



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Delivery

August 16, 2005

Mr. William P. Lovely, Jr.
United States Environmental Protection Agency
EPA New England (MC HBO)
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

**Re: Floodplain GE-Pittsfield/Housatonic River Site
Floodplain Residential and Non-Residential Properties Adjacent to 1½ Mile Reach of
Housatonic River (GEC710 and GEC720)
Supplemental Information Package for the Group 3C and 3D Floodplain Properties**

Dear Mr. Lovely:

On June 14, 2005, the General Electric Company (GE) submitted the *Removal Design/Removal Action Work Plan for the Group 3C and 3D Floodplain Properties* (RD/RA Work Plan) to the United States Environmental Protection Agency (EPA). EPA conditionally approved the RD/RA Work Plan in a letter to GE dated July 20, 2005.

The RD/RA Work Plan stated that, following selection of a Remediation Contractor to conduct response actions within the Group 3C and 3D floodplain properties, GE would submit a Supplemental Information Package to EPA to provide certain Contractor-specific information and implementation details. This letter and its attachments provide the following:

- Identification of and contact information for the selected Remediation Contractor;
- Copies of the Remediation Contractor's pre-mobilization submittals (i.e., Operations Plan; Site Safety, Health Plan [SSHP]; and Contingency Plan); and
- Identification of proposed backfill sources and locations, as well as analytical data collected from these sources.

In accordance with the July 20, 2005 conditional approval letter, this Supplemental Information Package also presents GE's expanded excavation limits based on constructability and related factors.

Additional details regarding the above-referenced information are provided below.

Selection of Remedial Contractor

GE has selected Severson Environmental Services, Inc. (Severson) of Niagara Falls, New York to conduct response actions within the Group 3C and 3D floodplain properties. Contact information for Severson is provided in Section 5.0 of the Contingency Plan (Attachment A).

Remediation Contractor's Pre-Mobilization Submittals

Sevenson has prepared several pre-mobilization submittals prior to initiating response actions within the Group 3C and 3D floodplain properties. Copies of Sevenson's Contingency Plan, SSHP, and Operations Plan are provided in Attachments A, B, and C, respectively.

Backfill Information

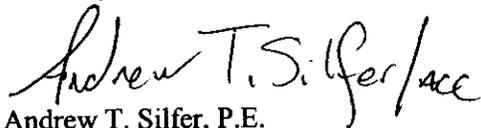
As shown in Attachment D, Sevenson has indicated that the common fill and topsoil sources will be the same as those used for the Group 3A and 3B floodplain properties. These common fill and topsoil sources are Lee Pit and Walden Complex, respectively. Analytical results collected from these sources were previously included in the Supplemental Information Package for the Group 3A and 3B floodplain properties. In the event that these sources do not contain enough fill material to complete the response actions within the Group 3C and 3D floodplain properties, Sevenson will then identify additional source(s), as necessary. In the event that additional source(s) are necessary, GE will notify EPA of the source location(s) and will supply EPA with the required analytical results prior to placement of such material.

Expanded Excavation Limits

In accordance with EPA's July 20, 2005 conditional approval letter, GE has elected to expand certain removal limits within the Group 3C floodplain properties based on constructability and related factors. A revised version of Technical Drawing 5 is included in Attachment E and contains the revised removal limits.

Please feel free to contact me if you have any questions regarding this letter or the attached supplemental information.

Sincerely,



Andrew T. Silfer, P.E.
GE Project Coordinator

ACC/meg
Attachments

V:\GE_Housatonic_Mile_and_Half\Reports and Presentations\SIP - 3C&3D\49552196Ltr.doc

cc: Dean Tagliaferro, EPA
Rose Howell, EPA*
Holly Inglis, EPA
Tim Conway, EPA
John Kilborn, EPA
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Robert Bell, MDEP*
Thomas Angus, MDEP*
Joanne Flescher, MDEP*
Nancy E. Harper, MA AG*

Dale Young, MA EOE*
Mayor James Ruberto, City of Pittsfield
Linda Palmieri, Weston (2 copies)
Michael Carroll, GE*
Richard Gates, GE
Rod McLaren, GE*
James Nuss, BBL
James Bieke, Goodwin Procter
Public Information Repositories
GE Internal Repository

* cover letter only

Attachments

Attachment A

Contingency Plan

CONTINGENCY PLAN

PHASE 3 FLOODPLAIN PROPERTIES GROUP 3C AND 3D REMOVAL ACTION AREA

Prepared by:

Sevenson Environmental Services, Inc.
2749 Lockport Road
Niagara Falls, NY 14305

August 4, 2005

CONTINGENCY PLAN

1.0 Spill prevention control and countermeasures plan

Throughout the course of the soil removal, all efforts will be made to avoid releases of excavated soils and/or chemicals; however, there is a potential for releases to occur during the remediation activities. Should an outside release occur, Severson will take immediate action to mitigate the release and will coordinate with outside agencies as required.

This Plan is designed to aid site personnel in responding quickly and effectively to the problems presented by accidental releases. Its primary goal is to limit the damage from a release while assuring the safety of all personnel who may be affected. This Plan provides a comprehensive summary of the various remediation processes from which a release could occur, the chain of command should a release occur, preventive measures to avoid/contain a release, and corrective actions for isolating, containing and cleaning up a release.

Throughout the performance of the pilot program activities, site personnel will take great care to minimize the potential for releases of fuels/oils used and contaminants in the soils. Review of the excavation activities has identified potential release scenarios, which will be discussed in the following sections.

1.1 Emergency Spill Response Procedures and Equipment

In the event of an emergency involving a hazardous material spill or release, the following general procedures will be used for rapid and safe response and control of the situation. Hazmat spill responses will be coordinated through the local Emergency Response Center.

1.1.1 Notification Procedures

If an employee discovers a chemical spill or a vapor or material release, he or she will immediately notify the Site Superintendent.

