59 SOUTH 4TH STREET

BROOKLYN, NEW YORK

Remedial Action Work Plan

NYC VCP Site Number: 14 CVCP237K

NYC E-Designation Site Number: 14EHAZ312K

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LIST OF ACRONYMS

Acronym	Definition
AOC	Area of Concern
AS/SVE	Air Sparging/Soil Vapor Extraction
BOA	Brownfield Opportunity Area
CAMP	Community Air Monitoring Plan
C/D	Construction/Demolition
COC	Certificate of Completion
CQAP	Construction Quality Assurance Plan
CSOP	Contractors Site Operation Plan
DCR	Declaration of Covenants and Restrictions
ECs/ICs	Engineering and Institutional Controls
HASP	Health and Safety Plan
IRM	Interim Remedial Measure
BCA	Brownfield Cleanup Agreement
MNA	Monitored Natural Attenuation
NOC	Notice of Completion
NYC VCP	New York City Voluntary Cleanup Program
NYC DEP	New York City Department of Environmental Protection
NYC DOHMH	New York State Department of Health and Mental Hygiene
NYCRR	New York Codes Rules and Regulations
NYC OER	New York City Office of Environmental Remediation
NYS DEC	New York State Department of Environmental Conservation
NYS DEC DER	New York State Department of Environmental Conservation Division of Environmental Remediation
NYS DOH	New York State Department of Health
NYS DOT	New York State Department of Transportation
ORC	Oxygen-Release Compound
OSHA	United States Occupational Health and Safety Administration

PE	Professional Engineer
PID	Photo Ionization Detector
QEP	Qualified Environmental Professional
QHHEA	Qualitative Human Health Exposure Assessment
RAOs	Remedial Action Objectives
RAR	Remedial Action Report
RAWP	Remedial Action Work Plan or Plan
RCA	Recycled Concrete Aggregate
RD	Remedial Design
RI	Remedial Investigation
RMZ	Residual Management Zone
SCOs	Soil Cleanup Objectives
SCG	Standards, Criteria and Guidance
SMP	Site Management Plan
SPDES	State Pollutant Discharge Elimination System
SVOC	Semi-Volatile Organic Compound
USGS	United States Geological Survey
UST	Underground Storage Tank
VOC	Volatile Organic Compound

CERTIFICATION

I, Shaik A. Saad, am a Professional Engineer licensed in the State of New York. I have primary direct responsibility for implementation of the remedial action for the 59 South 4th Street Site (NYC VCP Site No. 14CVCP237K).

I, Mark E. Robbins, am a Qualified Environmental Professional as defined in §43-140. I have primary direct responsibility for implementation of the remedial action for the 59 South 4th Street Site (NYC VCP Site No. 14CVCP237K).

I certify that this Remedial Action Work Plan (RAWP) has a plan for handling, transport and disposal of soil, fill, fluids and other materials removed from the property in accordance with applicable City, State and Federal laws and regulations. Importation of all soil, fill and other material from off-Site will be in accordance with all applicable City, State and Federal laws and requirements. This RAWP has provisions to control nuisances during the remediation and all invasive work, including dust and odor suppression.

_____
Name

_____
NYS PE License Number

_____
Signature

_____
Date

PE Stamp

_____
QEP Name

_____
QEP Signature

_____
Date

EXECUTIVE SUMMARY

The entity 59 South 4th LLC has applied to enroll in the New York City Voluntary Brownfield Cleanup Program (NYC VCP) to investigate and remediate a 7,500-square foot site located at 51-59 South 4th Street in Brooklyn, New York. A remedial investigation (RI) was performed to compile and evaluate data and information necessary to develop this Remedial Action Work Plan (RAWP). The remedial action described in this document provides for the protection of public health and the environment consistent with the intended property use, complies with applicable environmental standards, criteria and guidance and conforms with applicable laws and regulations.

Site Location and Current Usage

The Site is located at 51 to 59 South 4th Street in Williamsburg section in Brooklyn, New York and is identified as Block 2428 and Lots 28, 29, 30, 33, 34 and 35 on the New York City Tax Map. Figure 1 shows the Site location. The Site is 7,500-square feet and is bounded by a 4-story residential building to the north, a 6-story residential building to the south, a 4-story residential building to the east, and a vacant yard to the west. A map of the site boundary is shown in Figure 2. Currently, the Site is used by a scrap metal recycling company and contains three 1-story warehouses.

Summary of Proposed Redevelopment Plan

The proposed future use of the Site will consist of six 4-story single-family houses with cellars. Each house will be constructed as a 4-story single-family structure with shared party walls. Each house will be developed on a 16’8” by 75’ lot. The new addresses of the houses will be defined as 1 to 5 Wythe Lane and 6 Wythe Lane. Proposed houses on 1 to 5 Wythe Lane will have cellars and the bottom of the slab will be at 11 feet below grade. House on 6 Wythe Lane will have a cellar and a sub-cellar and the bottom of the slab will be at 14 feet 6 inches below the adjacent grade. A shared garage will be accessed via driveway under 6 Wythe Lane and 1 to 5 Wythe Lane backyards. The bottom of the garage slab will be approximately at 9 feet below grade surface.

The entire lot will be excavated to varying depths from 9 feet to 14 feet and 6 inches. Approximately 3,300 cubic yards of soil is to be removed during the construction. Heating and air conditioning for the houses will be provided by air source heat pumps with condensers on the roof and air handlers throughout each house. Each house will have its own HRV ventilation system located on the 3rd floors and hot water heater located in the cellar mechanical room. All units will contain their individual electric washer and dryer. The project also contains common elements that include a shared driveway, parking garage and a shared Mews walkway that constitutes Wythe Lane. Layout of the proposed site development is presented in Figure 3. The current zoning designation is M1-2/R6. The proposed use is consistent with existing zoning for the property.

Summary of the Remedy

The proposed remedial action achieves protection of public health and the environment for the intended use of the property. The proposed remedial action achieves all of the remedial action objectives established for the project and addresses applicable standards, criterion, and guidance; is effective in both the short-term and long-term and reduces mobility, toxicity and volume of contaminants; is cost effective and implementable; and uses standards methods that are well established in the industry.

The proposed remedial action will consist of:

1. Preparation of a Community Protection Statement and performance of all required NYC VCP Citizen Participation activities according to an approved Citizen Participation Plan.
2. Performance of a Community Air Monitoring Program for particulates and volatile organic carbon compounds.
3. Establishment of Unrestricted Use (Track 1) Soil Cleanup Objectives (SCOs).
4. Site mobilization involving Site security setup, equipment mobilization, utility mark outs and marking & staking excavation areas.
5. Excavation and removal of soil/fill exceeding Track 1 Unrestricted Use SCOs. Entire property will be excavated to a depth from 9 feet to 14 feet below grade for development purposes. Approximately 4,950 tons of soil will be removed;

6. Screening of excavated soil/fill during intrusive work for indications of contamination by visual means, odor, and monitoring with a PID. Appropriate segregation of excavated media on-Site.
7. Removal of underground storage tanks (if encountered) and closure of petroleum spills (if evidence of a spill/leak is encountered during Site excavation) in compliance with applicable local, State and Federal laws and regulations.
8. Transportation and off-Site disposal of all soil/fill material at permitted facilities in accordance with applicable laws and regulations for handling, transport, and disposal, and this plan. Sampling and analysis of excavated media as required by disposal facilities. Appropriate segregation of excavated media on-Site.
9. Collection and analysis of end-point samples to determine the performance of the remedy with respect to attainment of SCOs.
10. Import of materials to be used for backfill and cover in compliance with this plan and in accordance with applicable laws and regulations.
11. Implementation of storm-water pollution prevention measures in compliance with applicable laws and regulations.
12. Performance of all activities required for the remedial action, including permitting requirements and pretreatment requirements, in compliance with applicable laws and regulations.
13. Submission of a Remedial Action Report (RAR) that describes the remedial activities, certifies that the remedial requirements have been achieved, defines the Site boundaries, lists any changes from this RAWP, and if Track 1 SCOs are not achieved, describes all Engineering and Institutional Controls to be implemented at the Site..

If Track 1 SCOs are not achieved, the following construction elements will constitute Engineering and Institutional Controls:

14. As part of development, construction and maintenance of an engineered composite cover consisting of 16” concrete building slab across the footprint of the new building to prevent human exposure to residual soil/fill remaining under the Site.

15. As part of development, installation of a vapor barrier system beneath the building slab and outside foundation sidewalls below grade.

16. Operation of ventilated parking garage per Building Department's requirements.

17. If Track 1 SCOs are not achieved, submission of an approved Site Management Plan (SMP) in the RAR for long-term management of residual contamination, including plans for operation, maintenance, monitoring, inspection and certification of Engineering and Institutional Controls and reporting at a specified frequency.

18. If Track 1 SCOs are not achieved, the property will continue to be registered with an E-Designation at the NYC Buildings Department. Establishment of Engineering Controls: a requirement that management of these controls must be in compliance with an approved SMP.

COMMUNITY PROTECTION STATEMENT

The Office of Environmental Remediation created the New York City Voluntary Cleanup Program (NYC VCP) to provide governmental oversight for the cleanup of contaminated property in NYC. This Remedial Action Work Plan ("cleanup plan") describes the findings of prior environmental studies that show the location of contamination at the site, and describes the plans to clean up the site to protect public health and the environment.

This cleanup plan provides a very high level of protection for neighboring communities and also includes many other elements that address common community concerns, such as community air monitoring, odor, dust and noise controls, hours of operation, good housekeeping and cleanliness, truck management and routing, and opportunities for community participation. The purpose of this Community Protection Statement is to explain these community protection measures in non-technical language to simplify community review.

Remedial Investigation and Cleanup Plan. Under the NYC VCP, a thorough cleanup study of this property (called a remedial investigation) has been performed to identify past property usage, to sample and test soils, groundwater and soil vapor, and identify contaminant sources present on the property. The cleanup plan has been designed to address all contaminant sources that have been identified during the study of this property.

Identification of Sensitive Land Uses. Prior to selecting a cleanup, the neighborhood was evaluated to identify sensitive land uses nearby, such as schools, day care facilities, hospitals and residential areas. The cleanup program was then tailored to address the special conditions of this community.

Qualitative Human Health Exposure Assessment. An important part of the cleanup planning for the Site is the performance of a study to find all of the ways that people might come in contact with contaminants at the Site now or in the future. This study is called a Qualitative Human Health Exposure Assessment (QHHEA). A QHHEA was performed for this project. This assessment has considered all known contamination at the Site and evaluated the potential for people to come in contact with this contamination. All identified public exposures will be addressed under this cleanup plan.

Health and Safety Plan. This cleanup plan includes a Construction Health and Safety Plan (CHASP) that is designed to protect community residents and on-Site workers. The elements of this plan are in compliance with safety requirements of the United States Occupational Safety and Health Administration (OSHA). This plan includes many protective elements including those discussed below.

Site Safety Coordinator. This project has a designated Site safety coordinator to implement the Health and Safety Plan. The safety coordinator maintains an emergency contact sheet and protocol for management of emergencies. The Site safety coordinator is Ezgi Karayel and can be reached at (718) 636-0800.

Worker Training. Workers participating in cleanup of contaminated material on this project are required to be trained in a 40-hour hazardous waste operators training course and to take annual refresher training. This pertains to workers performing specific tasks including removing contaminated material and installing cleanup systems in contaminated areas.

Community Air Monitoring Plan. Community air monitoring will be performed during this cleanup project to ensure that the community is properly protected from contaminants, dust and odors. Air samples will be tested in accordance with a detailed plan called the Community Air Monitoring Plan or CAMP. Results will be regularly reported to the NYC Office of Environmental Remediation. This cleanup plan also has a plan to address any unforeseen problems that might occur during the cleanup (called a 'Contingency Plan').

Odor, Dust and Noise Control. This cleanup plan includes actions for odor and dust control. These actions are designed to prevent off-Site odor and dust nuisances and includes steps to be taken if nuisances are detected. Generally, dust is managed by application of physical covers and by water sprays. Odors are controlled by limiting the area of open excavations, physical covers, spray foams and by a series of other actions (called operational measures). The project is also required to comply with NYC noise control standards. If you observe problems in these areas, please contact the onsite Project Manager Ezgi Karayel at (718) 636-0800 or NYC Office of Environmental Remediation Project Manager Alysha Alfieri at (212) 676-0459.

Quality Assurance. This cleanup plan requires that evidence be provided to illustrate that all cleanup work required under the plan has been completed properly. This evidence will be

summarized in the final report, called the Remedial Action Report. This report will be submitted to the NYC Office of Environmental Remediation and will be thoroughly reviewed.

Storm-Water Management. To limit the potential for soil erosion and discharge, this cleanup plan has provisions for storm-water management. The main elements of the storm water management include physical barriers such as tarp covers and erosion fencing, and a program for frequent inspection.

Hours of Operation. The hours for operation of cleanup will comply with the NYC Department of Buildings construction code requirements or according to specific variances issued by that agency. For this cleanup project, the hours of operation are 7:00 am to 5:00 pm.

Signage. While the cleanup is in progress, a placard will be prominently posted at the main entrance of the property with a laminated project Fact Sheet that states that the project is in the NYC Voluntary Cleanup Program, provides project contact names and numbers, and locations of project documents can be viewed.

Complaint Management. The contractor performing this cleanup is required to address all complaints. If you have any complaints, you can call the facility Project Manager Ezgi Karayel at (718) 636-0800, the NYC Office of Environmental Remediation Project Manager Alysha Alfieri at (212) 676-0459, or call 311 and mention the Site is in the NYC Voluntary Cleanup Program.

Utility Mark-outs. To promote safety during excavation in this cleanup, the contractor is required to first identify all utilities and must perform all excavation and construction work in compliance with NYC Department of Buildings regulations.

Soil and Liquid Disposal. All soil and liquid material removed from the Site as part of the cleanup will be transported and disposed of in accordance with all applicable City, State and Federal regulations and required permits will be obtained.

Soil Chemical Testing and Screening. All excavations will be supervised by a trained and properly qualified environmental professional. In addition to extensive sampling and chemical testing of soils on the Site, excavated soil will be screened continuously using hand-held

instruments, by sight, and by smell to ensure proper material handling and management, and community protection.

Stockpile Management. Soil stockpiles will be kept covered with tarps to prevent dust, odors and erosion. Stockpiles will be frequently inspected. Damaged tarp covers will be promptly replaced. Stockpiles will be protected with silt fences. Hay bales will be used, as needed to protect storm water catch basins and other discharge points.

Trucks and Covers. Loaded trucks leaving the Site will be covered in compliance with applicable laws and regulations to prevent dust and odor. Trucks will be properly recorded in logs and records and placarded in compliance with applicable City, State and Federal laws, including those of the New York State Department of Transportation. If loads contain wet material that can leak, truck liners will be used. All transport of materials will be performed by licensed truckers and in compliance with all laws and regulations.

Imported Material. All fill materials proposed to be brought onto the Site will comply with rules outlined in this cleanup plan and will be inspected and approved by a qualified worker located on-Site. Waste materials will not be brought onto the Site. Trucks entering the Site with imported clean materials will be covered in compliance with applicable laws and regulations.

Equipment Decontamination. All equipment used for cleanup work will be inspected and washed, if needed, before it leaves the Site. Trucks will be cleaned at a truck inspection station on the property before leaving the Site.

Housekeeping. Locations where trucks enter or leave the Site will be inspected every day and cleaned regularly to ensure that they are free of dirt and other materials from the Site.

Truck Routing. Truck routes have been selected to: (a) limit transport through residential areas and past sensitive nearby properties; (b) maximize use of city-mapped truck routes; (c) limit total distance to major highways; (d) promote safety in entry to highways; (e) promote overall safety in trucking; and (f) minimize off-Site line-ups (queuing) of trucks entering the property. Operators of loaded trucks leaving the Site will be instructed not to stop or idle in the local neighborhood.

Final Report. The results of all cleanup work will be fully documented in a final report (called a Remedial Action Report) that will be available for you to review in the public document repositories located at Brooklyn Public Library-Leonard Branch.

Long-Term Site Management. If long-term protection after the cleanup is needed, the property owner will be required to comply with an ongoing Site Management Plan that calls for continued inspection of protective controls, such as Site covers. The Site Management Plan is evaluated and approved by the NYC Office of Environmental Remediation. Requirements that the property owner must comply with are defined in the property's deed or established through a city environmental designation. A certification of continued protectiveness of the cleanup will be required from time to time to show that the approved cleanup is still effective.

REMEDIAL ACTION WORK PLAN

1.0 SITE BACKGROUND

The entity 59 South 4th LLC has applied to enroll in the New York City Voluntary Cleanup Program (NYC VCP) to investigate and remediate a property located at 51-59 South 4th Street in the Williamsburg section of Brooklyn, New York (the "Site"). A Remedial Investigation (RI) was performed to compile and evaluate data and information necessary to develop this Remedial Action Work Plan (RAWP) in a manner that will render the Site protective of public health and the environment consistent with the contemplated end use. This RAWP establishes remedial action objectives, provides a remedial alternatives analysis that includes consideration of a permanent cleanup, and provides a description of the selected remedial action. The remedial action described in this document provides for the protection of public health and the environment, complies with applicable environmental standards, criteria and guidance and applicable laws and regulations.

1.1 SITE LOCATION AND CURRENT USAGE

The Site is located at 51 to 59 South 4th Street in Williamsburg section in Brooklyn, New York and is identified as Block 2428 and Lots 28, 29, 30, 33, 34 and 35 on the New York City Tax Map. Figure 1 shows the Site location. The Site is 7,500-square feet and is bounded by a 4-story residential building to the north, a 6-story residential building to the south, a 4-story residential building to the east, and a vacant yard to the west. A map of the site boundary is shown in Figure 2. Currently, the Site is used by a scrap metal recycling company and contains three 1-story warehouses.

1.2 PROPOSED REDEVELOPMENT PLAN

The proposed future use of the Site will consist of six 4-story single-family houses with cellars. Each house will be constructed as a 4-story single-family structure with shared party walls. Each house will be developed on a 16'8" by 75' lot. The new addresses of the houses will be defined as 1 to 5 Wythe Lane and 6 Wythe Lane. Proposed houses on 1 to 5 Wythe Lane will have cellars and the bottom of the slab will be at 11 feet below grade. House on 6 Wythe Lane

will have a cellar and a sub-cellar and the bottom of the slab will be at 14 feet 6 inches below the adjacent grade. A shared garage will be accessed via driveway under 6 Wythe Lane and 1 to 5 Wythe Lane backyards. The bottom of the garage slab will be approximately at 9 feet below grade surface.

The entire lot will be excavated to varying depths from 9 feet to 14 feet and 6 inches. Approximately 3,300 cubic yards of soil is to be removed during the construction. Heating and air conditioning for the houses will be provided by air source heat pumps with condensers on the roof and air handlers throughout each house. Each house will have its own HRV ventilation system located on the 3rd floor and hot water heater located in the cellar mechanical room. All units will contain their individual electric washer and dryer. The project also contains common elements that include a shared driveway, parking garage and a shared Mews walkway that constitutes Wythe Lane. Layout of the proposed site development is presented in Figure 3. The current zoning designation is M1-2/R6. The proposed use is consistent with existing zoning for the property.

The remedial action contemplated under this RAWP may be implemented independently of the proposed redevelopment plan.

1.3 DESCRIPTION OF SURROUNDING PROPERTY

The area surrounding the Site consists of a mix of residential and commercial properties. There are no sensitive receptors such as schools, hospitals, and day care facilities within a 500-foot radius of the Site.

Figure 2 shows the surrounding land usage.

1.4 REMEDIAL INVESTIGATION

A remedial investigation was performed and the results are documented in a companion document called "*Remedial Investigation Report, 51-59 South 4th Street*", dated February 2014 (RIR).

Summary of Past Uses of Site and Areas of Concern

Based upon the review of the Phase I Environmental Site Assessment (ESA) Report prepared by Lawrence Environmental Group, LLC in October 2012, a Site history was established. The Site was historically developed with three 1-story warehouses between 1965 and 1977. The property has been occupied by trucking companies, a sheet metal company, scrap metal companies, grocery store and residential buildings.

The AOCs identified for this site include:

1. The Site in general due to the historical and use for scrap metal recycling

Summary of the Work Performed under the Remedial Investigation

1. Conducted a Site inspection to identify AOCs and physical obstructions (i.e. structures, buildings, etc.);
2. Performed a GPR survey;
3. Installed five (5) soil borings across the entire project Site, and collected ten (10) soil samples for chemical analysis from the soil borings to evaluate soil quality;
4. Installed three (3) groundwater monitoring wells throughout the Site to establish groundwater flow and collected three (3) groundwater samples for chemical analysis to evaluate groundwater quality;
5. Installed four (4) soil vapor probes around Site perimeter and collected four (4) samples for chemical analysis;
6. Collected one (1) ambient air sample for chemical analysis.

Summary of Environmental Findings

1. Elevation of the property ranges from 33 to 38 feet.
2. Depth to groundwater ranges from 34.38 to 35.50 feet at the Site.
3. Groundwater flow is towards west beneath the Site.
4. Bedrock was not encountered during the RI.

5. The stratigraphy of the site, from the surface down, consists of 2 feet of medium coarse sand with traces of urban fill, 6 feet of coarse sand and 7 to 8 feet of medium to fine grained sand with pebbles.

6. Soil/fill samples collected during the RI were compared to 6 NYCRR Part 375-6.8 Track 1 Unrestricted Soil Cleanup Objectives (SCOs) and Track 2 Restricted Residential SCOS. Soil sampling results showed no VOCs or PCBs were found above Unrestricted Use SCOs. Trace levels of four VOCs; acetone (max. of 0.037 ppm), 2-butanone (0.0059 ppm), naphthalene (max. of 0.015 ppm) and tetrachloroethylene (PCE) (0.007 ppm) were detected in one or more soil samples. Seven (7) Polycyclic Aromatic Hydrocarbon (PAH) SVOCs including Benzo(a)anthracene (max. of 8.82 ppm), Benzo(a)pyrene (max. of 6.45 ppm), Benzo(b)fluoranthene (max. of 7.18 ppm), Benzo(k)fluoranthene (6.01 ppm), Chrysene (max. of 9.09 ppm), Dibenzo(a,h)anthracene (max. of 0.517 ppm) and Indeno(1,2,3-cd)pyrene (max. of 1.44 ppm) were detected above their respective Restricted Residential Use SCOs in two of the five shallow soil samples. SVOCs were not detected above Unrestricted Use SCOs in in any of deep soil samples. Pesticides including 4,4'-DDD (max. of 11.8 ppb); 4,4'-DDE (max. of 17.2 ppb); 4,4'-DDT (max. of 9 ppb); chlordane (max. of 3.4 ppb) and dieldrin (5.6 ppb) were identified at a concentration slightly exceeding their Track 1 Unrestricted Use SCOs in shallow soil samples. Six (6) metals, Barium (max. of 1620 ppm), Chromium Hexavalent (1.73 ppm), Copper (max. of 101 ppm), Lead (max. of 4700 ppm), Zinc (max. of 851 ppm), Mercury (max. of 2.7 ppm) and were identified above Track 1 Unrestricted SCOs in six of the soil samples. Of these metals, Barium, Lead and Mercury also exceed their Track 2 Restricted Residential SCOs. Overall, the findings were consistent with observations for historic fill sites in areas throughout NYC.

7. Groundwater sample collected during Remedial Investigation were compared to NYSDEC 6NYCRR Part 703.5 Groundwater Quality Standards (GQS). Groundwater results showed no SVOCs, PCBs or Pesticides at concentrations exceeding Groundwater Quality Standards (GQSs). One VOC, PCE, was detected in one groundwater sample at a concentration of 9 ug/L, which exceeds its GQS of 5 ug/L. Several metals were identified

in groundwater samples, but no metals were detected in any of the groundwater samples exceeding their respective GQSs.

