

REQUEST FOR PROPOSAL

**PROFESSIONAL SERVICES - REVIEW,
INSPECTION, SAMPLING & CERTIFICATION**

COMMERCIAL FILL REMOVAL & DISPOSAL PROJECT
121 CLAY BIRD LANE
BRIARCLIFF MANOR, NY
WESTCHESTER COUNTY, NEW YORK



TOWN OF MOUNT PLEASANT
1 TOWN HALL PLAZA
VALHALLA, NEW YORK 10595

September 2026

CARL FULGENZI, SUPERVISOR
RICH BENKWITT, SUPERINTENDENT OF HIGHWAYS

SPECIAL NOTICE

Town of Mount Pleasant
New York

PROPOSAL BID DUE DATE:

Bidder shall note that the proposal is required to be received by at 11:00 AM (local time) on Tuesday, September 22nd, 2026 at the Town Clerk's Office, 1 Town Hall Plaza, Valhalla, New York 10595.

PROPOSAL

PROFESSIONAL SERVICES - REVIEW, INSPECTION, SAMPLING & CERTIFICATION
COMMERCIAL FILL REMOVAL & DISPOSAL PROJECT
121 CLAY BIRD LANE
TOWN OF MOUNT PLEASANT
WESTCHESTER COUNTY, NEW YORK

To: Honorable Town Board
Acting as Commissioners of the Town of Mount Pleasant
One Town Hall Plaza
Valhalla, New York 10595

Ladies & Gentlemen:

This proposal is made by: _____

Whose business address is: _____

_____ zip code

Whose telephone number is: _____
() Area Code

State whether bidder is an individual, a partnership, or a corporation: _____

If a partnership, give the names of all partners: _____

State names of other individuals, firms or corporations interested in this proposal: _____

Proposal Bid & Services Amounts

The Town requests bids for the following services required under the Town project to remove approximately 1000 cubic yards of C&D excavated material. The scope of this proposal has been broken down into three tasks.

Task 1 – Review and provide written comments to the project plans, Work & Materials Handling Plan, Health and Safety Plan, Community Air Monitoring Plan.

This task is aimed at providing the engineer input to the project, associated plans and measures to permit the engineer to certify a final report that details the successful removal/remediation of the C&D excavated material from the project site in association with the rules and regulations of the state.

Task 1 involves:

- A timely review shall be submitted by a professional engineer of the proposed project plans, Work & Materials Handling Plan, Health and Safety Plan, Community Air Monitoring Plan for the purposes of completeness and accuracy. Submit comments to the plans and other input to the Town Engineer for consideration.
- Conduct a review of all prior soil sampling results, related reports and correspondences from NYSDEC regarding findings and statements identifying the type of excavated materials.
- Conduct a field inspection of the current site, berm pile, conditions, site access and other facility operations.

Task 1 bid shall be a fixed fee of: _____.

Task 2 – Conduct a Field Oversight Inspection & Reporting Requirements.

Under this task the Engineer shall conduct project oversight, inspection and reporting requirements in conjunction with regulatory requirements during the excavation and disposal of C&D excavated material. Work is required to be conducted in accordance with NYSDEC Part 360, DER-10 Technical Guidance (site remediation & sampling) and the December 2025 6 NYCRR Part 375 regulation amendment. These updated Soil Cleanup Objectives are to be deployed during the evaluation period of confirmatory sampling.

PID meter readings are required to permit detection of measurable VOC odor during operations for screening purposes as well as during sampling events. The Engineer is required to conduct visual inspections of the fill in the berm to determine if there is presence of unacceptable materials, i.e. suspect hazardous materials or observable contaminated waste, subject to segregation and/or special handling/disposal.

A Community Air Monitoring Program (CAMP) will be established by the Town with the field work conducted for the CAMP to be performed by others that specialize in the field of this work. The CAMP will be designed to monitor for potential off-site migration of dust, VOCs and lead. The Engineer will coordinate the operations of the project with input from the air monitoring contractor to prevent the release of contaminants or hazards out of the site. The results and related information produced by air monitoring contractor shall be incorporated and will assist in the final certification report by the Engineer.

Task 2 involves:

- During the active periods of work, the engineer or designated full-time resident representative(s) shall observe the work, operations, quality and levels of progress.
- Working with the CAMP contractor and reviewing air monitoring results to deploy dust control measures and/or permit work operations at the site.
- Working with all involved parties for the creation of progress updates and any interpretation of the project documents,
- Preparation of daily work reports, photo documentation, manifest management, verification of contract quantities for payment, etc. as required by the Town and NYSDEC.
- Verification and sign off of contract payment quantities. If needed, identifying and making recommendations to the Town for any change orders.
- Conducting necessary soil and wastewater sampling for off-site disposal at regulated facilities.
- Inspect/monitor soil and erosion control measures as required. Make recommendations and oversee any repairs with deficiencies to be corrected by the contractor.
- Close coordination with the Town of Mount Pleasant.

The Engineer shall allot at least **seven 7** business days for the daily field work to be conducted by both the Engineer and/or a qualified field technician working under the Engineer for this task.

Two background samples are to be taken to establish original site soil conditions. Representative samples are also anticipated to be required to be conducted for the registered land fill site receiving the excavated material. The number of representative samples will be identified by the registered site. The Engineer is required to coordinate and conduct the samples for this requirement. For the purposes of this bid, the Engineer shall factor in two representative samples to be collected, preserved, handled in accordance with lab protocols, coordinate delivery to the lab and complete the chain of custody form.

The following deliverables are required to be submitted under this task: daily reports/ manifest logs, site photos, site observation notes, record of PID readings and the lab sheet chain of custody

Task 2 item bids:

1. Field Inspection, Reporting with Labor & Equipment – Base Bid

a. Rate for Engineer _____ per Day (Est. Hours _____)

b. Rate for Field Tech. _____ per Day (Est. Hours _____)

Total For Base Bid of 7 Days Total _____.

Task 2 item bids:

2. Field Inspection, Reporting with Labor & Equipment – Additional Days

- a. Rate for Engineer _____ per Day (Est. Hours _____)
- b. Rate for Field Tech. _____ per Day (Est. Hours _____)

Total For Each Additional Day _____.

3. Background & Representative Sampling

- a. Background Sample (Full Part 375) _____ per sample
- b. Representative Sample (Part 375) _____ per sample

Total 2 Background & 2 Representative samples _____.

Task 3 – Post Material Removal, Final Stabilization and Engineers Certification.

This task involves confirmatory sampling to be conducted, development of the restoration plan and final engineers' certification report. The number of confirmatory soil samples are based on the Town's protocol outline in Attachment B of the Work Plan but a minimum of twelve (12) will be required.

Laboratory samples are to be preserved and handled in accordance with lab protocols. The Engineer will prepare the chain of custody form and coordinate delivery to the NYS Certified Lab.

The restoration plan is necessary to stabilize the site and will require the importing of clean fill. The amount of required fill is unknown at this time as the volume will depend on the depth of excavated material required to establish clear margin of soil cleanup. The imported fill must include a source and is required to meet Part 375 standards for unrestricted use, additionally conforming NYSDEC DER-10 requirements and soil guidelines. Site vegetative restoration is incorporated in the Plan.

A Site Closeout Report is required to be prepared and certified by a NYS licensed PE. This report will incorporate site observations, records of disposal manifests, air monitoring records, sampling results, findings and recommendations for submission to the NYSDEC.

The Task 3 work involves the following:

- o Conducting confirmatory soil testing in accordance with Attachment B of the Work Plan but shall factor a minimum of twelve (12) Part 375 parameters. Factor one (1) working day part-time Engineer and full-time Field Technician. Engineer shall perform additional sampling as needed.
- o Preparation of Final Site Stabilization Plan and oversight of the restoration work to be completed under this plan. Shall factor two (2) working days with part-time Engineer and full-time Field Technician.
- o Review of the imported soil data and info for compliance with DEC and Town requirements.
- o Preparation of a Final Engineering Report concluding soil was removed that includes documentation of field activities, disposal manifests, all laboratory samples & testing information with Professional Engineer sealed certification.

The following deliverables are required; Site Stabilization Plan & PE Sealed Final Certification Report with Adobe Acrobat electronic via Flash Drive.

Task 3 item bids:

1. Confirmatory Sampling Labor & Equipment – Base Bid

a. Rate for Engineer _____ per Day (Est. Hours _____)

b. Rate for Field Tech. _____ per Day (Est. Hours _____)

Total Base Bid of 1 Day _____.

2. Confirmatory Sampling Labor & Equipment – Additional Days

a. Rate for Engineer _____ per Day (Est. Hours _____)

b. Rate for Field Tech. _____ per Day (Est. Hours _____)

For Each Additional Day _____.

3. Confirmatory Sampling Lab Services

a. Confirmatory Sample (Full Part 375) _____ per sample

Total Twelve (12) Confirmatory samples _____.

4. Site Stabilization Plan _____ (Fixed Fee)

5. Site Stabilization Plan Oversight

a. Rate for Engineer _____ per Day (Est. Hours _____)

b. Rate for Field Tech. _____ per Day (Est. Hours _____)

Total Bid for two (2) Days _____.

6. Final Certification Report

a. Certification Report (PE Sealed) _____ (Fixed Fee)

Total Project Cost: _____

Qualifications - Technical and Experience

The following are minimum requirements requested by the Town to bid on this proposal.

- Proof of completing similar projects in size, scope, and industry within the last 3 to 5 years.
- Professional Engineer with a minimum of 15 years' experience overseeing NYSDEC cleanup projects subject to NYSDEC Part 360, DER-10 Technical Guidance and 6 NYCRR Part 375 regulations.
- Experience working with PID meter readings and Community Air Monitoring Program Plan including coordination with other contractors assigned to perform the CAMP.

Provide resumes and bios of the specific engineer and/or Field Technician to be assigned to the daily work, showing their individual roles and qualifications.

The bidder is informed of the following:

- 1. The Contract award will be made to the most responsive, responsible bidder submitting the most desirable acceptable bid and level of experience. The bid prices, goods and services shall be shown above clearly in numbers.
- 2. The Bidder shall complete all prices, goods and/or services price bid items on the following proposal pages. This includes both ELIGIBLE and INELIGIBLE contract items.

ADDENDA: The Undersigned hereby acknowledges receipt of the following

Addenda:

Addendum No.	Dated
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

CONTRACT TIME: This awarded the Contract, the undersigned agrees execute the agreement within thirty (30) consecutive calendar days after the approval of the Town Board.

OWNER'S RIGHTS RESERVED: The Undersigned understands that the Owner reserves the right to reject any or all Proposals or to waive any formality or technicality in any Proposal in the interest of the Owner.

THE ABOVE PROPOSAL IS HEREBY RESPECTFULLY SUBMITTED BY:

Contractor

By Title

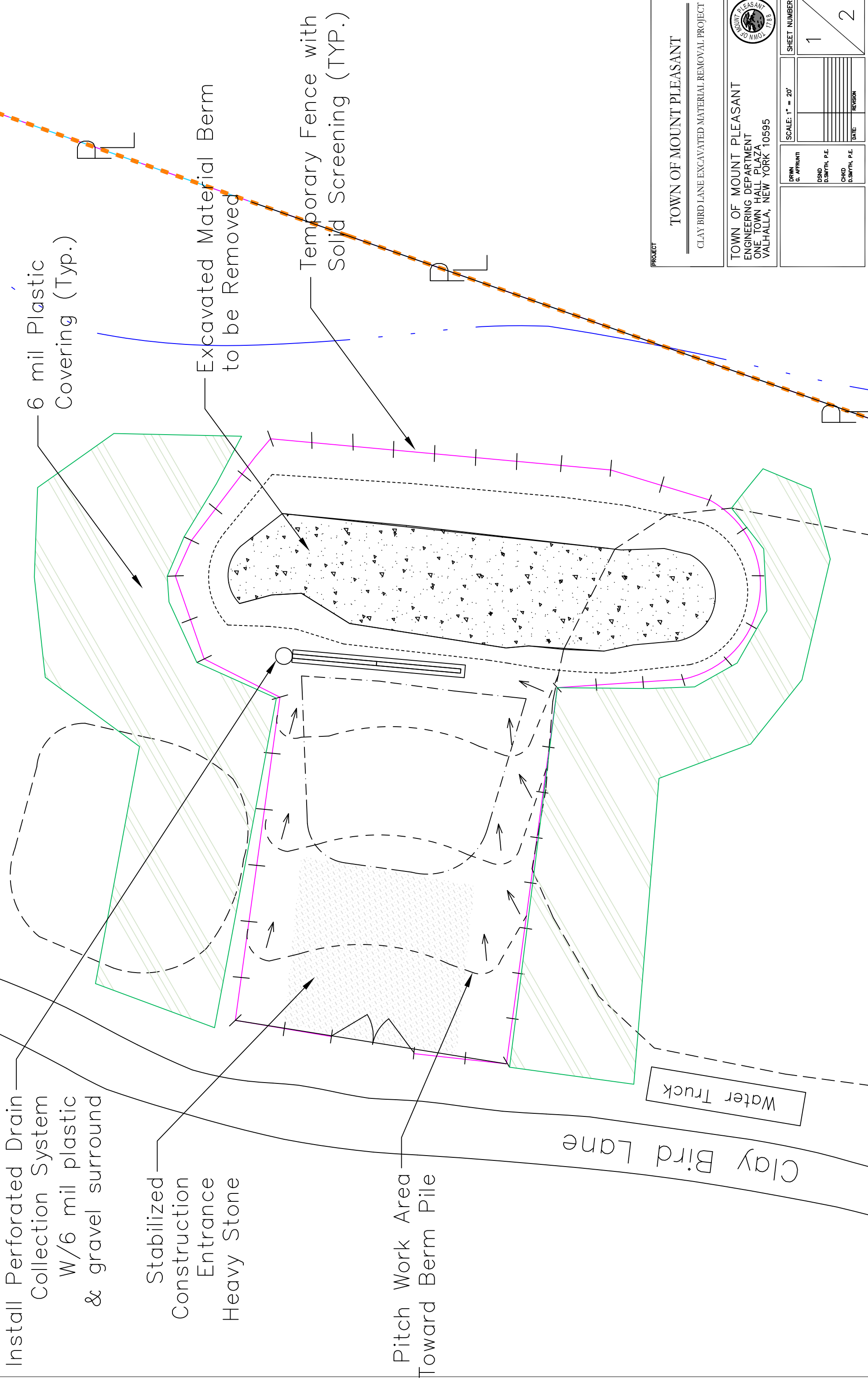
Business Address

Date

EXHIBIT A

Property, Berm Area Location
& Related Photos

MATERIAL REMOVAL WORK PLAN



PROJECT

TOWN OF MOUNT PLEASANT

CLAY BIRD LANE EXCAVATED MATERIAL REMOVAL PROJECT"



TOWN OF MOUNT PLEASANT
ENGINEERING DEPARTMENT
ONE TOWN HALL PLAZA
VALHALLA, NEW YORK 10595

DRWN G. AFFRONTI	DSND D.SMYTH, P.E.	CHKD D.SMYTH, P.E.
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EXHIBIT B

Work and Materials Management Plan

WORK & MATERIALS MANAGEMENT PLAN

**CLAY BIRD LANE
BRAIRCLIFF MANOR, NY**

MOUNT PLEASANT, NEW YORK



TOWN OF MOUNT PLEASANT
1 TOWN HALL PLAZA VALHALLA, NEW YORK
10595

AUGUST 2026

CARL FULGENZI, SUPERVISOR
RICH BENKWITT, SUPERINTENDENT OF HIGHWAYS

TABLE OF CONTENTS

1.0	INTRODUCTION	2
2.0	SITE DESCRIPTION.....	2
3.0	MATERIAL MANAGEMENT.....	2
3.1	Soil Screening Methods.....	3
3.2	Material Stockpiles	3
3.3	Documentation Sampling.....	4
3.4	Fluids Management.....	4
3.5	Material Excavation and Load Out.....	5
3.6	Material Transport Off-Site	5
3.7	Material Off-Site Disposal	6
3.8	Material Reuse On-Site.....	7
4.0	CONTINGENT EXCAVATION ACTIVITIES	7
4.1	Grossly-Impacted Soil Removal.....	8
5.0	COMMUNITY AIR MONITORING PLAN.....	8
6.0	DUST, VAPOR AND NUISANCE ODOR CONTROL PLAN	8
6.1	Odor Control Plan	8
6.2	Dust Control Plan.....	9
6.3	Other Nuisances	9
7.0	REPORTING	10
8.0	NOTIFICATION	10

LIST OF FIGURES

Figure 1 – Site Location Map

Figure 2 – Site Plan

LIST OF ATTACHMENTS

Attachment 1 – Health and Safety Plan

Attachment 2 – Soil Confirmation Sampling Plan

1.0 INTRODUCTION

This Work & Materials Management Plan (WMMP) was prepared by the Town of Mount Pleasant for the removal of commercial excavated material that was deposited on the town's facility located at 121 Clay Bird Lane in Briarcliff Manor, NY. This plan was created to provide the Town's Contractor an expected viable plan to remove the commercial material in a safe and effective manner to prevent release of any contaminants outside of the project area. The WMMP is being required by the New York State Department of Conservation (NYSDEC) whom will be approving this plan prior to any work commencement.

This WMMP describes soil handling procedures to be implemented during Remedial Action Work Plan (RAWP).

2.0 SITE DESCRIPTION

The Town facility is about 33.61 acre site and located off of Chappaqua Road at 121 Clay Bird Lane. Besides the mulch facility located on site the other occupants are Mount Pleasant Sportsman Club, Cellular service tower and Mount Pleasant Police Department practice range.

A site location map is provided as Figure 1 below.



The site is bordered by a residential area to the north & south, the Taconic State Parkway to the west and a large conference center to east.

The site was operated by a contractor to assist the town in recycling trees, stumps and larger brush calipers wood material into a mulch produce. This contractor created an earthen berm within the site that is required to be removed (See Figure 2). As the source of this material the contractor used to create the berm was unknown, the town was required to test the material to determine if contamination was present in the material. The material was found to contain higher levels of lead and other contaminants requiring the material be disposed of in a registered land fill.

3.0 MATERIAL MANAGEMENT

Material management activities specific to the handling and transportation along with disposal of the material is described in this section. A Town representative will monitor and document handling of material exported from the site that is transported and disposed of in accordance with applicable laws and regulations. If necessary, excavated material will be screened by visual and olfactory methods and with a photoionization detector (PID) to identify if soil is impacted with volatile organic compounds (VOCs). Excavated material will be stockpiled on-site.

It is expected that the berm material is impacted with semi volatile organic compounds (SVOCs), pesticides and metals above NYSDEC New York Codes, Rules, and Regulations (6NYCRR) Part 375 Unrestricted Use (UU) and/or Restricted-Use Restricted Residential (RURR) Soil Cleanup Objectives (SCOs) will be encountered. The material will be managed separately to avoid comingling with other material piles present on the site.

3.1 Soil Screening Methods

Visual, olfactory, and instrumental soil screening will be performed using a PID equipped with a 10.6 electron volt bulb that will be calibrated daily. Soil screening will take place during invasive work and excavation when berm material is adjoining other material stock piles to verify accurate separation of the two types of materials. Any visibly impacted material will be segregated for off-site disposal.

3.2 Material Stockpiles

Stockpiles will be constructed as necessary to separate and stage excavated material pending loading or characterization sampling in accordance with applicable federal and state laws and regulations, including regulations governing hazardous and solid waste. Separate stockpile areas will be constructed to avoid comingling of different waste streams. All stockpile areas will meet the following minimum requirements:

- Excavated soil will be placed onto a minimum 8-mil low-permeability liner of sufficient strength and thickness to prevent puncture during use. Different waste streams will be segregated into separate stockpiles (e.g., grossly-impacted material stockpiled in a contaminated soil area);

- Equipment and procedures will be used to place and remove the soil that will minimize the potential to jeopardize the integrity of the liner;
- Stockpiles will be covered upon reaching their capacity (e.g., about 1,000 cubic yards) until ready for loading. Stockpiles which have not reached their capacity, whether active or inactive, will be covered at the end of each workday.
- Stockpiles at or above grade will be encircled with silt fences and hay bales, as needed, to contain and filter particulates from any rainwater that has drained off the soils, and to mitigate the potential for surface water run-off;
- Stockpiles will be inspected at a minimum of once per week and after every storm event, and any deficiencies will be promptly addressed (i.e., any damaged tarps or coverings will be promptly replaced); and
- Results of inspections will be recorded in a logbook to be maintained at the site and made available for inspection by NYSDEC upon request.

