

Emergency Decontamination Procedures

Not Applicable

Emergency Medical Treatment and First Aid

This site has no workers with current first aid certification assigned to provide first aid during each shift.

Any site worker who requires medical care and/or is transferred to a medical facility shall be accompanied by Hazardous Substance Profiles included in Attachment 2 of this HASP and other

applicable information to apprise caregivers of the chemicals and hazards to which the victim has potentially been exposed. The emergency medical care facility for this site is:

St. John's Riverside Hospital
967 N Broadway, Yonkers, NY 10701
914-964-4444

The route to the facility is shown in on the map included in Attachment 3 of this HASP.

Emergency Alerting and Response Procedures

Upon discovering an emergency situation, personnel shall notify Kelvin Pittman, the Site Health and Safety Supervisor, (or a designated alternate) who will evaluate available information and initiate the appropriate actions. Personnel on this site are notified of emergencies by use of an employee alarm system.

Critique of Response and Follow-Up

After every emergency incident or evacuation of this site, Kelvin Pittman, Site Health and Safety Supervisor, will evaluate the quality and safety of response activities. Any deficiencies in response actions will be included in a specific follow-up plan and corrected.

This Emergency Response Plan shall be evaluated periodically throughout site operations and updated for accuracy. Changes made to emergency response procedures as the result of rehearsals or actual response incidents shall be recorded in this Plan. Kelvin Pittman, Site Health and Safety Supervisor, shall provide site workers with notification and training on changes to this Plan.

Emergency Equipment and PPE

No emergency equipment is required at this site. No emergency PPE is required at this site.

Procedures for Handling Emergency Incidents

Kelvin Pittman, the Site Health and Safety Supervisor, (or a designated alternate) shall determine the level of response required for containment, rescue, medical care and cleanup. The emergency response team is mobilized to the incident site and supplied with sufficient members, PPE, and emergency equipment.

When Kelvin Pittman, the Site Health and Safety Supervisor, (or alternate) determines that on-site emergency response is inadequate for the emergency or that outside assistance is needed or otherwise required, the applicable off-site organization shall be contacted. The Site Health and Safety Supervisor shall provide relevant information to the responding organizations, including hazards associated with the emergency incident, potential containment problems, and any missing site personnel.

Site emergencies shall be reported to local, state, and federal governmental agencies as required by those agencies.

Contingency Plan for Unexpected Conditions

Unexpected conditions that may be encountered during geotechnical and/or environmental evaluation of the site include buried drums, previously unidentified debris, and areas of grossly contaminated soil (i.e. free phase petroleum, DNAPL) not previously identified through historic testing by others. Grossly contaminated soil is defined in the NYSDEC's Draft DER-10 Technical Guidance for Site Investigation and Remediation document as soil that contains visibly identifiable free or otherwise readily detectable free or residual product.

The following procedures will be followed if “unexpected conditions” are encountered. Screening for “unexpected conditions” will be performed by the Dynamic Earth, LLC during all geotechnical and environmental related drilling and excavation activities. This screening will include the following:

1. Visual inspection for evidence of grossly contaminated soil or debris (i.e., visibly identifiable free or otherwise readily detectable free or residual product, debris, drums, etc.); and
2. Periodically screening for organic vapors with a photoionization detector (PID).

If grossly contaminated soil, debris or drums are identified, Dynamic Earth, LLC. will terminate investigation activities, secure the area of boring/excavation and immediately notify the Owner's Representative (Keith Morris of The Morris Companies) and Environmental Consultant (Damian Vanetti of GHD) who will contact the proper regulatory agencies.

In no circumstance should Dynamic Earth, LLC. disturb or attempt to remove or further unearth any drum containing unknown material, grossly contaminated soils or other previously unidentified debris. Any such material will be secured and photo documented. In general, Dynamic Earth, LLC will be responsible for notifying the Owner's Representative and Environmental Consultant, who will then notify NYSDEC, NYCDEP, and/or any other applicable regulatory agency of the “unexpected conditions” encountered.

If encountered and only after consultation with the owner's environmental consultant, any grossly contaminated soils generated from drilling or excavation activities will be stockpiled on 8-mil plastic sheeting and covered to prevent spreading of contaminants to other parts of the site. If necessary and only after Owner Representative and Environmental Consultant approval, Dynamic Earth, LLC can prepare a revised workplan to characterize, handle/manage and ultimately dispose of the grossly impacted materials in accordance with all appropriate regulations. All equipment used in connection with encountered unexpected conditions will be thoroughly decontaminated in accordance with the appropriate vehicle/equipment cleaning procedures.