The Site Superintendent will obtain information pertaining to the following:

- The material spilled or released.
- Location of the release.
- An estimate of quantity released and the rate at which it is being released.
- The direction in which the spill, vapor or smoke caused by the release is heading.
- Any injuries involved.
- Fire and/or explosion or possibility of these events.

CONTINGENCY PLAN

- The area and materials involved and the intensity of the fire or explosion.

This information will help the Site Superintendent to assess the magnitude and potential seriousness of the spill or release.

1.1.2 Procedure for Containing/Collecting Spills

The initial response to any spill or discharge will be to protect human health and safety, and then the environment. Identification, containment, treatment, and disposal assessment will be the secondary response.

If, for some reason, a chemical spill is not contained within a dike or sump area, an area of isolation will be established around the spill. The size of the area will generally depend on the size of the spill and the materials involved. When any spill occurs, only response personnel will be allowed within the designated affected area. If possible, the area will be roped or otherwise blocked off.

If an incident may threaten the health or safety of the surrounding community, GE will be consulted and determine if the public will be informed and possibly evacuated from the area. The Site Superintendent will inform the proper agencies in the event this is necessary.

As called for in regulations developed under the Comprehensive Environmental Response Compensation Liability Act of 1980 (Superfund), Severson's practice is to report a spill of a pound or more of any hazardous material for which a reportable quantity has not been established and which is listed under the Solid Waste Disposal Act, Clean Air Act, Clean Water Act, or TSCA. Severson also follows the same practice for any substances not listed in the Acts noted above but which can be classified as a hazardous waste under RCRA.

Response personnel will take the following measures:

- Make sure all unnecessary persons are evacuated from the hazard area.
- Put on protective clothing and equipment.
- If a flammable material is involved, remove all ignition sources, and use spark and explosion proof equipment for recovery of material.
- Determine the major components in the waste at the time of the spill and remove all surrounding materials that could be reactive with the spilled material.
- If wastes reach a storm sewer, try to dam the outfall by using sand, earth, sand bags, etc. If this is done, pump this material out into a temporary holding tank or drums as soon as possible.
- Place all small quantities of recovered liquid wastes (55 gallons or less) into drums for incineration or removal to an approved disposal site.

CONTINGENCY PLAN

- If volatile emissions may occur, spray the spill area with foam, if available.
- Apply appropriate spill control media to absorb discharged liquids.
- For large spills, establish diking around the leading edge of the spill using booms, soil or other appropriate material. If possible, use a diaphragm pump to transfer discharged liquid to drums or a holding tank.

1.1.3 Emergency Spill Response Cleanup Materials and Equipment

The supply of appropriate emergency response cleanup and personal protective equipment on hand will be inventoried and visually inspected on a weekly basis.

The materials listed below will be kept on-site for spill control depending on the types of hazardous materials present. The majority of this material will be located in the support zone, in a supply trailer or storage area.

- Activated charcoal (carbon) to adsorb organic solvents (hydrocarbons) and to reduce flammable vapors.
- Appropriate solvents, e.g. CITRIKLEEN, for decontamination of structures or equipment.

The following equipment will be kept on-site and dedicated for spill cleanup:

- Sausage-shaped absorbent booms for diking liquid spills, drains, or sewers.
- Sorbent sheets (diapers) for absorbing liquid spills.
- 55-gallon open-top drums for containerization of waste materials.

NOTE: All absorbent materials, solvents and other materials resulting from the cleanup of spilled or discharged substances will be properly stored, labeled and disposed.

2.0 Emergency vehicular access/egress

Emergency vehicles will access/egress the site through the same access roads utilized by the dump trucks hauling materials from/to the site. The haul roads will be maintained as necessary to ensure that emergency vehicles are able to access the site. The access roads will remain open at all times.

CONTINGENCY PLAN

3.0 Evacuation procedures of personnel from work site

Evacuation procedures will be implemented if human health is in danger. If the SSHO determines that a site incident requires evacuation of all on site personnel, he will follow evacuation procedures. The SSHO will use the following guidelines to establish safe evacuation routes:

- Evacuation routes will be in the upwind direction of the exclusion zone to the extent possible.
- Evacuation routes will be through the decontamination zone in order to decontaminate, if time allows, and to account for site personnel.
- Alternate routes will be established in the case that the primary route is blocked. Alternate routes will not cross or overlap the primary routes.
- Mobility constraints of personnel wearing protective clothing and equipment will be addressed.
- Prior to work at each site the SSHO will make all personnel clearly aware of evacuation routes.