8. Soil vapor samples collected during the RI were compared to the compounds listed in Table 3.1 Air Guideline Values Derived by the NYSDOH located in the New York State Department of Health (NYSDOH) Final Guidance for Evaluating Soil Vapor Intrusion. Soil vapor samples collected during the RI showed petroleum and chlorinated VOCs were detected in soil vapor samples collected during the RI. Petroleum related VOCs (BTEX) were detected at a maximum concentration of 94 ug/m^3. Most contaminant concentrations were below 55 ug/m^3 except for PCE detected in three of the soil vapor samples, at a concentration ranging from 17 ug/m^3 to 170 ug/m^3. Trichloroethylene and TCA were also detected in two of the soil vapor samples, both at a maximum concentration of 3 ug/m^3. Carbon tetrachloride was not detected in any of the soil vapor samples. PCE Concentrations are above the monitoring level range established by NYSDOH Final Guidance on Soil Vapor Intrusion (October 2006) and require further action.

For more detailed results, consult the RIR. Based on an evaluation of the data and information from the RIR and this RAWP, disposal of significant amounts of hazardous waste is not suspected at this site.

2.0 REMEDIAL ACTION OBJECTIVES

Based on the results of the RI, the following Remedial Action Objectives (RAOs) have been identified for this Site:

Groundwater

- Prevent direct exposure to contaminated groundwater.

Soil

- Prevent direct contact with contaminated soil.
- Prevent exposure to contaminants volatilizing from contaminated soil.
- Prevent migration of contaminants that would result in groundwater or surface water contamination.

Soil Vapor

- Prevent exposure to contaminants in soil vapor.
- Prevent migration of soil vapor into dwelling and other occupied structures.

3.0 REMEDIAL ALTERNATIVES ANALYSIS

The goal of the remedy selection process under is to select a remedy that is protective of human health and the environment taking into consideration the current, intended and reasonably anticipated future use of the property. The remedy selection process begins by establishing RAOs for media in which chemical constituents were found in exceedance of applicable standards, criteria and guidance values (SCGs). A remedy is then developed based on the following ten criteria:

- Protection of human health and the environment;
- Compliance with SCGs;
- Short-term effectiveness and impacts;
- Long-term effectiveness and permanence;
- Reduction of toxicity, mobility, or volume of contaminated material;
- Implementability;
- Cost effectiveness;
- Community acceptance;
- Land use; and
- Sustainability

The following is a detailed description of the alternatives analysis and remedy selection to address impacted media at the Site. As required, a minimum of two remedial alternatives (including a Track 1 scenario) are considered for alternatives analysis for this site:

Alternative #1 involves:

- Establishment of Unrestricted Use (Track 1) Soil Cleanup Objectives (SCOs).
- Removal of all soil/fill exceeding Track 1 SCOs throughout the Site and confirmation

that Unrestricted Use SCOs have been achieved with post-excavation endpoint sampling. If soil/fill-containing analytes at concentrations above Track 1 SCOs are still present at the base of the excavation, additional excavation will be performed to ensure complete removal of soil that does not meet Track 1 SCOs;

- No engineering or institutional controls are required in a Track 1 Unrestricted Use cleanup, but a final concrete cap will be installed as a part of development to prevent any potential future exposures from remaining fill material;
- A vapor barrier will be installed beneath the basement foundation and outside foundation sidewalls of the new buildings sidewalls of the new buildings as part of new development to prevent any potential future exposures from off-Site soil vapor.

Alternative #2 involves:

- Establishment of Site Specific (Track 4) Soil Cleanup Objectives (SCOs).
- Removal of all soils exceeding Track 4 SCOs and confirmation that Track 4 has been achieved with post-excavation endpoint sampling. Excavation for development purposes would take place to a depth of approximately 9 feet to 14 feet 6 inches to construct new building's cellars and garage. It is anticipated that remaining soils would be below Track 4 SCOs. If soil/fill containing analytes at concentrations above Track 4 Site-Specific SCOs is still present at the base of the excavation after removal of all soil required for construction of the new building is complete, additional excavation will be performed to meet Track 4 Site-Specific SCOs.;
- Placement of a vapor barrier beneath the foundation slab and along foundation side walls up to grade;
- Placement of a final cover over the entire site to eliminate exposure to remaining soil/fill;
- Establishment of use restrictions including prohibitions on the use of groundwater from the site and prohibitions on other sensitive site uses, such as farming or vegetable gardening, to eliminate future exposure pathways;

- Establishment of an approved Site Management Plan (SMP) to ensure long-term management of these engineering and institutional controls, including the performance of periodic inspections and certification that the controls are performing as they were intended; and
- Continued registration as an E-designated property to memorialize the remedial action and the Engineering and Institutional Controls required by this RAWP.

3.1 THRESHOLD CRITERIA

Protection of Public Health and the Environment

This criterion is an evaluation of the remedy's ability to protect public health and the environment, and an assessment of how risks posed through each existing or potential pathway of exposure are eliminated, reduced or controlled through removal, treatment, and implementation of Engineering Controls or Institutional Controls. Protection of public health and the environment must be achieved for all approved remedial actions.

Alternative #1 would be protective of human health and the environment by removing the soil/fill exceeding Track 1 Unrestricted Use SCOs, thus eliminating the potential for human and environmental exposure to contaminated soil/fill once construction is complete and eliminating the risk of contamination leaching into groundwater. Additionally, installation of a vapor barrier as a part of the new construction would prevent any potential vapor intrusion.

Alternative #2 would achieve comparable protection of human health and the environment by excavating and removing soil/fill at the Site and by ensuring that remaining soil/fill on-Site meets Track 4 Site Specific SCOs, as well as by employing institutional and engineering controls, including a vapor barrier and a composite cover system. The composite cover system would prevent direct contact with any remaining on-Site soil/fill. Implementing institutional controls including a Site Management Plan and continued "E" designation of property would ensure that the composite cover system remains intact and protective. Establishment of Track 4 Site-Specific SCOs would minimize the risk of contamination leaching into groundwater.

For both Alternatives, potential exposure to contaminated soils during construction would be minimized by implementing a Construction Health and Safety Plan (CHASP), an approved

Soils/Materials Management Plan (SMP) and Community Air Monitoring Plan (CAMP). Potential use of groundwater for potable supply would be prevented as its use is prohibited by city laws and regulations. Potential future migration of off-Site soil vapors into the new buildings would be prevented by the new buildings' basement slabs and vapor barrier.

3.2. BALANCING CRITERIA

Compliance with Standards, Criteria and Guidance (SCGs)

This evaluation criterion assesses the ability of the alternative to achieve applicable standards, criteria and guidance.

Alternative #1 would achieve compliance with remedial goals, chemical-specific SCGs, and RAOs for soil through the removal of soil/fill to Track 1 Unrestricted Use SCOs and Groundwater Protection Standards. Compliance with SCGs for soil vapor would also be achieved by installing a vapor barrier system below the new buildings' basement slab and continuing the vapor barrier around foundation walls, as part of development.

Alternative #2 would achieve compliance with remedial goals, SCGs, and RAOs for soil through the removal of soil/fill to Track 4 SCOs and groundwater protection standards and capping the Site with a composite cover. Compliance with SCGs for soil vapor could be achieved by ventilated garage and by installing a vapor barrier below the new buildings the new building's basement slab and continuing the vapor barrier around foundation walls. A site management plan would ensure that these engineering controls remain protective for the long term.

Health and safety measures contained in the CHASP and Community Air Monitoring Plan (CAMP) that comply with the applicable SCGs shall be implemented during Site redevelopment under this RAWP. For both Alternatives, focused attention on means and methods employed during the remedial action would ensure that handling and management of contaminated material would be in compliance with the applicable SCGs.

Short-term effectiveness and impacts

This evaluation criterion assesses the effects of the alternative during the construction and implementation phase until remedial action objectives are met. Under this criterion, alternatives are evaluated with respect to their effects on public health and the environment during implementation of the remedial action, including protection of the community, environmental impacts, time until remedial response objectives are achieved, and protection of workers during remedial actions.

Both Alternative #1 and #2 have similar-short term effectiveness during their respective implementations, as each requires excavation of soil/fill material. Both alternatives would result in short-term dust generation impacts associated with excavation, handling, load out of materials, and truck traffic. However, focused attention to means and methods during the remedial action including community air monitoring and appropriate truck routing, would minimize or negate the overall impact of these activities and any differences between these alternatives.

Both alternatives would employ appropriate measures to prevent short-term impacts, including a Community Air Monitoring Plan (CAMP) and a Soil/Materials Management Plan (SMMP), during all on-Site soil disturbance activities and would effectively prevent the release of significant contaminants into the environment. Both alternatives provide short-term effectiveness in protecting the surrounding community by decreasing the risk of contact with on-Site contaminants. Construction workers operating under appropriate management procedures and a Health and Safety Plan (CHASP) will be protected from on-Site contaminants (personal protective equipment would be worn consistent with the documented risks within the respective work zones).

Long-term effectiveness and permanence

This evaluation criterion addresses the results of a remedial action in terms of its permanence and quantity/nature of waste or residual contamination remaining at the Site after response objectives have been met, such as permanence of the remedial alternative, magnitude of remaining contamination, adequacy of controls including the adequacy and suitability of ECs/ICs that may be used to manage contaminant residuals that remain at the Site and assessment of containment systems and ICs that are designed to eliminate exposures to contaminants, and long-term reliability of Engineering Controls.

Alternative #1 would achieve long-term effectiveness and permanence related to on-site contamination by permanently removing all impacted soils and enabling unrestricted usage of the property.

Alternative #2 would provide long-term effectiveness by removing most on-site contamination and attaining Track 4 SCOs, establishing engineering controls including a composite cover system across the entire site, establishing institutional controls to ensure long-term management including use restrictions, a Site Management Plan, and continued registration as an E-designated property to memorialize these controls for the long term. The Site Management Plan would ensure long-term effectiveness of all engineering controls and institutional controls by requiring periodic inspection and certification that these controls and restrictions continue to be in place and are functioning as they were intended to and assuring that protections designed in the remedy would provide continued high levels of protection, in perpetuity.

Both alternatives would result in removal of soil contamination exceeding the SCOs providing the highest level, most effective and permanent remedy over the long-term with respect to a remedy for contaminated soil, which will eliminate any migration to groundwater. Potential sources of soil vapor and groundwater contamination would also be eliminated as part of the remedy.

Reduction of toxicity, mobility, or volume of contaminated material

This evaluation criterion assesses the remedial alternative's use of remedial technologies that permanently and significantly reduce toxicity, mobility, or volume of contaminants as their principal element. The following is the hierarchy of source removal and control measures that are to be used to remediate a Site, ranked from most preferable to least preferable: removal and/or treatment, containment, elimination of exposure and treatment of source at the point of exposure. It is preferred to use treatment or removal to eliminate contaminants at a Site, reduce the total mass of toxic contaminants, cause irreversible reduction in contaminants mobility, or reduce of total volume of contaminated media.

Alternative #1 would permanently eliminate the toxicity, mobility, and volume of contaminants from on-site soil by removing all soil in excess of Track 1 Unrestricted Use SCOs.

Alternative #2 would permanently eliminate the toxicity, mobility, and volume of contaminants from on-site soil by removing soil in excess of Track 4 SCOs, and remaining soil/fill would meet Track 4 site specific SCOs.

The excavation of soil for the new development in both scenarios would probably result in relatively minor differences between these two alternatives.

Implementability

This evaluation criterion addresses the technical and administrative feasibility of implementing an alternative and the availability of various services and materials required during its implementation, including technical feasibility of construction and operation, reliability of the selected technology, ease of undertaking remedial action, monitoring considerations, administrative feasibility (e.g. obtaining permits for remedial activities), and availability of services and materials.

Both Alternatives are feasible and implementable. The techniques, materials and equipment to implement Alternative #1 and #2 are readily available and have been proven effective in remediating the contaminants associated with the Site. They use standard materials, services, and well-established technology. The reliability of these remedies is also high. There are no specific difficulties associated with any of the activities proposed, which utilize standard/industry methods.

Cost effectiveness

This evaluation criterion addresses the cost of alternatives, including capital costs (such as construction costs, equipment costs, and disposal costs, engineering expenses) and site management costs (costs incurred after remedial construction is complete) necessary to ensure the continued effectiveness of a remedial action.

Since fill at the Site was found during the RI to only extend to a depth of up to 2 feet below grade, and the new building requires excavation of the entire Site to a depth of 9 feet to 14 feet, the costs associated with both Alternative 1 and Alternative 2 will likely be the comparable. Long-term costs for Alternative #2 are marginally higher than Alternative #1 based on implementation of a Site Management Plan as part of Alternative 2.

Community Acceptance

This evaluation criterion addresses community opinion and support for the remedial action. Observations here will be supplemented by public comment received on the RAWP.

Based on the overall goals of the remedial program and initial observations by the project team, both of the alternatives are expected to be acceptable to the community. This RAWP will be subject to a public review under the NYC VCP and will provide the opportunity for detailed public input on the remedial alternatives and the selected remedial action. This public comment related to site remediation will be considered by OER prior to approval of this plan. The Citizen Participation Plan for the project is provided in Appendix 1.

Land use

This evaluation criterion addresses the proposed use of the property. This evaluation has considered reasonably anticipated future uses of the Site and takes into account: current use and historical and/or recent development patterns; applicable zoning laws and maps; NYS Department of State's Brownfield Opportunity Areas (BOA) pursuant to section 970-r of the general municipal law; applicable land use plans; proximity to real property currently used for residential use, and to commercial, industrial, agricultural, and/or recreational areas; environmental justice impacts, Federal or State land use designations; population growth patterns and projections; accessibility to existing infrastructure; proximity of the site to important cultural resources and natural resources, potential vulnerability of groundwater to contamination that might emanate from the site, proximity to flood plains, geography and geology; and current Institutional Controls applicable to the site.

Both alternatives for remedial action at the site are comparable with respect to the proposed use and to land uses in the vicinity of the Site. The proposed use is consistent with the existing zoning designation for the property and is consistent with recent development patterns. The Site is surrounded by commercial and residential properties and both alternatives provide comprehensive protection of public health and the environment for these uses. Improvements in the current environmental condition of the property achieved by both alternatives are also consistent with the City's goals for cleanup of contaminated land and bringing such properties into productive reuse. Both alternatives are equally protective of natural resources and cultural

resources. This RAWP will be subject to public review under the NYC VCP and will provide the opportunity for detailed public input on the land use factors described in this section. This public comment will be considered by OER prior to approval of this plan.

Sustainability of the Remedial Action

This criterion evaluates the overall sustainability of the remedial action alternatives and the degree to which sustainable means are employed to implement the remedial action including those that take into consideration NYC's sustainability goals defined in *PlaNYC: A Greener, Greater New York*. Sustainability goals may include: maximizing the recycling and reuse of non-virgin materials; reducing the consumption of virgin and non-renewable resources; minimizing energy consumption and greenhouse gas emissions; improving energy efficiency; and promotion of the use of native vegetation and enhancing biodiversity during landscaping associated with Site development.

Both remedial alternatives are comparable with respect to the opportunity to achieve sustainable remedial action. The remedial plan would take into consideration the shortest trucking routes during off-Site disposal of historic fill and other soils, which would reduce greenhouse gas emissions and conserve energy used to fuel trucks. New York City Clean Soil Bank program may be utilized for reuse of native soils. To the extent practicable, energy efficient building materials, appliances, and equipment will be utilized to complete the development.

4.0 REMEDIAL ACTION

4.1 SUMMARY OF PREFERRED REMEDIAL ACTION

The preferred remedial action alternative is Alternative 1, the Track 1 Alternative. The preferred remedial action alternative achieves protection of public health and the environment for the intended use of the property. The preferred remedial action alternative will achieve all of the remedial action objectives established for the project and addresses applicable SCGs. The preferred remedial action alternative is effective in both the short-term and long-term and reduces mobility, toxicity and volume of contaminants. The preferred remedial action alternative is cost effective and implementable and uses standards methods that are well established in the industry.

The proposed remedial action will consist of:

1. Preparation of a Community Protection Statement and performance of all required NYC VCP Citizen Participation activities according to an approved Citizen Participation Plan.
2. Performance of a Community Air Monitoring Program for particulates and volatile organic carbon compounds.
3. Establishment of Unrestricted Use (Track 1) Soil Cleanup Objectives (SCOs).
4. Site mobilization involving Site security setup, equipment mobilization, utility mark outs and marking & staking excavation areas.
5. Excavation and removal of soil/fill exceeding Track 1 Unrestricted Use SCOs. Entire property will be excavated to a depth from 9 feet to 14 feet below grade for development purposes. Approximately 4,950 tons of soil will be removed;
6. Screening of excavated soil/fill during intrusive work for indications of contamination by visual means, odor, and monitoring with a PID. Appropriate segregation of excavated media on-Site.
7. Removal of underground storage tanks (if encountered) and closure of petroleum spills

(if evidence of a spill/leak is encountered during Site excavation) in compliance with applicable local, State and Federal laws and regulations.

8. Transportation and off-Site disposal of all soil/fill material at permitted facilities in accordance with applicable laws and regulations for handling, transport, and disposal, and this plan. Sampling and analysis of excavated media as required by disposal facilities. Appropriate segregation of excavated media on-Site.
9. Collection and analysis of end-point samples to determine the performance of the remedy with respect to attainment of SCOs.
10. Import of materials to be used for backfill and cover in compliance with this plan and in accordance with applicable laws and regulations.
11. Implementation of storm-water pollution prevention measures in compliance with applicable laws and regulations.
12. Performance of all activities required for the remedial action, including permitting requirements and pretreatment requirements, in compliance with applicable laws and regulations.
13. Submission of a Remedial Action Report (RAR) that describes the remedial activities, certifies that the remedial requirements have been achieved, defines the Site boundaries, lists any changes from this RAWP, and if Track 1 SCOs are not achieved, describes all Engineering and Institutional Controls to be implemented at the Site.

If Track 1 SCOs are not achieved, the following construction elements will constitute Engineering and Institutional Controls:

14. As part of development, construction and maintenance of an engineered composite cover consisting of 16” concrete building slab across the footprint of the new building to prevent human exposure to residual soil/fill remaining under the Site.
15. As part of development, installation of a vapor barrier system beneath the building slab and outside foundation sidewalls below grade.
16. Operation of ventilated parking garage per Building Department’s requirements.

17. If Track 1 SCOs are not achieved, submission of an approved Site Management Plan (SMP) in the RAR for long-term management of residual contamination, including plans for operation, maintenance, monitoring, inspection and certification of Engineering and Institutional Controls and reporting at a specified frequency.

18. If Track 1 SCOs are not achieved, the property will continue to be registered with an E-Designation at the NYC Buildings Department. Establishment of Engineering Controls and Institutional Controls; a requirement that management of these controls must be in compliance with an approved SMP Institutional Controls will include prohibition of the following: (1) vegetable gardening and farming; (2) use of groundwater without treatment rendering it safe for the intended use; (3) disturbance of residual contaminated material unless it is conducted in accordance with the SMP; and (4) higher level of land usage without OER-approval.

4.2 SOIL CLEANUP OBJECTIVES AND SOIL/FILL MANAGEMENT

Track 1 Soil Cleanup Objectives (SCOs) are proposed for this project. The SCOs for this Site are listed in Table 1. 1. If Track 1 is not achieved, the following Track 4 Site-Specific SCOs will be used:

Contaminant	Track 4 SCOs
SVOCs	250 ppm
Lead	800 ppm
Mercury	2.0 ppm
Barium	650 ppm

Soil and materials management on-Site and off-Site, including excavation, handling and disposal, will be conducted in accordance with the Soil/Materials Management Plan in Appendix 3. The location of planned excavations is shown in Longitudinal Section Drawing A-501.

Discrete contaminant sources (such as hotspots) identified during the remedial action will be identified by GPS or surveyed. This information will be provided in the Remedial Action Report.

Estimated Soil/Fill Removal Quantities

The total quantity of soil/fill to be excavated and disposed off-Site is approximately 4,950 tons.

Disposal facilities will be reported to OER when they are identified and prior to the start of remedial action.

End-Point Sampling

Removal actions for development purposes under this plan will be performed in conjunction with confirmation soil sampling. Seven (7) confirmation samples will be collected from the base of the excavation at locations to be determined by OER. For comparison to Track 1 SCOs, analytes will include VOCs, SVOC, pesticides, PCBs and metals according to analytical methods described below. For comparison to Track 4 SCOs, analytes will only include trigger compounds and elements established on the Track 4 SCO list.

Hot-spot removal actions, whether established under this RAWP or identified during the remedial program, will be performed in conjunction with post remedial end-point samples to ensure that hot-spots are fully removed. Analytes for end-point sampling will be those parameters that are driving the hot-spot removal action and will be approved by OER. Frequency for hot-spot end-point sample collection is as follows:

1. For excavations less than 20 feet in total perimeter, at least one bottom sample and one sidewall sample biased in the direction of surface runoff.

2. For excavations 20 to 300 feet in perimeter:

    - For surface removals, one sample from the top of each sidewall for every 30 linear feet of sidewall and one sample from the excavation bottom for every 900 square feet of bottom area.
    - For subsurface removals, one sample from each sidewall for every 30 linear feet of sidewall and one sample from the excavation bottom for every 900 square feet of bottom area.

3. For sampling of volatile organics, bottom samples should be taken within 24 hours of excavation, and should be taken from the zero to six-inch interval at the excavation floor. Samples taken after 24 hours should be taken at six to twelve inches.

4. For contaminated soil removal, post remediation soil samples for laboratory analysis should be taken immediately after contaminated soil removal. If the excavation is enlarged horizontally, additional soil samples will be taken pursuant to bullets 1-3 above.

Post-remediation end-point sample locations and depth will be biased towards the areas and depths of highest contamination identified during previous sampling episodes unless field indicators such as field instrument measurements or visual contamination identified during the remedial action indicate that other locations and depths may be more heavily contaminated. In all cases, post-remediation samples should be biased toward locations and depths of the highest expected contamination.

New York State ELAP certified labs would be used for all confirmation and end-point sample analyses. Labs performing confirmation and end-point sample analyses will be reported in the RAR. The RAR will provide a tabular and map summary of all confirmation and end-point sample results and will include all data including non-detects and applicable standards and/or guidance values. End-point samples will be Confirmation samples will be analyzed for compounds and elements as described above utilizing the following methodology:

Soil analytical methods will include:

- Volatile organic compounds by EPA Method 8260;
- Semi-volatile organic compounds by EPA Method 8270;
- Target Analyte List metals; and
- Pesticides/PCBs by EPA Method 8081/8082.

If either LNAPL and/or DNAPL are detected, appropriate samples will be collected for characterization and “finger print analysis” and required regulatory reporting (i.e. spills hotline) will be performed.

Quality Assurance/Quality Control

Quality Assurance/Quality control sampling will consist of collecting blind field duplicates, field blanks, and matrix spike duplicates. Hydro Tech will perform a completeness check of the analytical data packages and review the QA/QC observations and deficiencies.

Collected samples will be appropriately packaged, placed in coolers, and shipped via overnight courier or delivered directly to the analytical laboratory by field personnel. Samples will be containerized in appropriate laboratory provided glassware and shipped in plastic coolers. Samples will be preserved through the use of ice or "cold-paks" to maintain a temperative of $4^{o}C$.

Dedicated disposable sampling materials will be used for the collection of endpoint samples, eliminating the need to prepared field equipment (rinsate) blanks. However, if non-disposable equipment is used (stainless steel scoop, etc.), field rinsate blanks will be prepared at a rate of 1 for every eight samples collected. Decontamination of non-dedicated sampling equipment will consist of the follow:

- Gently tap or scrape to remove adhered soil,
- Rinse with tap water,
- Wash with Alconox detergent solution and scrub,
- Rinse with tap water, and
- Rinse with distilled or deionized water.