Element 11 - Confined Space Entry Procedures

This section of this HASP describes the site-specific written confined space entry program (permit space program) in compliance with *29 CFR 1910.120(b)(4)(ii)(I)* and *29 CFR 1910.146*.

Specifically this section identifies all permit-required confined spaces (permit spaces) on site and provides the procedures to protect site worker safety and health when working in or near permit required confined spaces. All confined spaces are treated as permit spaces until otherwise determined.

In compliance with the requirements of *29 CFR 1910.120(b)(4)(ii)(I)*, this section of the HASP is included even when no permit-required confined spaces are present on site in order to indicate that a site-specific evaluation for permit spaces has been made.

This permit space program (permit space program) includes the elements specified in *29 CFR 1910.146* and provides the following site-specific information:

- Identification and evaluation of permit spaces;
- Measures to prevent unauthorized entry;
- Entry permit system;
- Entry equipment and personal protective equipment;
- Permit spaces training;
- Rescue and emergency procedures;
- Employee participation;
- Entry procedures;

The person with overall responsibility for the permit space program is Christopher Zieger, Site Supervisor. The permit space program will be modified to reflect changing site conditions or work operations. This program is reviewed if any of the following conditions occur:

- Identification of confined spaces in addition to those already listed in this HASP;
- Occurrence of unauthorized entry of a permit space;
- Discovery of a permit space hazard not covered by the permit;
- Detection of a condition prohibited by the permit;
- Occurrence of an injury or near-miss during entry;
- Employee complaints of permit space program ineffectiveness;
- Change in the use or configuration of a confined space;

Additionally, an annual review of all entries performed during the previous 12 month period is conducted. If no entries were made into a permit space, then no annual review is performed.

Identification and Evaluation of Permit Spaces

On 07/24/2019, this site was carefully evaluated by Christopher Zieger, Site Supervisor, who determined there are no confined spaces on this site.

Element 12 - Standard Operating Procedures (SOPs)

Employees shall follow Health and Safety Program Standard Operating Procedures (SOPs) in compliance with *29 CFR 1910.120(b)(1)(ii)*.

Element 13 - Thermal Stress Issues

This section of the HASP describes how the site-specific environmental conditions (temperature, humidity, and air movement), workloads, and PPE may expose site workers to hazards resulting in illness or injury related to heat or cold stress. This Thermal Stress Prevention Program outlines exposure controls designed to protect site workers from heat or cold stress.

The elements of this Program are outlined in this section and include the following:

- Implementation Criteria;
- Prevention Strategies;
- Medical Management;
- Employee Training;

Kelvin Pittman, Site Health and Safety Supervisor, is responsible for implementing this program.

Implementation Criteria

The Thermal Stress Prevention Program is activated when the work area temperature rises above 95° Fahrenheit.

Throughout each work shift, air temperatures in the work area(s) are measured, adjusted temperature calculated, and the values recorded by Cell Phone

Prevention Strategies - Heat Stress

Work practices and exposure controls are used to reduce the risk of elevating a worker's core body temperature. These work practices and exposure controls include the following:

- Monitoring for signs of heat stress

Monitoring Signs of Heat Stress

Site workers monitor each other's actions, speech, and appearance for signs and symptoms of heat related illnesses including heat exhaustion and heat stroke. Physical signs and symptoms of heat exhaustion include headache, nausea, vertigo, weakness, thirst, and giddiness. Heat exhaustion may progress to heat stroke if a worker is unable to cool and re-hydrate his or her body. The primary signs and symptoms of heat stroke are confusion; irrational behavior; loss of consciousness; convulsions; a lack of sweating (usually); hot, dry skin; and an abnormally high body temperature.

Site workers should be aware of the key differences between the signs and symptoms of heat exhaustion and those of heat stroke, such as the lack of sweating, the color of the skin (red), and the rise in body temperature. Heat stroke is a medical emergency that requires immediate medical attention. Physical signs and symptoms of heat stress are discussed with site workers as necessary.

Medical Emergencies

If a worker exhibits signs or symptoms of heat exhaustion or heat stroke, procedures found in Element 10 - Emergency Response Plan will be followed

Site workers receive general training regarding thermal stress-related injuries and illnesses during initial HAZWOPER training and subsequent refresher training. The site-specific program and procedures are described in Element 3.