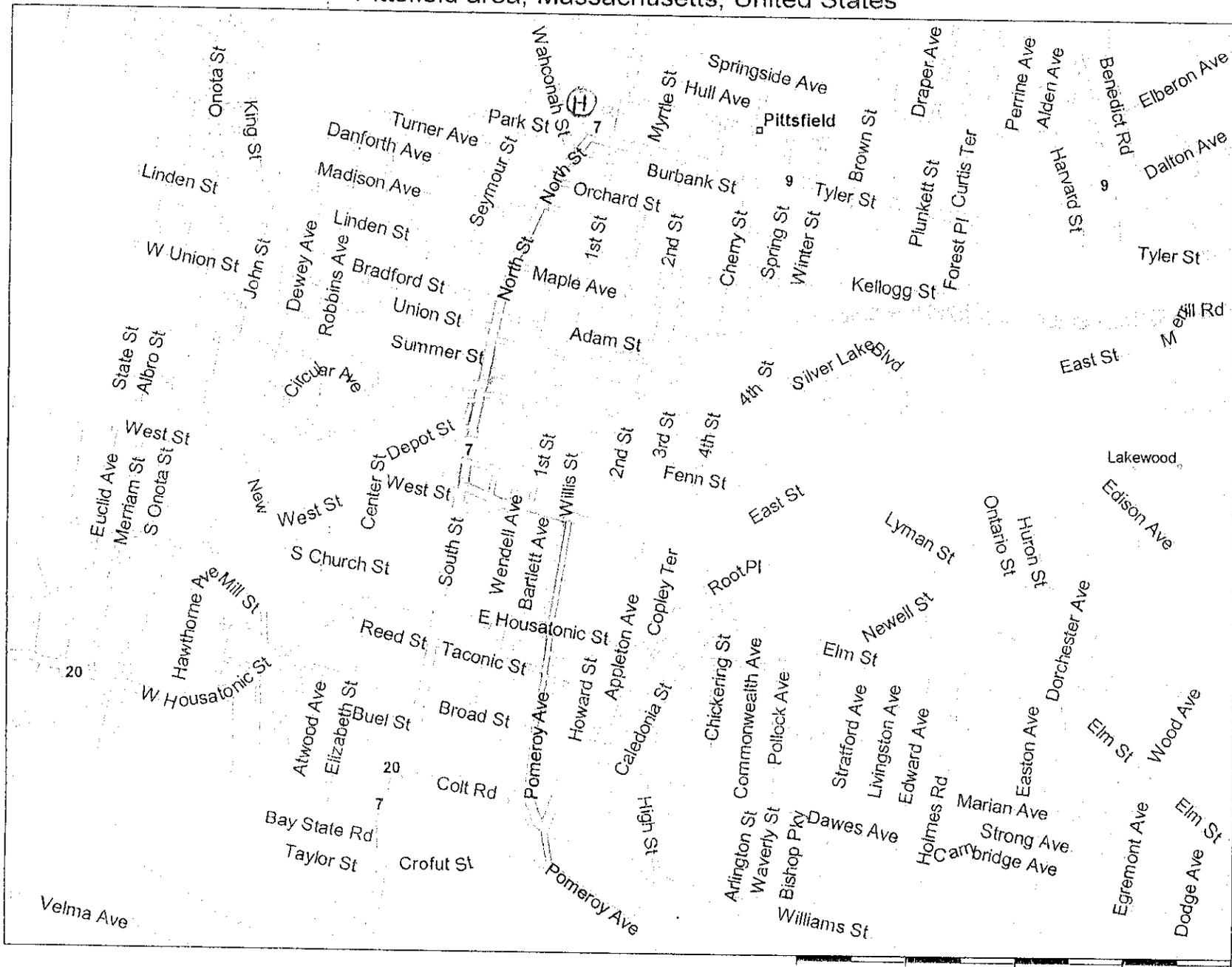
4.0 Flood control contingency plan

Sevenson will continuously monitor river conditions and weather forecasts. River condition data will be obtained from the USGS website at Coltsville, MA (www.waterdata.usgs.gov/ma/nwis/uv?01197000). When bad weather is forecasted or extreme flows are encountered, Sevenson will take the following actions:

- Cease excavation activities.
- Ensure that all stormwater and erosion control measures are in place.
- Remove all equipment and materials from the floodplain areas to higher ground until river flows return to workable conditions.
- Cover all soil stockpiles with poly sheeting to minimized the potential for sediments entering the river.
- Cover all exposed faces of excavations with either clean backfill or poly sheeting.

After each storm event or flood Sevenson will inspect and repair all stormwater and erosion control measures prior to resuming excavation activities.

Pittsfield area, Massachusetts, United States



Attachment B

Site Safety, Health Plan

CONTINGENCY PLAN

PHASE 3 FLOODPLAIN PROPERTIES GROUP 3C AND 3D REMOVAL ACTION AREA

Prepared by:

Sevenson Environmental Services, Inc.
2749 Lockport Road
Niagara Falls, NY 14305

August 4, 2005

CONTINGENCY PLAN

1.0 Spill prevention control and countermeasures plan

Throughout the course of the soil removal, all efforts will be made to avoid releases of excavated soils and/or chemicals; however, there is a potential for releases to occur during the remediation activities. Should an outside release occur, Severson will take immediate action to mitigate the release and will coordinate with outside agencies as required.

This Plan is designed to aid site personnel in responding quickly and effectively to the problems presented by accidental releases. Its primary goal is to limit the damage from a release while assuring the safety of all personnel who may be affected. This Plan provides a comprehensive summary of the various remediation processes from which a release could occur, the chain of command should a release occur, preventive measures to avoid/contain a release, and corrective actions for isolating, containing and cleaning up a release.

Throughout the performance of the pilot program activities, site personnel will take great care to minimize the potential for releases of fuels/oils used and contaminants in the soils. Review of the excavation activities has identified potential release scenarios, which will be discussed in the following sections.

1.1 Emergency Spill Response Procedures and Equipment

In the event of an emergency involving a hazardous material spill or release, the following general procedures will be used for rapid and safe response and control of the situation. Hazmat spill responses will be coordinated through the local Emergency Response Center.

1.1.1 Notification Procedures

If an employee discovers a chemical spill or a vapor or material release, he or she will immediately notify the Site Superintendent.

The Site Superintendent will obtain information pertaining to the following:

- The material spilled or released.
- Location of the release.
- An estimate of quantity released and the rate at which it is being released.
- The direction in which the spill, vapor or smoke caused by the release is heading.
- Any injuries involved.
- Fire and/or explosion or possibility of these events.

CONTINGENCY PLAN

- The area and materials involved and the intensity of the fire or explosion.

This information will help the Site Superintendent to assess the magnitude and potential seriousness of the spill or release.

1.1.2 Procedure for Containing/Collecting Spills

The initial response to any spill or discharge will be to protect human health and safety, and then the environment. Identification, containment, treatment, and disposal assessment will be the secondary response.