Prepare field blanks by pouring distilled or deionized water over decontaminated equipment and collecting the water in laboratory provided containers. Trip blanks will be used whenever samples are transported to the laboratory for analysis of VOCs. Trip blanks will not be used for samples to be analyzed for metals, SVOCs, pesticides, and PCBs. One blind duplicate sample will be prepared and submitted for analysis for every 20 samples.

Import and Reuse of Soils

Import of soils onto the property and reuse of soils already onsite will be performed in conformance with the Soil/Materials Management Plan in Appendix 3. The estimated quantity of

soil to be imported into the Site for backfill and cover soil is 0 tons. The estimated quantity of onsite soil/fill expected to be reused/relocated on Site is 0 tons.

4.3 ENGINEERING CONTROLS

The excavation required for the proposed Site development will achieve Track 1 Unrestricted Use SCOs. No Engineering Controls are required to address residual contamination at the Site. However, the following elements will be incorporated into the foundation design as part of the development: composite cover system, vapor barrier and ventilated garage. If Track 1 is not achieved, these elements will constitute Engineering Controls that will be employed in the remedial action to address residual contamination remaining at the Site.

Composite Cover System

Exposure to residual soil/fill will be prevented by an engineered, composite cover system to be built on the Site. This composite cover system is comprised of:

- 16” concrete building slab beneath the proposed cellar

The composite cover system is a permanent engineering control for the Site. The system will be inspected and reported at specified intervals as required by this RAWP and the SMP. A Soil Management Plan will be included in the Site Management Plan and will outline the procedures to be followed in the event that the composite cover system and underlying residual soil/fill is disturbed after the remedial action is complete. Maintenance of this composite cover system will be described in the Site Management Plan in the RAR.

Vapor Barrier

Migration of soil vapor will be mitigated with a combination of building slab and vapor barrier. In order to prevent subsurface vapors from impacting the interior air of the buildings, a vapor barrier system (VBS) consisting of at least 20-mil thickness will be installed beneath the building slab and sidewalls. Membrane specifications and data sheets will be provided to the OER in the Stipulation List. The installation of the VBS will be described in the RAR.

The project’s Professional Engineer licensed by the State of New York will have primary direct responsibility for overseeing the implementation of the vapor barrier. The extent of the

proposed vapor barrier membrane and installation details (penetrations, joints, etc.) with respect to the proposed building foundation, footings, slab, and sidewalls are provided in Appendix 5. The Remedial Action Report will include photographs (maximum of two photos per page) of the installation process, PE/RA certified letter (on company letterhead) from primary contractor responsible for installation oversight and field inspections, and a copy of the manufacturers certificate of warranty**.**

4.4 INSTITUTIONAL CONTROLS

Institutional Controls are not required on sites that achieve Track 1 Remedial Action. If Track 1 SCOs are not achieved, Institutional Controls (IC) will be utilized in this remedial action to manage residual soil/fill and other media and render the Site protective of public health and the environment. Institutional Controls are listed below. Long-term employment of EC/ICs will be implemented under a site-specific Site Management Plan (SMP) that will be included in the RAR.

Institutional Controls for this remedial action are:

- The property will continue to be registered with an E-Designation at the NYC Buildings Department. This RAWP includes a description of all ECs and ICs and summarizes the requirements of the Site Management Plan which will note that the property owner and property owner's successors and assigns must comply with the approved SMP;
- Submittal of a Site Management Plan in the RAR for approval by OER that provides procedures for appropriate operation, maintenance, monitoring, inspection, reporting and certification of ECs. SMP will require that the property owner and property owner's successors and assigns will submit to OER a periodic written statement that certifies that: (1) controls employed at the Site are unchanged from the previous certification or that any changes to the controls were approved by OER; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. OER retains the right to enter the Site in order to evaluate the continued maintenance of any controls. This certification

shall be submitted at a frequency to be determine by OER in the SMP and will comply with RCNY §43-1407(l)(3).

- Vegetable gardens and farming on the Site are prohibited in contact with residual soil materials;
- Use of groundwater underlying the Site is prohibited without treatment rendering it safe for its intended use;
- All future activities on the Site that will disturb residual material must be conducted pursuant to the soil management provisions in an approved SMP;
- The Site will be used for residential use and will not be used for a higher level of use without prior approval by OER.

4.5 SITE MANAGEMENT PLAN

Site Management is not required for Track 1 remedial actions. However, if Track 1 SCOs are not achieved, Site Management will be the last phase of remediation and begins with the approval of the Remedial Action Report and issuance of the Notice of Completion (NOC) for the Remedial Action. The Site Management Plan (SMP) describes appropriate methods and procedures to ensure implementation of all ECs and ICs that are required by this RAWP. The Site Management Plan is submitted as part of the RAR but will be written in a manner that allows its use as an independent document. Site Management continues until terminated in writing by OER. The property owner is responsible to ensure that all Site Management responsibilities defined in the Site Management Plan are implemented.

The SMP will provide a detailed description of the procedures required to manage residual soil/fill left in place following completion of the remedial action in accordance with the Brownfield Cleanup Agreement with OER. This includes a plan for: (1) implementation of EC's and ICs; (2) implementation of monitoring programs; (3) operation and maintenance of EC's; (4) inspection and certification of EC's; and (5) reporting.

Site management activities, reporting, and EC/IC certification will be scheduled by OER on a periodic basis to be established in the SMP and will be subject to review and modification by

OER. The Site Management Plan will be based on a calendar year and certification reports will be due for submission to OER by July 31 of the year following the reporting period.

4.6 QUALITATIVE HUMAN HEALTH EXPOSURE ASSESSMENT

The objective of the qualitative exposure assessment is to identify potential receptors and pathways for human exposure to the contaminants of concern (COC) that are present at, or migrating from, the Site. The identification of exposure pathways describes the route that the COC takes to travel from the source to the receptor. An identified pathway indicates that the potential for exposure exists; it does not imply that exposures actually occur.

Investigations reported in the Remedial Investigation Report (RIR) are sufficient to complete a Qualitative Human Health Exposure Assessment (QHHEA). As part of the VCP process, a QHHEA was performed to determine whether the Site poses an existing or future health hazard to the Site's exposed or potentially exposed population. The sampling data from the RI were evaluated to determine whether there is any health risk by characterizing the exposure setting, identifying exposure pathways, and evaluating contaminant fate and transport. This QHHEA was prepared in accordance with Appendix 3B and Section 3.3 (b) 8 of the NYSDEC Draft DER-10 Technical Guidance for Site Investigation and Remediation.

Known and Potential Sources

Based on the results of the RIR, the contaminants of concern are:

Soil:

- SVOCs including Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Chrysene, Dibenzofuran and Indeno(1,2,3-cd)pyrene exceeded Track 2 Restricted Residential SCOs.
- Metals including Barium, Lead and Mercury exceeded Track 2 Restricted Residential SCOs.

Groundwater:

- Trichloroethylene was detected above Groundwater Quality Standards (GQS) in one sample.

Soil Vapor:

- One chlorinated VOC; Tetrachloroethylene was above NYS DOH monitoring thresholds; and
- Petroleum VOCs were detected at low concentrations including benzene, toluene, ethyl-benzene and xylenes.

Nature, Extent, Fate and Transport of Contaminants

SVOCs are present in the shallow soil in the northwestern and southeastern portions of the Site. Metals are present in the shallow soil throughout the Site. One hotspot was identified in deep soil for metals in the southeastern portion of the Site. The filtered groundwater samples did not have exceedances of the GQS, with the exception trichloroethylene, which only slightly exceeded the GQS in one groundwater sample. One chlorinated VOC; tetrachloroethylene was identified in one soil vapor sample in the northeastern portion of the Site exceeding guidance issued by New York State DOH and however it was not found in any of the on-Site soil samples collected.

Potential Routes of Exposure

The five elements of an exposure pathway are: (1) a contaminant source; (2) contaminant release and transport mechanisms; (3) a point of exposure; (4) a route of exposure; and (5) a receptor population. An exposure pathway is considered complete when all five elements of an exposure pathway are documented. A potential exposure pathway exists when any one or more of the five elements comprising an exposure pathway cannot be documented. An exposure pathway may be eliminated from further evaluation when any one of the five elements comprising an exposure pathway has not existed in the past, does not exist in the present, and will never exist in the future. Three potential primary routes exist by which chemicals can enter the body:

- Ingestion of water, fill, or soil;
- Inhalation of vapors and particulates; and
- Dermal contact with water, fill, soil, or building materials.

Existence of Human Health Exposure

Current Conditions: The potential for exposure to surficial historic fill does not exist under current conditions because of the existing building slab. Groundwater is marginally contaminated but is not exposed at the Site, and because the Site is served by the public water supply and groundwater use for potable supply is prohibited, there is no potential for exposure. The only concern is the potential for exposure of soil vapors.

Construction/Remediation Activities: Once redevelopment activities begin, construction workers will come into direct contact with surface and subsurface soils and groundwater, as a result of on-Site construction and excavation activities. On-Site construction workers potentially could ingest, inhale or have dermal contact with any exposed impacted soil, and fill. Similarly, off-Site receptors could be exposed to dust and vapors from on-Site activities. During construction, on-Site and off-Site exposures to contaminated dust from on-Site will be addressed through the Soil/Materials Management Plan, dust controls, and through the implementation of the Community Air-Monitoring Program and a Construction Health and Safety Plan.

Proposed Future Conditions: Under future remediated conditions, all soils in excess of Track 1 SCOs will be removed and the site will meet, at minimum, Track 4 SCOs. The site will be fully capped, limiting potential direct exposure to soil and groundwater remaining in place, and engineering controls including the building foundation and vapor barrier system will prevent exposure to soil and soil vapor. The site is served by a public water supply, and groundwater is not used at the site. There are no plausible off-site pathways for ingestion, inhalation, or dermal exposure to contaminants derived from the site.

Receptor Populations

On-Site Receptors: Current onsite receptors are limited to workers, site representatives and visitors granted access to the property. During construction, onsite receptors will include construction worker, site representatives, and visitors. After construction, onsite receptors will include child and adult residents and visitors.

Off-Site Receptors: Potential off-site receptors within a 0.25-mile radius of the Site include: adult and child residents, and commercial and construction workers, pedestrians, trespassers, and cyclists, based on the following:

1. Commercial Businesses – existing and future
2. Residential Buildings – existing and future
3. Building Construction/Renovation – existing and future
4. Pedestrians, Trespassers, Cyclists– existing and future
5. Schools– existing and future

Overall Human Health Exposure Assessment

Based upon this analysis, complete on-Site exposure pathways appear to be present during the remedial action phase. Under current conditions, on-Site exposure pathways exist for contractors and others that may access the Site. There is no complete exposure pathway under future conditions after the site is developed. During remedial construction, on-Site and off-Site exposures to contaminated dust from historic fill material will be addressed through dust controls, and through the implementation of the Community Air Monitoring Program, the Soil/Materials Management Plan, and a Construction Health and Safety Plan. After the remedial action is complete, there will be no remaining exposure pathways to on-Site soil/fill or groundwater, as all soil above Unrestricted Use SCOs will have been removed and a vapor barrier system will have been installed as part of development.

This assessment takes into consideration the reasonably anticipated use of the site, which includes residential structures, site-wide impervious surface cover cap, a ventilated garage and a subsurface vapor barrier system for the building. Potential post-construction use of groundwater is not considered an option because groundwater in this area of New York City is not used as a potable water source.

5.0 REMEDIAL ACTION MANAGEMENT

5.1 PROJECT ORGANIZATION AND OVERSIGHT

Principal personnel who will participate in the remedial action include Ezgi Karayel (Project Manager) and Rachel Ataman (Sr. Vice President). The Professional Engineer (PE) is Shaik A. Saad and Qualified Environmental Professionals (QEP) for this project is Mark E. Robbins.

5.2 SITE SECURITY

Site access will be controlled by DOB approved construction fence. For work areas of limited size, barrier tape will be sufficient to delineate and restrict access.

5.3 WORK HOURS

The hours for operation of remedial construction will be from 7:00 to 5:00. These hours conform to the New York City Department of Buildings construction code requirements.

5.4 CONSTRUCTION HEALTH AND SAFETY PLAN

The Health and Safety Plan is included in Appendix 4. The Site Safety Coordinator will be Ezgi Karayel. Remedial work performed under this RAWP will be in full compliance with applicable health and safety laws and regulations, including Site and OSHA worker safety requirements and HAZWOPER requirements. Confined space entry, if any, will comply with OSHA requirements and industry standards and will address potential risks. The parties performing the remedial construction work will ensure that performance of work is in compliance with the HASP and applicable laws and regulations. The HASP pertains to remedial and invasive work performed at the Site until the issuance of the Notice of Completion.

All field personnel involved in remedial activities will participate in training required under 29 CFR 1910.120, including 40-hour hazardous waste operator training and annual 8-hour refresher training. Site Safety Officer will be responsible for maintaining workers training records.

Personnel entering any exclusion zone will be trained in the provisions of the HASP and be required to sign an HASP acknowledgment. Site-specific training will be provided to field personnel. Additional safety training may be added depending on the tasks performed. Emergency telephone numbers will be posted at the site location before any remedial work begins. A safety meeting will be conducted before each shift begins. Topics to be discussed include task hazards and protective measures (physical, chemical, environmental); emergency procedures; PPE levels and other relevant safety topics. Meetings will be documented in a log book or specific form.

An emergency contact sheet with names and phone numbers is included in the HASP. That document will define the specific project contacts for use in case of emergency.

5.5 COMMUNITY AIR MONITORING PLAN

Real-time air monitoring for volatile organic compounds (VOCs) and particulate levels at the perimeter of the exclusion zone or work area will be performed. Continuous monitoring will be performed for all ground intrusive activities and during the handling of contaminated or potentially contaminated media. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pit excavation or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be performed during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. Periodic monitoring during sample collection, for instance, will consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. Depending upon the proximity of potentially exposed individuals, continuous monitoring may be performed during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence. Exceedances of action levels observed during performance of the Community Air Monitoring Plan (CAMP) will be reported to the OER Project Manager and included in the Daily Report.

VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) will be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis during invasive work. Upwind concentrations will be measured at the start of each workday and periodically thereafter to establish background conditions. The monitoring work will be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment will be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment will be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

- If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities will be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities will resume with continued monitoring.
- If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities will be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities will resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.
- If the organic vapor level is above 25 ppm at the perimeter of the work area, activities will be shutdown.

All 15-minute readings must be recorded and be available for OER personnel to review. Instantaneous readings, if any, used for decision purposes will also be recorded.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations will be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate

monitoring will be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment will be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques will be employed. Work will continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.
- If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m^3 above the upwind level, work will be stopped and a re-evaluation of activities initiated. Work will resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m^3 of the upwind level and in preventing visible dust migration.

All readings will be recorded and be available for OER personnel to review.

5.6 AGENCY APPROVALS

All permits or government approvals required for remedial construction have been or will be obtained prior to the start of remedial construction. Approval of this RAWP by OER does not constitute satisfaction of these requirements and will not be a substitute for any required permit.

5.7 SITE PREPARATION

Pre-Construction Meeting

OER will be invited to attend the pre-construction meeting at the Site with all parties involved in the remedial process prior to the start of remedial construction activities.

Mobilization

Mobilization will be conducted as necessary for each phase of work at the Site. Mobilization includes field personnel orientation, equipment mobilization (including securing all sampling equipment needed for the field investigation), marking/staking sampling locations and utility mark-outs. Each field team member will attend an orientation meeting to become familiar with the general operation of the Site, health and safety requirements, and field procedures.

Utility Marker Layouts, Easement Layouts

The presence of utilities and easements on the Site will be fully investigated prior to the performance of invasive work such as excavation or drilling under this plan by using, at a minimum, the One-Call System (811). Underground utilities may pose an electrocution, explosion, or other hazard during excavation or drilling activities. All invasive activities will be performed incompliance with applicable laws and regulations to assure safety. Utility companies and other responsible authorities will be contacted to locate and mark the locations, and a copy of the Markout Ticket will be retained by the contractor prior to the start of drilling, excavation or other invasive subsurface operations. Overhead utilities may also be present within the anticipated work zones. Electrical hazards associated with drilling in the vicinity of overhead utilities will be prevented by maintaining a safe distance between overhead power lines and drill rig masts.

Proper safety and protective measures pertaining to utilities and easements, and compliance with all laws and regulations will be employed during invasive and other work contemplated under this RAWP. The integrity and safety of on-Site and off-Site structures will be maintained during all invasive, excavation or other remedial activity performed under the RAWP.

Equipment and Material Staging

Equipment and materials will be stored and staged in a manner that complies with applicable laws and regulations.

Stabilized Construction Entrance

Steps will be taken to ensure that trucks departing the site will not track soil, fill or debris off-Site. Such actions may include use of cleaned asphalt or concrete roads or use of stone or other aggregate-based egress paths between the truck inspection station and the property exit. Measures will be taken to ensure that adjacent roadways will be kept clean of project related soils, fill and debris.

Truck Inspection Station

An outbound-truck inspection station will be set up close to the Site exit. Before exiting the NYC VCP Site, trucks will be required to stop at the truck inspection station and will be examined for evidence of contaminated soil on the undercarriage, body, and wheels. Soil and debris will be removed. Brooms, shovels and potable water will be utilized for the removal of soil from vehicles and equipment, as necessary.

Extreme Storm Preparedness and Response Contingency Plan

Damage from flooding or storm surge can include dislocation of soil and stockpiled materials, dislocation of site structures and construction materials and equipment, and dislocation of support of excavation structures. Damage from wind during an extreme storm event can create unsafe or unstable structures, damage safety structures and cause downed power lines creating dangerous site conditions and loss of power. In the event of emergency conditions caused by an extreme storm event, the enrollee will undertake the following steps for site preparedness prior to the event and response after the event.

Storm Preparedness

Preparations in advance of an extreme storm event will include the following: containerized hazardous materials and fuels will be removed from the property; lose materials will be secured to prevent dislocation and blowing by wind or water; heavy equipment such as excavators and generators will be removed from holes, trenches and depressions on the property to high ground or removed from the property; an inventory of the property with photographs will be performed to establish conditions for the site and equipment prior to the event; stockpile covers for soil and fill will be secured by adding weights such as sandbags for added security and worn or ripped

stockpile covers will be replaced with competent covers; stockpiled hazardous wastes will be removed from the property; storm water management systems will be inspected and fortified, including, as necessary: clean and reposition silt fences, hay bales; clean storm sewer filters and traps; and secure and protect pumps and hosing.

Storm Response

At the conclusion of an extreme storm event, as soon as it is safe to access the property, a complete inspection of the property will be performed. A site inspection report will be submitted to OER at the completion of site inspection and after the site security is assessed. Site conditions will be compared to the inventory of site conditions and material performed prior to the storm event and significant differences will be noted. Damage from storm conditions that result in acute public safety threats, such as downed power lines or imminent collapse of buildings, structures or equipment will be reported to public safety authorities via appropriate means such as calling 911. Petroleum spills will be reported to NYS DEC within 2 hours of identification and consistent with State regulations. Emergency and spill conditions will also be reported to OER. Public safety structures, such as construction security fences will be repaired promptly to eliminate public safety threats. Debris will be collected and removed. Dewatering will be performed in compliance with existing laws and regulations and consistent with emergency notifications, if any, from proper authorities. Eroded areas of soil including unsafe slopes will be stabilized and fortified. Dislocated materials will by collected and appropriately managed. Support of excavation structure will be inspected and fortified as necessary. Impacted stockpiles will be contained and damaged stockpile covers will be replaced. Storm-water control systems and structures will be inspected and maintained as necessary. If soil or fill materials are discharged off site to adjacent properties, property owners and OER will be notified and corrective measure plan designed to remove and clean dislocated material will be submitted to OER and implemented following approval by OER and granting of site access by the property owner. Impacted offsite areas may require characterization based on site conditions, at the discretion of OER. If onsite petroleum spills are identified, a qualified environmental professional will determine the nature and extent of the spill and report to NYS DEC's spill hotline at DEC 800-457-7362. If the source of the spill is ongoing and can be identified, it should

be stopped it this can be done safely. Potential hazards will be addressed immediately, consistent with guidance issued by NYS DEC.

Storm Response Reporting

A site inspection report will be submitted to OER at the completion of site inspection. An inspection report established by OER is available on OER's website (www.nyc.gov/oer) and will be used for this purpose. Site conditions will be compared to the inventory of site conditions and material performed prior to the storm event and significant differences will be noted. The site inspection report will be sent to the OER project manager and will include the site name, address, tax block and lot, site primary and alternate contact name and phone number. Damage and soil release assessment will include: whether the project had stockpiles; whether stockpiles were damaged; photographs of damage and notice of plan for repair; report of whether soil from the site was dislocated and whether any of the soil left the site; estimates of the volume of soil that left the site, nature of impact, and photographs; description of erosion damage; description of equipment damage; description of damage to the remedial program or the construction program, such as damage to the support of excavation; presence of onsite or offsite exposure pathways caused by the storm; presence of petroleum or other spills and status of spill reporting to NYS DEC; description of corrective actions; schedule for corrective actions. This report should be completed and submitted to OER project manager with photographs within 24 hours of the time of safe entry to the property after the storm event.

5.8 TRAFFIC CONTROL

Drivers of trucks leaving the NYC VCP Site with soil/fill will be instructed to proceed without stopping in the vicinity of the site to prevent neighborhood impacts. The planned route on local roads for trucks leaving the site will be planned by the construction manager for the Site and reported to OER.

5.9 DEMOBILIZATION

Demobilization will include:

- As necessary, restoration of temporary access areas and areas that may have been disturbed to accommodate support areas (e.g., staging areas, decontamination areas, storage areas, temporary water management areas, and access area);
- Removal of sediment from erosion control measures and truck wash and disposal of materials in accordance with applicable laws and regulations;
- Equipment decontamination, and;
- General refuse disposal.

Equipment will be decontaminated and demobilized at the completion of all field activities. Investigation equipment and large equipment (*e.g.*, soil excavators) will be washed at the truck inspection station as necessary. In addition, all investigation and remediation derived waste will be appropriately disposed.

5.10 REPORTING AND RECORD KEEPING

Daily Reports

Daily reports providing a general summary of activities for each day of *active remedial work* will be emailed to the OER Project Manager by the end of the following day. Those reports will include:

- Project number and statement of the activities and an update of progress made and locations of work performed;
- Quantities of material imported and exported from the Site;
- Status of on-Site soil/fill stockpiles;
- A summary of all citizen complaints, with relevant details (basis of complaint; actions taken; etc.);
- A summary of CAMP excursions, if any;
- Photograph of notable Site conditions and activities.

The frequency of the reporting period may be revised in consultation with OER project manager based on planned project tasks. Daily email reports are not intended to be the primary mode of communication for notification to OER of emergencies (accidents, spills), requests for changes to the RAWP or other sensitive or time critical information. However, such information will be included in the daily reports. Emergency conditions and changes to the RAWP will be communicated directly to the OER project manager by personal communication. Daily reports will be included as an Appendix in the Remedial Action Report.

Record Keeping and Photo-Documentation

Job-site record keeping for all remedial work will be performed. These records will be maintained on-Site during the project and will be available for inspection by OER staff. Representative photographs will be taken of the Site prior to any remedial activities and during major remedial activities to illustrate remedial program elements and contaminant source areas. Photographs will be submitted at the completion of the project in the RAR in digital format (i.e. jpeg files).

5.11 COMPLAINT MANAGEMENT

All complaints from citizens will be promptly reported to OER. Complaints will be addressed and outcomes will also be reported to OER in daily reports. Notices to OER will include the nature of the complaint, the party providing the complaint, and the actions taken to resolve any problems.

5.12 DEVIATIONS FROM THE REMEDIAL ACTION WORK PLAN

All changes to the RAWP will be reported to the OER Project Manager and will be documented in daily reports and reported in the Remedial Action Report. The process to be followed if there are any deviations from the RAWP will include a request for approval for the change from OER noting the following:

- Reasons for deviating from the approved RAWP;
- Effect of the deviations on overall remedy; and

- Determination that the remedial action with the deviation(s) is protective of public health and the environment.