3.3 Documentation Sampling

If unacceptable or suspect materials are encountered during excavation, post-excavation soil samples may be collected. For the separation of the berm pile from the adjoining material pile, no less than five samples (four sidewall samples and one base sample) will be collected plus required quality assurance/quality control (QA/QC) samples.

Documentation samples will be collected from areas with the greatest apparent contamination as evidenced by odors, staining, and/or PID readings.

Samples will be analyzed for VOCs and SVOCs and compared to the NYSDEC soil cleanup Levels.

3.4 Fluids Management

The need to discharge liquids into the town sewer system will be addressed with approval of the Westchester County Department of Environmental Conservation (WCDEF) and subsequent issued NYSDEC SPDES permit if necessary conforming to any pre-treatment stipulations of that permit.

Dewatering fluids not suitable for discharge to the town sewer system may be collected, characterized, and managed off-site. If required, a dewatering and treatment system will be designed by a NYS-licensed Professional Engineer. For the remedy, dewatering is considered a remedial component inasmuch as it is necessary to facilitate excavation of contaminated material.

Untreated dewatering fluids will not be recharged back to the land surface or subsurface of the site. Discharge of water generated during remedial construction to surface waters (i.e., a local pond, stream, and/or river) is prohibited without a SPDES permit.

3.5 Material Excavation and Load Out

A Town hired representative under the supervision of a Professional Engineer (PE) or Qualified Environmental Professional (QEP) will monitor ground-intrusive work and the excavation and load-out of excavated material.

The Inspector and the Contractor are solely responsible for the safe execution of ground-intrusive activities and other remedial work performed under this Work & Material Management Plan (WMMP). The contractor is solely responsible for the identification of utilities and/or easements that might be affected by the work conducted under this WMMP.

Loaded vehicles leaving the site will be appropriately lined (as needed), securely covered, manifested, and placarded in accordance with the appropriate federal, state, and local requirements, including applicable transportation requirements (i.e., New York State Department of Transportation [NYSDOT] and NYCDOT requirements). Trucks hauling historic fill material will not be lined unless free liquids are present or the material is grossly impacted.

Additionally, the contractor will set up an outbound-truck inspection station within the designated work area. Before exiting the designated work area, trucks will be required to stop at the truck inspection station to be examined for evidence of contaminated soil on the undercarriage, body, and wheels. Soil and debris will be removed. Brooms, shovels and clean water will be utilized for the removal of soil from vehicles and equipment, as necessary. Measures will be taken to ensure that all egress points for truck and equipment transport from the site will be kept clean of project-related soils, fill and debris. Locations where vehicles enter or exit the site will be inspected daily for evidence of off-site sediment tracking.

Vehicles leaving the site will not be overloaded. The Site Supervisor will make reasonable efforts to observe that vehicles are not loaded beyond their NYSDOT weight rating and that material is secured beneath the truck bed cover.

3.6 Material Transport Off-Site

Any non-hazardous material subject to removal will be handled, transported and disposed by a licensed hauler in accordance with applicable 6 NYCRR Part 360, General Provisions and 6 NYCRR Part 364 Waste Transporter Permits regulations and other applicable federal, state and local regulations. The trucking entrance will be determined prior to the initiation of the work. All trucks loaded with site material will exit the vicinity of the site using only approved truck routes. The routes will be the most appropriate route and take into account: (a) limiting transport through residential areas and sensitive sites; (b) the use of city mapped truck routes; (c) prohibiting off-site queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; (f) overall safety in transport, and; (g) community input, when necessary.

Trucks will be prohibited from excessive stopping and idling in the neighborhood outside of the site.

Egress points for truck and equipment transport from the site will be kept clean of dirt and other materials during remediation and development.

To the extent possible, queuing of trucks will be performed on-site in order to minimize off-site disturbance. Off-site queuing will be minimized.

Material transported by trucks exiting the site will be secured with tight-fitting covers. Loose-fitting canvas-type truck covers will be prohibited. If loads contain wet material capable of producing free liquid, truck liners will be used.

3.7 Material Off-Site Disposal

Waste characterization samples will be collected for soil intended for off-site disposal. Sampling and analytical methods, sampling frequency, analytical results, and QA/QC results will be reported in a Final Engineering Report (FER). Data available for excavated material to be disposed of at a given facility will be submitted to the disposal facility with suitable explanation prior to shipment and receipt.

Disposal facilities are to be provided at the time of bidding with a letter of acceptance issued by the registered facility. This facility will be reported to the NYSDEC Project Manager prior to off-site transport and disposal of excavated material. Material excavated and removed from the site will be handled, transported and disposed of in accordance with local, state (including 6 NYCRR Part 360) and federal regulations. Unregulated off-site management of materials from this site is prohibited.

The following documentation will be obtained and reported by the Site Supervisor for each disposal location used in this project to fully demonstrate and document that the disposal of material derived from the site conforms to applicable laws:

- A letter from the Contractor to the receiving facility describing the material to be disposed of and requesting formal written acceptance of the material. This letter will state that material to be disposed of is contaminated material generated at an environmental remediation site in New York State. The letter will provide the project identity and the name and phone number of the Site Supervisor. The letter will include, as an attachment, a summary of all chemical data for the material being transported (including waste characterization data).
- A letter from all receiving facilities stating it is in receipt of the correspondence (above) and is approved to accept the material.

These documents will be included in the Final Engineering Report:

- Non-hazardous historic fill material and contaminated soil transported off-site will be handled, at a minimum, as a solid waste per 6 NYCRR Part 360. Historic fill and contaminated soil excavated from the site are prohibited from being disposed of at Part 360 Registration Facilities (also known as Soil Recycling Facilities).

- The Final Engineering Report will include an accounting of all the destination of material removed from the site. Documentation associated with disposal will also include records and approvals for receipt of the material. This information will also be presented in a table to be included in the Final Engineering Report.
- A “Bill of Lading” system or equivalent will be used for the off-site movement of non-hazardous wastes and contaminated soils. Hazardous wastes derived from the site, if any, will be stored, transported, and disposed of in compliance with applicable local, state, and federal regulations.
- Appropriately licensed haulers, in compliance with applicable local, state, and federal regulations, will be used to transport the material removed from this Site.

3.8 Material Reuse On-Site

Soil removed during implementation of the remedy or removed for grading or other purposes will not be permitted to be reused or remain on-site. Material will be transported for off-site disposal as described in Sections 3.6 and 3.7.

3.9 Backfill/Restoration/Cover Soil from Off-Site Sources

All soil and other material proposed for import onto the Site will be approved by the Project Manager and will be in compliance with provisions in this WMMP prior to receipt at the Site.

All imported soil will meet the backfill and cover soil quality standards established in 6NYCRR 375-6.7(d). Based on an evaluation of the land use, protection of groundwater and protection of ecological resources criteria. Soils that meet ‘exempt’ fill requirements under 6 NYCRR Part 360, but do not meet backfill or cover soil objectives for the Site, will not be imported onto the Site without prior approval by NYSDEC. Solid waste will not be imported onto the Site.

Trucks entering the Site with imported soil will be securely covered with the appropriate covers. Imported soil will be stockpiled separately from excavated soil and other material and covered to prevent dust releases.

4.0 CONTINGENT EXCAVATION ACTIVITIES

The potential exists that unforeseen structures or impacts may be encountered during excavation activities that would require immediate attention. In order to address this potential, the following section provides contingency measures for addressing grossly impacted material encountered during soil disturbance activities.

4.1 Grossly-Impacted Soil Removal

Grossly-impacted material (i.e., areas of heavily stained and/or odorous soil observed during soil disturbance activities) identified as result of the above identified screening, will be excavated to the extent necessary to remove the impacted material. Grossly-impacted soil that cannot be removed due to impediments will be isolated for further investigation. Grossly impacted materials will be segregated, stockpiled and properly characterized prior to off-site disposal as detailed in Section 3.0.

5.0 COMMUNITY AIR MONITORING PLAN (CAMP)

Community air monitoring will be conducted as detailed in the Health & Safety Plan, in compliance with the NYSDOH Generic CAMP, both found in Attachment 1.

6.0 DUST, VAPOR AND NUISANCE ODOR CONTROL PLAN

Dust, odor, and nuisance control will be accomplished by the remediation contractor as described in this section.

6.1 Odor Control Plan

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. NYSDEC and NYSDOH will be notified of all odor events and of all other complaints about the project. Implementation of all odor controls, including the halt of work, will be the responsibility of the Site Supervisor, who is responsible for certifying the Final Engineering Report. Application of odor controls is the responsibility of the Contractor.

All necessary means will be employed to prevent on and off-site 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) using non-PFAS foams to cover exposed odorous soils. If odors develop and cannot be otherwise controlled, additional means to eliminate odor nuisances will include: (a) direct load-out of soils to trucks for off-site disposal; (b) use of chemical odorants in spray or misting systems; and, (c) use of staff to monitor odors in surrounding neighborhoods.

7.0 STORMWATER POLLUTION PREVENTION

Barriers and hay bale checks will be installed and inspected once a week and after every storm event. Silt fencing or hay bales will be installed around the entire perimeter of the construction area. The results of inspections will be recorded in a logbook and maintained at the Site and available for inspection by NYSDEC. All necessary repairs shall be made immediately.

Accumulated sediments will be removed as required to keep the barrier and hay bales functional. Any removal of sediment will be disposed off and hauled off with contaminant material.

All undercutting or erosion of the silt fence toe anchor shall be repaired immediately with appropriate backfill material.

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

8.0 CONFIRMATION SAMPLING

Soil confirmation samples will be collected to demonstrate that soil exceeding cleanup goals has been removed. Upon reaching the initial excavation limits, confirmation samples will be collected and analyzed in accordance with the Soil Confirmation Sampling Plan (Attachment 2). The results of the confirmation sampling will direct termination or continuation of the excavation. If additional excavation is conducted, it will be followed by additional round(s) of confirmation sampling. The Confirmation Sampling Plan provides guidance as to how confirmation sampling results will be interpreted to support a decision whether the excavation has met the performance standard or whether additional excavation is needed.

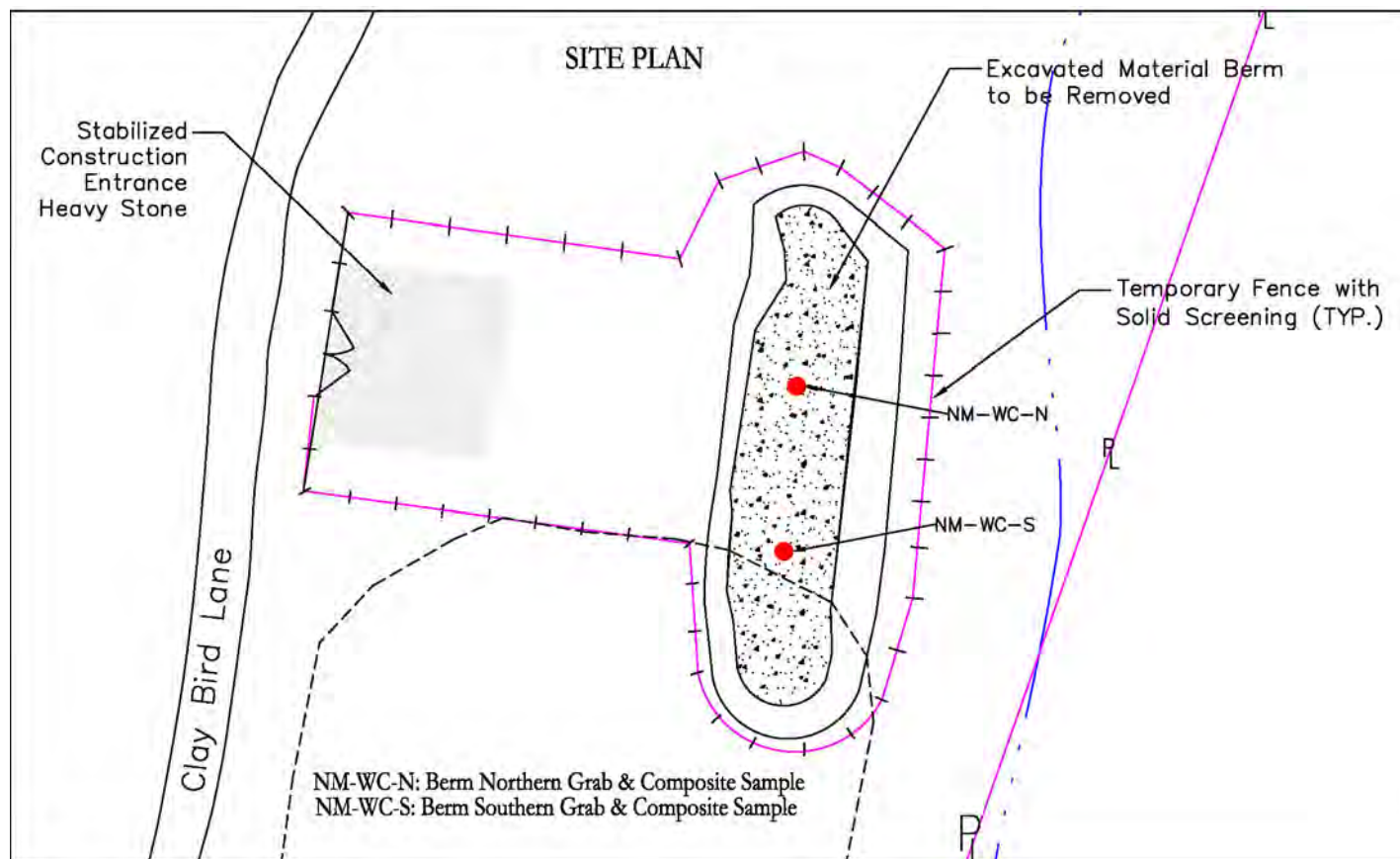
9.0 REPORTING

Daily reports will be prepared for the project file and available for review by the NYSDEC. The daily reports will include:

- An update of progress made during the reporting day
- Locations of work and quantities of material imported to and exported from the Site
- References to a site plan
- A summary of any and all complaints with relevant details (names, phone numbers, etc.)
- A summary of Air Monitoring Program findings, including exceedances
- An explanation of notable site conditions

Daily reports are not intended to be the mode of communication for notifying the NYSDEC of emergencies (e.g., accidents, spills, etc.), requests for changes to this WMMP, and/or other sensitive or time critical information; however, such conditions will also be included in the daily reports. If site conditions warrant, the Site Supervisor may request to change from daily to weekly reports that include the above information.

Figure1: Work Site Plan



Attachment 1 – Health & Safety Plan

Table of Contents

1.	Introduction	1
1.1	Applicable References.....	1
2.	Site Information and Scope of Work.....	1
2.1	Scope of Work Risk Assessment	2
3.	Roles and Responsibilities.....	3
3.1	Project Manager	3
3.2	Site Supervisor	3
3.3	Contractor/Employees	4
3.4	Subcontractors	4
4.	Training and Documentation.....	4
4.1	HASP/SITE Orientation	4
4.2	Daily Meetings and THA Review	5
4.3	Worker Training and Qualifications	5
4.3.1	OSHA 10 Hr./OSHA 30 Hr. Training.....	5
5.	Hazard Assessment and Control	5
5.1	SH&E Procedures	5
5.2	Project Risk Register/ Hazard Assessment.....	5
6.	Physical Hazard Assessment.....	6
6.1	Physical Hazards.....	6
7.	Chemical Hazard Assessment	6
7.1	Potential Chemical Hazards	6
7.2	Potential Exposure Pathways.....	6
7.2.1	Inhalation	6
7.2.2	Skin Contact.....	6
7.2.3	Ingestion.....	7
7.3	Decontamination.....	7
7.4	Air Monitoring	9
7.4.1	Real-Time Exposure Measurement/ Equipment.....	9
7.4.2	Health and Safety Action Levels.....	10
7.4.3	Monitoring Procedures.....	10
8.	Personal Protective Equipment	11
9.	Site Control	12
9.1	Site Work Zones	12
9.2	Site Control Map/ Diagram	12
10.	Personnel Acknowledgement and Disclaimer.....	13

Attachments

Attachment A: NYSDOH Generic Community Air Monitoring Plan

Executive Summary

The purpose of this Health and Safety Plan (HASP) is to address health and safety concerns related to the project for the removal and disposal activities of excavated construction and demolition material found at 121 Clay Bird Lane, Briarcliff Manor, New York. The specific roles, responsibilities, authority, and requirements as they pertain to the safety of workers and the scope of services are discussed herein. The document is intended to identify known potential hazards and facilitate communication and control measures to prevent injury or harm. Additionally, provisions to control the potential for environmental impact from these activities are included where applicable.

The primary physical hazards which may be encountered include:

- Traffic controls
- Operation of Heavy Equipment
- Heat and cold stress

The chemical hazards which may be encountered include:

- Lead (metal)
- Mercury (metal)
- alpha-Chlordane (pesticide)

All staff and contractors are bound by the provisions of this Health and Safety Plan and are required to participate in a preliminary project safety meeting to familiarize them with the anticipated hazards and respective onsite controls. The discussion will cover the entire Health and Safety Plan subject matter, putting emphasis on critical elements of the plan; such as the emergency response procedures, personal protective equipment, site control strategies, and monitoring requirements. In addition, daily tailgate safety meetings are typically held to discuss: the anticipated scope of work, required controls, identify new hazards and controls, incident reporting, review the results of inspections, any lessons learned or concerns from the previous day.

1. Introduction

This written Health and Safety Plan is designed to identify, evaluate, and control safety and health hazards, and to outline emergency response actions for project activities. Health and Safety Plans must be kept on site during work activities and made available to all workers including subcontractors and other site occupants for informational purposes.

The objective of this Health and Safety Plan is to assign responsibilities, establish personal protective standards and mandatory safety procedures, and provide for contingencies that may arise while performing work. This section of the Health and Safety Plan summarizes important safety, health and emergency procedures that apply.

1.1 Applicable References

This Health and Safety Plan conforms to the regulatory requirements and guidelines established in the following documents:

- Title 29, Part 1910 of the Code of Federal Regulations (29 CFR 1910), Occupational Safety and Health Standards (with special attention to Section 120, Hazardous Waste Operations and Emergency Response).
- 29 CFR 1926, Safety and Health Regulations for Construction.
- National Institute for Occupational Safety and Health/Occupational Safety and Hazards Administration/U.S. Coast Guard/U.S. Environmental Protection Agency, Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities, Publication No. 85-115, 1985.

Project Assumptions

- **This site is controlled by the Town of Mount Pleasant.**
- **No confined spaces will be entered on this project.**
- **No excavations will be entered.**
- **Work will be performed during daylight hours.**
- **This site is part of a larger parcel that is utilized by tenants such as the Mount Pleasant Sportsman Club, Town of Mount Pleasant Highway and Police Departments. These tenants utilize the single lane driveway that adjoins this site.**

2. Site Information and Scope of Work

Site Description

The Clay Bird Lane site is located at 121 Clay Bird Lane, Briarcliff Manor, New York. The project site is home to the Town's Mulch Processing Facility, Mount Pleasant Sportsman Club, cell tower with carriers and the Mount Pleasant PD Training Facility. The site borders the Taconic State Parkway to the west, residential parcels to the north & south and rural convention center to the east.

Site Background/History

The nearly 34 acre Clay Bird Lane site is owned by the Town of Mount Pleasant. There is a mulch recycling facility within this site that has been in operation for many years. The Town had permitted a contractor to use and operate the mulch recycling facility in an effort to reduce costs to the town. This contractor was under the direction to only process the town's tree and larger brush material. Under the contractors' operations of the site, this contractor created a berm to act as protection measure from the site to adjoining property/wetland area. As the contractor's unauthorized actions of hauling in 9,000 yards of excavated material to create topsoil product to sell (action not permitted by NYSDEC) and subsequent violation issued by NYSDEC, terminated the use of the site for the contractor. This action resulted in legal proceedings which are still underway. At the present time the Town is responsible for removal of the imported material and the berm. As such, the town conducted soil sampling as per NYSDEC Part 375 regulations and found the material used within the berm to exceed the unrestricted use soil cleanup standards with higher levels for lead with slightly higher levels for alpha-Chlordane pesticide and mercury.