Element 14 - Hot Work Requirements

No cutting and/or welding (hot work) will be conducted at this site as part of the scope of work covered by this HASP.

Element 15 - Energy Control or LOTO Program

This section of the HASP describes the site-specific hazardous energy control or Lockout/Tagout (LOTO) program. The purpose of this section is to establish the minimum requirements for the lockout of energy isolating devices whenever maintenance or servicing is done on machines or equipment. It shall be used to ensure that the machine or equipment is stopped, isolated from all potentially hazardous energy sources, and locked out before employees perform any servicing or maintenance where the unexpected energization or start-up of the machine or equipment or release of stored energy could cause injury. These procedures are intended to comply with *29 CFR 1910.147*.

The person with the overall responsibility for the LOTO program is Christopher Zieger, Site Supervisor.

On 07/24/2019, this site was carefully evaluated by Christopher Zieger, Site Supervisor, and it was determined that LOTO procedures are not necessary to protect site employees from hazardous energy for any machines or equipment.

Attachment 1

Job Hazard Analysis Worksheets

JOB HAZARD ANALYSIS WORKSHEET			
Phase Description:	Site Investigation; geotechnical drilling, excavation, piezometer installation		
Task or Operation:	Decontamination, Drilling, Excavation, Inspection, Sampling (soil/groundwater)		
Specific Location:	Site-Wide		
Task or Operation Start Date(s):	To be determined	Task or Operation Duration:	
Date of			
Job Hazard Analysis Developed by:		CHRISTOPHER J ZIEGER	
Job Hazard Analysis Reviewed by:		CHRISTOPHER J ZIEGER	
POTENTIAL HAZARDS DURING THIS TASK and/or OPERATION			
Chemical*	Physical	Biological	Radiological
» CHLORDANE » CHLORODIPHENYL (42% CHLORINE) » CHROMIUM METAL » DDT » LEAD (INORGANIC, DUSTS & FUMES), as Pb » NICKEL METAL	» Cold Weather Operations » Drilling Rig Operations » Excavation/Trenching Operations » Hand Tool Use » Heavy Equipment Operation » Heavy Manual Lifting/Moving » High Pressure Water Use » Inclement Weather - Lightning and High Winds » Inclement Weather - Snow, rain, and other precipitation » Noise (Sound Pressure Level), dBA » Poor Housekeeping » Repetitive Motion » Sharp Objects » Slips/Trips/Falls » Traffic - On or Near Site » Utilities (electrical, gas, water, etc.) - Overhead » Utilities (electrical, gas, water, etc.) - Underground	» Lyme Disease - Ticks » Rabies - Small Mammals » Skin Contact Dermatitis - Poison Plants (Ivy, Oak, and/or Sumac)	
HAZARD CONTROL MEASURES USED DURING THIS TASK and/or OPERATION			
Administrative Controls:			
Engineering Controls:	An engineering control exists for the Site including a geomembrane beneath one foot of clean fill material. Site personnel shall ensure that clean fill material and underlying materials encountered during drilling/excavation activities are not commingled. Following investigation activities, the cap is to be restored including placement of a new geomembrane followed by one foot of clean fill material in each test location.		
PPE Description:	Level D		
Decon Procedures for People & Equipment:	At a minimum, the procedures outlined below shall be followed for decontamination: Remove gross contamination from tools, respirator, monitoring equipment, boots, etc., prior to leaving the exclusion zone, using paper towels, handi-wipes, etc.		

	<p>Completely decontaminate soiled equipment in the Contamination Reduction Zone using detergent and water and dispose of all cleaning materials as follows.</p> <p>Due to the small quantity of waste generated during decontamination, it is allowable in most states to dispose of lightly contaminated materials in the site dumpster. It is important, however, to ensure that there is no chance of vapor generation or fluid leaking from the dumpster. At no time are materials containing free product to be disposed of in this manner. In this case, arrangements must be made for use of labeled drums and proper disposal.</p> <p>All decontamination materials including protective sheeting, rags, sorbents, disposable personal protective equipment, and decontamination fluids should be carefully screened with a Photo-ionization Detector (PID) prior to disposal to determine relative levels of contamination.</p> <p>Lightly contaminated decontamination fluids should either be treated via the site treatment system prior to discharge. Highly contaminated decontamination fluids must be stored in labeled drums and proper disposal arrangements must be made.</p> <p>Dispose of contaminated gloves, Tyvek suits, used cartridges, paper towels, etc., by placing in a plastic bag and discarding in accordance with applicable standards.</p> <p>Wash hands and face thoroughly with soap and water before lunch or coffee breaks, and as soon as practical after finishing work for the day.</p> <p>Particular care should be taken to protect any skin injuries. If open wounds exist on hands or forearms, handling chemicals should be restricted or eliminated.</p> <p>Shower as soon as possible.</p>
Required Permit(s):	No
Other Information:	