6.0 REMEDIAL ACTION REPORT

A Remedial Action Report (RAR) will be submitted to OER following implementation of the remedial action defined in this RAWP. The RAR will document that the remedial work required under this RAWP has been completed and has been performed in compliance with this plan. The RAR will include:

- Information required by this RAWP;
- As-built drawings for all constructed remedial elements, required certifications, manifests and other written and photographic documentation of remedial work performed under this remedy;
- Site Management Plan (if Track 1 is not achieved);
- Description of any changes in the remedial action from the elements provided in this RAWP and associated design documents;
- Tabular summary of all end point sampling results and all material characterization results, QA/QC results for end-point sampling, and other sampling and chemical analysis performed as part of the remedial action;
- Test results or other evidence demonstrating that remedial systems are functioning properly;
- Account of the source area locations and characteristics of all contaminated material removed from the Site including a map showing source areas;
- Account of the disposal destination of all contaminated material removed from the Site. Documentation associated with disposal of all material will include transportation and disposal records, and letters approving receipt of the material.
- Account of the origin and required chemical quality testing for material imported onto the Site.
- Continue registration of the property with an E-Designation baty the NYC Department of Buildings.

- Reports and supporting material will be submitted in digital form.

Remedial Action Report Certification

The following certification will appear in front of the Executive Summary of the Remedial Action Report. The certification will include the following statements:

I, _____, am currently a professional engineer licensed by the State of New York. I had primary direct responsibility for implementation of the remedial program for the Site name Site Site number.

I, _____, am a qualified Environmental Professional. I had primary direct responsibility for implementation remedial program for the Site name Site Site number .

I certify that the OER-approved Remedial Action Work Plan dated month day year and Stipulations in a letter dated month day, year; if any were implemented and that all requirements in those documents have been substantively complied with. I certify that contaminated soil, fill, liquids or other material from the property were taken to facilities licensed to accept this material in full compliance with applicable laws and regulations.

7.0 SCHEDULE

The table below presents a schedule for the proposed remedial action and reporting. If the schedule for remediation and development activities changes, it will be updated and submitted to OER. Currently, a 20-month remediation period is anticipated.

Schedule Milestone	Weeks from Remedial Action Start	Duration (weeks)
OER Approval of RAWP	0	4
Fact Sheet 2 announcing start of remedy	0	4
Mobilization	1	1
Remedial Excavation	2	16
Demobilization	16	1
Submit Remedial Action Report	20	4

APPENDIX 1
CITIZEN PARTICIPATION PLAN

The NYC Office of Environmental Remediation and Kub Capital LLC have established this Citizen Participation Plan because the opportunity for citizen participation is an important component of the NYC Voluntary Cleanup Program. This Citizen Participation Plan describes how information about the project will be disseminated to the Community during the remedial process. As part of its obligations under the NYC VCP, Kub Capital LLC will maintain a repository for project documents and provide public notice at specified times throughout the remedial program. This Plan also takes into account potential environmental justice concerns in the community that surrounds the project Site. Under this Citizen Participation Plan, project documents and work plans are made available to the public in a timely manner. Public comment on work plans is strongly encouraged during public comment periods. Work plans are not approved by the NYC Office of Environmental Remediation (OER) until public comment periods have expired and all comments are formally reviewed. An explanation of cleanup plans in the form of a public meeting or informational session is available upon request to OER's project manager assigned to this Site, Alysha Alfieri, who can be contacted about these issues or any others questions, comments or concerns that arise during the remedial process at (212) 788-8841

Project Contact List. OER has established a Site Contact List for this project to provide public notices in the form of fact sheets to interested members of the Community. Communications will include updates on important information relating to the progress of the cleanup program at the Site as well as to request public comments on the cleanup plan. The Project Contact List includes owners and occupants of adjacent buildings and homes, principal administrators of nearby schools, hospitals and day care centers, the public water supplier that serves the area, established document repositories, the representative Community Board, City Council members, other elected representatives and any local Brownfield Opportunity Area (BOA) grantee organizations. Any member of the public or organization will be added to the Site Contact List on request. A copy of the Site Contact List is maintained by OER's project

manager. If you would like to be added to the Project Contact List, contact NYC OER at (212) 788-8841 or by email at brownfields@cityhall.nyc.gov.

Repositories. A document repository is maintained in the nearest public library that maintains evening and weekend hours. This document repository is intended to house, for community review, all principal documents generated during the cleanup program including Remedial Investigation plans and reports, Remedial Action work plans and reports, and all public notices and fact sheets produced during the lifetime of the remedial project. Kub Capital LLC will inspect the repositories to ensure that they are fully populated with project information. The repository for this project is:

Brooklyn Public Library - Leonard Branch

81 Deveo Street, Brooklyn, NY 11215

(718) 486-3365

M-W-Th-F: 10:00 am – 6:00 pm

T: 1:00 pm – 8:00 pm

Sat: 10:00 am – 5:00 pm

Digital Documentation. NYC OER strongly encourages the use of digital documents in repositories as a means of minimizing paper use while also increasing convenience in access and ease of use.

Identify Issues of Public Concern. The major issues of concern to the public will be potential impacts of nuisance odors and dust during the disturbance of soil at the Site. This work will be performed in accordance with procedures that will be specified under a Remedial Program and considers and takes preventive measures for exposure to future residents of the property and those on adjacent properties during construction. Detailed plans to monitor the potential for exposure including a CHASP and a CAMP are required components of the remedial program. Implementation of these plans will be under the direct oversight of the NYCOER.

Public Notice and Public Comment. Public notice to all members of the Project Contact List is required at three major steps during the performance of the cleanup program (listed below) and at other points that may be required by OER. Notices will include Fact Sheets with

descriptive project summaries, updates on recent and upcoming project activities, repository information, and important phone and email contact information. All notices will be prepared by Kub Capital LLC, reviewed and approved by OER prior to distribution and mailed by Kub Capital LLC. Public comment is solicited in public notices for all work plans developed under the NYC Voluntary Cleanup Program. Final review of all work plans by OER will consider all public comments. Approval will not be granted until the public comment period has been completed.

Citizen Participation Milestones. Public notice and public comment activities occur at several steps during a typical NYC VCP project. See flow chart on the following page, which identifies when during the NYC VCP public notices are issued: These steps include:

- **Public Notice of the availability of the Remedial Investigation Report and Remedial Action Work Plan and a 30-day public comment period on the Remedial Action Work Plan.**

  Public notice in the form of a Fact Sheet is sent to all parties listed on the Site Contact List announcing the availability of the Remedial Investigation Report and Remedial Action Work Plan and the initiation of a 30-day public comment period on the Remedial Action Work Plan. The Fact Sheet summarizes the findings of the RIR and provides details of the RAWP. The public comment period will be extended an additional 15 days upon public request. A public meeting or informational session will be conducted by OER upon request.

- **Public Notice announcing the approval of the RAWP and the start of remediation**

  Public notice in the form of a Fact Sheet is sent to all parties listed on the Site Contact List announcing the approval of the RAWP and the start of remediation.

- **Public Notice announcing the completion of remediation, designation of Institutional and Engineering Controls and issuance of the Notice of Completion**

Public notice in the form of a Fact Sheet is sent to all parties listed on the Site Contact List announcing the completion of remediation, providing a list of all Institutional and Engineering Controls implemented for to the Site and announcing the issuance of the Notice of Completion.

APPENDIX 2

SUSTAINABILITY STATEMENT

This Sustainability Statement documents sustainable activities and green remediation efforts planned under this remedial action.

Reuse of Clean, Recyclable Materials. Reuse of clean, locally-derived recyclable materials reduces consumption of non-renewable virgin resources and can provide energy savings and greenhouse gas reduction.

An estimate of the quantity (in tons) of clean, non-virgin materials (reported by type of material) reused under this plan will be quantified and reported in the RAR.

Reduce Consumption of Virgin and Non-Renewable Resources. Reduced consumption of virgin and non-renewable resources lowers the overall environmental impact of the project on the region by conserving these resources.

An estimate of the quantity (in tons) of virgin and non-renewable resources, the use of which will be avoided under this plan, will be quantified and reported in the RAR.

Reduced Energy Consumption and Promotion of Greater Energy Efficiency. Reduced energy consumption lowers greenhouse gas emissions, improves local air quality, lessens in-city power generation requirements, can lower traffic congestion, and provides substantial cost savings.

Best efforts will be made to quantify energy efficiencies achieved during the remediation and will be reported in the Remedial Action Report (RAR). Where energy savings cannot be easily quantified, a gross indicator of the amount of energy saved or the means by which energy savings was achieved will be reported.

Conversion to Clean Fuels. Use of clean fuel improves NYC's air quality by reducing harmful emissions.

An estimate of the volume of clean fuels used during remedial activities will be quantified and reported in the RAR.

Recontamination Control. Recontamination after cleanup and redevelopment is completed undermines the value of work performed, may result in a property that is less protective of public health or the environment, and may necessitate additional cleanup work later or impede future redevelopment. Recontamination can arise from future releases that occur within the property or by influx of contamination from off-Site.

An estimate of the area of the Site that utilizes recontamination controls under this plan will be reported in the RAR in square feet.

Storm-water Retention. Storm-water retention improves water quality by lowering the rate of combined storm-water and sewer discharges to NYC's sewage treatment plants during periods of precipitation, and reduces the volume of untreated influent to local surface waters.

An estimate of the enhanced storm-water retention capability of the redevelopment project will be included in the RAR.

Linkage with Green Building. Green buildings provide a multitude of benefits to the city across a broad range of areas, such as reduction of energy consumption, conservation of resources, and reduction in toxic materials use.

The number of Green Buildings that are associated with this brownfield redevelopment property will be reported in the RAR. The total square footage of green building space created as a function of this brownfield redevelopment will be quantified for residential, commercial and industrial/manufacturing uses.

Paperless Brownfield Cleanup Program. Kub Capital LLC is participating in OER's Paperless Brownfield Cleanup Program. Under this program, submission of electronic documents will replace submission of hard copies for the review of project documents, communications and milestone reports.

Low-Energy Project Management Program. Kub Capital LLC is participating in OER's low-energy project management program. Under this program, whenever possible, meetings are

held using remote communication technologies, such as videoconferencing and teleconferencing to reduce energy consumption and traffic congestion associated with personal transportation.

Trees and Plantings. Trees and other plantings provide habitat and add to NYC's environmental quality in a wide variety of ways. Native plant species and native habitat provide optimal support to local fauna, promote local biodiversity, and require less maintenance.

An estimate of the land area that will be vegetated, including the number of trees planted or preserved, will be reported in square feet in the RAR.

TABLES

Table-1- Unrestricted Use Soil Cleanup Objectives

Contaminant	Unrestricted Use SCO
Metals	
Arsenic	13 [c]
Barium	350 [c]
Beryllium	7.2
Cadmium	2.5 [c]
Chromium, hexavalent [e]	1[b]
Chromium, trivalent [e]	30 [c]
Copper	50
Total Cyanide [e, f]	27
Lead	63 [c]
Manganese	1600 [c]
Total Mercury	0.18 [c]
Nickel	30
Selenium	3.9[c]
Silver	2
Zinc	109 [c]
PCBs/Pesticides	
2,4,5-TP Acid (Silvex)[f]	3.8
4,4'-DDE	0.0033 [b]
4,4'-DDT	0.0033 [b]
4,4'-DDD	0.0033 [b]
Aldrin	0.005 [c]
alpha-BHC	0.02
beta-BHC	0.036
Chlordane (alpha)	0.094
delta-BHC [g]	0.04
Dibenzofuran [f]	7
Dieldrin	0.005[c]
Endosulfan I[d, f]	2.4
Endosulfan II[d, f]	2.4
Endosulfan sulfate[d, f]	2.4
Endrin	0.014
Heptachlor	0.042
Lindane	0.1
Polychlorinated biphenyls	0.1
Semivolatile Organic Compounds	
Acenaphthene	20
Acenapthylene [f]	100 [a]
Anthracene [f]	100 [a]
Benz(a)anthracene [f]	1[c]
Benzo(a)pyrene	1[c]
Benzo(b)fluoranthene[f]	1[c]
Benzo(g,h,i)perylene [f]	100
Benzo(k)fluoranthene[f]	0.8 [c]
Chrysene [f]	1[c]
Dibenz(a,h)anthracene[f]	0.33 [b]
Fluoranthene [f]	100 [a]
Fluorene	30
Indeno(1,2,3-cd)pyrene [f]	0.5 [c]
m-Cresol [f]	0.33 [b]
Naphthalene [f]	12
o-Cresol [f]	0.33 [b]
p-Cresol [f]	0.33 [b]
Pentachlorophenol	0.8[b]
Phenanthrene [f]	100
Phenol	0.33[b]
Pyrene[f]	100

Volatile organic compounds	
1,1,1-Trichloroethane [f]	0.68
1,1-Dichloroethane [f]	0.27
1,1-Dichloroethene[f]	0.33
1,2-Dichlorobenzene[f]	1.1
1,2-Dichloroethane	0.02[c]
cis -1,2-Dichloroethene [f]	0.25
trans-1,2-Dichloroethene [f]	0.19
1,3-Dichlorobenzene[f]	2.4
1,4-Dichlorobenzene	1.8
1,4-Dioxane	0.1 [b]
Acetone	0.05
Benzene	0.06
n-Butylbenzene [f]	12
Carbon tetrachloride [f]	0.76
Chlorobenzene	1.1
Chloroform	0.37
Ethylbenzene[f]	1
Hexachlorobenzene [f]	0.33[b]
Methyl ethyl ketone	0.12
Methyl tert-butyl ether [f]	0.93
Methylene chloride	0.05
n - Propylbenzene [f]	3.9
sec-Butylbenzene [f]	11
tert-Butylbenzene[f]	5.9
Tetrachloroethene	1.3
Toluene	0.7
Trichloroethene	0.47
1,2,4-Trimethylbenzene [f]	3.6
1,3,5-Trimethylbenzene[f]	8.4
Vinyl chloride[f]	0.02
Xylene (mixed)	0.26

All soil cleanup objectives (SCOs) are in parts per million (ppm).

[a] The SCOs for unrestricted use were capped at a maximum value of 100 ppm. See Technical Support Document (TSD), section 9.3.

[b] For constituents where the calculated SCO was lower than the contract required quantitation limit (CRQL), the CRQL is used as the Track 1 SCO value.

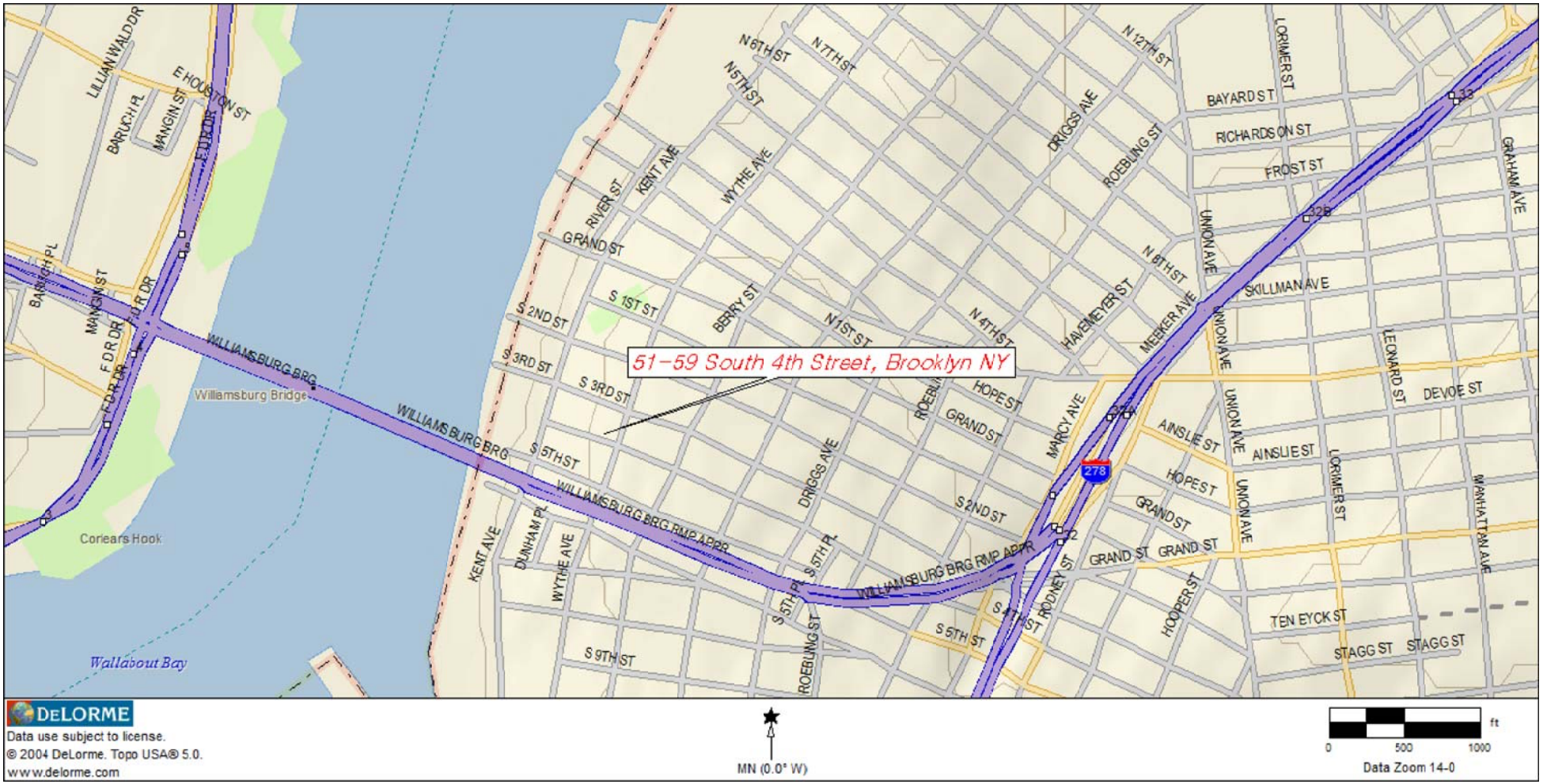
[c] For constituents where the calculated SCO was lower than the rural soil background concentration, as determined by the Department and Department of Health rural soil survey, the rural soil background concentration is used as the Track 1 SCO value for this use of the site.

[d] SCO is the sum of endosulfan I, endosulfan II and endosulfan sulfate.

[e] The SCO for this specific compound (or family of compounds) is considered to be met if the analysis for the total species of this contaminant is below the specific SCO.

[f] Protection of ecological resources SCOs were not developed for contaminants identified in Table 375-6.8(b) with "NS". Where such contaminants appear in Table 375-6.8(a), the applicant may be required by the Department to calculate a protection of ecological resources SCO according to the TSD.

FIGURES



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HTE Job # 130332

Drawn By: C.Q.
Reviewed By: M.R
Approved By: M.S
Date: 02/24/14
Scale: AS NOTED

TITLE:

FIGURE 1: TOPOGRAPHIC MAP

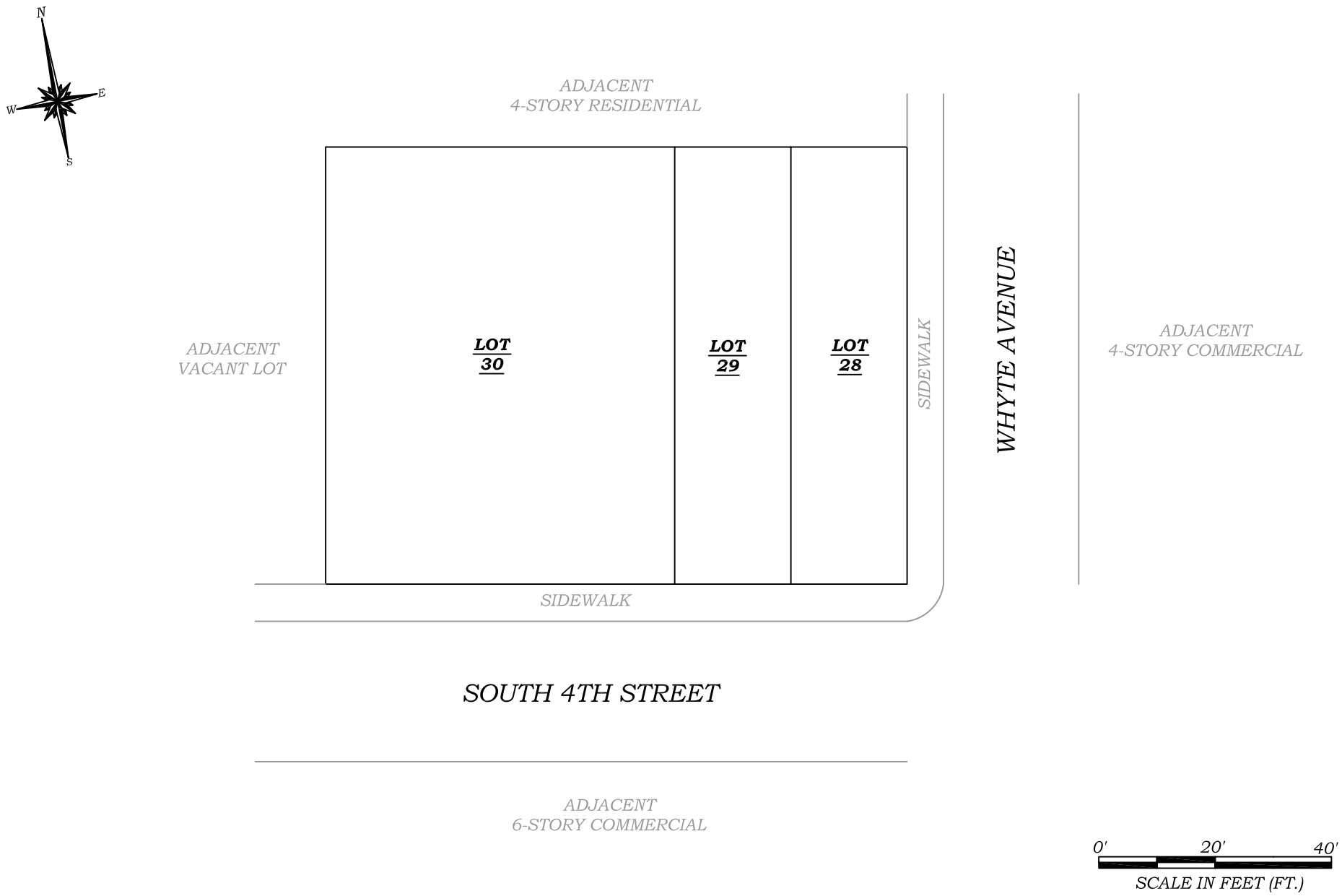

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FIGURE 2: SITE BOUNDARY MAP

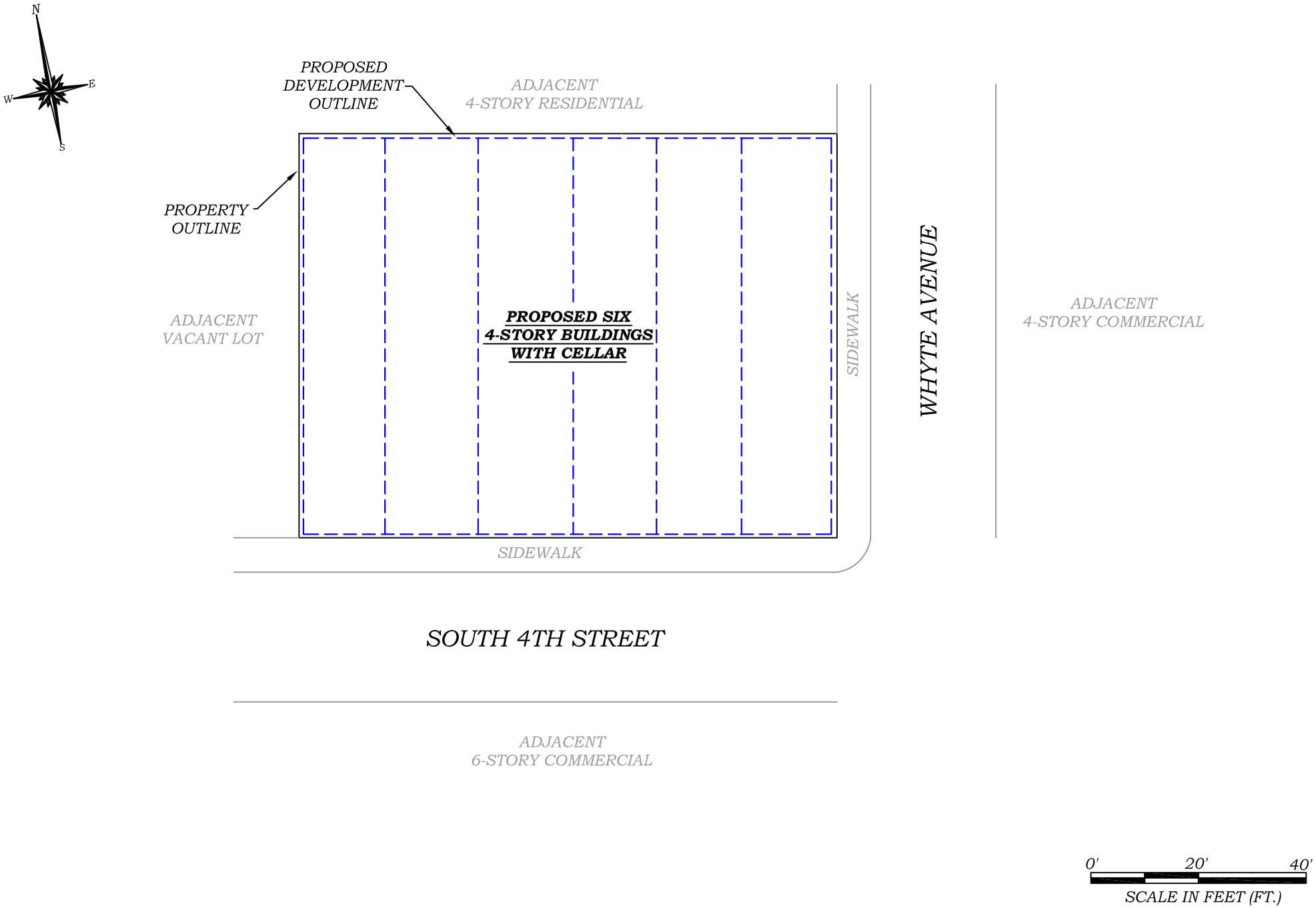

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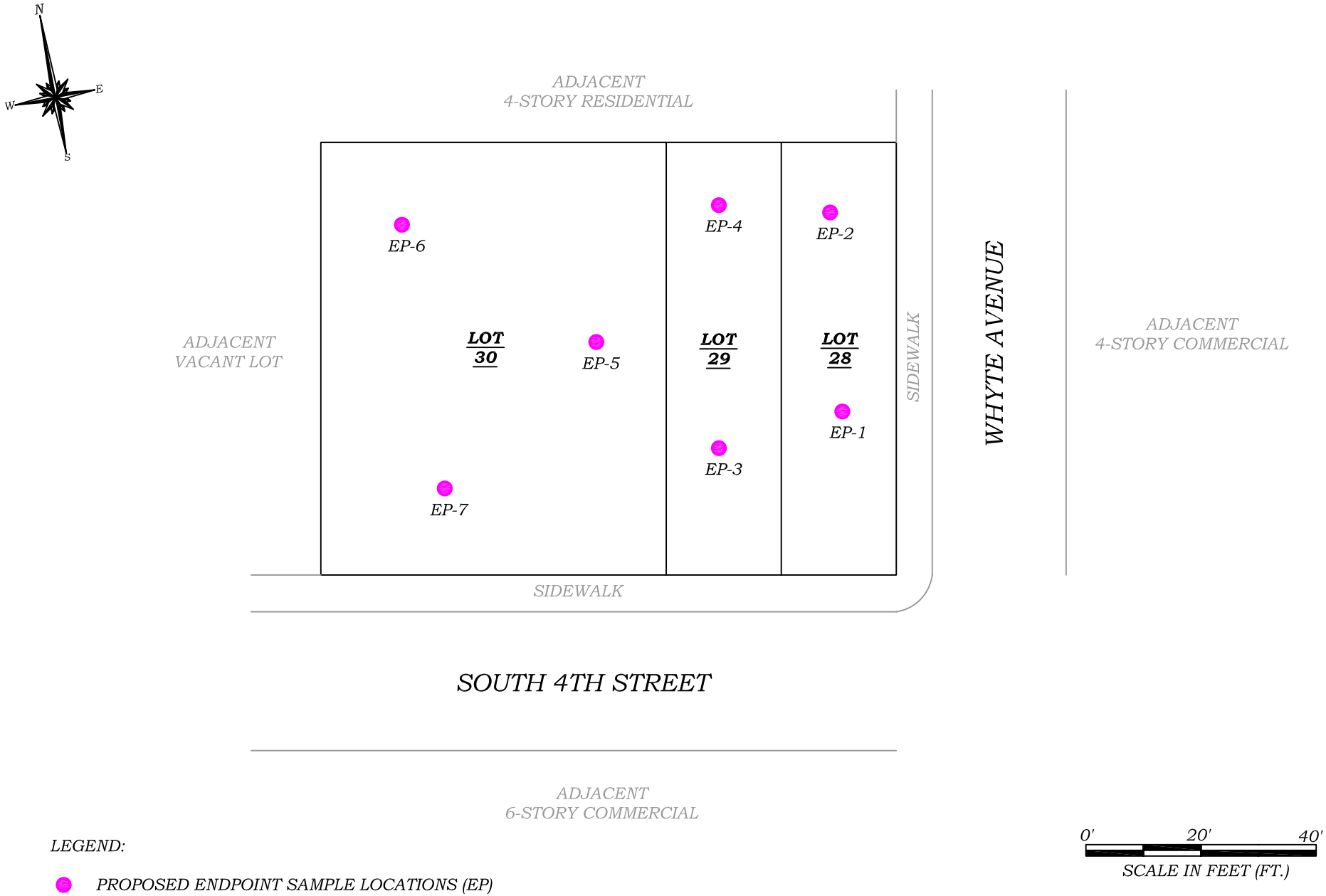
FIGURE 3: PROPOSED DEVELOPMENT PLAN



LEGEND:

● PROPOSED ENDPOINT SAMPLE LOCATIONS (EP)

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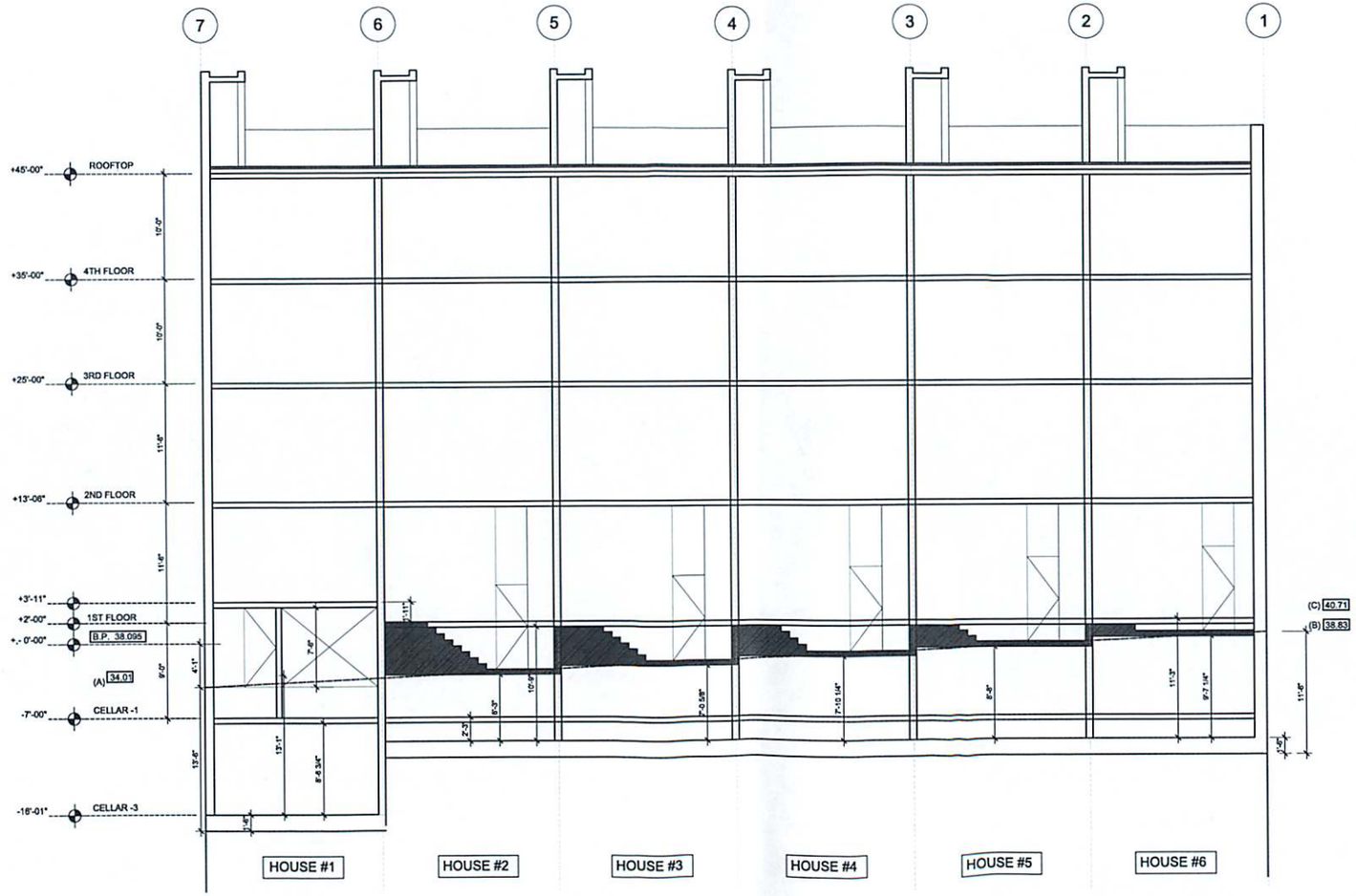
FIGURE 4: PROPOSED ENDPOINT SAMPLING PLAN



1 LONGITUDINAL SECTION 1

SCALE: 3/16"=1'-0"

ARCHITECT:

A+H ARCHITECTURE PC
233 BROADWAY #1804
NY NY 10279

JOAN HUMPHREYS: 212 791 6946

No.	DESCRIPTION	DATE
1	FILING SET	11/05/13

ISSUED / REVISIONS

PROJECT:

59 SOUTH 4TH STREET

OWNER:

DRAWING TITLE:

LONGITUDINAL SECTION

SCALE: N.T.S.

SEAL & SIGNATURE:

DATE: 12/06/2013
PROJECT No.
DRAWING BY:
NYC DOB Number:

A-501.00

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DOB SCAN | DOB scans & signatures

REGISTERED ARCHITECT
JOAN HUMPHREYS
015384
STATE OF NEW YORK

APPENDICES

APPENDIX 1
CITIZEN PARTICIPATION PLAN

The NYC Office of Environmental Remediation and Kub Capital LLC have established this Citizen Participation Plan because the opportunity for citizen participation is an important component of the NYC Voluntary Cleanup Program. This Citizen Participation Plan describes how information about the project will be disseminated to the Community during the remedial process. As part of its obligations under the NYC VCP, Kub Capital LLC will maintain a repository for project documents and provide public notice at specified times throughout the remedial program. This Plan also takes into account potential environmental justice concerns in the community that surrounds the project Site. Under this Citizen Participation Plan, project documents and work plans are made available to the public in a timely manner. Public comment on work plans is strongly encouraged during public comment periods. Work plans are not approved by the NYC Office of Environmental Remediation (OER) until public comment periods have expired and all comments are formally reviewed. An explanation of cleanup plans in the form of a public meeting or informational session is available upon request to OER's project manager assigned to this Site, Alysha Alfieri, who can be contacted about these issues or any others questions, comments or concerns that arise during the remedial process at (212) 788-8841

Project Contact List. OER has established a Site Contact List for this project to provide public notices in the form of fact sheets to interested members of the Community. Communications will include updates on important information relating to the progress of the cleanup program at the Site as well as to request public comments on the cleanup plan. The Project Contact List includes owners and occupants of adjacent buildings and homes, principal administrators of nearby schools, hospitals and day care centers, the public water supplier that serves the area, established document repositories, the representative Community Board, City Council members, other elected representatives and any local Brownfield Opportunity Area (BOA) grantee organizations. Any member of the public or organization will be added to the Site Contact List on request. A copy of the Site Contact List is maintained by OER's project

manager. If you would like to be added to the Project Contact List, contact NYC OER at (212) 788-8841 or by email at brownfields@cityhall.nyc.gov.

Repositories. A document repository is maintained in the nearest public library that maintains evening and weekend hours. This document repository is intended to house, for community review, all principal documents generated during the cleanup program including Remedial Investigation plans and reports, Remedial Action work plans and reports, and all public notices and fact sheets produced during the lifetime of the remedial project. Kub Capital LLC will inspect the repositories to ensure that they are fully populated with project information. The repository for this project is:

Brooklyn Public Library - Leonard Branch

81 Deveo Street, Brooklyn, NY 11215

(718) 486-3365

M-W-Th-F: 10:00 am – 6:00 pm

T: 1:00 pm – 8:00 pm

Sat: 10:00 am – 5:00 pm

Digital Documentation. NYC OER strongly encourages the use of digital documents in repositories as a means of minimizing paper use while also increasing convenience in access and ease of use.

Identify Issues of Public Concern. The major issues of concern to the public will be potential impacts of nuisance odors and dust during the disturbance of soil at the Site. This work will be performed in accordance with procedures that will be specified under a Remedial Program and considers and takes preventive measures for exposure to future residents of the property and those on adjacent properties during construction. Detailed plans to monitor the potential for exposure including a CHASP and a CAMP are required components of the remedial program. Implementation of these plans will be under the direct oversight of the NYCOER.

Public Notice and Public Comment. Public notice to all members of the Project Contact List is required at three major steps during the performance of the cleanup program (listed below) and at other points that may be required by OER. Notices will include Fact Sheets with

descriptive project summaries, updates on recent and upcoming project activities, repository information, and important phone and email contact information. All notices will be prepared by Kub Capital LLC, reviewed and approved by OER prior to distribution and mailed by Kub Capital LLC. Public comment is solicited in public notices for all work plans developed under the NYC Voluntary Cleanup Program. Final review of all work plans by OER will consider all public comments. Approval will not be granted until the public comment period has been completed.

Citizen Participation Milestones. Public notice and public comment activities occur at several steps during a typical NYC VCP project. See flow chart on the following page, which identifies when during the NYC VCP public notices are issued: These steps include:

- **Public Notice of the availability of the Remedial Investigation Report and Remedial Action Work Plan and a 30-day public comment period on the Remedial Action Work Plan.**

  Public notice in the form of a Fact Sheet is sent to all parties listed on the Site Contact List announcing the availability of the Remedial Investigation Report and Remedial Action Work Plan and the initiation of a 30-day public comment period on the Remedial Action Work Plan. The Fact Sheet summarizes the findings of the RIR and provides details of the RAWP. The public comment period will be extended an additional 15 days upon public request. A public meeting or informational session will be conducted by OER upon request.

- **Public Notice announcing the approval of the RAWP and the start of remediation**

  Public notice in the form of a Fact Sheet is sent to all parties listed on the Site Contact List announcing the approval of the RAWP and the start of remediation.

- **Public Notice announcing the completion of remediation, designation of Institutional and Engineering Controls and issuance of the Notice of Completion**

Public notice in the form of a Fact Sheet is sent to all parties listed on the Site Contact List announcing the completion of remediation, providing a list of all Institutional and Engineering Controls implemented for to the Site and announcing the issuance of the Notice of Completion.

APPENDIX 2

SUSTAINABILITY STATEMENT

This Sustainability Statement documents sustainable activities and green remediation efforts planned under this remedial action.

Reuse of Clean, Recyclable Materials. Reuse of clean, locally-derived recyclable materials reduces consumption of non-renewable virgin resources and can provide energy savings and greenhouse gas reduction.

An estimate of the quantity (in tons) of clean, non-virgin materials (reported by type of material) reused under this plan will be quantified and reported in the RAR.

Reduce Consumption of Virgin and Non-Renewable Resources. Reduced consumption of virgin and non-renewable resources lowers the overall environmental impact of the project on the region by conserving these resources.

An estimate of the quantity (in tons) of virgin and non-renewable resources, the use of which will be avoided under this plan, will be quantified and reported in the RAR.

Reduced Energy Consumption and Promotion of Greater Energy Efficiency. Reduced energy consumption lowers greenhouse gas emissions, improves local air quality, lessens in-city power generation requirements, can lower traffic congestion, and provides substantial cost savings.

Best efforts will be made to quantify energy efficiencies achieved during the remediation and will be reported in the Remedial Action Report (RAR). Where energy savings cannot be easily quantified, a gross indicator of the amount of energy saved or the means by which energy savings was achieved will be reported.

Conversion to Clean Fuels. Use of clean fuel improves NYC's air quality by reducing harmful emissions.

An estimate of the volume of clean fuels used during remedial activities will be quantified and reported in the RAR.

Recontamination Control. Recontamination after cleanup and redevelopment is completed undermines the value of work performed, may result in a property that is less protective of public health or the environment, and may necessitate additional cleanup work later or impede future redevelopment. Recontamination can arise from future releases that occur within the property or by influx of contamination from off-Site.

An estimate of the area of the Site that utilizes recontamination controls under this plan will be reported in the RAR in square feet.

Storm-water Retention. Storm-water retention improves water quality by lowering the rate of combined storm-water and sewer discharges to NYC's sewage treatment plants during periods of precipitation, and reduces the volume of untreated influent to local surface waters.

An estimate of the enhanced storm-water retention capability of the redevelopment project will be included in the RAR.

Linkage with Green Building. Green buildings provide a multitude of benefits to the city across a broad range of areas, such as reduction of energy consumption, conservation of resources, and reduction in toxic materials use.

The number of Green Buildings that are associated with this brownfield redevelopment property will be reported in the RAR. The total square footage of green building space created as a function of this brownfield redevelopment will be quantified for residential, commercial and industrial/manufacturing uses.

Paperless Brownfield Cleanup Program. Kub Capital LLC is participating in OER's Paperless Brownfield Cleanup Program. Under this program, submission of electronic documents will replace submission of hard copies for the review of project documents, communications and milestone reports.

Low-Energy Project Management Program. Kub Capital LLC is participating in OER's low-energy project management program. Under this program, whenever possible, meetings are

held using remote communication technologies, such as videoconferencing and teleconferencing to reduce energy consumption and traffic congestion associated with personal transportation.

Trees and Plantings. Trees and other plantings provide habitat and add to NYC's environmental quality in a wide variety of ways. Native plant species and native habitat provide optimal support to local fauna, promote local biodiversity, and require less maintenance.

An estimate of the land area that will be vegetated, including the number of trees planted or preserved, will be reported in square feet in the RAR.

APPENDIX 3

SOIL/MATERIALS MANAGEMENT PLAN

1.1 SOIL SCREENING METHODS

Visual, olfactory and PID soil screening and assessment will be performed under the supervision of a Qualified Environmental Professional and will be reported in the RAR. Soil screening will be performed during invasive work performed during the remedy and development phases prior to issuance of the Notice of Completion.

1.2 STOCKPILE METHODS

Excavated soil from suspected areas of contamination (e.g., hot spots, USTs, drains, etc.) will be stockpiled separately and will be segregated from clean soil and construction materials. Stockpiles will be used only when necessary and will be removed as soon as practicable. While stockpiles are in place, they will be inspected daily, and before and after every storm event. Results of inspections will be recorded in a logbook and maintained at the Site and available for inspection by OER. Excavated soils will be stockpiled on, at minimum, double layers of 8-mil minimum sheeting, will be kept covered at all times with appropriately anchored plastic tarps, and will be routinely inspected. Broken or ripped tarps will be promptly replaced.

All stockpile activities will be compliant with applicable laws and regulations. Soil stockpile areas will be appropriately graded to control run-off in accordance with applicable laws and regulations. Stockpiles of excavated soils and other materials shall be located at least of 50 feet from the property boundaries, where possible. Hay bales or equivalent will surround soil stockpiles except for areas where access by equipment is required. Silt fencing and hay bales will be used as needed near catch basins, surface waters and other discharge points.

1.3 CHARACTERIZATION OF EXCAVATED MATERIALS

Soil/fill or other excavated media that is transported off-Site for disposal will be sampled in a manner required by the receiving facility, and in compliance with applicable laws and regulations. Soils proposed for reuse on-Site will be managed as defined in this plan.

1.4 MATERIALS EXCAVATION, LOAD-OUT AND DEPARTURE

The PE/QEP overseeing the remedial action will:

- Oversee remedial work and the excavation and load-out of excavated material;
- Ensure that there is a party responsible for the safe execution of invasive and other work performed under this work plan;
- Ensure that Site development activities and development-related grading cuts will not interfere with, or otherwise impair or compromise the remedial activities proposed in this RAWP;
- Ensure that the presence of utilities and easements on the Site has been investigated and that any identified risks from work proposed under this plan are properly addressed by appropriate parties;
- Ensure that all loaded outbound trucks are inspected and cleaned if necessary before leaving the Site;
- Ensure that all egress points for truck and equipment transport from the Site will be kept clean of Site-derived materials during Site remediation.

Locations where vehicles exit the Site shall be inspected daily for evidence of soil tracking off premises. Cleaning of the adjacent streets will be performed as needed to maintain a clean condition with respect to Site-derived materials.

Open and uncontrolled mechanical processing of historical fill and contaminated soil on-Site will not be performed without prior OER approval.

1.5 OFF-SITE MATERIALS TRANSPORT

Loaded vehicles leaving the Site will comply with all applicable materials transportation requirements (including appropriate covering, manifests, and placards) in accordance with applicable laws and regulations, including use of licensed haulers in accordance with 6 NYCRR Part 364. If loads contain wet material capable of causing leakage from trucks, truck liners will

be used. Queuing of trucks will be performed on-Site, when possible in order to minimize off Site disturbance. Off-Site queuing will be minimized.

Outbound truck transport routes will be determined prior to the start of the excavation activities. This routing takes into account the following factors: (a) limiting transport through residential areas and past sensitive sites; (b) use of mapped truck routes; (c) minimizing off-Site queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; and (f) overall safety in transport. To the extent possible, all trucks loaded with Site materials will travel from the Site using these truck routes. Trucks will not stop or idle in the neighborhood after leaving the project Site.

1.6 MATERIALS DISPOSAL OFF-SITE

The following documentation will be established and reported by the PE/QEP for each disposal destination used in this project to document that the disposal of regulated material exported from the Site conforms with applicable laws and regulations: (1) a letter from the PE/QEP or Enrollee to each disposal facility describing the material to be disposed and requesting written acceptance of the material. This letter will state that material to be disposed is regulated material generated at an environmental remediation Site in Brooklyn, New York under a governmental remediation program. The letter will provide the project identity and the name and phone number of the PE/QEP or Enrollee. The letter will include as an attachment a summary of all chemical data for the material being transported; and (2) a letter from each disposal facility stating it is in receipt of the correspondence (1, above) and is approved to accept the material. These documents will be included in the RAR.

The Remedial Action Report will include an itemized account of the destination of all material removed from the Site during this remedial action. Documentation associated with disposal of all material will include records and approvals for receipt of the material. This information will be presented in the RAR.