If, for some reason, a chemical spill is not contained within a dike or sump area, an area of isolation will be established around the spill. The size of the area will generally depend on the size of the spill and the materials involved. When any spill occurs, only response personnel will be allowed within the designated affected area. If possible, the area will be roped or otherwise blocked off.

If an incident may threaten the health or safety of the surrounding community, GE will be consulted and determine if the public will be informed and possibly evacuated from the area. The Site Superintendent will inform the proper agencies in the event this is necessary.

As called for in regulations developed under the Comprehensive Environmental Response Compensation Liability Act of 1980 (Superfund), Severson's practice is to report a spill of a pound or more of any hazardous material for which a reportable quantity has not been established and which is listed under the Solid Waste Disposal Act, Clean Air Act, Clean Water Act, or TSCA. Severson also follows the same practice for any substances not listed in the Acts noted above but which can be classified as a hazardous waste under RCRA.

Response personnel will take the following measures:

- Make sure all unnecessary persons are evacuated from the hazard area.
- Put on protective clothing and equipment.
- If a flammable material is involved, remove all ignition sources, and use spark and explosion proof equipment for recovery of material.
- Determine the major components in the waste at the time of the spill and remove all surrounding materials that could be reactive with the spilled material.
- If wastes reach a storm sewer, try to dam the outfall by using sand, earth, sand bags, etc. If this is done, pump this material out into a temporary holding tank or drums as soon as possible.
- Place all small quantities of recovered liquid wastes (55 gallons or less) into drums for incineration or removal to an approved disposal site.

CONTINGENCY PLAN

- If volatile emissions may occur, spray the spill area with foam, if available.
- Apply appropriate spill control media to absorb discharged liquids.
- For large spills, establish diking around the leading edge of the spill using booms, soil or other appropriate material. If possible, use a diaphragm pump to transfer discharged liquid to drums or a holding tank.

1.1.3 Emergency Spill Response Cleanup Materials and Equipment

The supply of appropriate emergency response cleanup and personal protective equipment on hand will be inventoried and visually inspected on a weekly basis.

The materials listed below will be kept on-site for spill control depending on the types of hazardous materials present. The majority of this material will be located in the support zone, in a supply trailer or storage area.

- Activated charcoal (carbon) to adsorb organic solvents (hydrocarbons) and to reduce flammable vapors.
- Appropriate solvents, e.g. CITRIKLEEN, for decontamination of structures or equipment.

The following equipment will be kept on-site and dedicated for spill cleanup:

- Sausage-shaped absorbent booms for diking liquid spills, drains, or sewers.
- Sorbent sheets (diapers) for absorbing liquid spills.
- 55-gallon open-top drums for containerization of waste materials.

NOTE: All absorbent materials, solvents and other materials resulting from the cleanup of spilled or discharged substances will be properly stored, labeled and disposed.

2.0 Emergency vehicular access/egress

Emergency vehicles will access/egress the site through the same access roads utilized by the dump trucks hauling materials from/to the site. The haul roads will be maintained as necessary to ensure that emergency vehicles are able to access the site. The access roads will remain open at all times.

CONTINGENCY PLAN

3.0 Evacuation procedures of personnel from work site

Evacuation procedures will be implemented if human health is in danger. If the SSHO determines that a site incident requires evacuation of all on site personnel, he will follow evacuation procedures. The SSHO will use the following guidelines to establish safe evacuation routes:

- Evacuation routes will be in the upwind direction of the exclusion zone to the extent possible.
- Evacuation routes will be through the decontamination zone in order to decontaminate, if time allows, and to account for site personnel.
- Alternate routes will be established in the case that the primary route is blocked. Alternate routes will not cross or overlap the primary routes.
- Mobility constraints of personnel wearing protective clothing and equipment will be addressed.
- Prior to work at each site the SSHO will make all personnel clearly aware of evacuation routes.

4.0 Flood control contingency plan

Sevenson will continuously monitor river conditions and weather forecasts. River condition data will be obtained from the USGS website at Coltsville, MA (www.waterdata.usgs.gov/ma/nwis/uv?01197000). When bad weather is forecasted or extreme flows are encountered, Sevenson will take the following actions:

- Cease excavation activities.
- Ensure that all stormwater and erosion control measures are in place.
- Remove all equipment and materials from the floodplain areas to higher ground until river flows return to workable conditions.
- Cover all soil stockpiles with poly sheeting to minimized the potential for sediments entering the river.
- Cover all exposed faces of excavations with either clean backfill or poly sheeting.

After each storm event or flood Sevenson will inspect and repair all stormwater and erosion control measures prior to resuming excavation activities.

SITE SAFETY, HEALTH PLAN

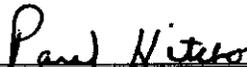
**Housatonic River Floodplain
Groups 3C + 3D Properties
Pittsfield, Massachusetts**

Prepared By:

SEVENSON ENVIRONMENTAL SERVICES, INC.