Previous Investigations

Table 2.1: Previous Investigation Data

Contaminants	Result (mg/kg)	Part 375 UU SCO's
Lead	854	63
Mercury	0.191	0.183
alpha-Chlordane	0.0144	0.014

Scope Of Work

This project involves the use of heavy equipment, transport vehicles and related equipment for the removal and disposal of up to 1,500 cubic feet of commercial fill to a registered land fill facility authorized to take in this type of fill. The Contractor will be required to install soil and erosion control measures, perimeter temporary fencing with screening, dust control, containment of area impacts from the operations, complete manifests and perform final cleanup of the work area.

2.1 Scope of Work Risk Assessment

This project has been identified as a Medium Risk project due to the intrusive work, use of heavy equipment, frequent exposure and/or moderate hazards with exposure to metals and pesticides.

The following tasks/ hazards may be encountered on projects performed under this contract and automatically trigger high risk ranking: hazardous substances or materials, work in controlled area, heavy equipment use and uneven terrain.

3. Roles and Responsibilities

The Project Manager (PM) is ultimately responsible for the development of the Health and Safety Plan, establishing a budget to complete the project, oversee the Site Inspector (SI), certify work output for invoices, payments for the contractor and consulting inspectors/engineers on the project. The Project Manager is also responsible for ensuring that the plan is implemented, that appropriate documentation is generated, that records are maintained and coordinating compliance with NYSDEC. The Site Inspector is responsible to oversee implementation of the Health and Safety Plan in the field, work is conducted safely as per Health and Safety Plan, work is complete as per plan, collection of all manifests or other documentation, conducting soil sampling as required, review of invoices and other measures for the successful completion of the project. All project team members are responsible for reviewing and abiding by site specific Health and Safety Plans, performing daily (or more frequent) task hazard assessments, stopping work when necessary to correct unsafe behaviors or conditions, and reporting incidents promptly to the PM.

3.1 Project Manager

The Project Manager has overall management authority and responsibility for all site operations, including safety. The Project Manager will provide the site supervisor with work plans, staff, and budgetary resources, which are appropriate to meet the safety needs of the project operations. Some of the Project Manager's specific responsibilities include:

- Project start-up activities require appropriate SH&E planning prior to work commencing, including identification of hazards, associated risk, and appropriate controls for each task and operation found in the workscope.
- Verifying those personnel, to whom site specific Health and Safety Plans applies, including any subcontractors, have received a copy of it, with ample opportunity to review the document and to ask questions.
- Providing adequate authority and resources to the Site Inspector to allow for the successful implementation of all necessary SH&E Procedures.
- Maintaining regular communications with the Site Inspector.
- Conducting Safety System Auditing by way of Management Site Visits and/or Project Manager Self-Assessments on a regular basis.
- Approving amendments to the Health and Safety Plan (in conjunction with the Site Inspector).
- Coordinating activities with the client as needed to ensure the safe implementation of site-specific Health and Safety Plans.

3.2 Site Supervisor

The Site Supervisor has the overall responsibility and authority to direct work operations at the job site according to the provided work plans and HASP. The Project Manager may act as the Site Supervisor while on site. The Site Supervisor's responsibilities include:

- Working with the Contractor to complete the project as per the work plan while adhering to the Health and Safety Plans.
- Discussing safety issues with the Project Manager and field personnel as become apparent.
- Assisting with the implementation of site-specific Health and Safety Plans and ensuring compliance.
- Conduct inspections of the site for compliance with site specific Health and Safety Plans and applicable SH&E Procedures.
- Verifying that all operations are in compliance with the requirements of site-specific Health and Safety Plans and halting any activity that poses a potential hazard to personnel, property, or the environment.
- Temporarily suspending individuals from field activities for infractions against the Health and Safety Plans pending consideration by the Project Manager.
- Conduct soil sampling of stabilized excavated ground to determine clean break which would allow final restoration work to be completed.

3.3 Contractor/Employees

Responsibilities of contractor and employees associated with this project include, but are not limited to:

- Understanding and abiding by the SH&E Procedures specified in the Health and Safety Plan and other applicable safety policies, and clarifying those areas where understanding is incomplete.
- Providing feedback to SH&E management for continuous improvement relating to omissions and modifications in the Health and Safety Plan or other safety policies and procedures.
- Notifying the Site Inspector of unsafe conditions and acts.
- Stopping work if there is doubt about how to safely perform a task or if unsafe acts or conditions are observed (including subcontractors or team contractors).
- Speaking up and refusing to work on any site or operation where the SH&E procedures specified in site specific Health and Safety Plans or other safety policies are not being followed.
- Contacting the Site Supervisor or Site Safety Officer or the SH&E Manager at any time to discuss potential concerns and update the THA in the field to reflect the modifications

3.4 Subcontractors

Each subcontractor is responsible for assigning specific work tasks to their employees. Each subcontractor's management will provide qualified employees and allocate sufficient time, materials, and equipment to safely complete assigned tasks. In particular, each subcontractor is responsible for equipping its personnel with any required personnel protective equipment (PPE) and all required training.

The Town considers each subcontractor to be an expert in all aspects of the work operations for which they are tasked to provide, and each subcontractor is responsible for compliance with the regulatory requirements that pertain to those services as well as all other requirements applicable to their work. Each subcontractor is expected to perform its operations in accordance with its own unique safety policies and procedures, in order to ensure that hazards associated with the performance of the work activities are properly controlled. Copies of any required safety documentation for a subcontractor's work activities will be provided to the Town for review prior to the start of on-site activities.

Hazards not listed in site specific Health and Safety Plans but known to any subcontractor, or known to be associated with a subcontractor's services, must be identified and addressed to the Project Manager or the Site Inspector prior to beginning work operations. The Site Inspector or authorized representative has the authority to halt any subcontractor operations, and to remove any subcontractor or subcontractor employee from the site for failure to comply with established health and safety procedures or for operating in an unsafe manner.

4. Training and Documentation

The following sections describe the standard practices or programs that will be established to prepare employees to perform work safely and consistent with any policy and Procedures.

4.1 Health and Safety Plan Orientation

The Project Manager shall conduct a project/site-specific Health and Safety Plan orientation prior to the start of field operations, with support as needed by the Site Inspector. This meeting will involve representatives from all organizations with a direct contractual relationship with the Town on the job site. Participants will then sign the Health and Safety Plan Personnel Acknowledgement register at the end of the Health and Safety Plan.

4.2 Daily Meetings and THA Review

The Site Inspector or designee shall facilitate any required meeting to discuss the specific requirements of site- specific Health and Safety Plans and review the applicable THAs prior to the commencement of daily project activities. Attendance at a daily meeting is mandatory for all employees and subcontractors at the site.

4.3 Worker Training and Qualifications

All personnel at this site must be qualified and experienced in the tasks they are assigned.

4.3.1 OSHA 10 Hr./OSHA 30 Hr. Training

OSHA 10/30 training is required for projects with construction or construction-like hazard, including, work where we, our client, or another contractor are presently building, removing, or disassembling structures or digging excavations of any size by mechanical means. This includes projects of any work where our employees are exposed to construction site hazards. "Construction-like" hazards exist on sites where the focus is NOT construction/demolition, but where our work scope includes use of heavy machinery movement, work at heights, confined space, hot work, lifting/hoisting loads, and/or ground breaking (includes drill rig, direct push and vac truck use). If these hazards exist, OSHA 10 hr. training is required for field staff.

OSHA 30 hr. training is required for supervisors. The term "supervisor" has many different meanings. The requirement for supervisors to complete an OSHA 30 hr. construction course will be based on field supervisory roles and responsibilities, not administrative supervision roles. Field supervisors required to take the OSHA 30 construction course are defined as those individuals who provide work direction and leadership directly field personnel and/or our subcontractors for construction/demolition activities or tasks that have construction-like hazards. These supervisors must be knowledgeable of construction hazards and controls because they are responsible for:

- Field implementation of a construction/demolition scope of work
- Controlling performance on the job site
- Evaluating and controlling hazards & preventing site safety risks
- Intervening to prevent unsafe actions or conditions of employees, clients, and subcontractors related to construction/demolition hazard.

5. Hazard Assessment and Control

A hazard assessment and control plan are prepared that incorporates both qualitative and quantitative methods to identify hazards and the degree to which they may impact employees and operations.

5.1 Safety Health & Environment Procedures

All SH&E procedures for field activity reference and application are provided and included in site specific Health and Safety Plans. The applicable field procedures checklist is in the Physical Hazards section below.

5.2 Project Risk Register/ Hazard Assessment

Project start-up activities require appropriate SH&E planning prior to work commencing, including identification of hazardous tasks required to complete the Scope of Work (SOW). A Project Risk Register/Hazard Assessment shall be developed to guide work.

6. Physical Hazard Assessment

6.1 Physical Hazards

A physical hazard is a hazard that threatens the physical safety of an individual; contact with the hazard typically results in an injury. Procedures are likely to be encountered during work under this contract and therefore included in **Attachment C** for implementation and reference.

7. Chemical Hazard Assessment

7.1 Potential Chemical Hazards

The exposure to potential chemical hazards will be determined on a site by site basis. However, below is a list of potential chemical hazards that may be encountered during work under this contract.

Summary of Hazardous Properties of Contaminant Exposure Hazards

PEL.....Permissible Exposure Limits

TLV: Threshold Limit Values

Chemical Name	Media	Primary Routes of Exposure	PEL	TLV	IP electron volts (eV)
Metals					
Chromium III	Soil, GW, Vapor, etc.	Dermal	0.5 mg/m ³	0.5 mg/m ³	n/a
Chromium VI	Soil, GW, Vapor, etc.	Dermal	0.005 mg/m ³	0.005 mg/m ³	n/a
Lead	Soil, GW, Vapor, etc.	Dermal	0.05 mg/m ³	0.05 mg/m ³	n/a
Mercury	Soil, GW, Vapor, etc.	Dermal	0.1 mg/m ³	0.025 mg/m ³	n/a
Pesticides					
alpha-Chlordane ¹	Soil, GW, Vapor, etc.	Dermal	0.5 mg/m ³	0.5 mg/m ³	n/a
Common Site COCs					
Dust	Soil, GW, Vapor, etc.	Inhalation	15 mg/m ³	10 mg/m ³	n/a

1. Exposure limits based on Chlordane. No PELs are set for alpha or gamma chlordane.

7.2 Potential Exposure Pathways

Occupational exposure to chemical hazards associated with the work activities could potentially occur by two primary routes (inhalation and skin contact) and one indirect route (incidental ingestion).

7.2.1 Inhalation

The primary risks associated with the scope of work pertain to potential exposure to airborne contaminants. Constituents that potentially pose an occupational concern to employees by the inhalation route are carbon monoxide, dust and lead particles. Air monitoring will be performed within the employee breathing zone to assess the need to implement appropriate control measures or stop work. In addition, air monitoring will be performed at the source to assess potential explosion hazards.

7.2.2 Skin Contact

Personnel handling residual product or waste and associated equipment may be exposed to chemical hazards by skin contact or adsorption. However, exposure is expected to be limited since workers will be required to wear appropriate PPE (i.e. appropriate work gloves, body clothing, and/or face shield).

7.2.3 Ingestion

Personnel handling residual product or waste and associated equipment, including project hazardous materials, may be exposed by incidental ingestion. Typically, this exposure occurs if proper PPE was not used or personal hygiene was not practiced. Personal protection against exposure via ingestion can be accomplished by performance of proper decontamination procedures when exiting contaminated work areas as well as using the correct PPE.

7.3 Decontamination

All possible and necessary steps shall be taken to reduce or minimize contact with chemicals and contaminated/impacted materials while performing field activities. Decontamination steps are as follows:

- All persons and equipment entering the Work Zone shall be considered contaminated, and thus, must be properly decontaminated prior to exiting to clean areas of the site.
- Avoid reactions between the solutions and contaminated materials. Review the applicable SDS.
- All contaminated PPE and decontamination materials shall be contained, stored and disposed of in accordance with site-specific requirements determined by site management.
- Use caution while working around decontamination stations, including the decontamination pad, which may be a slip or trip hazard.
- Use disposable equipment when possible and practical.
- All employees performing equipment decontamination shall wear the appropriate PPE to protect against exposure to contaminated materials. The level of PPE may be equivalent to the level of PPE required in the Work Zone. Other PPE may include splash protection, such as face-shields and splash suits, and knee protectors.
- All decontaminated equipment shall be visually inspected for contamination prior to leaving the contaminated work zone.

Decontamination Procedures & Equipment		
Procedure		Equipment Needed
Remove all equipment, sample containers, and notes to the Contaminated Work Zone. Obtain decontamination solutions and decontaminate the tools (shovels, auger flights, etc.) by brushing them under a water rinse. A high-pressure steam cleaner also may be used for decontamination. All waste and spent decontamination solutions will be properly contained. Remove disposable booties, or scrub boots with a stiff bristle brush and water, when necessary. Washtubs and chairs will be provided. Remove outer gloves (and boot covers, if used). Remove Tyvek® coveralls; discard in provided container. Remove hardhat and eye protection. Remove respirator. Remove inner gloves. Wash hands and face. The decontamination area will be covered with plastic sheeting that will be replaced when torn or heavily soiled and at the end of each shift.		Alconox solution Deionized water Brushes Plastic sheeting
Decontamination Procedures & Equipment		
Type Equipment	Decontamination Solution	Procedure
Respirator	Alconox solution and deionized water	Washing: Disassemble and wash with an Alconox solution in deionized water. A stiff bristle (not wire) brush may be used. Rinsing: Rinse in deionized water to remove all traces of detergent. This is important to prevent dermatitis. Disinfecting: Thoroughly rinse or immerse in a sanitizer provided by the manufacturer. Final Rinsing: Rinse thoroughly in clean water to remove all traces of disinfectant. Drying: Drain and dry by hanging by the straps from racks or by towel drying with clean, soft cloths or paper towels.
Water quality meter, oil/water interface probe, down-hole water		Washing: Disassemble and wash with an Alconox solution in deionized water.
Sampling pumps, reusable sampling tools/equipment		Rinsing: Rinse in deionized water to removal all traces of detergent.
Drilling Equipment/Tools	High-pressure steam cleaner	Apply steam cleaner to used equipment/tools
Waste Handling for Decontamination		
Waste Streams/Products		Disposal Procedures
Wash water	Spent plastic sheets/ consumables from decontamination procedures	Containerize in 55-gallon DOT drums, and stage drums in temporary location pending shipment off site for treatment/ disposal.
Used PPE		
Spent plastic sheets/ consumables from decontamination procedures		

7.4 Air Monitoring

Monitoring shall be performed within the work area on site in order to detect the presence and relative levels of toxic substances. The data collected throughout monitoring shall be used to determine the appropriate levels of PPE. Monitoring shall be in accordance with Exposure Monitoring Procedure and as specified in the work permit and/or THA for the tasks. Key elements of the procedure include:

- Calibration of monitoring equipment and/or daily bump tests to verify calibrations and confirm alarm function.
- Personal monitoring and result evaluation must be directed by a Certified Industrial Hygienist or Certified Safety Professional.

All monitoring data, including background readings, will be logged in a field logbook and incorporated into the project files. See the New York State Department of Health's (NYSDOH's) Generic Community Air Monitoring Plan (**Attachment B**) for additional information.

7.4.1 Real-Time Exposure Measurement/ Equipment

Monitoring shall be performed within the work area on site in order to detect the presence and relative levels of toxic substances. The data collected throughout monitoring shall be used to determine the appropriate levels of PPE. Monitoring shall be conducted as specified in the work permit and THA as work is performed. All instrumentation needs to be rated intrinsically safe to prevent fire or explosion.

Instrument	Manufacturer/Model	Substances Detected
Photo Ionization Detector (PID)	RAE Systems mini-RAE Photovac Microtip (min. 10.6 eV bulb)	• Petroleum hydrocarbons • Organic Solvents
Multi or 4 Gas Detectors	RAE Systems Multi-RAE	• Oxygen • Carbon Monoxide
Particulate Monitor	MIE Model PDM-3 mini-RAM	• Aerosols, mist, dust, and fumes

7.4.2 Health and Safety Action Levels

An action level is a point at which increased protection is required due to the concentration of contaminants in the work area or other environmental conditions. The concentration level (above background level) and the ability of the PPE to protect against that specific contaminant determine each action level. The action levels are based on concentrations in the breathing zone.

If ambient levels are measured which exceed the action levels in areas accessible to unprotected personnel, necessary control measures (barricades, warning signs, and mitigation actions to limit, etc.) must be implemented prior to commencing activities at the specific work area.

Personnel should also be able to upgrade or downgrade their level of protection with the concurrence of Site Supervisor or Site Safety Officer or the Safety Manager.

- Reasons to Upgrade:**
- Known or suspected presence of dermal hazards;
 - Occurrence or likely occurrence of gas, vapor, or dust emission; or
 - Change in work task that will increase the exposure or potential exposure to hazardous materials.
- Reasons to Downgrade:**
- New information indicating that the situation is less hazardous than was originally suspected;
 - Change in site conditions that decrease the potential hazard; or
 - Change in work task that will reduce exposure to hazardous materials.

7.4.3 Monitoring Procedures

The monitoring procedures shown below are general guidelines for sampling activities. A reading in excess of action level outlined below will require additional ventilation for 30 minutes, followed by re-monitoring.

Monitoring Procedures and Action Levels

Parameter	Zone Location and Monitoring Interval	Response Level	Response Activity
Volatile Organic Compounds (VOCs) and volatile hydrocarbons (total by PID)	Breathing zone, continuously during tasks where exposure to VOCs and volatile hydrocarbons is possible	< 5 ppm	Continue monitoring, may continue work in required PPE
		5- 25 ppm (sustained for 5 minutes)	STOP WORK and notify PM. Investigate the cause of elevated VOC measurements and identify measures to reduce concentrations (cover impacted soils, ventilation, etc.). Work activities shall only continue once levels have decreased to or below 5 units above background. If levels continue above 5 units, only individuals who are medically qualified to wear respiratory protection are permitted to continue work activities with Project Manager approval. Don Level C PPE (organic vapor respirator cartridges), continue monitoring, and initiate continuous air monitoring for benzene.
		> 25 ppm (sustained for 5 minutes)	Cease work, exit, and contact the Site Safety Officer, Site Supervisor, and Project Manager.
Benzene (by PID with benzene-specific separation tube)	Breathing zone, continuously where indicated by VOC readings	> 0.25 ppm	Cease work, exit the area, and contact the Site Safety Officer, Site Supervisor, and Project Manager.
Hydrogen Sulfide (multi-gas detector or individual H ₂ S meter)	Breathing zone, continuously during tasks where exposure to hydrogen sulfide is possible	< 5 ppm	Continue work activities. Contact the Site Safety Officer to investigate the potential for contributing factors.
		> 5 ppm	Cease work, exit the area or confined space, and contact the Site Safety Officer, Site Supervisor and Project Manager.
Combustible Gas (multi-gas meter or individual combustible gas indicator, CGI)	Breathing zone or in the immediate work area continuously during tasks where explosive atmospheres are possible	> 5% of LEL	Cease work, exit, and contact the Site Safety Officer, Site Supervisor, and Project Manager.
Oxygen (O₂) (multi-gas detector or individual O ₂ meter)	Breathing zone, continuously during tasks where oxygen enriched or deficient atmospheres are possible	< 19.5 % O ₂	Cease work deficient atmosphere), exit the area or confined space, and contact the Site Safety Officer, Site Supervisor, and Project Manager.
		> 23.5 % O ₂	Cease work enriched atmosphere), exit the area or confined space, and contact the Site Safety Officer, Site Supervisor, and Project Manager.

Monitoring Procedures and Action Levels cont.