All impacted soil/fill or other waste excavated and removed from the Site will be managed as regulated material and will be disposed in accordance with applicable laws and regulations.

Historic fill and contaminated soils taken off-Site will be handled as solid waste and will not be disposed at a Part 360-16 Registration Facility (also known as a Soil Recycling Facility).

Waste characterization will be performed for off-Site disposal in a manner required by the receiving facility and in conformance with its applicable permits. Waste characterization sampling and analytical methods, sampling frequency, analytical results and QA/QC will be reported in the RAR. A manifest system for off-Site transportation of exported materials will be employed. Manifest information will be reported in the RAR. Hazardous wastes derived from on-Site will be stored, transported, and disposed of in compliance with applicable laws and regulations.

If disposal of soil/fill from this Site is proposed for unregulated disposal (i.e., clean soil removed for development purposes), including transport to a Part 360-16 Registration Facility, a formal request will be made for approval by OER with an associated plan compliant with 6NYCRR Part 360-16. This request and plan will include the location, volume and a description of the material to be recycled, including verification that the material is not impacted by site uses and that the material complies with receipt requirements for recycling under 6NYCRR Part 360. This material will be appropriately handled on-Site to prevent mixing with impacted material.

1.7 MATERIALS REUSE ON-SITE

Soil and fill that is derived from the property that meets the soil cleanup objectives established in this plan may be reused on-Site. The soil cleanup objectives for on-Site reuse are listed in Table 1. 'Reuse on-Site' means material that is excavated during the remedy or development, does not leave the property, and is relocated within the same property and on comparable soil/fill material, and addressed pursuant to the NYC VCP agreement subject to Engineering and Institutional Controls. The PE/QEP will ensure that reused materials are segregated from other materials to be exported from the Site and that procedures defined for material reuse in this RAWP are followed.

Organic matter (wood, roots, stumps, etc.) or other waste derived from clearing and grubbing of the Site will not be buried on-Site. Soil or fill excavated from the site for grading or other purposes will not be reused within a cover soil layer or within landscaping berms.

1.8 DEMARCATION

After completion of hotspot removal and any other invasive remedial activities, and prior to backfilling, the top of the residual soil/fill will be defined by one of three methods: (1) placement of a demarcation layer. The demarcation layer will consist of geosynthetic fencing or equivalent material to be placed on the surface of residual soil/fill to provide an observable reference layer. A description or map of the approximate depth of the demarcation layer will be provided in the SMP; or (2) a land survey of the top elevation of residual soil/fill before the placement of cover soils, pavement and associated sub-soils, or other materials or structures or, (3) all materials beneath the approved cover will be considered impacted and subject to site management after the remedy is complete. Demarcation may be established by one or any combination of these three methods. As appropriate, a map showing the method of demarcation for the Site and all associated documentation will be presented in the RAR.

This demarcation will constitute the top of the site management horizon. Materials within this horizon require adherence to special conditions during future invasive activities as defined in the Site Management Plan.

1.9 IMPORT OF BACKFILL SOIL FROM OFF-SITE SOURCES

This Section presents the requirements for imported fill materials to be used below the cover layer and within the clean soil cover layer. All imported soils will meet OER-approved backfill and cover soil quality objectives for this Site. The backfill and cover soil quality objectives are listed in Table 1.

A process will be established to evaluate sources of backfill and cover soil to be imported to the Site, and will include an examination of source location, current and historical use(s), and any applicable documentation. Material from industrial sites, spill sites, environmental remediation sites or other potentially contaminated sites will not be imported to the Site.

The following potential sources may be used pending attainment of backfill and cover soil quality objectives:

- Clean soil from construction projects at non-industrial sites in compliance with applicable laws and regulations;

- Clean soil from roadway or other transportation-related projects in compliance with applicable laws and regulations;
- Clean recycled concrete aggregate (RCA) from facilities permitted or registered by the regulations of NYS DEC.

All materials received for import to the Site will be approved by a PE/QEP and will be in compliance with provisions in this RAWP. The RAR will report the source of the fill, evidence that an inspection was performed on the source, chemical sampling results, frequency of testing, and a Site map indicating the locations where backfill or soil cover was placed.

Source Screening and Testing

Inspection of imported fill material will include visual, olfactory and PID screening for evidence of contamination. Materials imported to the Site will be subject to inspection, as follows:

- Trucks with imported fill material will be in compliance with applicable laws and regulations and will enter the Site at designated locations;
- The PE/QEP is responsible to ensure that every truck load of imported material is inspected for evidence of contamination; and
- Fill material will be free of solid waste including pavement materials, debris, stumps, roots, and other organic matter, as well as ashes, oil, perishables or foreign matter.

Composite samples of imported material will be taken at a minimum frequency of one sample for every 500 cubic yards of material. Once it is determined that the fill material meets imported backfill or cover soil chemical requirements and is non-hazardous, and lacks petroleum contamination, the material will be loaded onto trucks for delivery to the Site.

Recycled concrete aggregate (RCA) will be imported from facilities permitted or registered by NYSDEC. Facilities will be identified in the RAR. A PE/QEP is responsible to ensure that the facility is compliant with 6NYCRR Part 360 registration and permitting requirements for the period of acquisition of RCA. RCA imported from compliant facilities will not require additional testing, unless required by NYSDEC under its terms for operation of the facility.

RCA imported to the Site must be derived from recognizable and uncontaminated concrete. RCA material is not acceptable for, and will not be used as cover material.

1.10 FLUIDS MANAGEMENT

All liquids to be removed from the Site, including dewatering fluids, will be handled, transported and disposed in accordance with applicable laws and regulations. Liquids discharged into the New York City sewer system will receive prior approval by New York City Department of Environmental Protection (NYC DEP). The NYC DEP regulates discharges to the New York City sewers under Title 15, Rules of the City of New York Chapter 19. Discharge to the New York City sewer system will require an authorization and sampling data demonstrating that the groundwater meets the City's discharge criteria. The dewatering fluid will be pretreated as necessary to meet the NYC DEP discharge criteria. If discharge to the City sewer system is not appropriate, the dewatering fluids will be managed by transportation and disposal at an off-Site treatment facility.

Discharge of water generated during remedial construction to surface waters (i.e. a stream or river) is prohibited without a SPDES permit issued by New York State Department of Environmental Conservation.

1.11 STORM-WATER POLLUTION PREVENTION

Applicable laws and regulations pertaining to storm-water pollution prevention will be addressed during the remedial program. Erosion and sediment control measures identified in this RAWP (silt fences and barriers, and hay bale checks) will be installed around the entire perimeter of the remedial construction area and inspected once a week and after every storm event to ensure that they are operating appropriately. Discharge locations will be inspected to determine whether erosion control measures are effective in preventing significant impacts to receptors. Results of inspections will be recorded in a logbook and maintained at the Site and available for inspection by OER. All necessary repairs shall be made immediately. Accumulated sediments will be removed as required to keep the barrier and hay bale check functional. Undercutting or erosion of the silt fence toe anchor will be repaired immediately with

appropriate backfill materials. Manufacturer's recommendations will be followed for replacing silt fencing damaged due to weathering.

1.12 CONTINGENCY PLAN

This contingency plan is developed for the remedial construction to address the discovery of unknown structures or contaminated media during excavation. Identification of unknown contamination source areas during invasive Site work will be promptly communicated to OER's Project Manager. Petroleum spills will be reported to the NYS DEC Spill Hotline. These findings will be included in the daily report. If previously unidentified contaminant sources are found during on-Site remedial excavation or development-related excavation, sampling will be performed on contaminated source material and surrounding soils and reported to OER. Chemical analytical testing will be performed for TAL metals, TCL volatiles and semi-volatiles, TCL pesticides and PCBs, as appropriate.

1.13 ODOR, DUST AND NUISANCE CONTROL

Odor Control

All necessary means will be employed to prevent on- and off-Site odor nuisances. At a minimum, procedures will include: (a) limiting the area of open excavations; (b) shrouding open excavations with tarps and other covers; and (c) use of foams to cover exposed odorous soils. If odors develop and cannot otherwise be controlled, additional means to eliminate odor nuisances will include: (d) direct load-out of soils to trucks for off-Site disposal; and (e) use of chemical odorants in spray or misting systems.

This odor control plan is capable of controlling emissions of nuisance odors. If nuisance odors are identified, work will be halted and the source of odors will be identified and corrected. Work will not resume until all nuisance odors have been abated. OER will be notified of all odor complaint events. Implementation of all odor controls, including halt of work, will be the responsibility of the PE/QEP's certifying the Remedial Action Report.

Dust Control

Dust management during invasive on-Site work will include, at a minimum:

- Use of a dedicated water spray methodology for roads, excavation areas and stockpiles.
- Use of properly anchored tarps to cover stockpiles.
- Exercise extra care during dry and high-wind periods.
- Use of gravel or recycled concrete aggregate on egress and other roadways to provide a clean and dust-free road surface.

This dust control plan is capable of controlling emissions of dust. If nuisance dust emissions are identified, work will be halted and the source of dusts will be identified and corrected. Work will not resume until all nuisance dust emissions have been abated. OER will be notified of all dust complaint events. Implementation of all dust controls, including halt of work, will be the responsibility of the PE/QEP's responsible for certifying the Remedial Action Report.

Other Nuisances

Noise control will be exercised during the remedial program. All remedial work will conform, at a minimum, to NYC noise control standards.

Rodent control will be provided, during Site clearing and grubbing, and during the remedial program, as necessary, to prevent nuisances.

APPENDIX 4

HEALTH AND SAFETY PLAN

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HEALTH AND SAFETY PLAN

51-59 South 4th Street
Brooklyn, New York

Block 2428, Lots 28, 29, 30, 33, 34 and 35

Prepared For:	Mayor's Office of Environmental Remediation E-Designation Program 253 Broadway, 14th Floor New York, NY 10007
Prepared By:	Hydro Tech Environmental, Corp. 15 Ocean Avenue, 2nd Floor Brooklyn, New York 11225
Project Manager:	Ezgi Karayel
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Hydro Tech Job No.	130332

1.0 HEALTH & SAFETY PLAN

1.1 Introduction

The HASP has been prepared in conformance with applicable regulations, safe work practices and the project's requirements. It addresses those activities associated with the installation, sampling of soil and groundwater probes and the in-field characterization of soil samples. The Project Manager (PM), Site Safety Officer (SSO) and Hydro Tech field staff will implement the Plan during site work. Compliance with this HASP is required of all persons and third parties who perform fieldwork for this project. Assistance in implementing this HASP can be obtained from the Hydro Tech's SSO. The content of this HASP may change or undergo revision based upon additional information that is made available to health and safety personnel, monitoring results or changes in the technical scope of work. Any changes proposed must be reviewed by the SSO.

Scope of Work

The Scope of Work activities will include the following:

- Monitoring excavation activities

Emergency Numbers

Contact	Phone Number
NYU Langone Medical Center	718-384-5179
New York City EMS	911
NYPD	911
NYFD	911
National Response Center	800-424-8802
Poison Information Center	800-562-8816
Chemtree	800-424-9555

Project Management/Health and Safety Personnel

Title	Contact	Phone Number	Cell Phone
Sr. Vice President	Rachel Ataman	(631) 462-5866	(631) 457-0032
Site Safety Officer	Ezgi Karayel	(718) 636-0800	(631) 457-3236
Project Engineer	Ezgi Karayel	(718) 636-0800	(631) 457-3236

Directions to NYU Langone Medical Center of Williamsburg *(see attached* **Figure 1***)*

1. Head west on South 4th Street toward Kent Avenue
2. Turn right onto Kent Avenue
3. Take the 1st right onto South 3rd Street
4. Take the 1st right onto Wythe Avenue
5. Turn left onto Broadway

Destination will be on the right.

1.2 Health and Safety Staff

This section briefly describes the personnel and their health and safety responsibilities for the:

PROJECT ENGINEER– Ezgi Karayel

- Has the overall responsibility for the health and safety of site personnel
- Ensures that adequate resources are provided to the field health and safety staff to carry out their responsibilities as outlined below.

- Ensures that fieldwork is scheduled with adequate personnel and equipment resources to complete the job safely.
- Ensures that adequate telephone communication between field crews and emergency response personnel is maintained.
- Ensures that field site personnel are adequately trained and qualified to work at the Site.

SITE SAFETY OFFICER – Ezgi Karayel

- Directs and coordinates health and safety monitoring activities.
- Ensures that field teams utilize proper personal protective equipment (PPE).
- Conducts initial onsite, specific training prior to personnel and/or subcontractors proceeding to work.
- Conducts and documents periodic safety briefings; ensures that field team members comply with this HASP.
- Completes and maintains Accident/Incident Report Forms.
- Notifies Hydro Tech corporate administration of all accidents/incidents.
- Determines upgrade or downgrade of PPE based on site conditions and/or downgrade of PPE based on site conditions and/or real-time monitoring results.
- Ensures that monitoring instruments are calibrated daily or as determined by manufactured suggested instructions.
- Maintains health and safety field log books.
- Develops and ensures implementation of the HASP.
- Approves revised or new safety protocols for field operations.
- Coordinates revisions of this HASP with field personnel and the SSO Division Contracting Officer.
- Responsible for the development of new company safety protocols and procedures and resolution of any outstanding safety issues which may arise during the conduction of site work.
- Reviews personnel and subcontractors current and up-to-date medical examination and acceptability of health and safety training.

FIELD PERSONNEL AND SUBCONTRACTORS (IF ANY)

- Reports any unsafe or potentially hazardous conditions to the SSO.
- Maintains knowledge of the information, instructions and emergency response actions contained in this HASP.
- Comply with rules, regulations and procedures as set forth in this HASP and any revisions that are instituted.
- Prevents admittance to work sites by unauthorized personnel.

1.3 Chemical & Waste Description/Characterization

The following list of chemicals is based on the materials either once stored onsite or believed to be formerly stored onsite:

- Unknown Contaminant(s) including SVOCs and TAL metals.

The following information references are presented in order to identify the properties and hazards of the materials that may/will be encountered at the Site.

- Dangerous Properties of Industrial Materials - Sax
- Chemical Hazards of the Workplace - Proctor/Hughes
- Condensed Chemical Dictionary - Hawley
- Rapid Guide to Hazardous Chemical in the Workplace - Lewis 1990.
- NIOSH Guide to Chemical Hazards - 1990
- ACGIH TLV Values and Biological Exposure Indices - 1991-1992

1.4 Hazard Assessment

The potential hazards associated with planned site activities include chemical, physical and biological

hazards. This section discusses those hazards that are anticipated to be encountered during the activities listed in the scope of work.

The potential to encounter chemical hazards is dependent upon the work activity performed (invasive or non-invasive), the duration and location of the work activity. Such hazards could include inhalation or skin contact with chemicals that could cause: dermatitis, skin burn, being overcome by vapors or asphyxiation. In addition, the handling of contaminated materials and chemicals could result in fire and/or explosion.

The potential to encounter physical hazards during site work includes: heat stress, exposure to excessive noise, loss of limbs, being crushed, head injuries, cuts and bruises and other physical hazards due to motor vehicle operation, heavy equipment and power tools.

Chemical Hazards

The potential for personnel and subcontractors to come in contact with chemical hazards may occur during the following tasks:

- Installation of soil probes/groundwater monitoring wells
- Removal of any contaminated materials during sampling

Exposure Pathways
Exposure to these compounds during ongoing activities may occur through inhalation of contaminated dust particles, inhalation of volatile (VOC) and semi-volatile (SVOC) vapor fume compounds, by way of dermal absorption, and accidental ingestion of the contaminant by either direct or indirect cross contamination activities (eating, smoking, poor hygiene). Indirectly, inhalation of contaminated dust particles (metals, silica, VOCs, SVOCs) can occur during adverse weather conditions (high or changing wind directions) or during operations that may generate airborne dust such as excavation, and sampling activities. Dust control measures such as applying water to roadways and work sites will be implemented, where visible dust is generated from non-contaminated and contaminated soils. Where dust control measures are not feasible or effective, respiratory protection will be used.

Additional Precautions
Dermal absorption or skin contact with chemical compounds is possible during invasive activities at the Site, including removal of product, excavation of tanks, and handling of contaminated soils. The use of PPE in accordance with Section 9.2 and strict adherence to proper decontamination procedures should significantly reduce the risk of skin contact.

The potential for accidental ingestion of potentially hazardous chemicals is expected to be remote, when good hygiene practices are used.

Physical Hazards

A variety of physical hazards may be present during Site activities. These hazards are similar to those associated with any construction type project. These physical hazards are due to motor vehicles, and heavy equipment operation, the use of improper use of power and hand tools, misuse of pressurized cylinders, walking on objects, tripping over objects, working on surfaces which have the potential to promote falling, mishandling and improper storage of solid and hazardous materials, skin burns, crushing of fingers, toes, limbs, hit on the head by falling objects or hit one's head due to not seeing the object of concern, temporary loss of one's hearing and/or eyesight. Theses hazards are not unique and are generally familiarly to most hazardous waste site workers at construction sites. Additional task specific safety requirements will be covered during safety briefings.
Noise
Noise is a potential hazard associated with operation of heavy equipment, power tools, pumps and generators. High noise operators will be evaluated at the discretion of the SSO. Employees with an 8-hour

time weighted average exposure exceeding 85 decibels (db) will be included in the hearing conservation program in accordance with 29 CFR 1910.85.

It is mandated that employees working around heavy equipment or using power tools that dispense noise levels exceeding 95 db are to wear hearing protection that shall consist of earplugs and earphones. This is particularly relevant as the jet engines of modern airplanes can give sound level readings of greater than 110 db.

Heat/Cold Stress
Extremes in temperature and the effects of hard work in impervious clothing can result in heat stress and/or hypothermia. The human body is designed to function at a certain internal temperature. When metabolism or external sources (fire, hot summer day, winter weather, etc.) cause the body temperature to rise or fall excessively, the body seeks to protect itself by triggering cooling/warming mechanisms. Profuse sweating is an example of a cooling mechanism, while uncontrollable shivering is an example of a warming mechanism. The SSO monitor the temperature to determine potential adverse effects the weather can cause on site personnel.

Protective clothing worn to guard against chemical contact effectively stops the evaporation of perspiration. Thus the use of protective clothing increases heat stress problems. Cold stress can easily occur in winter with sub-freezing ambient temperatures. Workers in protective garments may heat-up and sweat, only to rapidly cool once out of the tank and the PPE. The major disorders due to heat stress are heat cramps, heat exhaustion and heat stroke.

HEAT CRAMPS are painful spasms that occur in the skeletal muscles of workers who sweat profusely in the heat and drink large quantities of water, but fail to replace the body's lost salts or electrolytes. Drinking water while continuing to lose salt tends to dilute the body's extra cellular fluids. Soon water seeps by osmosis into active muscles and causes pain. Muscles fatigued from work as usually most susceptible to cramps.

HEAT EXHAUSTION is characterized by extreme weakness or fatigue, dizziness, nausea, and headache. In serious cases, a person may vomit or lose consciousness. The skin is clammy and moist, complexion pale or flushed, and body temperature normal or slightly higher than normal. Treatment is rest in a cool place and replacement of body water lost by perspiration. Mild cases may recover spontaneously with this treatment; severe cases may require care for several days. There are no permanent effects.

HEAT STROKE is a very serious condition caused by the breakdown of the body's heat regulating mechanisms. The skin is very dry and hot with red mottled or bluish appearance. Unconsciousness, mental confusion or convulsions may occur. Without quick and adequate treatment, the result can be death or permanent brain damage. Get medical assistance quickly! As first aid treatment, the person should be moved to a cool place. Soaking the person's clothes with water and fanning them should reduce body heat artificially, but not too rapidly.
Steps that can be taken to reduce heat stress are:

- Acclimatize the body. Allow a period of adjustment to make further heat exposure endurable.
- Drink more liquids to replace body water lost during sweating.
- Rest is necessary and should be conducted under the monitoring condition from the SSO and the effect personnel physiological state.
- Wearing personal cooling devices. There are two basic designs; units with pockets for holding frozen packets and units that circulate a cooling fluid from a reservoir through tubes to different parts of the body. Both designs can be in the form of a vest, jacket or coverall. Some circulating units also have a copy for cooling the head.

Cold temperatures can cause problems. The severe effects are FROSTBITE and HYPOTHERMIA.

FROSTBITE is the most common injury resulting from exposure to cold. The extremities of the body are often affected. The signs of frostbite are:

- The skin turns white or grayish-yellow
- Pain is sometimes felt early but subsides later. Often there is no pain
- The affected part feels intensely cold and numb

Shivering, numbness, drowsiness, muscular weakness and a low internal body temperature characterize the condition known as HYPOTHERMIA. This can lead to unconsciousness and death. With both frostbite and hypothermia, the affected areas need to be warmed quickly. Immersing in warm, not hot, water best does this. In such cases medical assistance will be sought.

To prevent these effects from occurring, persons working in the cold should wear adequate clothing and reduce the time spent in the cold area. The field SSO, to determine appropriate time personnel may spend in adverse weather conditions, will monitor this.

Lockout/Tagout

PURPOSE -- This program establishes procedures for de-energizing, isolating and ensuring the energy isolation of equipment and machinery. The program will be used to ensure that equipment and machinery is de-energizing and isolated from unexpected energization by physically locking (Lockout) energy isolation devices or, in the absence of locking capabilities, tagout (Tagout) the device to warn against energization. These procedures will provide the means of achieving the purpose of this program, prevention of injury to Hydro Tech employees from the unexpected energization or start-up of equipment and machinery, or from the release of stored energy.

APPLICATION -- This program applies to the control of energy during the servicing and/or maintenance of equipment and machinery. This program covers normal operations only if a guard or other safety device is removed or bypassed, or any part of the body is placed into an area of the equipment or machinery where work is performed on the material, or a danger zone exists during the operating cycle. Minor tool changes, adjustments, and other minor servicing activities which take place during normal production operations do not require isolation and lockout/tagout if they are routine and integral to the use of the equipment.

SCOPE -- This program will include all employees whose duties require them to service, install, repair, adjust, lubricate, inspect or perform work on powered equipment or machinery that may also have the potential for stored energy.

PROGRAM RESPONSIBILITIES -- The SSO will have the overall responsibility of the program to ensure that; authorized and affected employees receive adequate training and information, the program is evaluated annually, and the lockout/tagout equipment is properly used and the procedures of this program are followed.

The program evaluation will be conducted to ensure that the procedures and requirements of the program are being followed and will be utilized to correct any deviations or inadequacies that may be discovered. The evaluation will consist of one or more inspections or audits of actual lockout/tagout procedures being used to isolate equipment. A review of the authorized and affected employee's responsibilities will be conducted at the time of the inspection /audit. Any authorized employee, except the one(s) utilizing the energy isolation procedure being inspected, may perform the inspection/audit.
A record will be maintained of program evaluation inspections and will include:

1. The identity of the equipment or machine on which energy control procedures were being utilized.
2. The date(s) of the inspection(s).
3. The employee(s) included in the inspection(s).
4. The person performing the inspection.

Authorized employees (persons who implement lockout/tagout procedures) will be responsible for following

the procedures established by this program.

Affected employees are responsible for understanding the significance of a lockout/tagout device and the prohibition relating to attempts to restart or re-energize equipment or machinery that is locked out or tagged out.

TRAINING – Where applicable, Hydro Tech employees will be provided instruction in the purpose and functions of the energy control program to ensure that they understand the significance of locked or tagged out equipment and also have the knowledge and skill to correctly apply and remove energy controls. Training will include:

The recognition of applicable hazardous energy source(s), the type and magnitude of energy available, and the policies and procedures of the Hydro Tech energy control program.

1. Affected employees will be made aware of the purpose and use of energy control procedures and the prohibition relating to attempts to remove lockout or tagout devices.
2. Instruction in the limitations of tagout as a sole means of energy control.
   a. Tags are warning devices and do not provide the physical restraint that a lockwould.
   b. Tags may provide a false sense of security.
   c. Tags may become detached during use.