2749 Lockport Road
Niagara Falls, New York 14305

August 4, 2005



Paul J. Hitcho, PhD, CIH
Safety and Health Manager

TABLE OF CONTENTS

1.0	<u>GENERAL</u>	3
2.0	<u>SITE DESCRIPTION and CONTAMINATION CHARACTERIZATION</u>	3
3.0	<u>BASIS</u>	4
4.0	<u>PERSONNEL RESPONSIBLE FOR SAFETY and HEALTH</u>	4
5.0	<u>CONSIDERATIONS</u>	5
7.0	<u>FIRE ALARM PLAN</u>	8
8.0	<u>WORK ZONES</u>	11
8.1	<u>Exclusion Zone (EZ)</u>	8
8.2	<u>Contamination Reduction Zone</u>	9
8.3	<u>Support Zone</u>	9
9.0	<u>HEAT STRESS</u>	11
10.0	<u>MEDICAL SURVEILLANCE</u>	12
11.0	<u>LEVELS OF PROTECTION/PERSONNEL PROTECTIVE EQUIPMENT</u>	13
11.1	<u>Levels of Protection</u>	13
11.3	<u>Respiratory Protection</u>	14
11.4	<u>Task and Level of Protection in Exclusion Zone</u>	15
12.0	<u>SAFETY TRAINING</u>	15
13.0	<u>CONSTRUCTION</u>	17
14.0	<u>COMMUNICATIONS</u>	18
15.0	18
	<u>EMERGENCY EQUIPMENT and FIRST AID REQUIREMENTS</u>	18
16.0	<u>HEARING CONSERVATION</u>	18
17.0	<u>RECORD KEEPING</u>	19
18.0	<u>EMERGENCY RESPONSES</u>	20
18.1	<u>Worker Injury</u>	20
18.2	<u>Fires</u>	21
18.3	<u>Unusual Objects or Events</u>	21
18.4	<u>Spills</u>	22
18.5	<u>Notification and Documentation</u>	22
19.0	<u>AIR MONITORING</u>	22
19.4	<u>Calibration</u>	24
20.0	<u>STANDARD OPERATING PROCEDURES</u>	24

Table of Contents Continued

FIGURES

FIGURE 1- DIRECTIONS TO HOSPITAL

APPENDICES

APPENDIX A - MATERIAL SAFETY DATA SHEETS

APPENDIX B - HAZARD ANALYSIS

APPENDIX C - HEAT STRESS

APPENDIX D - FORMS

1.0 GENERAL

Basic requirements to be addressed by Severson Environmental Services, Inc.'s (Severson) Site Safety, Health Plan (SSHP) have been stipulated within the Contract Documents. This Plan specified, hereafter, will meet the requirements of the specifications and will provide for a safe and minimal risk working environment for on-site personnel. It also provides for emergency response procedures to minimize the potential adverse impact of construction activities on the general public.

2.0 SITE DESCRIPTION and CONTAMINATION CHARACTERIZATION

The General Electric (GE) Pittsfield/Housatonic River site (the site) consists of the 254-acre GE manufacturing facility; the Housatonic River, riverbanks, and associated floodplains from Pittsfield, Massachusetts to Rising Pond Dam (approximately 30 miles); former river oxbows that have been filled; neighboring commercial properties; Allendale School; Silver Lake; and other properties or areas that have become contaminated. The hazardous substances associated with the site include polychlorinated biphenyls (PCBs), dioxins, furans, volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and inorganic constituents.

The site has been used for industrial purposes since the turn of the century, when industries such as the Stanley Electric Company and the Berkshire Gas Company and its predecessors occupied portions of the property in the Merrill Street area. GE initiated operations on the property in 1903. The area has been utilized by three manufacturing divisions at the GE facility (Transformer, Ordnance, and Plastics).

The scope of this plan is limited to the work activities associated with the remediation of the Group 3C and 3D floodplain properties. The major contaminant associated with this project is polychlorinated biphenyls (PCBs). The highest reported PCB concentration for the Group 3C properties is 1,100 parts per million (ppm) and for the Group 3D properties is 680 ppm.

The work to be performed during this project include:

- Mobilization and site preparation
- Soil excavation / truck loading
- Backfilling excavation
- Site restoration and demobilization

3.0 **BASIS**

The Occupational Safety and Health Administration (OSHA) Standards and Regulations, Parts 1910 and 1926 provide the basis for this plan. In particular, this plan follows the OSHA requirements governing hazardous waste operations found in 29 CFR 1910.120 and 1926.65. Additional specifications within this section are in addition to the regulatory requirements and reflect the positions of the EPA, National Institute for Occupational Safety and Health (NIOSH), U.S. Coast Guard, and U.S. Department of Labor. These positions are reflected in the publication, Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities.

4.0 **PERSONNEL RESPONSIBLE FOR SAFETY and HEALTH**

The following personnel are responsible for the safety and health program to be implemented at this Site:

4.1 **Paul Hitcho - Certified Industrial Hygienist (CIH)** (Certificate #2771); Safety and Health Manager

His duties are:

- a) Be responsible for the development, implementation, oversight, and enforcement of the SSHP.
- b) Sign and date the SSHP prior to submittal.
- c) Visit the site as needed to audit the effectiveness of the SSHP.
- d) Be available for emergencies.
- e) Provide onsite consultation as needed to ensure the SSHP is fully implemented.
- f) Coordinate any modifications to the SSHP with the Site Superintendent, the SSHO, and GE.
- g) Provide continued support for upgrading/downgrading of the level of personnel protection.
- h) Be responsible for evaluating air monitoring data and recommending changes to engineering controls, work practices, and PPE.
- i) Review accident reports and results of daily inspections.

4.2 **Tom Patrick - Site Safety and Health Officer (SSHO)**

His duties are:

- a) Assist and represent the Safety and Health Manager in onsite training and the day to day onsite implementation and enforcement of the accepted SSHP.
- b) Be assigned to the site on a full time basis for the duration of field activities.
- c) Have authority to ensure site compliance with specified safety and health requirements, Federal, State and OSHA regulations and all aspects of the SSHP including, but not limited to, activity hazard analyses, air monitoring, use of PPE, decontamination, site control, standard operating procedures used to minimize hazards, safe use of engineering controls, the emergency response plan, confined space entry procedures, spill containment program, and the preparation of records by performing a daily safety and health inspection and documenting results on the Daily Safety Inspection Log in accordance with 29 CFR 1904.
- d) Have authority to stop work if unacceptable health and safety conditions exist, and take necessary action to re-establish and maintain safe working conditions.
- e) Consult with and coordinate any modifications to the SSHP with the Safety and Health Manager, the Site Superintendent, and GE.
- f) Conduct accident investigations and prepare accident reports.
- g) Review results of daily quality control inspections and document safety and health findings into the Daily Safety Inspection Log.
- h) In coordination with site management and the Safety and Health Manager, recommend corrective actions for identified deficiencies and oversee the corrective actions.