Parameter	Zone Location and Monitoring Interval	Response Level	Response Activity
Carbon Monoxide (CO) (multi-gas detector or individual CO meter)	Breathing zone, continuously during tasks where exposure to CO is possible	< 10 ppm	Continue work in Level D and continue monitoring
		> 10 ppm	Cease work, exit the area or confined space, and contact the Site Safety Officer, Site Supervisor, and Project Manager.
Dust not otherwise classified (total by aerosol monitor)	Breathing zone every 30 minutes during field activities where exposure to excessive dusts are possible	< 5 mg/m ³	Continue work in Level D and continue monitoring
		> 5 mg/m ³	Upgrade to Level C (P100 respirator cartridges), implement dust suppression measures; contact the Site Safety Officer & Site Supervisor.
		> 10 mg/m ³	Cease activities, implement more effective dust suppression measures; contact the Site Safety Officer & Site Supervisor.
Dust not otherwise classified (total by aerosol monitor)	Edge of Exclusion Zone, every 30 minutes during excavation activities	< 5 mg/m ³	Continue work in required PPE, monitor air, and implement engineering controls
		> 5 mg/m ³	Cease activities and contact the Site Safety Officer & Site Supervisor.

8. Personal Protective Equipment

PPE is considered the last line of defense in hazard control. PPE is meant to protect workers when all other methods (elimination, substitution, engineering, and administrative) have been exhausted. All employees must be trained in the proper use and maintenance of PPE.

A PPE assessment can be performed to help determine PPE requirements. PPE upgrades for individual tasks or steps of a task are to be identified in the appropriate THA(s).

Minimum Required PPE:

- Hard hat
- Safety glasses w/ side shields (may be clear or shaded)
- Safety toe work boots
- Long pants and shirts with sleeves (short or long- cover shoulders no tank or muscle shirtstyles)

List of PPE Required on Site:

1. Face/Eyes:
 - Spoggles (Safety Glasses with Foam Liner for Dust Protection)
2. Head/Ears:
 - Earplugs, &
 - Over-ear Hearing Protection
3. Hands:
 - Leather Cut, Abrasion and Puncture Resident, &
 - Neoprene Butyl Rubber Gloves
4. Legs/Feet:
 - Rubber Boots &
 - Waders
5. Body:
 - Sunscreen,
 - Insect Repellent Permethrin Applied to Clothing,
 - Long-sleeved Shirt,
 - High-visibility Vest,
 - Disposable Coveralls,
 - Disposable booties, &
 - Respirator w/organic vapor/HEPA cartridge

9. Site Control

The purpose of site control is to protect the public from inadvertently coming into contact with site hazards and to protect AECOM employees being impacted by hazards. This section details the equipment and actions needed to promote optimal site control.

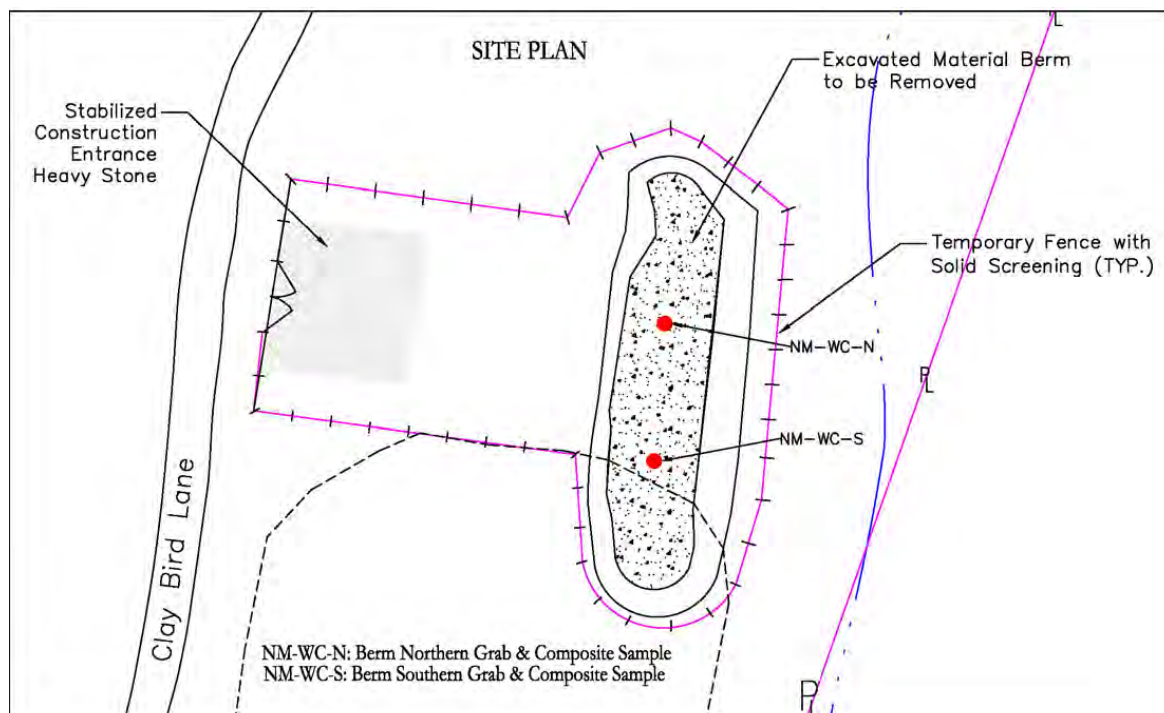
9.1 Site Work Zones

Site layout and site control need to be coordinated achieve a productive work environment and efficient work process while minimizing exposure of employees and the public to hazards associated with the work. Consider the following items when planning the site layout and controls:

- “Line of Fire” hazards- overhead utilities, falling/ tipping equipment, release of energy/ pressure, flying debris,
- Noise, dust, odor suppression
- Contamination containment and decontamination area layout
- Traffic control for site vehicles/ equipment (public traffic control requires Traffic control Plan)
- Restricted access for areas requiring special training, skills, or certifications
- Restriction of work near railroads
- Presence or creation of excavations
- Loading/unloading areas
- Portable restrooms
- Dumpsters and bins
- Equipment lay down
- Heavy equipment parking
- Overnight safety and security needs

The site controls will be established on a location by location basis.

9.2 Site Plan/ Diagram



10. Personnel Acknowledgement and Disclaimer

By signing below, the undersigned acknowledges that he/she has reviewed the Health and Safety Plan for the Clay Bird Lane project performed for the Town of Mount Pleasant. The undersigned also acknowledges that he/she has been instructed in the contents of this document and understands the information pertaining to the specified work and will comply with the provisions contained therein. The employee understands that they are NOT to perform any work that they have not been adequately trained for and that they are to stop work if it is unsafe to proceed. Finally, the employee understands to notify the Site Inspector for any incident, ***including ANY injury even if no first aid or medical treatment is required.***

Print Name	Signature	Organization	Date

Attachment **A**

NYSDOH Generic Community
Air Monitoring Plan.

APPENDIX 1A

NYSDOH GENERIC CAMP

Appendix 1A
New York State Department of Health
Generic Community Air Monitoring Plan

Overview

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical- specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for VOCs and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate DEC/NYSDOH staff.

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required 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 might reasonably 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. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required 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.

VOC Monitoring, Response Levels, and Actions

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

1. 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 must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

2. 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 must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can 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.

3. If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

4. All 15-minute readings must be recorded and be available for State (DEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

Particulate Monitoring, Response Levels, and Actions

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

1. 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 must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed $150 \text{ mcg}/\text{m}^3$ above the upwind level and provided that no visible dust is migrating from the work area.

2. If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than $150 \text{ mcg}/\text{m}^3$ above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within $150 \text{ mcg}/\text{m}^3$ of the upwind level and in preventing visible dust migration.

3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

December 2009

Appendix 1B Fugitive Dust and Particulate Monitoring

A program for suppressing fugitive dust and particulate matter monitoring at hazardous waste sites is a responsibility on the remedial party performing the work. These procedures must be incorporated into appropriate intrusive work plans. The following fugitive dust suppression and particulate monitoring program should be employed at sites during construction and other intrusive activities which warrant its use:

1. Reasonable fugitive dust suppression techniques must be employed during all site activities which may generate fugitive dust.
2. Particulate monitoring must be employed during the handling of waste or contaminated soil or when activities on site may generate fugitive dust from exposed waste or contaminated soil. Remedial activities may also include the excavation, grading, or placement of clean fill. These control measures should not be considered necessary for these activities.
3. Particulate monitoring must be performed using real-time particulate monitors and shall monitor particulate matter less than ten microns (PM₁₀) with the following minimum performance standards:
 - (a) Objects to be measured: Dust, mists or aerosols;
 - (b) Measurement Ranges: 0.001 to 400 mg/m³ (1 to 400,000 µg/m³);
 - (c) Precision (2-sigma) at constant temperature: +/- 10 µg/m³ for one second averaging; and +/- 1.5 g/m³ for sixty second averaging;
 - (d) Accuracy: +/- 5% of reading +/- precision (Referred to gravimetric calibration with SAE fine test dust (mm_d= 2 to 3 µm, g_m= 2.5, as aerosolized);
 - (e) Resolution: 0.1% of reading or 1g/m³, whichever is larger;
 - (f) Particle Size Range of Maximum Response: 0.1-10;
 - (g) Total Number of Data Points in Memory: 10,000;
 - (h) Logged Data: Each data point with average concentration, time/date and data point number
 - (i) Run Summary: overall average, maximum concentrations, time/date of maximum, total number of logged points, start time/date, total elapsed time (run duration), STEL concentration and time/date occurrence, averaging (logging) period, calibration factor, and tag number;
 - (j) Alarm Averaging Time (user selectable): real-time (1-60 seconds) or STEL (15 minutes), alarms required;
 - (k) Operating Time: 48 hours (fully charged NiCd battery); continuously with charger;
 - (l) Operating Temperature: -10 to 50° C (14 to 122° F);
 - (m) Particulate levels will be monitored upwind and immediately downwind at the working site and integrated over a period not to exceed 15 minutes.
4. In order to ensure the validity of the fugitive dust measurements performed, there must be appropriate Quality Assurance/Quality Control (QA/QC). It is the responsibility of the remedial party to adequately supplement QA/QC Plans to include the following critical features: periodic instrument calibration, operator training, daily instrument performance (span) checks, and a record keeping plan.
5. The action level will be established at 150 µg/m³ (15 minutes average). While conservative,

this short-term interval will provide a real-time assessment of on-site air quality to assure both health and safety. If particulate levels are detected in excess of 150 ug/m³, the upwind background level must be confirmed immediately. If the working site particulate measurement is greater than 100 ug/m³ above the background level, additional dust suppression techniques must be implemented to reduce the generation of fugitive dust and corrective action taken to protect site personnel and reduce the potential for contaminant migration. Corrective measures may include increasing the level of personal protection for on-site personnel and implementing additional dust suppression techniques (see paragraph 7). Should the action level of 150 ug/m³ continue to be exceeded work must stop and DER must be notified as provided in the site design or remedial work plan. The notification shall include a description of the control measures implemented to prevent further exceedances.

6. It must be recognized that the generation of dust from waste or contaminated soil that migrates off-site, has the potential for transporting contaminants off-site. There may be situations when dust is being generated and leaving the site and the monitoring equipment does not measure PM₁₀ at or above the action level. Since this situation has the potential to allow for the migration of contaminants off-site, it is unacceptable. While it is not practical to quantify total suspended particulates on a real-time basis, it is appropriate to rely on visual observation. If dust is observed leaving the working site, additional dust suppression techniques must be employed. Activities that have a high dusting potential--such as solidification and treatment involving materials like kiln dust and lime--will require the need for special measures to be considered.

7. The following techniques have been shown to be effective for the controlling of the generation and migration of dust during construction activities:

- (a) Applying water on haul roads;
- (b) Wetting equipment and excavation faces;
- (c) Spraying water on buckets during excavation and dumping;
- (d) Hauling materials in properly tarped or watertight containers;
- (e) Restricting vehicle speeds to 10 mph;
- (f) Covering excavated areas and material after excavation activity ceases; and
- (g) Reducing the excavation size and/or number of excavations.

Experience has shown that the chance of exceeding the 150ug/m³ action level is remote when the above-mentioned techniques are used. When techniques involving water application are used, care must be taken not to use excess water, which can result in unacceptably wet conditions. Using atomizing sprays will prevent overly wet conditions, conserve water, and provide an effective means of suppressing the fugitive dust.

8. The evaluation of weather conditions is necessary for proper fugitive dust control. When extreme wind conditions make dust control ineffective, as a last resort remedial actions may need to be suspended. There may be situations that require fugitive dust suppression and particulate monitoring requirements with action levels more stringent than those provided above. Under some circumstances, the contaminant concentration and/or toxicity may require additional monitoring to protect site personnel and the public. Additional integrated sampling and chemical analysis of the dust may also be in order. This must be evaluated when a health and safety plan is developed and when appropriate suppression and monitoring requirements are established for protection of health and the environment.

Attachment 2 – Post-Excavation Sampling Plan

Post-Excavation Confirmatory Sampling Plan

I. Purpose and Scope

This *Post-Excavation Confirmatory Sampling Plan* identifies the anticipated approach for performing post-excavation sampling in areas where soil excavation is performed as a component of the remedial approach. For purposes of this Plan, confirmation soil sampling is defined to mean soil sampling conducted at the extent of the excavation to verify that soil remedial goals identified in the work plan are achieved. Confirmation soil sampling is anticipated to be conducted on excavation sidewalls and at the bottom of the excavation.

In general, post-excavation confirmatory samples will be collected from the bottom and/or sidewalls of each excavation to confirm that soils impacted above specified cleanup levels have been removed following excavation to targeted limits. If necessary based on the initial samples, further excavation and confirmatory sampling will be conducted until cleanup levels are achieved. This approach is further discussed below.

II. Technical Approach - General

The approach specified herein is applicable to areas where excavation is performed to remove soils/material exceeding specified cleanup levels established by NYSDEC Part 375.

As indicated above, confirmatory sampling will include sidewall sampling and/or bottom sampling. The need for each type of sampling will depend on the nature of the pre-excavation dataset, the basis for the cleanup level that triggered the excavation, and the depth of removal.

These factors, and their implication on the nature of the sidewall and bottom sampling, along with the approach for identifying the specific constituents to be analyzed for in post-excavation confirmatory samples is also discussed below.

A. **Sidewall Sampling**

To the extent possible, existing samples will be used to delineate an excavation area if:

- (1) the location of the sample is such that it would serve as an excavation boundary,
- (2) the analyzed constituents in the sample include the constituents that initially triggered the excavation, and
- (3) the target constituents are below cleanup levels.

Soil confirmation samples are planned to be collected from the perimeter of the excavation following discrete locations but will be subject to change depending on the configuration of the final excavation:

- where excavation sidewalls are less than or equal to (2) two feet below ground surface, samples shall be taken along the mid-point of each excavation sidewall (where the excavation sidewall lengths exceed 40 lineal feet, samples will be collected at a spacing of approximately every 40 linear feet along the length of the excavation sidewalls), and
- where excavation sidewalls are greater than or equal to two feet high below grade surface, floor confirmation samples will also be collected, along with mid-point samples, every 40 linear feet where the sidewalls and floor of the excavation meet.

The perimeter sidewall samples will be located in a manner that encompasses the original sample location that triggered removal in each specific area. Data obtained from bottom verification samples will be used to confirm the vertical extent of removal.

Post-Excavation Confirmatory Sampling Plan

B. Bottom Sampling

The need for post-excavation bottom sampling will be determined based on the type of regulatory exceedance that prompted the excavation.

Soil confirmation samples are planned to be collected from the following discrete locations but will be subject to change depending on the configuration of the final excavation:

- at (2) two locations in the bottom of the excavation area was performed to a depth greater than 2 feet below ground surface in areas where the highest concentrations of lead have been identified or as specified by Site Supervisor, and
- at (4) four locations in the bottom of the excavation area was performed less than or equal to a depth of 2 feet below ground surface in areas where the highest concentrations of lead have been identified or as specified by Site Supervisor.

C. Laboratory Analyses

Confirmation soil samples will be submitted to a state-certified analytical laboratory for analysis in accordance with U.S. Environmental Protection Agency (EPA) analytical methods. The soil samples will be analyzed using the following methods: Chromium (EPA7196A), Cyanide (EPA 9014/9010C), Herbicides (EPA 8151A), Metals (varies), Pesticides (EPA 8081B), Polychlorinated Biphenyls-PCB (EPA 8082A), Semi-Volatiles (EPA 8270D) and Volatile Organics (EPA 8260C).

For each area, confirmatory sampling will focus on the specific constituent(s) that triggered the need for excavation in that area.

D. Soil Confirmation Sample Labeling & Chain-Of-Custody

This section describes standard operating procedures for sample chain-of-custody. The purpose of these procedures is to assure that the integrity of the soil samples are maintained during their collection, transportation, and storage prior to analysis. Each sample will be labeled and properly sealed immediately after collection. Sample tracking documents will be prepared so that chain-of-custody records can be maintained and sample disposition can be controlled.

Forms and labels will be filled out with waterproof ink. Sample identification documents will include a daily field activity log, a sample label, and chain-of-custody records. Such records will be prepared during each sampling activity.

Each sample label will include the following information:

- Client and project number,
- Sample location,
- Unique field identification number or sample identification number,
- Date and time sample collected,
- Name or initials of sample collector, and
- Analyses requested.

Post-Excavation Confirmatory Sampling Plan

Each chain-of-custody record will include the following information:

- Client and project number,
- Site name,
- Name or initials of sample collector,
- Field identification number or sample identification number for each sample,
- Laboratory sample number for each sample,
- Date and time sample collected for each sample,
- Preservative used (if any) for each sample,
- Sample matrix of each sample,
- Type of sample container used for each sample,
- Any filtering performed or requested, if applicable,
- Analyses requested for each sample,
- Name of the destination laboratory,
- Signatures of all persons involved in possession of the samples; that is, "relinquished by" and "received by",
- Dates and times of transfers of sample possession, and
- Any remarks by either sample collector or laboratory.

Samples will always be accompanied by a chain-of-custody record. When transferring samples to the analytical laboratory, the individuals relinquishing and the individuals receiving the samples will sign, date, and note the time on the chain-of-custody record. A separate chain-of-custody record will accompany each transfer of samples. The method of shipment and courier name will be entered on the chain-of-custody records.

E. Data Evaluation

Confirmation sampling results will be evaluated to verify soil remedial objectives have been achieved in the designated excavation areas. If, based on the laboratory results, one or more of the analyzed constituents remain at concentrations above the cleanup goals in bottom and/or sidewall samples, additional removal and sampling will be performed. The extent of additional removal will be determined on a case- by-case basis, but will generally extend halfway to the next clean sample or to the adjacent excavation sidewall.

If all sample results are below cleanup goals then excavation will be deemed complete.

III. Reporting

Sampling forms with Chain of Custody and the results of the post-excavation sampling will be presented in the Completion Report documenting the associated remedial action activities.

EXHIBIT C

Recommended Health & Safety Plan

Health and Safety Plan

Table of Contents

1.	Introduction	1
1.1	Applicable References.....	1
2.	Site Information and Scope of Work.....	1
2.1	Scope of Work Risk Assessment	2
3.	Roles and Responsibilities.....	3
3.1	Project Manager	3
3.2	Site Supervisor	3
3.3	Contractor/Employees	4
3.4	Subcontractors	4
4.	Training and Documentation.....	4
4.1	HASP/SITE Orientation	4
4.2	Daily Meetings and THA Review	5
4.3	Worker Training and Qualifications	5
4.3.1	OSHA 10 Hr./OSHA 30 Hr. Training.....	5
5.	Hazard Assessment and Control	5
5.1	SH&E Procedures	5
5.2	Project Risk Register/ Hazard Assessment.....	5
6.	Physical Hazard Assessment.....	6
6.1	Physical Hazards.....	6
7.	Chemical Hazard Assessment	6
7.1	Potential Chemical Hazards	6
7.2	Potential Exposure Pathways.....	6
7.2.1	Inhalation	6
7.2.2	Skin Contact.....	6
7.2.3	Ingestion.....	7
7.3	Decontamination.....	7
7.4	Air Monitoring	9
7.4.1	Real-Time Exposure Measurement/ Equipment.....	9
7.4.2	Health and Safety Action Levels.....	10
7.4.3	Monitoring Procedures.....	10
8.	Personal Protective Equipment	11
9.	Site Control	12
9.1	Site Work Zones	12
9.2	Site Control Map/ Diagram	12
10.	Personnel Acknowledgement and Disclaimer.....	13

Executive Summary

The purpose of this Health and Safety Plan (HASP) is to address health and safety concerns related to the project for the removal and disposal activities of excavated construction and demolition material found at 121 Clay Bird Lane, Briarcliff Manor, New York. The specific roles, responsibilities, authority, and requirements as they pertain to the safety of workers and the scope of services are discussed herein. The document is intended to identify known potential hazards and facilitate communication and control measures to prevent injury or harm. Additionally, provisions to control the potential for environmental impact from these activities are included where applicable.