Initial training will be provided during to energy control program implementation, when new employees are hired or when job responsibilities change to include utilization of energy control procedures.

Retraining will be conducted whenever there is a change in job assignments that require the employee to utilize energy control procedures, a change in equipment that presents a new hazard, a change in the energy control procedures or when the program evaluation identifies inadequacies in the energy control program procedures.

Records of employee training will be maintained and will include the employee's name and date(s) of training.

STANDARD OPERATING PROCEDURES –where necessary, Hydro Tech will provide the necessary devices to effectively lockout or tagout energy isolating devices. Lockout/tagout devices will be the only devices used for controlling energy and shall not be used for other purposes. Any device used for lockout/tagout will be capable of withstanding the environment to which they are exposed for the maximum period they are to be exposed. The devices will be substantial enough to prevent removal without excessive force. Excessive force for a locking device would be bolt cutters or other metal cuttings tools. Tagout devices will be attached by a non-reusable method, attachable by hand, and very difficult to remove by hand. A nylon cable tie or equivalent will be used.

Lockout/tagout devices will indicate the identity of the employee who applied the device, and the tagout device will warn against the hazards if the equipment is energized.
Lockout is the preferred method of energy isolation. When physical lockout is not possible, the energy isolation will be tagged out of service with a warning tag attached at the power source. In the case of plug-in power source, the tag will be attached at the male plug. To ensure full employee protection using tagout instead of lockout, additional steps should be taken to guard against accidental or inadvertent energization. These steps may include, where applicable: removal of fuses, blocking switches, removal of a valve handle.

Standard Operating Procedures

I. APPLICATION OF CONTROLS
A. Preparing to Shut Down Equipment
   1. Prior to equipment shutdown, the authorized employee(s) must have knowledge of:
      a. The type(s) and magnitude of power.

b. The hazards of the energy to be controlled.
c. The method(s) to control the energy.
d. The location and identity of all isolating devices that control or feed the equipment to be locked/tagged out.

2. Notify all affected employees that the lockout/tagout system will be in effect.
3. Assemble applicable lockout/tagout devices, i.e., padlocks, tags, multiple lock hasps, etc.

B. Equipment Shutdown and Isolation

1. If equipment is in operation, shut it down by the normal stopping procedure (stop button, switch).
2. Operate disconnects, switches, valves, or other energy isolating devices so that the equipment is de-energizing and isolated from its energy source(s).
3. Verify that equipment is shut down by operating equipment from the normal operating location and any remote locations.

C. Installation of Lockout/Tagout Device, Release of Stored Energy, and Verification

1. Attach individually assigned lock(s) or tag(s) to energy isolating device(s). Where it is not possible to lock a switch, valve or other isolating device, electrical fuses must be removed, blank flanges installed in piping, lines disconnected, or other suitable methods used to ensure that equipment is isolated from energy sources. A tag must be installed at the point of power interruption to warn against energizing.
   a. Each lock or tag must positively identify the person who applied it and locks must be individually keyed.
   b. If more than one person is involved in the task, employees will place their own lock and tag. Multiple lock hasps are available for this.
2. Release, restrain, or dissipate stored energy such spring tension, elevated machine members, rotating flywheels, hydraulic pressure, pistons and air, gas, steam, water pressure, etc. by repositioning, blocking bleeding, or other suitable means.
3. Prior to starting work on equipment and after ensuring that no personnel are exposed, the authorized employee will verify that isolation and de-energization have been accomplished by:
   a. Attempting, through normal effort, to operate energy isolating devices such as switches, valves, or circuit breaker with locks or tags installed.
   b. Attempting to operate the equipment or machinery that is locked or tagged out. This includes all sources of energy, i.e. electrical, hydraulic, gravity, air, water, stream pressure, etc.
   c. Verifying the presence and effectiveness of restraint (blocking) and energy dissipation or release (bleeding).
4. If there is a possibility of the re-accumulation of stored energy to a hazardous level, verification of isolation will be contained until the servicing or maintenance is completed, or until the possibility of such accumulation no longer exists.

D. Group Lockout/Tagout

1. When more than one individual is involved in locking or tagging equipment out of operation, each individual will attach their individual lock or tag, or the equivalent, to the energy isolating device(s).
   a. An equivalent lockout device may be in the form of a group lockout device such as a multiple lock hasp or lock box.
   b. Primary responsibility for a group of authorized employees working under a group lockout device will be vested in a designated authorized employee.
   c. Group lockout methods will provide a level of protection equal to that afforded by a personal lockout/tagout device.

II. RETURNING EQUIPMENT TO SERVICE

A. Restore Equipment to Normal Operating Status

1. Re-install all parts or subassemblies removed for servicing or maintenance.
2. Re-install all tools, rests, or other operating devices
3. Re-install all guards and protective devices (i.e. limit switches).

4. Remove all blocks, wedges, or other restraints from the operating area of the equipment (ways, slides, etc.).
5. Remove all tools, equipment, and shop towels from the operating area of the equipment.

B. Verify Equipment Ready for Operation
1. Inspect area for non-essential items
2. Ensure that all employees are safely positioned clear of the operating areas of the equipment. Post a watch if energy isolation devices are not in line of sight of the equipment.

C. Notify Affected Employees of Impending Start-up
1. The sudden noise of start-up may startle nearby employees.
2. Equipment may need to be tested to determine operational safety by a qualified operator.

D. Remove Energy Isolation Devices - Only by authorized employee(s) who installed it/them.
1. Remove line blanks, reconnect piping (if applicable), and remove warning tag.
2. Close bleeder valves, remove warning tag.
3. Replace fuse(s), close circuit breaker(s) and remove warning tag.
4. Remove lock and tag from control panel, valve, etc.

Employee(s) who installed them may make an exception for removal of lockout/tagout devices. If it is necessary to operate a piece of equipment that is locked/tagged out, <u>every</u> effort must be made to locate the employee whose lock or tag is on the equipment. If he or she cannot be located and only after positive assurance is made that no one is working on the locked out equipment, the <u>supervisor</u> may personally remove the lock. The supervisor must assure that the equipment is once again locked out, or the employee notified that the equipment has been re-energized, before the employee resumes work. Employees will recheck locked out equipment if they have left the equipment (breaks, lunch, and end of shift) to make sure it is still de-energized and locked out.

III. TEMPORARY REMOVAL OF LOCKOUT/TAGOUT PROTECTION

A. In situations when the equipment must be temporarily energized to test or position the equipment or its components, the following steps will be followed:
1. Clear the equipment of tools and materials that are non-essential to the operation.
2. Ensure the equipment components are operationally intact.
3. Remove employees from the equipment area.
4. Remove the lockout/tagout devices by the employee who installed in/them.
5. Energize and proceed with testing or positioning.
6. De-energize all systems and re-install all energy control measures.
7. Verify re-installed energy control measures are effective.

IV. SHIFT OR PERSONNEL CHANGES

A. The following steps will be followed to ensure continuity of employee protection during personnel changes.
1. All personnel involved in the maintenance or servicing activity will be notified that a transfer of personal locks/tags is about to occur.
2. Clear all personnel from hazardous area(s) of equipment.
3. Under the supervision of the shift supervisor or group designee, the off-going employee will immediately install theirs.
    a. If an entire group or more than one employee will be transferring work responsibility, locks/tags will be removed and replaced one at a time in order of installation.
4. When the transfer of lockout/tagout devices is complete, the effectiveness of all energy isolation devices will be verified to the satisfaction of all personnel involved.
5. Once the effectiveness of energy isolation protection is confirmed, the service/maintenance operation may continue.

V. CONTRACTOR NOTIFICATION

A. Whenever outside personnel may be engaged in activities covered by this program, they will inform the contractor of applicable lockout/tagout procedures used to protect Hydro Tech employees from the hazards

of working near energized equipment.

1. The contractor will be expected to ensure that his/her employees understand and comply with the restrictions and prohibitions of this program.
2. Hydro Tech requires, under these circumstances, the contractor to inform us of their lockout/tagout procedures so that HTE employees can comply with the restrictions and prohibitions of the contractor's program.
3. Hydro Tech also requires the contractor to notify the program administrator, the area supervisor, and affected Hydro Tech employees prior to de-energizing, isolating andlocking out Hydro Tech equipment. Conversely, notification is also required when this equipment will be returned to service.

DEFINITIONS

Affected employee - An employee whose job requires him/her to operate or use a machine or equipment on which servicing or maintenance is being performed under lockout or tagout, or whose job requires him/her to work in an area in which such servicing or maintenance is being performed.

Authorized employee(s) - A person or persons who locks or implements a tagout system procedure to perform servicing or maintenance on a machine or equipment. An authorized employee and an affected employee may be the same person when the affected employee's duties also include performing maintenance or service on a machine or equipment that must be locked or tagged out.

"Capable of being locked out" - An energy isolating device will be considered to be capable of being locked out either if it is designed with a hasp or other attachment or integral part to which, or through which, a lock can be affixed, or if it has a locking mechanism built into it. Other energy isolating devices will also be considered to be capable of being locked out, if lockout can be achieved without the need to dismantle, rebuild, or replace the energy-isolating device or permanently alter its energy control capability.

Energized - Connected to an energy source or containing residual or stored energy.

Energy isolating device - A mechanical device that physically prevents the transmission or release of energy, including but not limited to the following: a manually operated electrical circuit breaker; a disconnect switch; a manually operated switch by which the conductors of a circuit can be disconnected from all ungrounded supply conductors and, in addition, no pole can be operated independently; a slide gate; a slip blind; a line valve; a block; and any similar device used to block or isolate energy. The term does not include a push button, selector switch, and other control circuit type devices.

Energy sources - any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal or other type of energy.

Lockout - The placement of lockout device on an energy-isolating device, in accordance with an established procedure, is ensuring that the energy isolating device and the equipment being controlled cannot be operated until the lockout device is removed.

Lockout device - A device that utilizes positive means such as a lock, either key or combination type, to hold an energy isolating device in the safety position and prevent the energizing of a machine or equipment.

Normal production operations - The utilization of a machine or equipment to perform its intended production function.

Servicing and/or maintenance - Workplace activities such as constructing, installing, setting up, adjusting, inspecting, modifying, and maintaining and/or servicing machines or equipment. These activities include lubrication, cleaning or unjamming of machines or equipment and making adjustments or tool changes, where the employee may be exposed to the unexpected energization or startup of the equipment or release of hazardous energy.

Setting up - Any work performed to prepare a machine or equipment to perform its normal production operation.

Stored energy - Energy that is available and may cause movement even after energy sources have been isolated. Stored energy may be in the form of compressed springs, elevated equipment components, hydraulic oil pressure, pressurized water, air, steam, or gas, or rotating flywheels, shafts or cams.

Tagout - The placement of a tagout device on an energy-isolating device, in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

Tagout device - A prominent warning device, such as a tag and a means of attachment, which can be securely fastened to an energy isolating device in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

GENERAL MACHINERY AND EQUIPMENT LIST

EQUIPMENT/LOCATION	ENERGY SOURCES/LOCATION
A. Direct Push Probe Machine	Diesel Engine

1.5 Training

General Health and Safety Training

In accordance with Hydro Tech corporate policy, and pursuant to 29 CFR 1910.120, hazardous waste site workers shall, at the time of job assignment, have received a minimum of 40 hours of initial health and safety training for hazardous waste site operations. As a minimum, the training shall have consisted of instruction in the topics outlined in the above reference. Personnel who have not met the requirements for initial training will not be allowed to work in any site activities in which they may be exposed to hazards (chemical or physical).

Completion of the Hydro Tech Health and Safety Training Course for Hazardous Waste Operations or an approved equivalent will fulfill the requirements of this section. In addition to the required initial training, each employee shall have received 3 days of directly supervised on-the-job training. This training will address the duties the employees are expected to perform.

The Hydro Tech SSO the responsibility of ensuring that personnel assigned to this project complies with these requirements. Written certification of completion of the required training will be provided to the SSO.

Manager/Supervisor Training

In accordance with 29 CFR 1910.120, onsite management and supervisors who will be directly responsible for, or who supervise employees engaged in hazardous waste operation shall receive training as required in this HASP and at least eight (8) additional hours of specialized training on managing such operations at the time of job assignment.

Annual 8-Hour Refresher Training

Annual 8-hour refresher training will be required of all hazardous waste site field personnel in order to maintain their qualification for fieldwork. The following topics will be reviewed: toxicology, respiratory protection, including air purifying devices and self-contained breathing apparatus (SCBA), medical surveillance, decontamination procedures and personnel protective clothing. In addition, topics deemed necessary by the SSO may be added to the above list.

Site Specific Training

Prior to commencement of field activities, all personnel assigned to the project will be provided training that will specifically address the activities, procedures, monitoring and equipment for the site operations. It will include Site and facility layout, hazards, and emergency services at the Site, and will highlight all provisions contained within this HASP. This training will also allow field workers to clarify anything they do not understand and to reinforce their responsibilities regarding safety and operations for their particular activity.

Onsite Safety Briefings

Project personnel and visitors will be given periodic onsite health and safety briefings by the SSO, or their designee, to assist site personnel in safely conducting their work activities. The briefings will include information on new operations to be conducted, changes in work practices or changes in the Site's environmental conditions. The briefings will also provide a forum to facilitate conformance with safety requirements and to identify performance deficiencies related to safety during daily activities or as a result of safety audits.

Additional Training

Additional training may be required by the SSO for participation in certain field tasks during the course of the project. Such additional training could be in the safe operation of heavy or power tool equipment or hazard communication training.

Subcontractor Training

Subcontractor personnel, who work onsite, only occasionally, for a specific limited task and who are unlikely to be exposed over permissible exposure limits, may be exempted from the initial 40-hour training requirement. The SSO will determine if this exemption is allowed. In any case, the subcontractor personnel who are exposed to hazards are not exempted from the 40-hours training requirement nor medical surveillance requirements found in Section 5.6.

1.6 Medical Surveillance

General

All contractor and subcontractor personnel performing field work at the Site are required to have passed a complete medical surveillance examination in accordance with 29 CFR 1910.120 (f). A physician's medical release for work will be confirmed by the SSO before an employee can begin site activities. Such examinations shall include a statement as to the worker's present health status, the ability to work in a hazardous environment (including any required PPE which may be used during temperature extremes), and the worker's ability to wear respiratory protection.

A medical data sheet will be completed by all onsite personnel and kept at the Site. Where possible, this medical data sheet will accompany the personnel needing medical assistance or transport to hospital facilities.

MEDICAL SURVEILLANCE PROTOCOL
The medical surveillance protocol to be implemented is the occupational physicians' responsibility, but shall meet the requirements of CFR 1910.120 and ANSI Z88.2 (1980). The medical surveillance protocol shall, as a minimum, cover the following:

a. Medical and Occupational History
b. General physical examination (including evaluation of major organ system)
c. Serum lead and ZPP

d. Chest X-ray (performed no more frequently that every four years, except when otherwise indicated).
e. Pulmonary Function Testing (FVC and FEV1.0).
f. Ability to wear respirator
g. Audiometric testing.

Additional clinical tests may be included at the discretion of the occupational physician.

1.7 Site Control, PPE & Communications

Site Control

A Support Zone (SZ) is an uncontaminated area that will be the field support area for most operations. The SZ provides for field team communications and staging for emergency response. Appropriate sanitary facilities and safety equipment will be located in this zone. Potentially contaminated personnel or materials are not allowed in this zone. The only exception will be appropriately packaged/decontaminated and labeled samples. A contamination reduction corridor will be established. This is the route of entry and egress to the Site, and it provides an area for decontamination of personnel and portable equipment as well.

The area where contamination exists is considered to be the Exclusion Zone (EZ). All areas where excavation and handling of contaminated materials take place are considered the EZ. This zone will be clearly delineated by cones, tape or other means. The SSO may establish more than one EZ where different levels of protection may be employed or where different hazards exist. Personnel are not allowed in the EZ without:

- A buddy
- Appropriate personal protective equipment
- Medical authorization
- Training certification

Personal Protective Equipment

GENERAL
The level of protection worn by field personnel will be enforced by the SSO. Levels of protection for general operations are provided below and are defined in this section. Levels of protection may be upgraded or downgraded at the discretion of the SSO. The decision shall be based on real-time air monitoring, site history data, and prior site experience. Any changes in the level of protection shall be recorded in the health and safety field logbook.

PERSONAL PROTECTIVE EQUIPMENT SPECIFICATIONS
For tasks requiring Level B PPE, the following equipment shall be used:
- Cotton or disposable coveralls
- Chemical protective suit (e.g. Saran-coated Tyvek®)
- Gloves, inner (latex)
- Gloves, outer (Nitrile®)
- Boots (PVC), steel toe/shank
- Boot Covers (as needed)
- Hard Hat
- Hearing protection (as needed)

For tasks requiring Level C PPE, the following equipment shall be used:

- Cotton or disposable coveralls
- Disposable outer coveralls (Poly-coated Tyvek)
- Gloves, inner (latex)
- Gloves, outer (Nitrile®)

- Boots (PVC), steel toe/shank
- Boot covers (as needed)
- Hard Hat
- Hearing protection (as needed)
- Splash suit and face shield for decontamination operations (as needed)

For tasks requiring Level D PPE, the following equipment shall be used:

- Cotton or disposable coveralls
- Gloves, inner (latex)
- Gloves, outer (Nitrile®)
- Boots (PVC) steel toe/shank
- Boot covers (as needed)
- Hard hat
- Hearing protection (as needed)
- Safety glasses

For tasks requiring respiratory protection, the following equipment shall be used:

Level D - No respiratory protective equipment necessary except for a dust mask
Level C - A full-face air-purifying respirator equipped with organic vapor/pesticide-HEPA cartridges
Level B - An airline respirator or a self-contained breathing apparatus (SCBA)

INITIAL LEVELS OF PROTECTION
Levels of protection for the activities may be upgraded or downgraded depending on direct-reading instruments or personnel monitoring. The following are the initial levels of protection that shall be used for each planned field activity.

LEVEL OF PERSONAL PROTECTIVE EQUIPMENT REQUIRED

Activity	**Level of Protection Respiratory/PPE**
Drilling/Coring	C/D
Sampling	C/D
Ground-Penetrating Radar/Magnetometer	C/D

Communications

Communications is the ability to talk with others. While working in Level C/B Protection, personnel may find that communication become a more difficult task and process to accomplish. This is further complicated by distance and space. In order to address this problem, electronic instruments, mechanical devices or hand signals will be used as follows:

- Walkie-Talkies - Hand held radios would be utilized as much as possible by field teams for communication between downrange operations and the Command Post base station.

- Telephones - A mobile telephone will be located in the Command Post vehicle in the Support Zone for communication with emergency support services/facilities. If a telephone is demobilized, the nearest public phones will be identified.

- Air Horns - A member of the downrange field team will carry an air horn and another will be evident in the Support Zone to alert field personnel to an emergency situation.

- Hand Signals - Members of the field team long with use of the buddy system will employ this

communication method. Signals become especially important when in the vicinity of heavy moving equipment and when using Level B respiratory equipment. The signals shall become familiar to the entire field team before site operations commence and they will be reinforced and reviewed during site-specific training.

HAND SIGNALS FOR ONSITE COMMUNICATION

Signal	**Meaning**
Hand gripping throat	Out of air, can't breathe
Grip partners' wrist	Leave area immediately; no debate
Hands on top of head	Need assistance
Thumbs up	OK, I'm all right; I understand
Thumbs down	No; negative, unable to understand you. I'm not all right

1.8 Air Monitoring Plan

General

Continuous air monitoring in the EZ during invasive tasks will accompany site operations, as indicated in this HASP or as required by the SSO. Monitoring will be performed to verify the adequacy of respiratory protection, to aid in site layout and to document work exposure. All monitoring instruments shall be operated by qualified personnel only and will be calibrated daily prior to use, or more often as necessary. For additional references and information, see Hydro Tech's Site-Specific Air Monitoring Program.

Real Time Monitoring

INSTRUMENTATION

At least one (1) of the following monitoring instruments will be available for use during field operations as necessary:

- Photoionization Detector (PID), Rae Instruments with 10.2 EV probe or equivalent
- Flame Ionization Detector (FID), Foxboro Model 128 or equivalent
- Combustible Gas Indicator (CGI)/Oxygen (O_2) Meter, MSA or equivalent.

A FID or PID shall be used to monitor the organic vapor concentrations in active work areas. Organic vapor concentrations shall be measured upwind of the work areas to determine background concentrations. The SSO will interpret monitoring results using professional judgment. The PPE utilized shall always be the most protective, thus the action level criteria are flexible guidelines.

A CGI/O_2 meter shall be used to monitor for combustible gases and oxygen content in the boreholes during drilling activities.

Calibration records shall be documented, and included in the health and safety logbook or instrument calibration logbook. All instruments shall be calibrated before and after each daily use in accordance with the manufacturers' procedures.

ACTION LEVELS

Action levels for upgrading of PPE in this HASP will apply to all site work during the duration of field activities at the Site.

Action levels are for unknown contaminants using direct reading in the Breathing Zone (BZ) for organic vapors and dusts, and at the source for combustible gases.

MONITORING DURING FIELD ACTIVITIES

Hydro Tech shall perform real time air monitoring prior to the commencement of work to establish baseline conditions. Baseline conditions will be established at the approximate center of the Site and at the perimeter of the Site both upwind and downwind.

During all work activities real time monitoring will occur. As necessary, Hydro Tech shall have at each applicable workstation a PID, explosimeter and oxygen deficiency meter. The real time monitoring for remedial activities will be conducted approximating the Breathing Zone of the workers. The monitoring will be continuous during working operations.

The air-monitoring instrument may indicate that personnel working in the exclusion zone increase their level of protection. All personnel will be trained in the action levels. When conditions warrant an increase in protection, all personnel will stop working and immediately leave the exclusion zone. They will then don the appropriate safety equipment necessary and return to their current workstation. All of this activity will be monitored by the SSO. The SSO will keep the Hydro Tech Project Manager aware of any extraordinary situations and conditions that may occur. Working conditions and monitoring levels will be noted in the Field Notebook along with the time, date and page number. Verbal reports will be given to the Project Manager when there is a change in the PPE level.

The previous day's results shall be reviewed each morning to determine what actions are necessary and the general conditions resulting from and around the Site.

The record keeping will include:

- Date & Time of Monitoring
- Air Monitoring Location
- Instrument, Model #, Serial #
- Calibration/Background Levels
- Results of Monitoring
- SSO Signature
- Comments

Excavation Operations - Monitoring will be performed continuously during all excavation and demolition operations. A PID and/or FID shall be utilized to monitor the breathing zone, the excavated area and any material taken from the excavation. A CGI/O_2 meter shall be used to monitor the excavation for the presence of combustible gases.

ACTION LEVELS OF AIRBORNE CONTAMINANTS

Instrument	Action Level	Action to be Taken
FID/PID	< 100 ppm, for a 15-minute average	Stop work & initiate vapor control
>100 ppm, for a 15-minute average	Stop work & initiate evacuation procedure	
CGI	10% LEL	Stop work, initiate ventilating
	50% LEL	Stop work, initiate evacuation procedure and contact fire dept.

Personnel Monitoring Procedure

The Site SSO, concurrent with activities that may generate the contaminants in excess of OSHA PEL's, may perform assessment and evaluation of field personnel exposures to airborne contaminants.
Procedures to be followed include:

The SSO may select high-risk individuals who may be subject to contaminant exposure based on job assignment.

The Personal Sampling is being conducted to determine the proper levels of respiratory protection required, to document potential exposures to compounds, and to assure compliance with OSHA standards. Therefore, it is important that the data collected be from "worst case" locations and personnel.

For example: when work is being conducted to excavate at an underground tank location, those persons closest to the excavation and most intimately involved with the work should be sampled. If a backhoe operator solely conducted the excavation, then that employee should be monitored. However, if there are additional workers who must enter the excavation and work with the freshly excavated soil, these persons would be closer to the potential contaminants and they should be sampled.