4.3 Joe Mahoney – Project Manager

His duties are:

- a) Allocate resources to safely perform all operations.
- b) Support and enforce all health and safety practices

5.0 CONSIDERATIONS

Sevenson may modify the SSHP upon agreement of the CIH and with notification to GE. GE will be provided the opportunity to review and comment on any proposed SSHP modifications. All notifications and comments will be in writing, and all modifications must be approved by GE.

Should any unforeseen or site-specific safety related factor, hazard, or condition become evident during performance of work at this site, it will be Sevenson's responsibility to bring such to the attention of GE (both verbally and in writing) as quickly as possible for resolution. In the interim Sevenson will take prudent

action to establish and maintain safe working conditions and to safeguard employees, the public and the environment.

6.0 ACCIDENT and ILLNESS PREVENTION PLAN

General

During all active site work, Severson will implement and maintain an Accident Prevention Plan to ensure safe, accident free completion of the site work. As a minimum, Severson will implement the safety standards presented in the OSHA regulations.

Severson's designated Superintendent/Competent Person (Wayne Kostuk) will be directly responsible for enforcing the Safety Plan for Contractor and Subcontractor personnel and will report directly to the SSHO and Project Manager any unsafe site activities as they occur.

This project may involve contact with contaminated soil and debris as well as possible airborne exposure to site personnel. Based upon the contaminant concentration in the soils, the primary chemical of concern is PCBs. A copy of the Material Safety Data Sheets (MSDS) for the chemical of concern can be found in Appendix A.

Appendix B contains an activity hazard analysis phased for the major tasks to be accomplished.

The hazards that are expected to be encountered by personnel with the exception of possible employee exposure to PCBs and heat stress are common to any construction site. Some of these hazards and their applicable OSHA regulations would include:

- 1) Motorized equipment - (1926.600-604)
- 2) Excavation - (1926.650)

The other problems expected to be encountered i.e., personal protection, first aid, and emergency procedures are discussed more fully in other sections of this plan.

Severson's Project Manager will be responsible for the administration of the accident prevention program. The CIH will be responsible for the implementation and overview of the program while the SSHO will manage the program on a daily basis. The SSHO will determine daily whether any of the safety rules are being violated, advise the employee on the proper procedure(s), initiate any disciplinary action which may be required, investigate all accidents, and make recommendations that will correct all unsafe conditions to assure that operations

are being performed in accordance with the SSHP, OSHA regulations, and contract requirements.

It is anticipated that all phases of the project will have essentially the same types of hazards present, and there will be no change in the emphasis of our accident prevention program.

All subcontractors will be required to follow the Severson accident prevention program. Subcontractor personnel will be trained in the content and procedures associated with the program. The SSHO will be responsible to determine subcontractor compliance with this program.

There will be daily safety meetings conducted by the SSHO. The topics will be developed in conjunction with the CIH. All on-site personnel will be required to attend the safety meetings. A log will be kept of the attendees and subjects covered.

Basic fire prevention measures will be followed. A Fire Alarm Plan is included in Section 7.0 of this Plan.

The site will be kept in a neat and orderly fashion. Non-contaminated refuse will be disposed of on a regular basis. The disposal of contaminated material is discussed in the section on decontamination.

Motorized equipment will be checked to see that brake and steering mechanisms are in working order as well that all alarm systems and safety guards are operating. Electrical equipment will be checked to determine whether it is properly grounded and there are no frayed cords or other obvious defects.

There will be one person on-site at all times trained and certified in first aid and cardiopulmonary resuscitation. There will also be an industrial first aid kit located in the site office. All injuries and/or illnesses will be reported to the SSHO who will then decide on the proper course of treatment i.e., routine first aid or emergency medical treatment.

Sanitation will be provided in accordance with the personnel decontamination procedures outlined in other sections of this plan.

In case of severe weather it is the responsibility of the SSHO to make the determination that the weather has become too severe to safely perform the work.

At no time while on duty may employees use or be under the influence of alcohol, narcotics, intoxicants, or similar mind-altering substances. Employees found to be under the influence of or consuming such substances will be immediately removed from the job site.

A hazard communication program will be implemented in accordance with OSHA regulation 1926.59. Prior to bringing hazardous substances onto the job site, all employees potentially exposed to the substance will be advised of the information in the MSDS for the substance. A copy of the MSDS for each hazardous substance at the project will be provided to the designated authority(s) and made readily available to all potentially exposed employees. Severson's Hazard Communication Program is an addendum to this plan, and a copy of it will be kept on site.

Severson's Corporate Health and Safety Plan which outlines policies and procedures is also an addendum to this plan, and a copy of it will also be kept on site.

7.0 FIRE ALARM PLAN

The basic outline of the fire alarm program is as follows:

- 1) The alarm system (a single long blast on an air horn) will be activated when any on-site personnel notices the presence of a fire. Initial warnings will be sent out to all personnel carrying a radio, who will then be responsible for notifying their respective crews.
- 2) As soon as the initial alarm to on-site personnel is completed and evacuation is under way, outside assistance will be immediately requested if deemed necessary by the SSHO. Phone numbers of emergency response teams will be available at each on-site phone.
- 3) Personnel not intrinsically involved in on-site emergency response procedures will evacuate to an area upwind of the fire. If the fire can be treated with a fire extinguisher, personnel closest to the fire will obtain a fire extinguisher and attempt to extinguish the fire. This will be attempted only if there is minimum risk to the personnel involved. Severson personnel have received training in the use of fire extinguishers, but they have not received fire brigade training as outlined by OSHA.