The primary physical hazards which may be encountered include:

- Traffic controls
- Operation of Heavy Equipment
- Heat and cold stress

The chemical hazards which may be encountered include:

- Lead (metal)
- Mercury (metal)
- alpha-Chlordane (pesticide)

All staff and contractors are bound by the provisions of this Health and Safety Plan and are required to participate in a preliminary project safety meeting to familiarize them with the anticipated hazards and respective onsite controls. The discussion will cover the entire Health and Safety Plan subject matter, putting emphasis on critical elements of the plan; such as the emergency response procedures, personal protective equipment, site control strategies, and monitoring requirements. In addition, daily tailgate safety meetings are typically held to discuss: the anticipated scope of work, required controls, identify new hazards and controls, incident reporting, review the results of inspections, any lessons learned or concerns from the previous day.

1. Introduction

This written Health and Safety Plan is designed to identify, evaluate, and control safety and health hazards, and to outline emergency response actions for project activities. Health and Safety Plans must be kept on site during work activities and made available to all workers including subcontractors and other site occupants for informational purposes.

The objective of this Health and Safety Plan is to assign responsibilities, establish personal protective standards and mandatory safety procedures, and provide for contingencies that may arise while performing work. This section of the Health and Safety Plan summarizes important safety, health and emergency procedures that apply.

1.1 Applicable References

This Health and Safety Plan conforms to the regulatory requirements and guidelines established in the following documents:

- Title 29, Part 1910 of the Code of Federal Regulations (29 CFR 1910), Occupational Safety and Health Standards (with special attention to Section 120, Hazardous Waste Operations and Emergency Response).
- 29 CFR 1926, Safety and Health Regulations for Construction.
- National Institute for Occupational Safety and Health/Occupational Safety and Hazards Administration/U.S. Coast Guard/U.S. Environmental Protection Agency, Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities, Publication No. 85-115, 1985.

Project Assumptions

- **This site is controlled by the Town of Mount Pleasant.**
- **No confined spaces will be entered on this project.**
- **No excavations will be entered.**
- **Work will be performed during daylight hours.**
- **This site is part of a larger parcel that is utilized by tenants such as the Mount Pleasant Sportsman Club, Town of Mount Pleasant Highway and Police Departments. These tenants utilize the single lane driveway that adjoins this site.**

2. Site Information and Scope of Work

Site Description

The Clay Bird Lane site is located at 121 Clay Bird Lane, Briarcliff Manor, New York. The project site is home to the Town's Mulch Processing Facility, Mount Pleasant Sportsman Club, cell tower with carriers and the Mount Pleasant PD Training Facility. The site borders the Taconic State Parkway to the west, residential parcels to the north & south and rural convention center to the east.

Site Background/History

The nearly 34 acre Clay Bird Lane site is owned by the Town of Mount Pleasant. There is a mulch recycling facility within this site that has been in operation for many years. The Town had permitted a contractor to use and operate the mulch recycling facility in an effort to reduce costs to the town. This contractor was under the direction to only process the town's tree and larger brush material. Under the contractors' operations of the site, this contractor created a berm to act as protection measure from the site to adjoining property/wetland area. As the contractor's unauthorized actions of hauling in 9,000 yards of excavated material to create topsoil product to sell (action not permitted by NYSDEC) and subsequent violation issued by NYSDEC, terminated the use of the site for the contractor. This action resulted in legal proceedings which are still underway. At the present time the Town is responsible for removal of the imported material and the berm. As such, the town conducted soil sampling as per NYSDEC Part 375 regulations and found the material used within the berm to exceed the unrestricted use soil cleanup standards with higher levels for lead with slightly higher levels for alpha-Chlordane pesticide and mercury.

Previous Investigations

Table 2.1: Previous Investigation Data

Contaminants	Result (mg/kg)	Part 375 UU SCO's
Lead	854	63
Mercury	0.191	0.183
alpha-Chlordane	0.0144	0.014

Scope Of Work

This project involves the use of heavy equipment, transport vehicles and related equipment for the removal and disposal of up to 1,500 cubic feet of commercial fill to a registered land fill facility authorized to take in this type of fill. The Contractor will be required to install soil and erosion control measures, perimeter temporary fencing with screening, dust control, containment of area impacts from the operations, complete manifests and perform final cleanup of the work area.

2.1 Scope of Work Risk Assessment

This project has been identified as a Medium Risk project due to the intrusive work, use of heavy equipment, frequent exposure and/or moderate hazards with exposure to metals and pesticides.

The following tasks/ hazards may be encountered on projects performed under this contract and automatically trigger high risk ranking: hazardous substances or materials, work in controlled area, heavy equipment use and uneven terrain.

3. Roles and Responsibilities

The Project Manager (PM) is ultimately responsible for the development of the Health and Safety Plan, establishing a budget to complete the project, oversee the Site Inspector (SI), certify work output for invoices, payments for the contractor and consulting inspectors/engineers on the project. The Project Manager is also responsible for ensuring that the plan is implemented, that appropriate documentation is generated, that records are maintained and coordinating compliance with NYSDEC. The Site Inspector is responsible to oversee implementation of the Health and Safety Plan in the field, work is conducted safely as per Health and Safety Plan, work is complete as per plan, collection of all manifests or other documentation, conducting soil sampling as required, review of invoices and other measures for the successful completion of the project. All project team members are responsible for reviewing and abiding by site specific Health and Safety Plans, performing daily (or more frequent) task hazard assessments, stopping work when necessary to correct unsafe behaviors or conditions, and reporting incidents promptly to the PM.

3.1 Project Manager

The Project Manager has overall management authority and responsibility for all site operations, including safety. The Project Manager will provide the site supervisor with work plans, staff, and budgetary resources, which are appropriate to meet the safety needs of the project operations. Some of the Project Manager's specific responsibilities include:

- Project start-up activities require appropriate SH&E planning prior to work commencing, including identification of hazards, associated risk, and appropriate controls for each task and operation found in the workscope.
- Verifying those personnel, to whom site specific Health and Safety Plans applies, including any subcontractors, have received a copy of it, with ample opportunity to review the document and to ask questions.
- Providing adequate authority and resources to the Site Inspector to allow for the successful implementation of all necessary SH&E Procedures.
- Maintaining regular communications with the Site Inspector.
- Conducting Safety System Auditing by way of Management Site Visits and/or Project Manager Self-Assessments on a regular basis.
- Approving amendments to the Health and Safety Plan (in conjunction with the Site Inspector).
- Coordinating activities with the client as needed to ensure the safe implementation of site-specific Health and Safety Plans.

3.2 Site Supervisor

The Site Supervisor has the overall responsibility and authority to direct work operations at the job site according to the provided work plans and HASP. The Project Manager may act as the Site Supervisor while on site. The Site Supervisor's responsibilities include:

- Working with the Contractor to complete the project as per the work plan while adhering to the Health and Safety Plans.
- Discussing safety issues with the Project Manager and field personnel as become apparent.
- Assisting with the implementation of site-specific Health and Safety Plans and ensuring compliance.
- Conduct inspections of the site for compliance with site specific Health and Safety Plans and applicable SH&E Procedures.
- Verifying that all operations are in compliance with the requirements of site-specific Health and Safety Plans and halting any activity that poses a potential hazard to personnel, property, or the environment.
- Temporarily suspending individuals from field activities for infractions against the Health and Safety Plans pending consideration by the Project Manager.
- Conduct soil sampling of stabilized excavated ground to determine clean break which would allow final restoration work to be completed.

3.3 Contractor/Employees

Responsibilities of contractor and employees associated with this project include, but are not limited to:

- Understanding and abiding by the SH&E Procedures specified in the Health and Safety Plan and other applicable safety policies, and clarifying those areas where understanding is incomplete.
- Providing feedback to SH&E management for continuous improvement relating to omissions and modifications in the Health and Safety Plan or other safety policies and procedures.
- Notifying the Site Inspector of unsafe conditions and acts.
- Stopping work if there is doubt about how to safely perform a task or if unsafe acts or conditions are observed (including subcontractors or team contractors).
- Speaking up and refusing to work on any site or operation where the SH&E procedures specified in site specific Health and Safety Plans or other safety policies are not being followed.
- Contacting the Site Supervisor or Site Safety Officer or the SH&E Manager at any time to discuss potential concerns and update the THA in the field to reflect the modifications

3.4 Subcontractors

Each subcontractor is responsible for assigning specific work tasks to their employees. Each subcontractor's management will provide qualified employees and allocate sufficient time, materials, and equipment to safely complete assigned tasks. In particular, each subcontractor is responsible for equipping its personnel with any required personnel protective equipment (PPE) and all required training.

The Town considers each subcontractor to be an expert in all aspects of the work operations for which they are tasked to provide, and each subcontractor is responsible for compliance with the regulatory requirements that pertain to those services as well as all other requirements applicable to their work. Each subcontractor is expected to perform its operations in accordance with its own unique safety policies and procedures, in order to ensure that hazards associated with the performance of the work activities are properly controlled. Copies of any required safety documentation for a subcontractor's work activities will be provided to the Town for review prior to the start of on-site activities.

Hazards not listed in site specific Health and Safety Plans but known to any subcontractor, or known to be associated with a subcontractor's services, must be identified and addressed to the Project Manager or the Site Inspector prior to beginning work operations. The Site Inspector or authorized representative has the authority to halt any subcontractor operations, and to remove any subcontractor or subcontractor employee from the site for failure to comply with established health and safety procedures or for operating in an unsafe manner.

4. Training and Documentation

The following sections describe the standard practices or programs that will be established to prepare employees to perform work safely and consistent with any policy and Procedures.

4.1 Health and Safety Plan Orientation

The Project Manager shall conduct a project/site-specific Health and Safety Plan orientation prior to the start of field operations, with support as needed by the Site Inspector. This meeting will involve representatives from all organizations with a direct contractual relationship with the Town on the job site. Participants will then sign the Health and Safety Plan Personnel Acknowledgement register at the end of the Health and Safety Plan.

4.2 Daily Meetings and THA Review

The Site Inspector or designee shall facilitate any required meeting to discuss the specific requirements of site- specific Health and Safety Plans and review the applicable THAs prior to the commencement of daily project activities. Attendance at a daily meeting is mandatory for all employees and subcontractors at the site.

4.3 Worker Training and Qualifications

All personnel at this site must be qualified and experienced in the tasks they are assigned.

4.3.1 OSHA 10 Hr./OSHA 30 Hr. Training

OSHA 10/30 training is required for projects with construction or construction-like hazard, including, work where we, our client, or another contractor are presently building, removing, or disassembling structures or digging excavations of any size by mechanical means. This includes projects of any work where our employees are exposed to construction site hazards. "Construction-like" hazards exist on sites where the focus is NOT construction/demolition, but where our work scope includes use of heavy machinery movement, work at heights, confined space, hot work, lifting/hoisting loads, and/or ground breaking (includes drill rig, direct push and vac truck use). If these hazards exist, OSHA 10 hr. training is required for field staff.

OSHA 30 hr. training is required for supervisors. The term "supervisor" has many different meanings. The requirement for supervisors to complete an OSHA 30 hr. construction course will be based on field supervisory roles and responsibilities, not administrative supervision roles. Field supervisors required to take the OSHA 30 construction course are defined as those individuals who provide work direction and leadership directly field personnel and/or our subcontractors for construction/demolition activities or tasks that have construction-like hazards. These supervisors must be knowledgeable of construction hazards and controls because they are responsible for:

- Field implementation of a construction/demolition scope of work
- Controlling performance on the job site
- Evaluating and controlling hazards & preventing site safety risks
- Intervening to prevent unsafe actions or conditions of employees, clients, and subcontractors related to construction/demolition hazard.

5. Hazard Assessment and Control

A hazard assessment and control plan are prepared that incorporates both qualitative and quantitative methods to identify hazards and the degree to which they may impact employees and operations.

5.1 Safety Health & Environment Procedures

All SH&E procedures for field activity reference and application are provided and included in site specific Health and Safety Plans. The applicable field procedures checklist is in the Physical Hazards section below.

5.2 Project Risk Register/ Hazard Assessment

Project start-up activities require appropriate SH&E planning prior to work commencing, including identification of hazardous tasks required to complete the Scope of Work (SOW). A Project Risk Register/Hazard Assessment shall be developed to guide work.

6. Physical Hazard Assessment

6.1 Physical Hazards

A physical hazard is a hazard that threatens the physical safety of an individual; contact with the hazard typically results in an injury. Procedures are likely to be encountered during work under this contract and therefore included in **Attachment C** for implementation and reference.

7. Chemical Hazard Assessment

7.1 Potential Chemical Hazards

The exposure to potential chemical hazards will be determined on a site by site basis. However, below is a list of potential chemical hazards that may be encountered during work under this contract.

Summary of Hazardous Properties of Contaminant Exposure Hazards

PEL.....Permissible Exposure Limits

TLV: Threshold Limit Values

Chemical Name	Media	Primary Routes of Exposure	PEL	TLV	IP electron volts (eV)
Metals					
Chromium III	Soil, GW, Vapor, etc.	Dermal	0.5 mg/m ³	0.5 mg/m ³	n/a
Chromium VI	Soil, GW, Vapor, etc.	Dermal	0.005 mg/m ³	0.005 mg/m ³	n/a
Lead	Soil, GW, Vapor, etc.	Dermal	0.05 mg/m ³	0.05 mg/m ³	n/a
Mercury	Soil, GW, Vapor, etc.	Dermal	0.1 mg/m ³	0.025 mg/m ³	n/a
Pesticides					
alpha-Chlordane ¹	Soil, GW, Vapor, etc.	Dermal	0.5 mg/m ³	0.5 mg/m ³	n/a
Common Site COCs					
Dust	Soil, GW, Vapor, etc.	Inhalation	15 mg/m ³	10 mg/m ³	n/a

1. Exposure limits based on Chlordane. No PELs are set for alpha or gamma chlordane.

7.2 Potential Exposure Pathways

Occupational exposure to chemical hazards associated with the work activities could potentially occur by two primary routes (inhalation and skin contact) and one indirect route (incidental ingestion).

7.2.1 Inhalation

The primary risks associated with the scope of work pertain to potential exposure to airborne contaminants. Constituents that potentially pose an occupational concern to employees by the inhalation route are carbon monoxide, dust and lead particles. Air monitoring will be performed within the employee breathing zone to assess the need to implement appropriate control measures or stop work. In addition, air monitoring will be performed at the source to assess potential explosion hazards.

7.2.2 Skin Contact

Personnel handling residual product or waste and associated equipment may be exposed to chemical hazards by skin contact or adsorption. However, exposure is expected to be limited since workers will be required to wear appropriate PPE (i.e. appropriate work gloves, body clothing, and/or face shield).

7.2.3 Ingestion

Personnel handling residual product or waste and associated equipment, including project hazardous materials, may be exposed by incidental ingestion. Typically, this exposure occurs if proper PPE was not used or personal hygiene was not practiced. Personal protection against exposure via ingestion can be accomplished by performance of proper decontamination procedures when exiting contaminated work areas as well as using the correct PPE.

7.3 Decontamination

All possible and necessary steps shall be taken to reduce or minimize contact with chemicals and contaminated/impacted materials while performing field activities. Decontamination steps are as follows:

- All persons and equipment entering the Work Zone shall be considered contaminated, and thus, must be properly decontaminated prior to exiting to clean areas of the site.
- Avoid reactions between the solutions and contaminated materials. Review the applicable SDS.
- All contaminated PPE and decontamination materials shall be contained, stored and disposed of in accordance with site-specific requirements determined by site management.
- Use caution while working around decontamination stations, including the decontamination pad, which may be a slip or trip hazard.
- Use disposable equipment when possible and practical.
- All employees performing equipment decontamination shall wear the appropriate PPE to protect against exposure to contaminated materials. The level of PPE may be equivalent to the level of PPE required in the Work Zone. Other PPE may include splash protection, such as face-shields and splash suits, and knee protectors.
- All decontaminated equipment shall be visually inspected for contamination prior to leaving the contaminated work zone.

Decontamination Procedures & Equipment		
Procedure		Equipment Needed
Remove all equipment, sample containers, and notes to the Contaminated Work Zone. Obtain decontamination solutions and decontaminate the tools (shovels, auger flights, etc.) by brushing them under a water rinse. A high-pressure steam cleaner also may be used for decontamination. All waste and spent decontamination solutions will be properly contained. Remove disposable booties, or scrub boots with a stiff bristle brush and water, when necessary. Washtubs and chairs will be provided. Remove outer gloves (and boot covers, if used). Remove Tyvek® coveralls; discard in provided container. Remove hardhat and eye protection. Remove respirator. Remove inner gloves. Wash hands and face. The decontamination area will be covered with plastic sheeting that will be replaced when torn or heavily soiled and at the end of each shift.		Alconox solution Deionized water Brushes Plastic sheeting
Decontamination Procedures & Equipment		
Type Equipment	Decontamination Solution	Procedure
Respirator	Alconox solution and deionized water	Washing: Disassemble and wash with an Alconox solution in deionized water. A stiff bristle (not wire) brush may be used. Rinsing: Rinse in deionized water to remove all traces of detergent. This is important to prevent dermatitis. Disinfecting: Thoroughly rinse or immerse in a sanitizer provided by the manufacturer. Final Rinsing: Rinse thoroughly in clean water to remove all traces of disinfectant. Drying: Drain and dry by hanging by the straps from racks or by towel drying with clean, soft cloths or paper towels.
Water quality meter, oil/water interface probe, down-hole water		Washing: Disassemble and wash with an Alconox solution in deionized water.
Sampling pumps, reusable sampling tools/equipment		Rinsing: Rinse in deionized water to removal all traces of detergent.
Drilling Equipment/Tools	High-pressure steam cleaner	Apply steam cleaner to used equipment/tools
Waste Handling for Decontamination		
Waste Streams/Products		Disposal Procedures
Wash water	Spent plastic sheets/ consumables from decontamination procedures	Containerize in 55-gallon DOT drums, and stage drums in temporary location pending shipment off site for treatment/ disposal.
Used PPE		
Spent plastic sheets/ consumables from decontamination procedures		

7.4 Air Monitoring

Monitoring shall be performed within the work area on site in order to detect the presence and relative levels of toxic substances. The data collected throughout monitoring shall be used to determine the appropriate levels of PPE. Monitoring shall be in accordance with Exposure Monitoring Procedure and as specified in the work permit and/or THA for the tasks. Key elements of the procedure include:

- Calibration of monitoring equipment and/or daily bump tests to verify calibrations and confirm alarm function.
- Personal monitoring and result evaluation must be directed by a Certified Industrial Hygienist or Certified Safety Professional.

All monitoring data, including background readings, will be logged in a field logbook and incorporated into the project files. See the New York State Department of Health's (NYSDOH's) Generic Community Air Monitoring Plan (**Attachment B**) for additional information.

7.4.1 Real-Time Exposure Measurement/ Equipment

Monitoring shall be performed within the work area on site in order to detect the presence and relative levels of toxic substances. The data collected throughout monitoring shall be used to determine the appropriate levels of PPE. Monitoring shall be conducted as specified in the work permit and THA as work is performed. All instrumentation needs to be rated intrinsically safe to prevent fire or explosion.

Instrument	Manufacturer/Model	Substances Detected
Photo Ionization Detector (PID)	RAE Systems mini-RAE Photovac Microtip (min. 10.6 eV bulb)	• Petroleum hydrocarbons • Organic Solvents
Multi or 4 Gas Detectors	RAE Systems Multi-RAE	• Oxygen • Carbon Monoxide
Particulate Monitor	MIE Model PDM-3 mini-RAM	• Aerosols, mist, dust, and fumes

7.4.2 Health and Safety Action Levels

An action level is a point at which increased protection is required due to the concentration of contaminants in the work area or other environmental conditions. The concentration level (above background level) and the ability of the PPE to protect against that specific contaminant determine each action level. The action levels are based on concentrations in the breathing zone.