*Detailed Chemical Information is listed on attached Hazardous Substance Profiles and/or MSDS

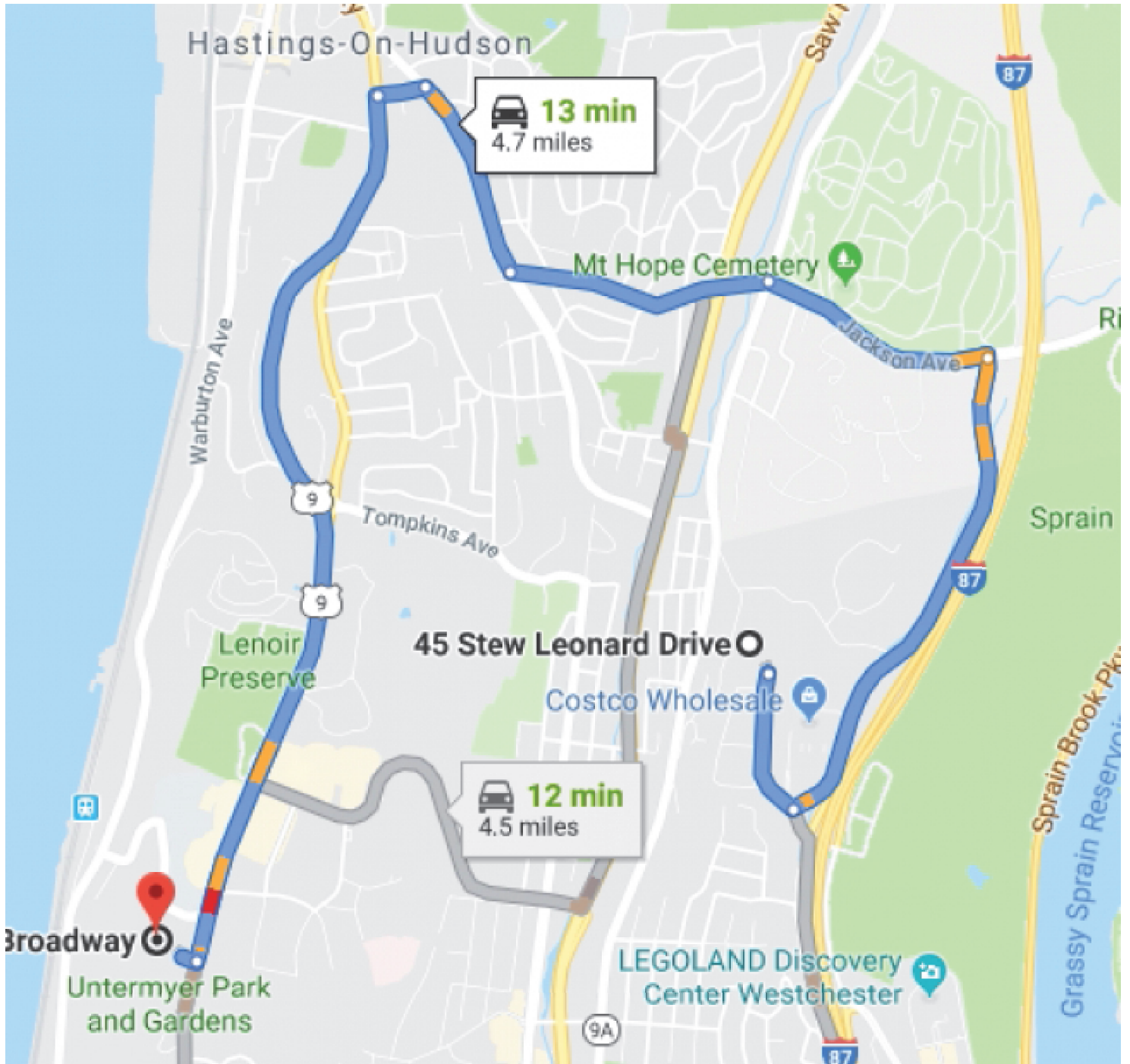
Attachment 2

Hazardous Substance Profiles and/or MSDS

Hazardous Substance Profiles are not included in this HASP. Please refer to the manufacturer's MSDS or other appropriate documentation for each hazardous substance identified in the Chemical Hazards section of Element 2.