8.0 WORK ZONES

Severson will clearly layout and identify work areas in the field and will limit equipment, operations and personnel in the area as defined below:

- 8.1 Exclusion Zone (EZ)** - This includes all areas in which excavation in contaminated material and well installation will take place. The EZ will

be clearly delineated in the field prior to commencing site work by fencing and/or warning signs spaced around the perimeter of the zone warning of a hazardous work area. Access from the Support Zone into the EZ will be controlled by surrounding the Contamination Reduction Zone (CRZ) with stakes, flagging, or warning signs.

Access to the EZ will be restricted to personnel who are wearing the proper personal protective equipment, have received the required medical examination, and have undergone the safety and health training. Eating, drinking, or smoking is prohibited in this area.

- 8.2 **Contamination Reduction Zone** - This zone will occur at the interface of the EZ and the Support Zone and will provide for the transfer of construction materials and equipment and the decontamination of transport vehicles handling contaminated soil prior to entering the Support Zone, the decontamination of personnel and clothing prior to entering the Support Zone and for the physical segregation of the Support Zone from the EZ.

Access to the CRZ will be restricted to personnel who are the proper personal protective equipment, have undergone the medical examination, and have participated in the training program. Eating, drinking, or smoking is prohibited in this area.

- 8.3 **Support Zone** - This area is the remainder of site and is defined as being an area outside the zone of significant air, soil or surface water contamination. The Support Zone will be clearly delineated and procedures will be implemented to prevent active or passive contamination from the work site. The function of the Support Zone includes:

- 1) An entry area for personnel, material and equipment to the CRZ;
- 2) An exit area for decontaminated personnel, materials and equipment from the CRZ;
- 3) The housing of site special services; and
- 4) A storage area for clean, safety and work equipment.

The Support Zone will be clearly delineated in the field. As excavation, removal of any contaminated materials, and backfill with excavated material proceeds throughout the site, the delineating boundary will be continuously relocated to preclude recontamination of freshly decontaminated areas.

- 8.4 **Personnel Decontamination** - All on-site personnel performing or supervising work within the EZ or CRZ are required to follow the personal

hygiene decontamination procedures. Severson will provide and require the use of:

- 1) Contained storage and disposal for used disposable outerwear; and
- 2) Hand/face washing facilities.

Personnel decontamination consists of the following steps:

- 1) Disposable PPE will be removed and discarded into properly labeled "contaminated material" impermeable receptacles when required.
- 2) Non-disposable PPE will be washed in a low sudsing detergent, rinsed with warm water, and wiped dry with a disposable cloth.
- 3) Decontaminated PPE will be stored in a secure area of the support zone.
- 4) Doffing and decontamination procedures will be those as outlined in the USCG/NIOSH/OSHA/EPA Manual on Hazardous Waste Operations.

8.5 Equipment Decontamination - Equipment decontamination will consist of the following steps:

- 1) All equipment in the EZ will be assumed to be contaminated and will be decontaminated in the CRZ.
- 2) No vehicles shall leave the CRZ of the site until they are properly inspected and approved by the SSHO for general cleanliness of frame and tires.
- 3) No vehicles shall leave the site unless they are in a broom clean condition, free of loose dirt or stabilized material on tailgates, axles, and wheels.
- 4) The SSHO shall be responsible for monitoring all vehicles to confirm proper decontamination prior to exiting. Approval shall be based on visual inspection of all exposed surfaces.
- 5) Wash water residues shall be collected and stored in a designated container. It will then be transported to the GE facility for treatment / disposal by GE.

- 6) Personnel engaged in vehicle decontamination shall wear protective equipment including appropriate protective clothing and respiratory protection consistent with the established health and Safety program.
- 7) Clearing of non disposable equipment will be verified by the use of wipe samples. The GE Representative will collect representative samples.

9.0 HEAT STRESS

Heat stress is one of the most common hazards encountered at a site, and there are a number of factors which have an effect in determining the amount of heat stress experienced by an individual worker. These factors include environmental conditions, type of clothing worn, workload, and individual characteristics. Since heat stress is a common hazard and has the potential to become a serious illness, Severson has developed a program to protect its employees.

All employees will be trained in the following:

- 1) Individual factors which influence an individual's susceptibility to heat.
- 2) Environmental characteristics such as temperature, humidity, wind speed, and cloud cover.
- 3) Body response to heat.
- 4) Effect of personal protective equipment and workload.
- 5) The various types of heat disorders and their associated symptoms.
- 6) Severson heat stress program - acclimatization, monitoring, work/rest regimen, and fluid intake (balanced electrolytic fluids).

Training for the heat stress program will be conducted at the time of the initial training.

Monitoring will be initiated when the ambient air temperature in the work area is 70°F or greater. The monitoring frequency will depend upon the temperature and the type of protective clothing worn. As the temperature increases, the monitoring will become more frequent. Also, if an employee is wearing impermeable protective clothing, the frequency of monitoring will increase. For example, at 72.5°F (adjusted temperature)¹ and wearing an impermeable suit, and

¹Adjusted Temperature = Air temperature + (13% sunshine)

employee will be monitored after every 120 minutes of work. If the temperature increases to 87.5°F (adjusted temperature), the workers will be monitored after every 60 minutes of work.

The monitoring will include:

- 1) Heart rate;
- 2) Body temperature (oral); and
- 3) Body water loss (if practicable).

The heart rate will be determined for 30 seconds as soon as practicable during the rest period. If this heart rate exceeds 110 beats per minute, the next work cycle will be shortened by one third.

The oral temperature will also be taken at the end of the work period. If the oral temperature exceeds 99.6°F, then the next work cycle will be shortened by one third. If the employee's body temperature exceeds 100.6°F, he will not be assigned work which requires an impermeable protective suit.

If the heat stress conditions become severe, then the SSHO or Industrial Hygienist will recommend that body water loss be determined. The employee will be weighed, and the total body water loss will be kept below 1.5 percent body weight loss in a work day.