If ambient levels are measured which exceed the action levels in areas accessible to unprotected personnel, necessary control measures (barricades, warning signs, and mitigation actions to limit, etc.) must be implemented prior to commencing activities at the specific work area.

Personnel should also be able to upgrade or downgrade their level of protection with the concurrence of Site Supervisor or Site Safety Officer or the Safety Manager.

- Reasons to Upgrade:**
- Known or suspected presence of dermal hazards;
 - Occurrence or likely occurrence of gas, vapor, or dust emission; or
 - Change in work task that will increase the exposure or potential exposure to hazardous materials.

- Reasons to Downgrade:**
- New information indicating that the situation is less hazardous than was originally suspected;
 - Change in site conditions that decrease the potential hazard; or
 - Change in work task that will reduce exposure to hazardous materials.

7.4.3 Monitoring Procedures

The monitoring procedures shown below are general guidelines for sampling activities. A reading in excess of action level outlined below will require additional ventilation for 30 minutes, followed by re-monitoring.

Monitoring Procedures and Action Levels

Parameter	Zone Location and Monitoring Interval	Response Level	Response Activity
Volatile Organic Compounds (VOCs) and volatile hydrocarbons (total by PID)	Breathing zone, continuously during tasks where exposure to VOCs and volatile hydrocarbons is possible	< 5 ppm	Continue monitoring, may continue work in required PPE
		5- 25 ppm (sustained for 5 minutes)	STOP WORK and notify PM. Investigate the cause of elevated VOC measurements and identify measures to reduce concentrations (cover impacted soils, ventilation, etc.). Work activities shall only continue once levels have decreased to or below 5 units above background. If levels continue above 5 units, only individuals who are medically qualified to wear respiratory protection are permitted to continue work activities with Project Manager approval. Don Level C PPE (organic vapor respirator cartridges), continue monitoring, and initiate continuous air monitoring for benzene.
		> 25 ppm (sustained for 5 minutes)	Cease work, exit, and contact the Site Safety Officer, Site Supervisor, and Project Manager.
Benzene (by PID with benzene-specific separation tube)	Breathing zone, continuously where indicated by VOC readings	> 0.25 ppm	Cease work, exit the area, and contact the Site Safety Officer, Site Supervisor, and Project Manager.
Hydrogen Sulfide (multi-gas detector or individual H ₂ S meter)	Breathing zone, continuously during tasks where exposure to hydrogen sulfide is possible	< 5 ppm	Continue work activities. Contact the Site Safety Officer to investigate the potential for contributing factors.
		> 5 ppm	Cease work, exit the area or confined space, and contact the Site Safety Officer, Site Supervisor and Project Manager.
Combustible Gas (multi-gas meter or individual combustible gas indicator, CGI)	Breathing zone or in the immediate work area continuously during tasks where explosive atmospheres are possible	> 5% of LEL	Cease work, exit, and contact the Site Safety Officer, Site Supervisor, and Project Manager.
Oxygen (O₂) (multi-gas detector or individual O ₂ meter)	Breathing zone, continuously during tasks where oxygen enriched or deficient atmospheres are possible	< 19.5 % O ₂	Cease work deficient atmosphere), exit the area or confined space, and contact the Site Safety Officer, Site Supervisor, and Project Manager.
		> 23.5 % O ₂	Cease work enriched atmosphere), exit the area or confined space, and contact the Site Safety Officer, Site Supervisor, and Project Manager.

Monitoring Procedures and Action Levels cont.

Parameter	Zone Location and Monitoring Interval	Response Level	Response Activity
Carbon Monoxide (CO) (multi-gas detector or individual CO meter)	Breathing zone, continuously during tasks where exposure to CO is possible	< 10 ppm	Continue work in Level D and continue monitoring
		> 10 ppm	Cease work, exit the area or confined space, and contact the Site Safety Officer, Site Supervisor, and Project Manager.
Dust not otherwise classified (total by aerosol monitor)	Breathing zone every 30 minutes during field activities where exposure to excessive dusts are possible	< 5 mg/m ³	Continue work in Level D and continue monitoring
		> 5 mg/m ³	Upgrade to Level C (P100 respirator cartridges), implement dust suppression measures; contact the Site Safety Officer & Site Supervisor.
		> 10 mg/m ³	Cease activities, implement more effective dust suppression measures; contact the Site Safety Officer & Site Supervisor.
Dust not otherwise classified (total by aerosol monitor)	Edge of Exclusion Zone, every 30 minutes during excavation activities	< 5 mg/m ³	Continue work in required PPE, monitor air, and implement engineering controls
		> 5 mg/m ³	Cease activities and contact the Site Safety Officer & Site Supervisor.

8. Personal Protective Equipment

PPE is considered the last line of defense in hazard control. PPE is meant to protect workers when all other methods (elimination, substitution, engineering, and administrative) have been exhausted. All employees must be trained in the proper use and maintenance of PPE.

A PPE assessment can be performed to help determine PPE requirements. PPE upgrades for individual tasks or steps of a task are to be identified in the appropriate THA(s).

Minimum Required PPE:

- Hard hat
- Safety glasses w/ side shields (may be clear or shaded)
- Safety toe work boots
- Long pants and shirts with sleeves (short or long- cover shoulders no tank or muscle shirtstyles)

List of PPE Required on Site:

1. Face/Eyes:
 - Spoggles (Safety Glasses with Foam Liner for Dust Protection)
2. Head/Ears:
 - Earplugs, &
 - Over-ear Hearing Protection
3. Hands:
 - Leather Cut, Abrasion and Puncture Resident, &
 - Neoprene Butyl Rubber Gloves
4. Legs/Feet:
 - Rubber Boots &
 - Waders
5. Body:
 - Sunscreen,
 - Insect Repellent Permethrin Applied to Clothing,
 - Long-sleeved Shirt,
 - High-visibility Vest,
 - Disposable Coveralls,
 - Disposable booties, &
 - Respirator w/organic vapor/HEPA cartridge

9. Site Control

The purpose of site control is to protect the public from inadvertently coming into contact with site hazards and to protect AECOM employees being impacted by hazards. This section details the equipment and actions needed to promote optimal site control.

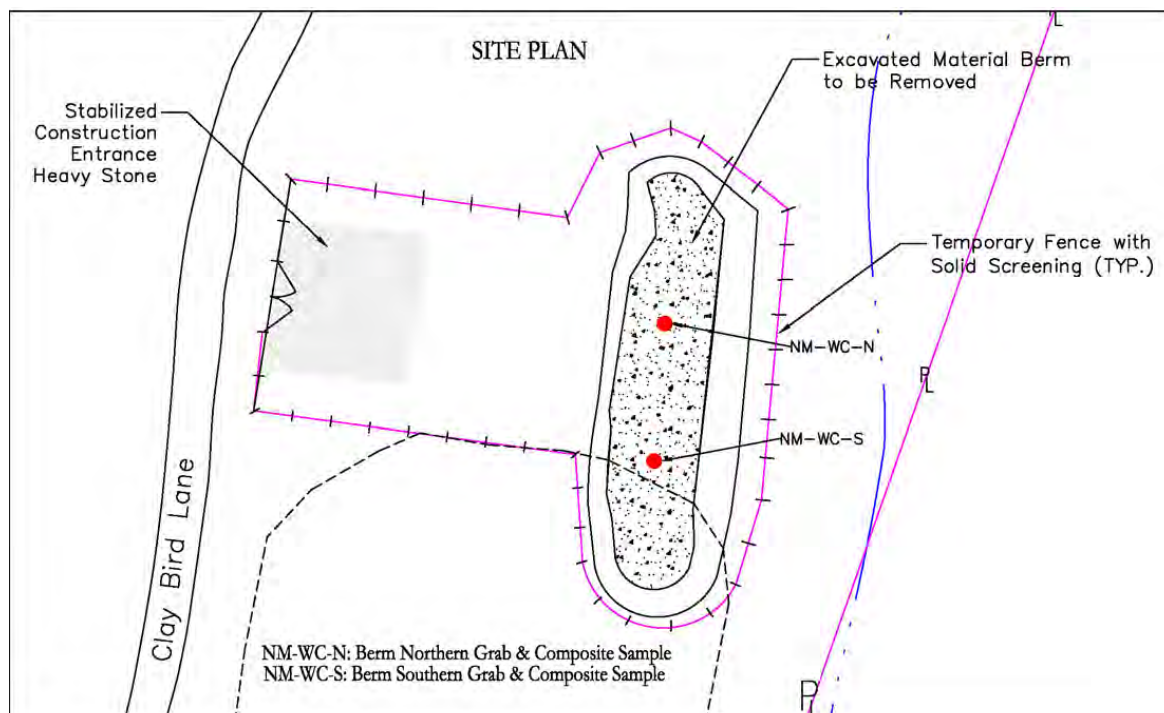
9.1 Site Work Zones

Site layout and site control need to be coordinated achieve a productive work environment and efficient work process while minimizing exposure of employees and the public to hazards associated with the work. Consider the following items when planning the site layout and controls:

- “Line of Fire” hazards- overhead utilities, falling/ tipping equipment, release of energy/ pressure, flying debris,
- Noise, dust, odor suppression
- Contamination containment and decontamination area layout
- Traffic control for site vehicles/ equipment (public traffic control requires Traffic control Plan)
- Restricted access for areas requiring special training, skills, or certifications
- Restriction of work near railroads
- Presence or creation of excavations
- Loading/unloading areas
- Portable restrooms
- Dumpsters and bins
- Equipment lay down
- Heavy equipment parking
- Overnight safety and security needs

The site controls will be established on a location by location basis.

9.2 Site Plan/ Diagram



10. Personnel Acknowledgement and Disclaimer

By signing below, the undersigned acknowledges that he/she has reviewed the Health and Safety Plan for the Clay Bird Lane project performed for the Town of Mount Pleasant. The undersigned also acknowledges that he/she has been instructed in the contents of this document and understands the information pertaining to the specified work and will comply with the provisions contained therein. The employee understands that they are NOT to perform any work that they have not been adequately trained for and that they are to stop work if it is unsafe to proceed. Finally, the employee understands to notify the Site Inspector for any incident, ***including ANY injury even if no first aid or medical treatment is required.***

Print Name	Signature	Organization	Date

Attachment **A**

NYSDOH Generic Community
Air Monitoring Plan.

Appendix 1A
New York State Department of Health
Generic Community Air Monitoring Plan

Overview

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical-specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for VOCs and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate DEC/NYSDOH staff.

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required 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 might reasonably 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. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required 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.

VOC Monitoring, Response Levels, and Actions

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

1. 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 must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

2. 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 must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can 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.

3. If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

4. All 15-minute readings must be recorded and be available for State (DEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

Particulate Monitoring, Response Levels, and Actions

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

1. 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 must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed $150 \text{ mcg}/\text{m}^3$ above the upwind level and provided that no visible dust is migrating from the work area.

2. If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than $150 \text{ mcg}/\text{m}^3$ above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within $150 \text{ mcg}/\text{m}^3$ of the upwind level and in preventing visible dust migration.

3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

December 2009

**FUGITIVE DUST AND PARTICULATE MONITORING FROM
DER-10 TECHNICAL GUIDANCE
FOR SITE INVESTIGATIONS AND REMEDIATION**

Appendix 1B

Fugitive Dust and Particulate Monitoring

A program for suppressing fugitive dust and particulate matter monitoring at hazardous waste sites is a responsibility on the remedial party performing the work. These procedures must be incorporated into appropriate intrusive work plans. The following fugitive dust suppression and particulate monitoring program should be employed at sites during construction and other intrusive activities which warrant its use:

1. Reasonable fugitive dust suppression techniques must be employed during all site activities which may generate fugitive dust.
2. Particulate monitoring must be employed during the handling of waste or contaminated soil or when activities on site may generate fugitive dust from exposed waste or contaminated soil. Remedial activities may also include the excavation, grading, or placement of clean fill. These control measures should not be considered necessary for these activities.
3. Particulate monitoring must be performed using real-time particulate monitors and shall monitor particulate matter less than ten microns (PM₁₀) with the following minimum performance standards:
 - (a) Objects to be measured: Dust, mists or aerosols;
 - (b) Measurement Ranges: 0.001 to 400 mg/m³ (1 to 400,000 µg/m³);
 - (c) Precision (2-sigma) at constant temperature: +/- 10 µg/m³ for one second averaging; and +/- 1.5 g/m³ for sixty second averaging;
 - (d) Accuracy: +/- 5% of reading +/- precision (Referred to gravimetric calibration with SAE fine test dust (mm_d= 2 to 3 µm, g_m= 2.5, as aerosolized);
 - (e) Resolution: 0.1% of reading or 1g/m³, whichever is larger;
 - (f) Particle Size Range of Maximum Response: 0.1-10;
 - (g) Total Number of Data Points in Memory: 10,000;
 - (h) Logged Data: Each data point with average concentration, time/date and data point number
 - (i) Run Summary: overall average, maximum concentrations, time/date of maximum, total number of logged points, start time/date, total elapsed time (run duration), STEL concentration and time/date occurrence, averaging (logging) period, calibration factor, and tag number;
 - (j) Alarm Averaging Time (user selectable): real-time (1-60 seconds) or STEL (15 minutes), alarms required;
 - (k) Operating Time: 48 hours (fully charged NiCd battery); continuously with charger;
 - (l) Operating Temperature: -10 to 50° C (14 to 122° F);
 - (m) Particulate levels will be monitored upwind and immediately downwind at the working site and integrated over a period not to exceed 15 minutes.
4. In order to ensure the validity of the fugitive dust measurements performed, there must be appropriate Quality Assurance/Quality Control (QA/QC). It is the responsibility of the remedial party to adequately supplement QA/QC Plans to include the following critical features: periodic instrument calibration, operator training, daily instrument performance (span) checks, and a record keeping plan.
5. The action level will be established at 150 µg/m³ (15 minutes average). While conservative,

this short-term interval will provide a real-time assessment of on-site air quality to assure both health and safety. If particulate levels are detected in excess of 150 ug/m³, the upwind background level must be confirmed immediately. If the working site particulate measurement is greater than 100 ug/m³ above the background level, additional dust suppression techniques must be implemented to reduce the generation of fugitive dust and corrective action taken to protect site personnel and reduce the potential for contaminant migration. Corrective measures may include increasing the level of personal protection for on-site personnel and implementing additional dust suppression techniques (see paragraph 7). Should the action level of 150 ug/m³ continue to be exceeded work must stop and DER must be notified as provided in the site design or remedial work plan. The notification shall include a description of the control measures implemented to prevent further exceedances.

6. It must be recognized that the generation of dust from waste or contaminated soil that migrates off-site, has the potential for transporting contaminants off-site. There may be situations when dust is being generated and leaving the site and the monitoring equipment does not measure PM₁₀ at or above the action level. Since this situation has the potential to allow for the migration of contaminants off-site, it is unacceptable. While it is not practical to quantify total suspended particulates on a real-time basis, it is appropriate to rely on visual observation. If dust is observed leaving the working site, additional dust suppression techniques must be employed. Activities that have a high dusting potential--such as solidification and treatment involving materials like kiln dust and lime--will require the need for special measures to be considered.

7. The following techniques have been shown to be effective for the controlling of the generation and migration of dust during construction activities:

- (a) Applying water on haul roads;
- (b) Wetting equipment and excavation faces;
- (c) Spraying water on buckets during excavation and dumping;
- (d) Hauling materials in properly tarped or watertight containers;
- (e) Restricting vehicle speeds to 10 mph;
- (f) Covering excavated areas and material after excavation activity ceases; and
- (g) Reducing the excavation size and/or number of excavations.

Experience has shown that the chance of exceeding the 150ug/m³ action level is remote when the above-mentioned techniques are used. When techniques involving water application are used, care must be taken not to use excess water, which can result in unacceptably wet conditions. Using atomizing sprays will prevent overly wet conditions, conserve water, and provide an effective means of suppressing the fugitive dust.

8. The evaluation of weather conditions is necessary for proper fugitive dust control. When extreme wind conditions make dust control ineffective, as a last resort remedial actions may need to be suspended. There may be situations that require fugitive dust suppression and particulate monitoring requirements with action levels more stringent than those provided above. Under some circumstances, the contaminant concentration and/or toxicity may require additional monitoring to protect site personnel and the public. Additional integrated sampling and chemical analysis of the dust may also be in order. This must be evaluated when a health and safety plan is developed and when appropriate suppression and monitoring requirements are established for protection of health and the environment.

EXHIBIT D

Related Correspondents Regarding Soil

David Smyth

From: Upright, Douglas J (DEC) <Douglas.Upright@dec.ny.gov>
Sent: Friday, June 5, 2026 11:59 AM
To: David Smyth
Cc: Maccoll, Ian J (DEC)
Subject: RE: Clay Bird Lane Soil Classification and Uses Info

David,

I'll offer a few points of clarification and will be free at 3pm for a quick call if you'd like. Currently, all the material both the berm and soil stockpiles would be classified as construction and demolition debris (C&D), specifically excavated material. Excavated material can be disposed of at a facility authorized under 6 NYCRR 360 to accept C&D or re-used under a beneficial use determination (BUD). It's not our role to prepare a plan for the disposal of wastes but I can offer the following guidance.

The material in the stockpiles has many potential disposal facilities and beneficial reuses. I suspect that many C&D processors would accept this at a lower disposal rate due to its low amounts of contamination, but the department cannot dictate to a facility that it must accept the material so you would need to arrange this with the facility. Neither can we offer any particular facility for its disposal, as it could be construed as an endorsement and it is our role to remain impartial. The facility just needs to have a registration or permit from our department to accept the material.

The other option would be reuse. Field observations and the chemical testing indicate that much if not all of this material would likely be suitable for reuse specifically under the Fill type 3 BUD. See the below excerpt describing the characteristics and allowed uses for fill type 3:

Fill Type 3 (F3)	Any setting where the fill meets the engineering criteria, for use, except: 1. Undeveloped land; and 2. Agricultural crop on land used for raising livestock or producing animal products for human consumption. If used on residential property, material must be under impermeable surface or under a	Only soil, sand, gravel, and de minimis amounts of brick, concrete or asphalt; no other non-soil constituents. Must not produce objectionable petroleum or other odors.	Lower level between Protection of Public Health-Residential Land Use and Protection of Groundwater Soil Cleanup Objectives in section 375-6.8(b) of the Title.
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Note that the fill buds require the material to meet the engineering criteria for use, i.e. a NYSDOT specification or project specific specification. Note that a person may not receive payment for allowing the reuse of a material on their property and that you must keep records of its removal. A 6 NYCRR 364 registration is required to move this material either to its site of reuse or to a disposal facility. This is all detailed in 6 NYCRR 360.13, the most recent regs can be found here:

<https://extapps.dec.ny.gov/fs/projects/part360/July2023/part360fulltextadopt2023.pdf>

See the waste tracking form here,: [Construction and Demolition Debris Tracking Document](#)

This form must be completed for all loads of C&D, and in the case of materials from the Clay Bird Site I am formally requesting you to furnish them to this department upon their generation.

With regard to the berm materials, more information is going to be required. Are you aware of the source of the material? Given the results of the lead testing this material maybe considered a hazardous waste. This a hazardous waste determination should be performed on the berm material, including a TCLP test. Hazardous waste cant be used under a BUD so until this procedure has been completed the erosion and sediment controls we discussed should remain in place and the material should remain at the site.

Best,
DOUGLAS UPRIGHT, P.E. *(he/him/his)*
Regional Materials Management Engineer

New York State Department of Environmental Conservation
Division of Materials Management | Region 3
21 South Putt Corners Road, New Paltz, NY 12561
w: (845) 255-3760 | f: (845) 255-3414 | douglas.upright@dec.ny.gov
dec.ny.gov | @NYSDEC on Social Media | [Podcast](#)

From: Maccoll, Ian J (DEC) <Ian.Maccoll@dec.ny.gov>
Sent: Wednesday, June 3, 2026 2:13 PM
To: Upright, Douglas J (DEC) <Douglas.Upright@dec.ny.gov>
Subject: FW: Clay Bird Lane Soil Classification and Uses Info

From: David Smyth <dsmyth@mtpleasantny.gov>
Sent: Wednesday, June 3, 2026 8:25 AM
To: Maccoll, Ian J (DEC) <Ian.Maccoll@dec.ny.gov>
Subject: Clay Bird Lane Soil Classification and Uses Info

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Hi Ian,

Hope all is well. We are looking to start the process of getting the soil material removed from the Clay Bird Lane site and would like clarification on the Metropolis Fill and Berm Soil as detailed below. This information would assist in determining how, who and at what costs to get the material disposed of properly.