To meet the intent of the sampling will require sampling at periods of the most disturbances. To be accurate in determining potential exposures, as many tasks/trades shall be sampled as possible during the course of this project. At completion of the project, a goal of 20% of all workers who must perform their duties in or around the contaminated soil, tanks and excavations is sought.

All sampling data must be provided in writing to the employees within 3 days of receipt of results by Hydro Tech.

Air sampling pumps used to collect employee exposure samples shall be calibrated before and after use each day. Calibration shall be accomplished using a primary standard calibration system, e.g. the bubble tube method. Results of the calibrations shall be included in the health and safety field logbook and with the exposure report.

Chemical analysis of samples collected for assessment of employee exposures shall be performed in accordance with NIOSH or OSHA analytical methods only by laboratories accredited by the American Industrial Hygiene Association.

Results of the personal exposure assessment shall be provided to the individual, in writing within fifteen (15) working days after receipt of laboratory reports. Reports to field personnel shall provide calculated time-weighted average exposures and shall provide comparative information relative to established permissible exposure limits. The air sampling data sheet and laboratory report is considered a part of the employee exposure report. A copy of the employee personal exposure assessment report shall also be included in the project file and the employees' medical record for Hydro Tech employees. Reports for subcontractor employees will be sent directly to the subcontractors' employer.

Air Monitoring Reports

Air Monitoring Reports will be completed by the SSO and/or authorized personnel and submitted to the Project Manager in the daily safety logs and will include the following:

- Date of monitoring
- Equipment utilized for air monitoring
- Real-time air monitoring results from each work location
- Calibration method of equipment and results

1.9 Safety Considerations

General

In addition to the specific requirements of this HASP, common sense should be used at all times.
The general safety rules and practices below will be in effect at the Site at the discretion of the Project Manager, SSO or other authorized personnel.

- The site will be suitably marked or barricaded as necessary to prevent unauthorized visitors but not hinder emergency services if needed.

- As needed, all open holes, trenches and obstacles will be properly barricaded in accordance with local site requirements. These requirements will be determined by proximity to traffic ways, both pedestrian

and vehicular, and site of the hole, trench or obstacle. If holes are required to be left open during non-working hours, they will be adequately decked over or barricaded and sufficiently lighted.

- Before any digging or boring operations are conducted, underground utility locations will be identified. All boring, excavation and other site work will be planned and performed with consideration for underground lines. Any excavation work will be performed in accordance with Hydro Tech's Standard Operating Procedures for Excavations.

- Either workers or other people will enact dust-mitigating procedures when there exists the potential for the inhalation of dust particles.

- The act of smoking and ignition sources in the vicinity of potentially flammable or contaminated material is strictly prohibited.

- Drilling, boring, and use of cranes and drilling rigs, erection of towers, movement of vehicles and equipment and other activities will be planned and performed with consideration for the location, height, and relative position of aboveground utilities and fixtures, including signs; canopies; building and other structures and construction; and natural features such as trees, boulders, bodies of water, and terrain.

- When working in areas where flammable vapors may be present, particular care shall be exercised with tools and equipment that may be sources of ignition. All tools and equipment provided must be properly bonded and/or grounded. Metal buttons and zippers are prohibited on safety clothing for areas that may contain a flammable or explosive atmosphere.

- Approved and appropriate safety equipment (as specified in this HASP), such as eye protection, hard hats, foot protection, and respirators, must be worn in areas where required. In addition, eye protection must be worn when sampling soil or water that may be contaminated.

- Beards interfere with respirator fit and are not allowed within the site boundaries because all site personnel may be called upon to use respirator protection is some situations.

- No smoking, eating, chewing tobacco, gum chewing or drinking will be allowed in the contaminated areas.

- Contaminated tools and hands must be kept away from the face.

- Personnel must use personal hygiene safe guards (washing up) at the end of the shift or as soon as possible after leaving the Site.

- Each sample must be treated and handled as though it were contaminated.

- Persons with long hair and/or loose fitting clothing that could become entangled in power equipment must take adequate precautions.

- Horseplay is prohibited in the work area.

- Work while under the influence of intoxicants, narcotics or controlled substances is prohibited.

Posted Signs

Posted danger signs will be used where an immediate hazard exists. Caution signs will be posted to warn against potential hazards and to caution against unsafe practices. Traffic control methods and barricades will be used as needed. Wooden stakes and flagging tape, or equally effective material will be used to demarcate all restricted areas.

Other postings may include the OSHA poster, emergency hospital route and telephone numbers of contact personnel.

Invasive Operations

The SSO will be present onsite during all invasive work (e.g. demolition, excavations). The SSO will ensure that appropriate levels of protection and safety procedures are followed. No personnel will enter any excavations for any reasons. All personnel will stay at least 10 feet back from the edge of the excavation and out of the swing radius of the backhoe. No drums or other potential sources will be sampled or removed during this phase without further additions to the HASP.

The proximity of water, sewer and electrical lines will be identified prior to invasive operations. The possibility of the presence of underground conduits or vessels containing materials under pressure will also be investigated prior to invasive operations. Properly-sized containment systems will be utilized and consideration of the potential volume of liquid or waste released during operations will be discussed with members of the field team to minimize the potential for spills and provide a method for collection of waste materials. Emergency evacuation procedures and the location of safety equipment will be established prior to start up operations. The use of protective clothing, especially hard hats, boots, and gloves will be required during drilling and other heavy equipment work.

Soil, Sediment and Groundwater Sampling

Personnel must wear prescribed protective clothing and equipment including eye protection, chemical resistant gloves and splash aprons (where appropriate) when sampling solids and liquids. Sample bottles are to be bagged prior to sampling to ease decontamination. Personnel must be aware of the location of emergency equipment, including spill containment materials prior to sampling. Personnel are to practice contamination avoidance at all times, as well as to utilize the buddy system and maintain communications with the Command Post.

Sample Handling

Personnel responsible for the handling of samples will wear the prescribed level of protection. Samples are to be identified as to their hazard and packaged as to prevent spillage or breakage. Any unusual sample conditions shall be noted. Laboratory personnel and all field personnel shall be advised of sample hazard levels and the potential contaminants present. This can be accomplished by a phone call to the lab coordinator and/or including a written statement with the samples reviewing lab safety procedures in handling in order to assure that the practices are appropriate for the suspected contaminants in the sample.

Heavy Equipment Decontamination

Personnel steam cleaning heavy equipment shall use the prescribed level of protection and adhere to the buddy system. Initially this task usually employs level C. The heavy equipment decontamination shall be restricted to authorized personnel only. Special consideration will be given to wind speed and direction. Downwind areas are to be kept free of personnel to avoid unnecessary exposure to potential airborne contamination.

Additional Safety Considerations

No other additional safety considerations at this time.

1.10 Decontamination and Disposal Procedures

Contamination Prevention

One of the most important aspects of decontamination is the prevention of contamination. Good contamination prevention should minimize worker exposure and help ensure valid sample results by precluding cross-contamination. Procedures for contamination avoidance include:

Personnel:
Do not walk through areas of obvious or known contamination
Do not directly handle or touch contaminated materials
Make sure that there are no cuts or tears on PPE
Fasten all closures in suits; cover with tape if necessary
Particular care should be taken to prevent any skin injuries
Stay upwind of airborne contaminants
Do not carry cigarettes, cosmetics, gum, etc. into contaminated areas

Sampling and Monitoring:
When required by the SSO, cover instruments with clear plastic, leaving openings for sampling ports and bag sample containers prior to emplacement of sample material.

Heavy Equipment:
Care should be taken to limit the amount of contamination that comes in contact with heavy equipment (tires, contaminated augers). Dust control measures may be needed on roads inside the site boundaries.

Personnel Decontamination

All personnel shall pass through an outlined decontamination procedure when exiting the hot zone at each location. Field washes for equipment and PPE shall be set up at each drilling location. The system will include a gross wash and rinse for all disposable clothing and boots worn in the EZ. Upon exiting the EZ, all personnel will wash their hands, arms, neck, and face before entering the Support Zone.

Equipment Decontamination

Equipment used at the Site that is potentially contaminated shall be decontaminated to prevent hazardous materials from leaving the Site. All heavy equipment will be decontaminated at the decontamination pad and inspected by the SSO and Project Manager before it leaves the Site. The decontamination area will provide for the containment of all wastewater from the decontamination process. Respirators, airline and any other personnel equipment that comes in contact with contaminated soils shall pass through a field wash.

Decontamination during Medical Emergencies

If emergency life-saving first aid and/or medical treatment are required, normal decontamination procedures may need to be abbreviated or omitted. The Site SSO or designee will accompany contaminated victims to the medical facility to advice on matters involving decontamination, when necessary. The outer garments can be removed if they do not cause delays, interfere with treatment or aggravate the problem. Respiratory equipment must always be removed. Protective clothing can be cut away. If the outer contaminated garments cannot be safely removed, a plastic barrier between the individual and clean surfaces should be used to help prevent contaminating the inside of ambulances and /or medical personnel. Outer garments are then removed at the medical facility.
No attempt will be made to wash or rinse the victim, unless it is known that the individual has been contaminated with an extremely toxic or corrosive material that could also cause severe injury or loss of life to emergency response personnel. For minor medical problems or injuries, the normal decontamination procedures will be followed. Note that heat stroke requires prompt treatment to prevent irreversible damage or death. Protective clothing must be promptly removed. Less serious forms of heat stress also require prompt attention and removal of protective clothing immediately; unless the victim is obviously contaminated, decontamination should be omitted or minimized and treatment begun immediately.

Disposal Procedures

A segregating system of non-hazardous waste and hazardous waste will be developed by the SSO and PM. All discarded material, waste materials or other objects shall be handled in such a way as to preclude the potential for spreading contamination, creating sanitary hazards, or causing litter to be left on site. All potentially contaminated materials, e.g. clothing, gloves, etc., will be bagged or drummed as necessary, labeled and segregated for disposal. All non-contaminated materials shall be collected and bagged for appropriate disposal as normal domestic waste.

1.11 Emergency Plan

The potential for the development of an emergency situation is low considering the low concentrations of hazardous substances at the work site. Nevertheless, an emergency situation could occur. All Hydro Tech and subcontractor field team members prior to the start of work will know the emergency plan outlined in this section. The emergency plan will be available for use at all times during site work.

Various individual site characteristics will determine preliminary actions taken to assure that this emergency plan is successfully implemented in the event of a site emergency. Careful consideration must be given to the proximity of neighborhood housing or places of employment, and to the relative possibility of site fire, explosion or release of vapors or gases that could affect the surrounding community.

The Project Manager shall make contact with local fire, police and other emergency units prior to beginning work on site. In these contacts, the Project Manager will inform the emergency units about the nature and duration of work expected to the Site and the type of contaminants and the possible health or safety effects of emergencies involving these contaminants. At this time, the Project Manager and the emergency response units shall make the necessary arrangements to be prepared for any emergencies that could occur.

The Project Manager shall implement the contingency plan whenever conditions at the Site warrant such action. The Project Manager will be responsible for coordination of the evacuation emergency treatment, and transportation of site personnel as necessary, and notification of emergency response units and the appropriate management staff.

The cases where the PM is not available, the SSO shall serve as the alternate emergency coordinator.

Evacuation

In the event of an emergency situation, such as fire, explosion, or significant release of toxic gases, an air horn or other appropriate device will be sounded for approximately 10 second intervals indicating the initiation of evacuation procedures. All personnel will evacuate and assemble near the entrance to the site. The location shall be upwind of the Site where possible.
For efficient and safe site evacuation and assessment of the emergency situation, the Project Manager will have authority to initiate action if outside services are required. Under no circumstances will incoming personnel or visitors be allowed to proceed into the area once the emergency signal has been given.
The SSO or designated SSO must ensure that access for emergency equipment is provided and that all combustion apparatuses have been shut down once the alarm has been sounded. Once the safety of all personnel is established, the Fire Department and other emergency response groups as necessary will be notified by telephone of the emergency.

Potential or Actual Fire or Explosion

Immediately evacuate the Site (air horn will sound for 10-second intervals), notify the local fire and police departments, and other appropriate emergency response groups if an actual fire or explosion has taken place.

Personnel Injury

Emergency first aid shall be applied on site as deemed necessary. If necessary, the individual shall be decontaminated and transported to the nearest medical facility.

The ambulance/rescue squad shall be contacted for transport as necessary in an emergency. However, since some situations may require transport of an injured party by other means, the hospital route is identified below. A map to this facility provided with this HASP in Section 2.2.3.

Accident / Incident Reporting

As soon as first aid and/or emergency response needs have been met, the following parties are to be contacted by telephone:

1. Rachel Ataman-cell phone (631) 457-0032
2. The employer of any injured worker if not an Hydro Tech employee

Written confirmation of verbal reports is to be submitted within 24 hours. The report form entitled "Accident Data Report" is to be used for this purpose. All Hydro Tech representatives contacted by telephone are to receive a copy of this report. If the employee involved is not a Hydro Tech employee, his employer shall receive a copy of this report.

For reporting purposes, the term accident refers to fatalities, lost time injuries, spill or exposure to hazardous materials (toxic materials, explosive or flammable materials).
Any information released from the health care provider, which is not deemed confidential patient information, is to be attached to the appropriate form. Any medical information that is released by patient consent is to be filed in the individuals' medical records and treated as confidential.

Overt Personnel Exposure

SKIN CONTACT:	Use copious amounts of soap and water. Wash/rinse affected area thoroughly, and then provide appropriate medical attention. Eyes should be rinsed for 15 minutes upon chemical contamination.
INHALATION:	Move personnel to fresh air and if necessary, decontaminate and transport to hospital.
INGESTION:	Decontamination and transport to emergency medical facility.
PUNCTURE WOUND OR LACERATION:	Decontaminate and transport to emergency medical facility.

Adverse Weather Conditions

In the event of adverse weather conditions, the SSO or designee will determine if work can continue without sacrificing the health and safety of all field workers. Some of the items to be considered prior to determining if work should continue are:

- Potential for heat stress and heat-related injuries
- Potential for cold stress and cold-related injuries
- Treacherous weather-related conditions
- Limited visibility

- Potential for electrical storms

Site activities will be limited to daylight hours and acceptable weather conditions. Inclement working conditions include heavy rain, fog, high winds, and lighting. Observe daily weather reports and evacuate if necessary in case of inclement weather conditions.

Emergency Response Equipment List

Some or all of the following will either be available onsite or be able to be brought to the Site within a 2-hour period:

- 55 Gallon Drums
- 85 Gallon Drums
- Absorbent Pads
- Absorbent Booms
- Speedy-Dry
- Plastic Sheeting
- Hay Bales
- Pneumatic Nibbler
- Back Hoe
- Pressure Washer
- Air Compressor
- Wilden Pumps
- Equipment Storage Trailer
- Submersible Pumps
- Miscellaneous Hand Tools
- Portable Lighting

Large Equipment

If necessary, Hydro Tech can have the following large equipment brought to the Site within 2-hours:

- Large Vacuum Truck
- Super Sucker
- Dump Trucks
- Drill Rig
- Utility Vehicle

1.12 Logs, Reports and Record Keeping

Medical and Training Records

The employer keeps medical and training records. All subcontractors must provide verification of training and medical qualifications to the SSO. The SSO will keep a log of personnel meeting appropriate training and medical qualifications for site work. The log will be kept in the project file.
Medical records will be maintained in accordance with 29 CFR 1910.20.

Onsite Log

A log of personnel onsite each day will be kept by the SSO or designee. A copy of these logs will be sent to the Hydro Tech records coordinator for data entry. Originals will be kept in the project file.
Exposure Records

Any personal monitoring results, laboratory reports, calculations and air sampling data sheets are part of an employee exposure record. These records will be kept in accordance with 29 CFR 1910.20. For Hydro Tech employees, the originals will be sent to the Hydro Tech records coordinator. For subcontractor employees,

the original will be sent to the subcontractor employer and a copy kept in the project file.

Accident / Incident Reports

An accident/incident report must be completed for all accidents and incidents. The originals will be sent to the appropriate Hydro Tech records coordinator for maintenance by Hydro Tech. Copies will be distributed as stated. A copy of the forms will be kept in the project file.

OSHA Form 200

An OSHA Form 200 (Log of Occupational Injuries and Illnesses) will be kept at the Site. All recordable injuries or illnesses will be recorded on this form. At the end of the project, the original will be sent to the Hydro Tech corporate records administrator for maintenance. Subcontractor employers must also meet the requirements of maintaining an OSHA 200 form. The Hydro Tech accident/incident report meets the requirements of the OSHA Form 101 (Supplemental Record) and must be maintained with the OSHA Form 200 for all recordable injuries or illnesses.

Health and Safety Field Log Book

The SSO or designee will maintain the logbook in accordance with standard Hydro Tech procedures. Daily site conditions, activities, personnel, calibration records, monitoring results and significant events will be recorded. The original logbooks will become part of the exposure records file.

1.13 Sanitation

If sanitary sewers are not provided at the Site, provisions shall be made for access to sanitary systems by using nearby public facilities consistent with provisions of governing local ordinance codes. In the latter case, provisions are required for the removal of accumulated waste products within those units.

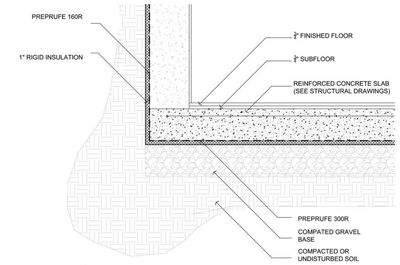
If a commercial/industrial laundry is used to clean or launder clothing that is potentially contaminated, they shall be informed of the potential harmful effects of exposure to hazardous substances related to the affected clothing.

Personnel and subcontractors sites shall follow decontamination procedures described in the HASP, or as directed by the SSO. This will generally include at a minimum site-specific training in shower usage and cleanup, personal hygiene requirements and the donning of protective equipment/clothing.

APPENDIX 5
Waterproofing/Vapor Barrier Layout and Details

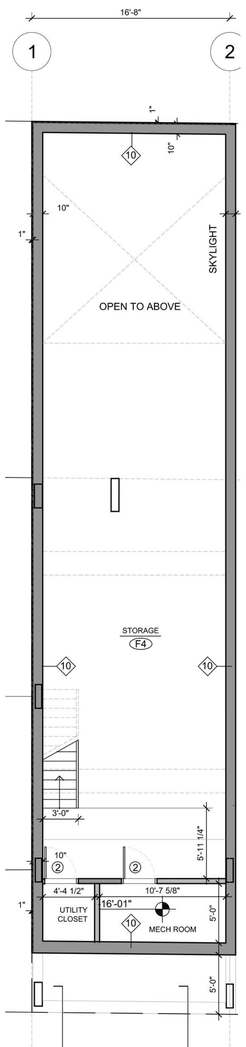
LEGEND

- PARTITION TYPE
- PLUMBING FIXTURE OR APPLIANCE TYPE
- FINISH OF FLOOR
- DOOR TYPE
- INTERIOR PARTITION



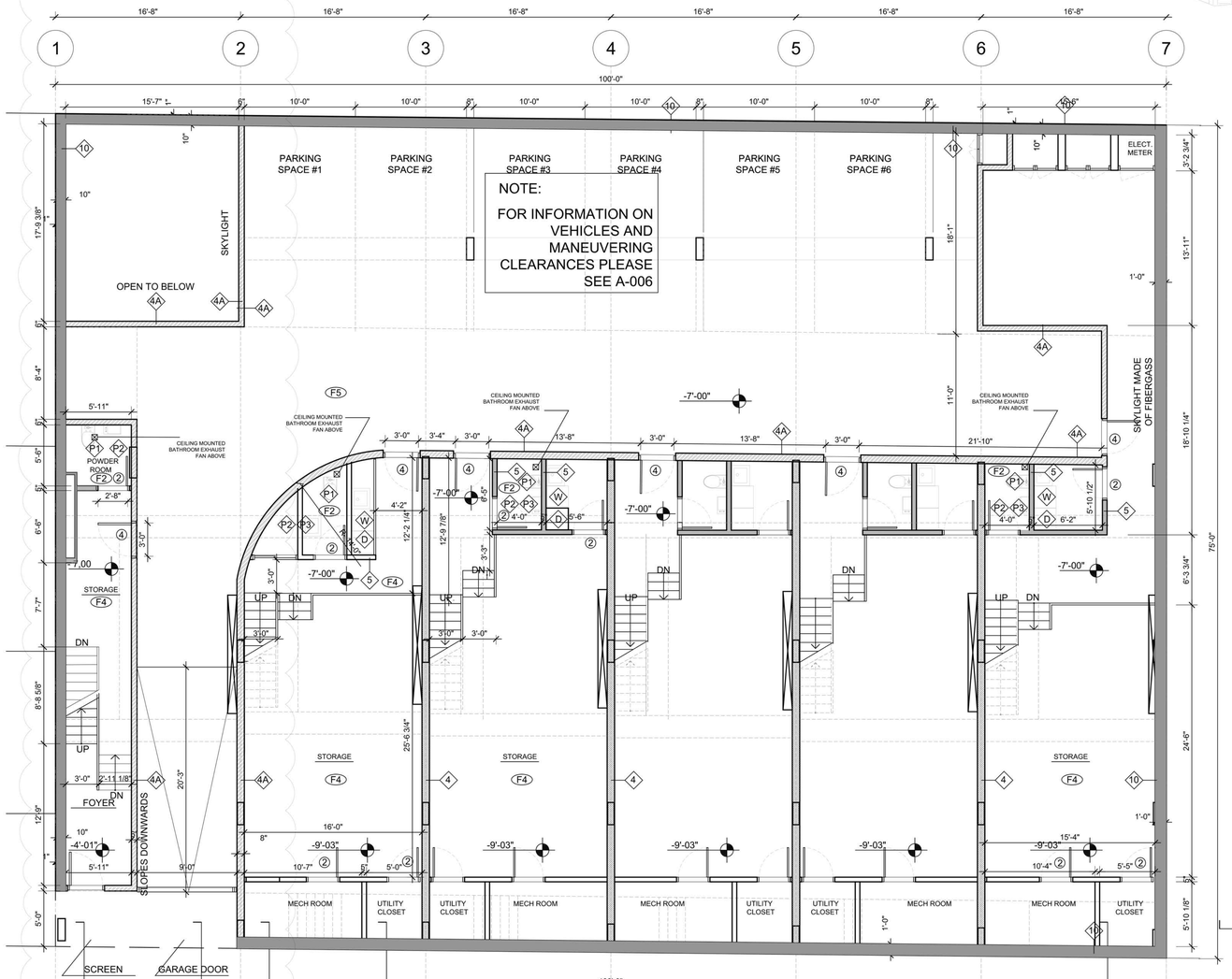
3 CELLAR FLOOR WATERPROOFING

SCALE: 3"=1'-0"



2 SUBCELLAR PLAN

SCALE: 3/16"=1'-0"



1 CELLAR PLAN

SCALE: 3/16"=1'-0"

NOTE:

FOR INFORMATION ON VEHICLES AND MANEUVERING CLEARANCES PLEASE SEE A-006

NOTE:

FOR DIMENSIONS AND TAGS OF LOTS,29,30 SEE LOT 33

ARCHITECT:

A+H ARCHITECTURE PC
233 BROADWAY #1804
NY NY 10279

JOAN HUMPHREYS: 212 791 6946

No.	DESCRIPTION	DATE
	D.O.B. FILING SET	12/19/13

ISSUED / REVISIONS

PROJECT:

6 WYTHE LANE
BROOKLYN, NY 11249

OWNER:

DRAWING TITLE:

PROPOSED SUB CELLAR AND CELLAR FLOOR PLANS

SCALE: N.T.S.

SEAL & SIGNATURE:

DATE: 12/19/2013
PROJECT No.
DRAWING BY:
NYC DOB Number:

A-001.00

6 OF 34

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