Attachment 3

Figures and Map



Map to Hospital

45 Stew Leonard Dr

Yonkers, NY 10710

▼ Take Sprain Rd to Jackson Ave in Greenburgh

3 min (1.3 mi) _____

↑ Head south on Stew Leonard Dr

0.3 mi _____

↶ Turn left onto Sprain Rd

1.0 mi _____

▼ Drive from Broadway to Yonkers

9 min (3.4 mi) _____

↶ Turn left onto Jackson Ave

0.5 mi _____

↑ Continue onto Ravensdale Rd

0.5 mi _____

↷ Turn right onto Farragut Ave

0.4 mi _____

↶ Turn left onto Olinda Ave

495 ft _____

↶ Turn left onto Broadway

1.9 mi _____

Directions to Hospital

Community Air Monitoring Plan

(as provided by others)

COMMUNITY AIR MONITORING PLAN

1 - INTRODUCTION

As part of a Brownfield Cleanup Agreement (BCA) with the New York State Department of Environmental Conservation (NYSDEC) (BCA No. C3-60-066), Austin Avenue Brownfield Redevelopment, LLC (the Volunteer) has completed a Remedial Investigation (RI) at the former Austin Avenue Landfill site, and is prepared to proceed with the Remedial Action component of the BCA. The site located at Corporate Drive and Austin Avenue is proposed to be redeveloped into 100,000 square feet of residential buildings with associated parking and access drives.

This Community Air Monitoring Plan (CAMP) describes the measures that will be undertaken during field work to monitor ambient air at the downwind site perimeter during site activities that disturb soil or fill material.

2 - OBJECTIVES

The objective of this CAMP is to provide a measure of protection for the downwind community from potential airborne contaminant releases that might arise as a result of the planned Remedial Action, which will include the excavation and subsequent backfilling of soil and fill material, to establish a soil cover as an engineering control to mitigate potential exposure. The CAMP also provides a means to measure and properly control airborne dust.

3 - METHODS

The CAMP will include monitoring for particulate matter (e.g. airborne “dust”) and volatile organic vapors. Readings will be recorded and will be available for State (DEC and DOH) personnel to review, as requested.

A. PARTICULATE MONITORING

Particulate (e.g. “dust”) emissions will be measured continuously at the upwind and downwind property boundaries. Real time monitoring equipment (e.g. MiniRAM or equivalent), with audible alarms and capable of measuring particulate matter less than 10 micrometers in size, will be used.

- If the downwind particulate level is 100 micrograms per cubic meter (ug/m^3) greater than background (upwind) for a 15-minute period, then dust suppression techniques will be employed. Work will continue with dust suppression provided that downwind particulate levels do not exceed $150 \text{ ug}/\text{m}^3$ above upwind levels and provided that no visible dust is migrating from the work area.
- If, after dust suppression techniques, downwind particulate levels are greater than $150 \text{ ug}/\text{m}^3$ above upwind levels, work will be stopped and a re-evaluation of activities will be initiated. Work will resume provided that dust suppression measures and other controls are successful in reducing downwind particulate concentrations to within $150 \text{ ug}/\text{m}^3$ of the upwind level and in preventing visible dust migration.

B. VOLATILE ORGANIC VAPOR MONITORING

Volatile organic vapor emissions will be measured continuously in the work zones. Real time monitoring equipment (e.g. MiniRAE photoionization detector or equivalent) will be used.

- ◆ If ambient air concentrations of total organic vapors exceed 5 parts per million (ppm) above background for a 15 minute average, work activities need to be temporarily halted, and monitoring continued. If the total organic vapors level readily decreases to below 5 ppm over background, work activities can be resumed with continued monitoring.
- ◆ If ambient air concentrations of total organic vapors persist at levels in excess of 5 ppm above background, but less than 25 ppm, work activities need to be halted, the source of the vapors identified, corrective actions taken to abate emissions, and monitoring continued. Work can resume following these steps with continued monitoring, as long as concentrations decrease to levels below 5 ppm.
- ◆ If ambient air concentrations of total organic vapors exceed 25 ppm over background work must be halted.