Thank you in advance for any information you can provide us.

David

SOIL STOCKPILE

Official classification: _____

Commonly referred to as: _____

Allowable use or reuse, option 1: _____

Allowable use or reuse, option 2 (if applicable): _____

Permitted destinations: _____

Prohibited use examples: _____

Documentation requirements during disposal, use or reuse: _____

BERM MATERIAL

Official classification: _____

Commonly referred to as: _____

Allowable use or reuse, option 1: _____

Allowable use or reuse, option 2 (if applicable): _____

Permitted destinations: _____

Prohibited use examples: _____

Documentation requirements during disposal, use or reuse: _____

EXHIBIT E

Berm Soil Testing Report & Results



WASTE CHARACTERIZATION REPORT

FOR

**121 CLAY BIRD LANE
BRIARCLIFF MANOR, NY 10510**

PREPARED FOR:

**HARRIS BEACH MURTHA
ATTENTION: MR. DARIUS CHAFIZADEH
445 HAMILTON AVENUE
WHITE PLAINS, NY 10601**

PREPARED BY:

**LAUREL ENVIRONMENTAL GEOSCIENCES, DPC.
53 WEST HILLS ROAD, SUITE 1
HUNTINGTON STATION, NEW YORK 11746**

REPORT DATE: MAY 14, 2026

LAUREL PROJECT# 26-179



TABLE OF CONTENTS

1.0	INTRODUCTION	3
1.1	SITE BACKGROUND	3
2.0	WASTE CHARACTERIZATION SAMPLING SCOPE	4
2.1	SOIL STOCKPILE SEGREGATION AND WASTE CHARACTERIZATION SAMPLING	4
2.2	BERM AREA WASTE CHARACTERIZATION SAMPLING	4
3.0	SOIL SAMPLING LABORATORY ANALYSIS	5
3.1	SOIL STOCKPILE SAMPLING RESULTS	5
3.2	BERM AREA SAMPLING RESULTS	5
4.0	CONCLUSIONS AND RECOMMENDATIONS	6

LIST OF TABLES

Table I:	Analytes Detected in Soil Stockpile Grab Samples
Table II:	Analytes Detected in Soil Stockpile Composite Samples
Table III:	Analytes Detected in Berm Grab Samples
Table IV:	Analytes Detected in Berm Composite Samples

LIST OF FIGURES

Figure 1.0:	Site Location
Figure 2.0:	Site Sketch with Sampling Locations
Figure 3.0:	Site Sketch with Regulatory Exceedances

LIST OF APPENDICES

Appendix A:	Photographic Log
Appendix B:	Laboratory Data Package



1.0 INTRODUCTION

Laurel Environmental Geosciences, D.P.C. ("Laurel") was retained by Harris Beach Murtha to prepare this Waste Characterization Report for the property located at 121 Clay Bird Lane, Briarcliff Manor, New York (the "Site"). The purpose of this waste characterization sampling event was to provide sufficient laboratory analytical data to ensure that the recently imported soil, currently stored south of the gun range, is suitable for its proposed use. The Site Location is shown in Figure 1.0 of this report.

1.1 SITE BACKGROUND

According to available historical aerial photographs, the Site was first developed as an agricultural parcel in a wooded area north of Chappaqua Road as early as 1949. The first structures are visible on the Site by 1964, at the northern end of Clay Bird Lane, where the current gun range is located. By 1994, stockpiles of lumber and wood chips are visible to the west of Clay Bird Lane, where the current mulching operations are taking place. The mulching area expanded to the southwest between 2004 and 2006, with smaller stockpiles of wood chips and dirt appearing at the Site until 2020, when significantly larger piles of wood and dirt begin to arrive at the Site.

The area of the Site currently being investigated is located on the eastern side of Clay Bird Lane, southeast of the current mulching operations. This area of the Site appeared to have been cleared circa 2007 and was potentially used for the parking of vehicles, although the view is mostly obscured by trees. By 2018, small piles of woodchips and dirt are visible in this area. This area of the Site was cleared again circa 2022, and a large berm of material was placed circa 2023. According to historical aerial photographs, mulching equipment is present in the investigation area of the Site from 2024 onwards.

According to David Smyth, Town Engineer for the Town of Mount Pleasant, approximately 8,000 cubic yards of soil were recently imported to the Site by the operators of the mulching business for use in producing topsoil. The imported soil reportedly originated from a nearby redevelopment project and had some limited laboratory testing performed to certify that the soil was clean. *Laurel* was not provided with any existing laboratory data for review as part of this scope of work.



2.0 WASTE CHARACTERIZATION SAMPLING SCOPE

On April 13, 2026, *Laurel* mobilized to the Site to direct the waste characterization sampling of the imported material. The sampling locations are shown on Figure 2.0 of this report, and a photographic log documenting the sampling event is included in Appendix A.

2.1 SOIL STOCKPILE SEGREGATION AND WASTE CHARACTERIZATION SAMPLING

To meet the New York State Department of Environmental Conservation ("NYSDEC") Division of Environmental Remediation ("DER") Technical Guidance for Site Investigation and Remediation, Table 5.4(e) – Recommended Number of Soil Samples for Soil Imported To or Exported From a Site, the existing stockpile of approximately 8,000 cubic yards of imported soil was segregated into nine (9) smaller stockpiles (designated SP1 through SP9). The soil was field screened while being segregated, and no visual or olfactory evidence of contamination was noted, and no volatile organic compounds ("VOCs") were detected by the photoionization detector ("PID"). The soil consisted of brown pebbly soil ranging from coarse sand to silty sand with clay and fines. No evidence of visual or olfactory contamination was observed during the sampling event. De minimis amounts of wood chips, asphalt millings, and mulch were observed within the soil stockpiles.

For each of the nine (9) segregated soil stockpiles, at least two (2) grab samples and one (1) composite sample were collected for laboratory analysis, and three (3) additional grab samples were collected based on recorded photoionization detector ("PID") readings that exceeded 0.0 parts per million ("ppm"), totaling twenty-one (21) grab samples and nine (9) 5-point composite samples.

All soil samples were placed into laboratory-supplied containers, stored on ice, and shipped via laboratory courier to ALS Environmental – Stratford, located in Stratford, Connecticut, a New York State Department of Health ("NYSDOH") approved environmental laboratory (ELAP ID No. 10854), under chain of custody ("COC") procedures.

2.2 BERM AREA WASTE CHARACTERIZATION SAMPLING

The berm was visually assessed and determined to contain tan to brown silty sand with pebbles and larger rounded rocks, with limited pockets of concrete, brick, and gravel. While the true southern extent of the berm could not be determined due to the soil stockpiles being placed partially on top of the berm, the berm is believed to be constructed from less than 1,000 cubic yards of material.

The accessible areas of the berm were separated into a northern and southern half, and three (3) test pits were conducted within each section of the berm. The soil within the berm was field screened and no visual or olfactory evidence of contamination was noted, and no VOCs were detected by the PID. After the test pits were completed, a grab sample and a 5-point composite sample were collected from within each section.

All soil samples were placed into laboratory-supplied containers, stored on ice, and shipped via laboratory courier to ALS Environmental – Stratford, located in Stratford, Connecticut, a NYSDOH approved environmental laboratory (ELAP ID No. 10854), under COC procedures.



3.0 SOIL SAMPLING LABORATORY ANALYSIS

All soil samples were analyzed for full NYSDEC Part 375 parameters, and the results were compared against the NYSDEC Part 375 Soil Cleanup Objectives ("SCOs") and Part 360 limits for beneficial reuse. The detected analytes are shown in Tables I through IV attached at the end of this report, and all regulatory exceedances are shown in Figure 3.0; the full laboratory data package is included in Appendix B.

3.1 SOIL STOCKPILE SAMPLING RESULTS

In the soil stockpiles, the following analytes were detected:

- Several VOCs, semi-volatile organic compounds ("SVOCs"), metals, and pesticides were detected in the samples at concentrations below the most stringent NYSDEC Part 375 Unrestricted Use SCOs.

The sampling results indicate that the soil stockpiles contain low levels of VOCs, SVOCs, metals, and pesticides, which are generally consistent with soil originating from formerly agricultural or landscaped properties. Based on the sampling results, the currently stockpiled soil is suitable for the proposed use (i.e., producing topsoil).

3.2 BERM AREA SAMPLING RESULTS

In the accessible areas of the berm areas, the following analytes were detected:

- In the northern composite sample, the metal lead was detected at an elevated concentration of 854 milligrams per kilogram ("mg/kg"), which is above the most stringent NYSDEC Part 375 Unrestricted Use SCO of 63 mg/kg, and the NYSDEC Part 360.13 General Fill Limits of 400 mg/kg. The metal mercury was also detected at a concentration of 0.191 mg/kg, which is above the stringent NYSDEC Part 375 Unrestricted Use SCO of 0.180 mg/kg, but below the NYSDEC Part 360.13 General Fill Limits of 0.73 mg/kg.
- In the southern composite sample, the pesticide alpha-Chlordane was detected at a concentration of 0.0144 mg/kg, which is above the stringent NYSDEC Part 375 Unrestricted Use SCO of 0.0140 mg/kg, but below the NYSDEC Part 360.13 General Fill Limits of 0.91 mg/kg. The metal mercury was also detected at a concentration of 0.183 mg/kg, which is above the stringent NYSDEC Part 375 Unrestricted Use SCO of 0.180 mg/kg, but below the NYSDEC Part 360.13 General Fill Limits of 0.73 mg/kg.
- Several additional SVOCs, metals, and pesticides were in the samples at concentrations below the most stringent NYSDEC Part 375 Unrestricted Use SCOs.

The sampling results indicate that the berm contains elevated levels of metals and pesticides, in combination with the observed presence of bricks and concrete within the berm, the sampling results are consistent with historical fill material that is typically generated during redevelopment of urban properties. Based on the sampling results, the material within the berm is not suitable for beneficial reuse and should be disposed of at a licensed waste disposal facility.



4.0 CONCLUSIONS AND RECOMMENDATIONS

This Waste Characterization Investigation was performed to provide sufficient laboratory analytical data to ensure that the recently imported soil, currently stored south of the gun range, is suitable for its proposed use. The existing soil stockpile was segregated into nine (9) smaller stockpiles, and twenty-one (21) grab samples and nine (9) 5-point composite samples were collected. Two (2) additional grab samples and two (2) additional composite samples were collected from the accessible area of the berm that was present beneath the soil stockpile.

Laboratory analysis of samples collected from each of the nine (9) soil stockpiles identified no exceedances of the most stringent NYSDEC Part 375 Unrestricted Use SCOs. The soil stockpiles contain low levels of VOCs, SVOCs, metals, and pesticides, which are generally consistent with soil originating from formerly agricultural or landscaped properties. Based on the laboratory analytical results, the soil stockpiles are suitable for their proposed use (i.e., producing topsoil). However, *Laurel* understands that the NYSDEC has become involved in this issue and has indicated that the material should be handled as a regulated waste and disposed of at a licensed waste disposal facility, regardless of the chemical quality of the soil.

The material from the accessible areas of the berm were found to contain metals above the NYSDEC Part 360.16 General Fill Limits and pesticides above the most stringent NYSDEC Part 375 Unrestricted Use SCOs. The sampling results in combination with the observed presence of bricks and concrete within the berm indicate that presence of historical fill material that is typically generated during redevelopment of urban properties. Based on the sampling results, the material within the berm is not suitable for beneficial reuse and should be disposed of at a licensed waste disposal facility.

Respectfully submitted,

Laurel Environmental Geosciences, DPC.



Jamie Burgher
Project Manager, Geologist III

ENVIRONMENTAL PROFESSIONAL CERTIFICATION

I declare that, to the best of my professional knowledge and belief, we meet the definition of *Environmental Professional* as defined in § 312.10 of 40 Code of Federal Regulations (CFR) 312. The Environmental Professional who directed this project has the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Site.



Scott A. Yamck, P.G.
President, Principal Hydrogeologist
NYS P.G. Lic# 000330



TABLES

Table I: Analytes Detected in Soil Stockpile Grab Samples

Sample Name Sampling Date Client Matrix	Compound	Part 375 UU SCOs	Part 360 GFLs	SP1_WC_Grab_1 4/13/2026		SP2_WC_Grab_2 4/13/2026		SP2_WC_Grab_1 4/13/2026		SP2_WC_Grab_2 4/13/2026		SP2_WC_Grab_3 4/13/2026		SP3_WC_Grab_1 4/13/2026		SP3_WC_Grab_2 4/13/2026	
				Result	Q	Result	Q	Result	Q	Result	Q	Result	Q	Result	Q	Result	Q
VOCs, 8260 TCL Dilution Factor	mg/Kg	0.03	12	1	U	1	U	1	U	1	U	1	U	1	U	1	U
				0.004	U	0.004	U	0.005	U	0.004	U	0.004	U	0.006	U	0.005	U
				0.002	U	0.002	U	0.002	U	0.002	U	0.002	U	0.003	U	0.003	U
Sample Name Sampling Date Client Matrix	Compound	Part 375 UU SCOs	Part 360 GFLs	SP4_WC_Grab_1 4/13/2026		SP4_WC_Grab_2 4/13/2026		SP5_WC_Grab_1 4/13/2026		SP5_WC_Grab_2 4/13/2026		SP5_WC_Grab_3 4/13/2026		SP6_WC_Grab_1 4/13/2026		SP6_WC_Grab_2 4/13/2026	
				Result	Q	Result	Q	Result	Q	Result	Q	Result	Q	Result	Q	Result	Q
				mg/Kg		mg/Kg		mg/Kg		mg/Kg		mg/Kg		mg/Kg		mg/Kg	
				1	U	1	U	1	U	1	U	1	U	1	U	1	U
VOCs, 8260 TCL Dilution Factor	mg/Kg	0.03	12	0.005	U	0.004	U	0.005	U	0.006	U	0.004	U	0.005	U	0.005	U
				0.002	J	0.002	U	0.002	U	0.003	U	0.002	U	0.002	U	0.002	U
Sample Name Sampling Date Client Matrix	Compound	Part 375 UU SCOs	Part 360 GFLs	SP7_WC_Grab_1 4/13/2026		SP7_WC_Grab_2 4/13/2026		SP8_WC_Grab_1 4/13/2026		SP8_WC_Grab_2 4/13/2026		SP9_WC_Grab_1 4/13/2026		SP9_WC_Grab_2 4/13/2026		SP9_WC_Grab_3 4/13/2026	
				Result	Q	Result	Q	Result	Q	Result	Q	Result	Q	Result	Q	Result	Q
				mg/Kg		mg/Kg		mg/Kg		mg/Kg		mg/Kg		mg/Kg		mg/Kg	
				1	U	1	U	1	U	1	U	1	U	1	U	1	U
VOCs, 8260 TCL Dilution Factor	mg/Kg	0.03	12	0.004	U	0.006	U	0.007	J	0.004	U	0.004	U	0.006	J	0.005	U
				0.002	U	0.003	U	0.002	U	0.002	U	0.002	U	0.002	U	0.002	U

Notes: mg/kg=milligrams per kilogram. Part 375 UU SCOs=NYSDEC Part 375 Unrestricted Use Soil Cleanup Objectives, Part 360

GFLs=NYSDEC Part 360.13 General Fill Limits. Any exceedances are color coded.

Q is the qualifier column, where J=analyte detected at or above the method detection limit, but below the reporting limit – data is estimated, and

U=analyte not detected at or above the level indicated.

Table II: Analytes Detected in Soil Stockpile Composite Samples

Sample Name Sampling Date Client Matrix	SP1_WC_COMP 4/13/2026 Soil	SP2_WC_COMP 4/13/2026 Soil	SP3_WC_COMP 4/13/2026 Soil	SP4_WC_COMP 4/13/2026 Soil	SP5_WC_COMP 4/13/2026 Soil
SVOCs, 8270 TCL Dilution Factor	mg/kg 1	mg/kg 1	mg/kg 1	mg/kg 1	mg/kg 1
Benzo(a)anthracene	1	0.03	0.05	0.04	0.03
Benzo(a)pyrene	1	0.04	0.05	0.04	0.03
Benzo(b)fluoranthene	1	0.04	0.04	0.04	0.04
Benzo(g,h,i)perylene	0.64	0.03	0.03	0.03	0.03
Benzo(k)fluoranthene	0.8	0.04	0.04	0.04	0.03
Chrysene	1	0.03	0.05	0.03	0.03
Fluoranthene	85	0.06	0.09	0.07	0.04
Indeno(1,2,3-cd)pyrene	0.5	0.04	0.04	0.04	0.04
Phenanthrene	1.1	0.04	0.05	0.04	0.03
Pyrene	64	0.04	0.09	0.07	0.05

Sample Name Sampling Date Client Matrix	Part 375 UU SCOs	Part 360 GFLs	SP6_WC_COMP 4/13/2026 Soil	SP7_WC_COMP 4/13/2026 Soil	SP8_WC_COMP 4/13/2026 Soil	SP9_WC_COMP 4/13/2026 Soil
SVOCs, 8270 TCL Dilution Factor	mg/kg 1	mg/kg 1	mg/kg 1	mg/kg 1	mg/kg 1	mg/kg 1
Benzo(a)anthracene	1	1	0.04	0.03	0.05	0.06
Benzo(a)pyrene	1	1	0.05	0.03	0.04	0.05
Benzo(b)fluoranthene	1	1	0.05	0.04	0.03	0.04
Benzo(g,h,i)perylene	0.64	100	0.03	0.03	0.03	0.04
Benzo(k)fluoranthene	0.8	1	0.04	0.03	0.03	0.04
Chrysene	1	1	0.04	0.03	0.05	0.07
Fluoranthene	85	100	0.08	0.04	0.08	0.11
Indeno(1,2,3-cd)pyrene	0.5	0.5	0.04	0.04	0.04	0.04
Phenanthrene	1.1	100	0.04	0.03	0.03	0.04
Pyrene	64	100	0.09	0.04	0.08	0.11

Table II: Analytes Detected in Soil Stockpile Composite Samples [continued]

Sample Name	SP1_WC_COMP 4/13/2026	SP2_WC_COMP 4/13/2026	SP3_WC_COMP 4/13/2026	SP4_WC_COMP 4/13/2026	SP5_WC_COMP 4/13/2026
Sampling Date	Soil	Soil	Soil	Soil	Soil
Client Matrix	Result	Q	Result	Q	Result
Pesticides, 8081 TCL	mg/kg		mg/kg		mg/kg
Dilution Factor	5		5		5
4,4'-DDD	0.0033	U	0.002	U	0.002
4,4'-DDE	0.0033	U	0.002	U	0.002
alpha-Chlordane	0.014	D	0.002	D	0.002
Dieldrin	0.005	U	0.002	U	0.002
Heptachlor	0.013	U	0.002	U	0.002

Sample Name	SP6_WC_COMP 4/13/2026	SP7_WC_COMP 4/13/2026	SP8_WC_COMP 4/13/2026	SP9_WC_COMP 4/13/2026
Sampling Date	Soil	Soil	Soil	Soil
Client Matrix	Result	Q	Result	Q
Pesticides, 8081 TCL	mg/kg		mg/kg	
Dilution Factor	5		5	
4,4'-DDD	0.002	U	0.002	U
4,4'-DDE	0.002	U	0.002	U
alpha-Chlordane	0.004	D	0.004	D
Dieldrin	0.002	U	0.002	U
Heptachlor	0.002	U	0.002	U

Table II: Analytes Detected in Soil Stockpile Composite Samples [continued]

Sample Name	Compound	Part 375 UU SCOs	Part 360 GFLs	SP1_WC_COMP 4/13/2026		SP2_WC_COMP 4/13/2026		SP3_WC_COMP 4/13/2026		SP4_WC_COMP 4/13/2026		SP5_WC_COMP 4/13/2026		
Sampling Date				Client Matrix	Soil		Soil		Soil		Soil		Soil	
					Result	Q	Result	Q	Result	Q	Result	Q	Result	Q
Metals, TAL		mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	
Dilution Factor				1		1		1		1		1		
Arsenic		13	16	3.0		2.2		2.3		2.8		2.1		
Barium		410	350	70		65		77		79		75		
Beryllium		4.4	14	2.6		0.4		0.4		0.4		0.3		
Chromium		~	~	20		20		22		22		20		
Copper		50	270	20		17		21		23		18		
Lead		63	400	7.7		8.0		10		14		7.3		
Manganese		1,600	2,000	311		279		361		385		337		
Nickel		30	130	15		14		16		18		15		
Zinc		109	2,200	45		35		45		48		40		
Mercury		0.18	0.73	0.04		0.03	U	0.08		0.05		0.03	U	
Chromium, Trivalent		30	36	20		20		22		22		20		

Table II: Analytes Detected in Soil Stockpile Composite Samples [continued]

Sample Name Sampling Date Client Matrix	Compound	Part 375 UU SCOs	Part 360 GFLs	SP6_WC_COMP 4/13/2026		SP7_WC_COMP 4/13/2026		SP8_WC_COMP 4/13/2026		SP9_WC_COMP 4/13/2026	
				Result	Q	Result	Q	Result	Q	Result	Q
Metals, TAL		mg/kg	mg/kg	mg/kg		mg/kg		mg/kg		mg/kg	
Dilution Factor											
Arsenic		13	16	1		1		1		1	
Barium		410	350	2.5		2.2		1.9		2.3	
Beryllium		4.4	14	82		75		70		64	
Chromium		~	~	0.4		0.3		0.3		0.3	
Copper		50	270	22		19		18		16	
Lead		63	400	23		19		18		17	
Manganese		1,600	2,000	8.3		8.3		7.4		7.8	
Nickel		30	130	351		315		291		297	
Zinc		109	2,200	17		14		14		12	
Mercury		0.18	0.73	43		39		38		33	
Chromium, Trivalent		30	36	0.03	U	0.04		0.03	U	0.04	
				22		19		18		16	

Notes: mg/kg=milligrams per kilogram. Part 375 UU SCOs=NYSDEC Part 375 Unrestricted Use Soil Cleanup Objectives, Part 360 GFLs=NYSDEC Part 360.13 General Fill Limits. Any exceedances are color coded.
Q is the qualifier column, where D=result is from an analysis that required a dilution, J=analyte detected at or above the method detection limit, but below the reporting limit – data is estimated, P=the percent difference between the two instruments exceeded the method detection limits, and U=analyte not detected at or above the level indicated.

Table III: Analytes Detected in Berm Grab Samples

Sample Name Sampling Date Client Matrix	Part 375 UU SCOs	Part 360 GFLs	BM_WC_Grab_N 4/13/2026 Soil		BM_WC_Grab_S 4/13/2026 Soil	
Compound			Result	Q	Result	Q
VOCs, 8260 TCL	mg/kg	mg/kg	mg/kg		mg/kg	
Dilution Factor			1		1	
Acetone	0.03	0.05	0.0048	U	0.0054	U
Naphthalene	12	12	0.0024	U	0.0027	U

Notes: mg/kg=milligrams per kilogram. Part 375 UU SCOs=NYSDEC Part 375 Unrestricted Use Soil Cleanup Objectives, Part 360 GFLs=NYSDEC Part 360.13 General Fill Limits. Any exceedances are color coded.
Q is the qualifier column, where U=analyte not detected at or above the level indicated.

Table IV: Analytes Detected in Berm Composite Samples

Sample Name Sampling Date Client Matrix	Compound	Part 375 UU SCOs mg/kg	Part 360 GFLs mg/kg	BM_WC_COMP_N 4/13/2026		BM_WC_COMP_S 4/13/2026	
				Soil Result	Q	Soil Result	Q
SVOCs, 8270 TCL				mg/kg		mg/kg	
Dilution Factor				1		1	
Benzo(a)anthracene		1	1	0.07		0.03	U
Benzo(a)pyrene		1	1	0.06		0.03	U
Benzo(b)fluoranthene		1	1	0.06		0.03	U
Benzo(g,h,i)perylene		0.64	100	0.05		0.03	U
Benzo(k)fluoranthene		0.8	1	0.05		0.03	U
Chrysene		1	1	0.08		0.03	U
Fluoranthene		85	100	0.13		0.03	U
Indeno(1,2,3-cd)pyrene		0.5	0.5	0.04	J	0.04	U
Phenanthrene		1.1	100	0.06		0.03	U
Pyrene		64	100	0.13		0.03	U
Pesticides, 8081 TCL				mg/kg		mg/kg	
Dilution Factor				5		5	
4,4'-DDD		0.0033	2.6	0.002	U	0.003	DP
4,4'-DDE		0.0033	1.8	0.003	D	0.003	DP
alpha-Chlordane		0.014	0.91	0.009	D	0.0144	D
Dieldrin		0.005	0.039	0.005	D	0.004	D
Heptachlor		0.013	0.38	0.010	D	0.008	D

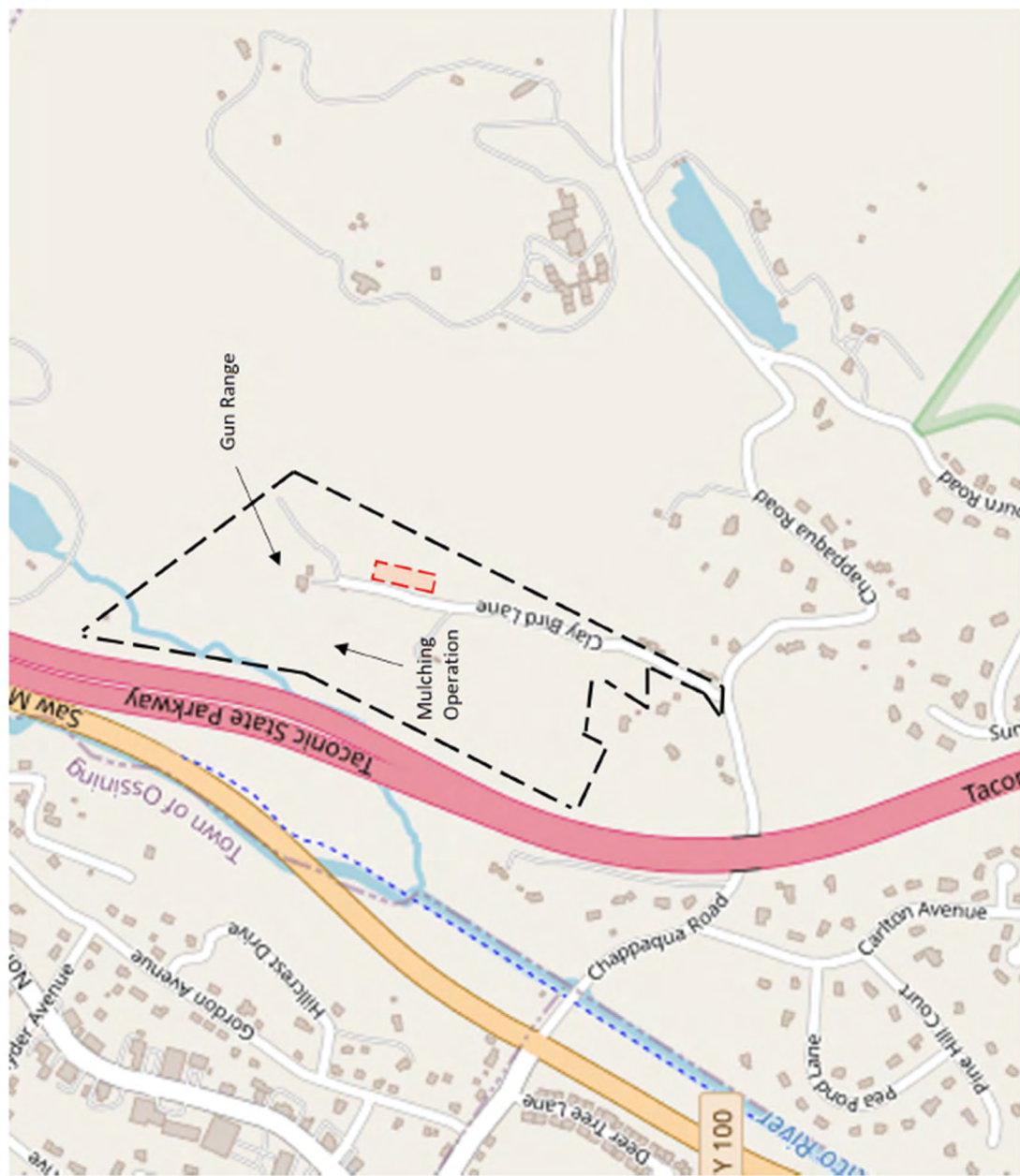
Table IV: Analytes Detected in Berm Composite Samples [continued]

Sample Name Sampling Date Client Matrix	Part 375 UU SCOs	Part 360 GFLs	BM_WC_COMP_N 4/13/2026		BM_WC_COMP_S 4/13/2026	
Compound			Result	Q	Result	Q
Metals, TAL	mg/kg	mg/kg	mg/kg		mg/kg	
Dilution Factor			1		1	
Arsenic	13	16	3.1		3.0	
Barium	410	350	89		92	
Beryllium	4.4	14	0.4		0.4	
Chromium	~	~	24		23	
Copper	50	270	24		24	
Lead	63	400	854		17	
Manganese	1,600	2,000	407		338	
Nickel	30	130	18		18	
Zinc	109	2,200	54		54	
Mercury	0.18	0.73	0.191		0.183	
Chromium, Trivalent	30	36	24		23	

Notes: mg/kg=milligrams per kilogram. Part 375 UU SCOs=NYSDC Part 375 Unrestricted Use Soil Cleanup Objectives, Part 360 GFLs=NYSDC Part 360.13 General Fill Limits. Any exceedances are color coded.

Q is the qualifier column, where D=result is from an analysis that required a dilution, P=the percent difference between the two instruments exceeded the method detection limits, and U=analyte not detected at or above the level indicated.

FIGURES



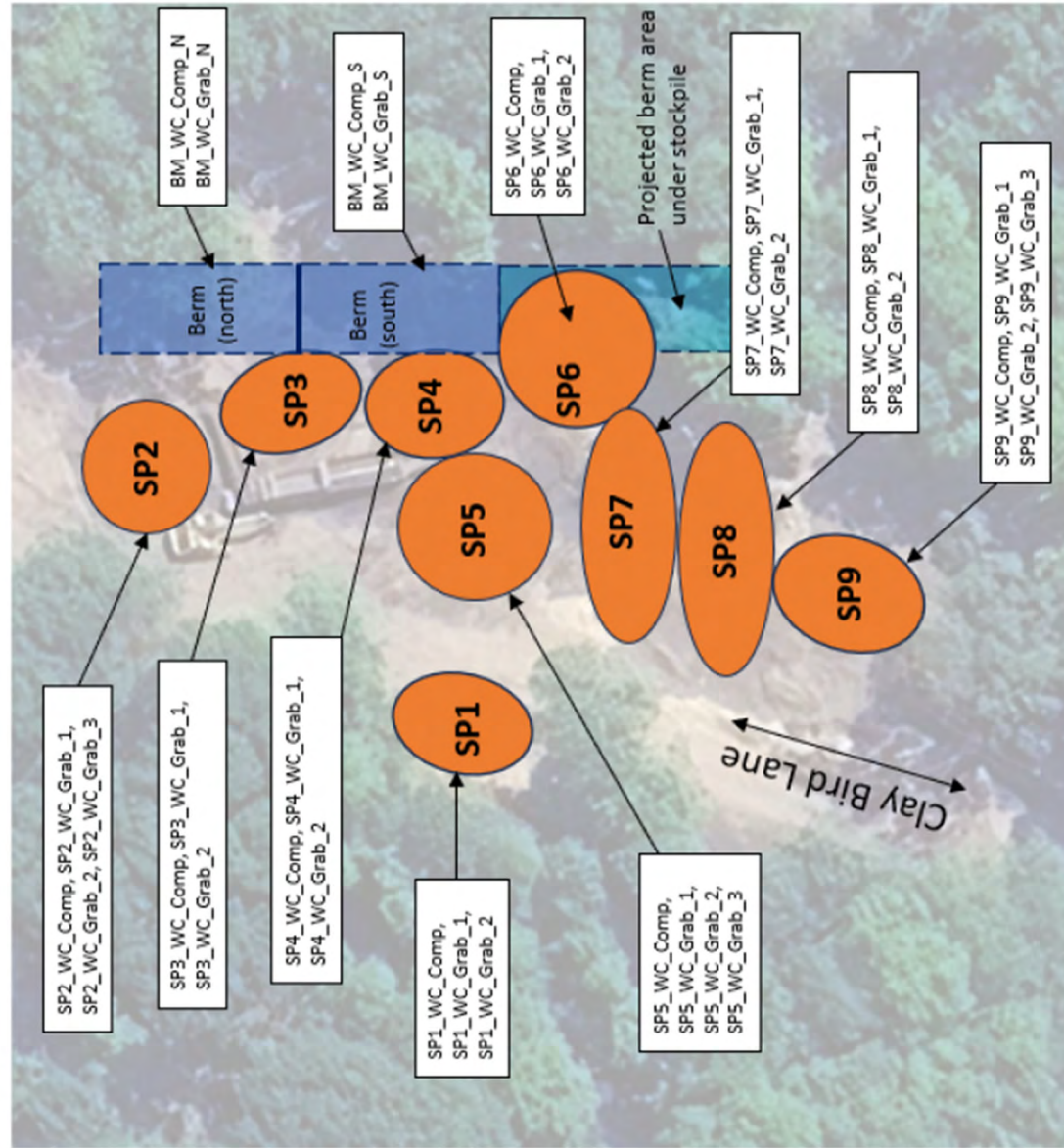
53 West Hills Road
Huntington Station, NY 11746
PHONE: 631-673-0612
FAX: 631-427-5323
WWW.LAURELENV.COM

FIGURE 1.0
SITE LOCATION
121 Clay Bird Lane,
Brarcliff Manor, NY 10510

PROJECT: 26-179
DRAWING DATE: 5/4/25
DRAWN BY: BL
CHECKED BY: JB
REVISIONS:

KEY
--- Site Boundary
- - - Area of Investigation

Laurel makes no guarantee as to the accuracy of this drawing and it should only be used for informational purposes.



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FIGURE 2.0
SITE SKETCH WITH SAMPLING
LOCATIONS
121 Clay Bird Lane,
Brancliff Manor, NY 10510

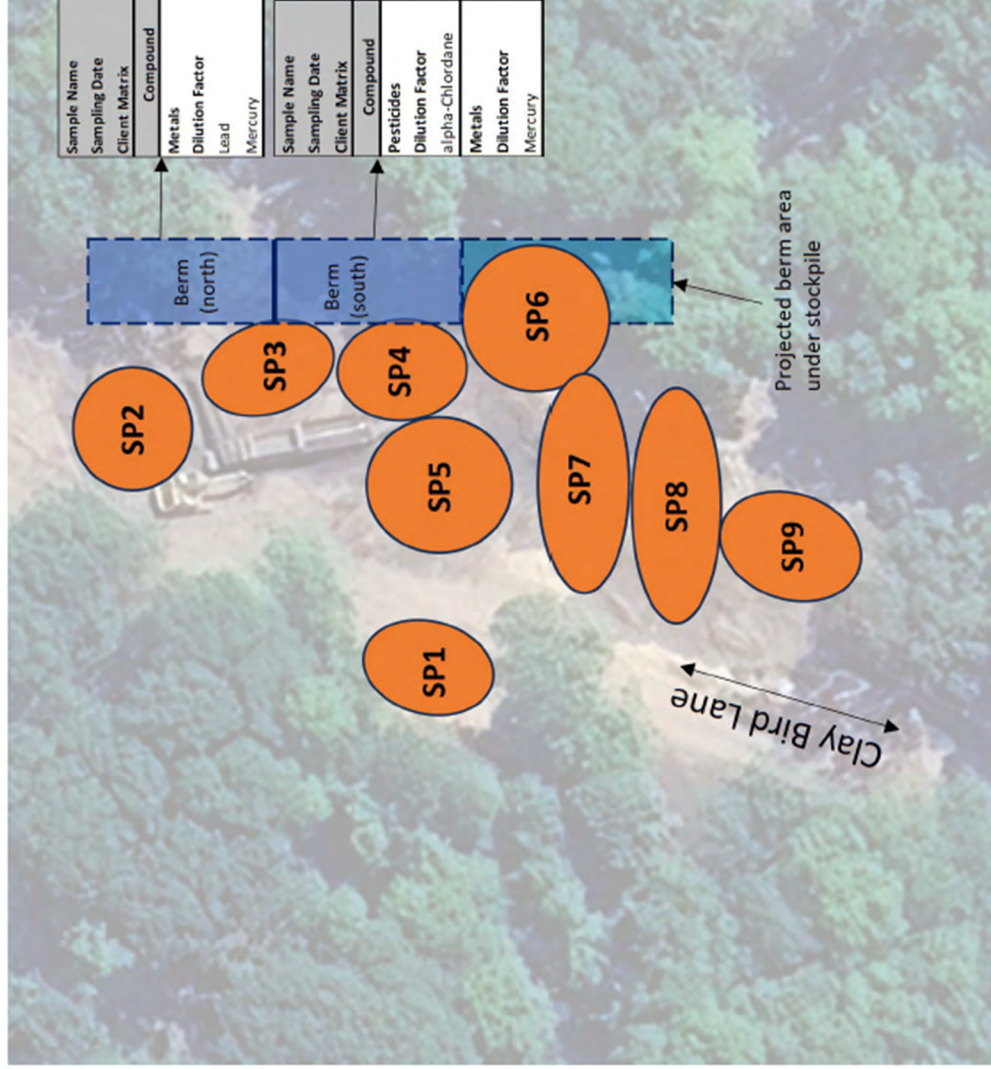
PROJECT: 26-179
DRAWING DATE: 4/10/26
DRAWN BY: BL
CHECKED BY: JB
REVISIONS:

KEY

- Soil Stockpiles
- Berm
- Projected Berm under Stockpile

NOT TO SCALE

Laurel makes no guarantee as to the accuracy of this drawing and it should only be used for informational purposes.



Sample Name	Sampling Date	Client Matrix	Compound	Part 375 UU SCOs	Part 360.13 GFLs	BM_WC_COMP_N 4/13/2026
Metals				mg/Kg	mg/Kg	Soil
Dilution Factor						Result
Lead				63	400	1
Mercury				0.18	0.73	0.191

Sample Name	Sampling Date	Client Matrix	Compound	Part 375 UU SCOs	Part 360.13 GFLs	BM_WC_COMP_S 4/13/2026
Pesticides				mg/Kg	mg/Kg	Soil
Dilution Factor						Result
alpha-Chlordane				0.014	0.91	0.0144
Metals				mg/Kg	mg/Kg	1
Dilution Factor						0.183
Mercury				0.18	0.73	



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FIGURE 3.0
SITE SKETCH WITH REGULATORY
EXCEEDANCES
121 Clay Bird Lane,
Briarcliff Manor, NY 10510

PROJECT: 26-179
DRAWING DATE: 4/30/26
DRAWN BY: BL
CHECKED BY: JB
REVISIONS:

KEY
 Soil Stockpiles
 Berm
 Projected Berm under Stockpile

NOT TO SCALE

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Appendix A

Photographic Log



Photo 1: View of the soil stockpile at the beginning of the workday.



Photo 2: View of soil being separated into new stockpiles (shown: SP2)



Photo 3: View of excavator working to separate the soil stockpile.



Photo 4: View of one of the nine separated stockpiles (shown: SP1)



Photo 5: View of suspected asphalt millings encountered while segregating the soil into stockpiles.



Photo 6: View of suspected mulch encountered while segregating the soil into stockpiles.



Photo 7: View of soil and associated sample collected from SP1.



Photo 8: View of the berm area (boxed in red) shown underneath the soil stockpile.



Photo 9: View of fines and rocks present on the surface of the berm material.



Photo 10: View of test pits conducted for sample collection in the berm.



Photo 11: Additional view of berm material with fines, bricks, and concrete.