The length of the work cycle will depend upon the monitoring cycle. The length of the rest cycle depends upon the physical monitoring results. The initial rest period will be 15 minutes (minimum) in duration. During the 15 minute rest period the body will usually return to homeostasis. If not, the rest period will then be increased to ensure that a homeostatic condition is reached.

Sevenson's heat stress program can be found in Appendix C.

10.0 MEDICAL SURVEILLANCE

Sevenson will utilize the services of physicians who are board certified in occupational medicine to supervise the medical surveillance program. Dr. Peter Greeney is Director of Workcare, Orange, California.

The medical examination will consist of:

- Medical History
- General Physical, including evaluation of all major organ systems
- Pulmonary Function Examination (at least FVC and FEV 1.0)
- Electrocardiogram
- Stress Test (optional)

- Chest X-Ray (optional)
- Otoscopic Examination
- Audiometric Examination
- Visual Acuity Examination
- Blood Tests, Blood Count, Blood Profile - (SMAC 25)
- Drug Screen

Sevenson will obtain a certification from the occupational physician that the employee is medically fit to wear respiratory protection and has no medical condition that would place him at an increased risk in regards to that detected medical condition. No employee will be permitted to work in the Exclusion Zone until his certificate has been submitted to GE. Sevenson's employee participate in the company's medical surveillance program, and, as a minimum, receive an annual physical examination.

All medical records will be kept for at least 30 years.

11.0 LEVELS OF PROTECTION/PERSONNEL PROTECTIVE EQUIPMENT

Sevenson will provide for on-site personnel and visitors all necessary protective clothing and equipment and maintain it in accordance with the manufacturer's specifications. All equipment will be NIOSH approved.

If two or more activities are being conducted in close proximity to each other all workers will use the highest level of protection required for those activities so as to prevent two tasks from being performed adjacent to each other using different levels of protection.

All of Sevenson's personnel who are required to wear a respirator will have to pass a fit test given in accordance with 1926.58. Cartridges will be changed daily or upon increased resistance or breakthrough.

Prescription glasses worn on-site will be safety glasses. Prescription lens inserts will be provided for all employees who wear a full face air purifying respirator.

All personal protective equipment worn on-site will be decontaminated or properly disposed of at the end of the work day.

11.1 Levels of Protection - The following are the various levels of protection that will be in effect for this project:

Protective Clothing:

LEVEL C

- Chemical-resistant suit;
- Nitrile outer gloves;
- Latex inner gloves;
- Hearing protection (as needed);
- Hard hat;
- Long cotton underwear and gloves, if necessary;
- Additional work clothes as dictated by weather;
- Chemical-resistant washable over boots;
- Taping of sleeves and pant legs;
- Splash suit and face shield for decontamination operations (as needed)

LEVEL D Modified

- Chemical-resistant suit
- Work clothes as dictated by the weather;
- Eye protection;
- Hard hat;
- Chemical-resistant washable over boots;
- Hearing protection (as needed).

LEVEL D

- Work clothes as dictated by weather;
- Eye protection;
- Hard hat;
- Boots, steel toe/shank; ad
- Hearing protection (as needed).

11.2 Chemical Protective Clothing - All chemical protective clothing including work clothing and safety boots which have entered the CRZ or EZ will be properly disposed of or decontaminated before leaving the CRZ. Level D Modified shall be the minimum level of protection set for any activity in the EZ (unless an upgrade is required).

11.3 Respiratory Protection - All on-site personnel unable to pass a qualitative respiratory fit test will not enter or work in the EZ or CRZ. All workers using respirators shall have a qualitative fit test yearly, as outlined in the respiratory protection program. In addition, each respirator shall be individually assigned and not interchanged between workers. Cartridges/canisters and filters shall be changed daily or upon breakthrough, whichever, occurs first. All prescription eyeglasses in use

on-site shall be safety glasses. Prescription lens inserts shall be provided for full-face respirators. The use of contact lenses is prohibited on-site.

The following provisions apply to respiratory protection:

- 1) Employees who are required to wear respirators must pass a pulmonary function test.
- 2) Each time a respirator is donned the employee must perform a positive pressure/negative pressure fit test.
- 3) No facial hair which interferes with a satisfactory fit is permitted. A "two-day" growth of beard is considered to interfere with the fit, i.e., as a minimum employee must shave every other day.
- 4) Canisters and filters shall be changed daily or more frequently if breakthrough occurs.

11.4 Task and Level of Protection in Exclusion Zone - The initial (anticipated) Level of Protection is as follows:

Task	PPE Level
Mobilization	Level D
Soil Excavation / Truck Loading	Level D Modified
Backfilling Excavation	Level D
Site Restoration	Level D

Personal protective downgrade and upgrade will occur when:

- 1) The SSHO makes the change based on site activity, air monitoring of contaminant levels and work place practices as specified in this plan.
- 2) The CIH approves the change with the knowledge and approval of GE.

12.0 SAFETY TRAINING

Sevenson will provide and require that all personnel assigned to or entering the site complete training or refresher sessions.

Training and refresher sessions will ensure that all personnel are capable of and familiar with the use of safety, health, respiratory, and protective equipment and with the safety and security procedures required for this site. The training session will include the OSHA mandated 40 hour training course for new Sevenson personnel, as well as, refresher courses for those persons who require it.

Documentation will be available to GE that each employee or subcontractor employee has satisfied the requirements of the OSHA training regulation 1910.120(e).

The SSHO will provide and conduct a training program on site for all site personnel prior to commencing work within the EZ. This training program will address as a minimum the following topics:

- 1) Potential hazards;
- 2) Biology, chemistry and physics of hazardous materials;
- 3) Rights and responsibilities of workers under OSHA;
- 4) Standard safety operating procedures;
- 5) Types of monitoring equipment to be used;
- 6) Site Safety Plan;
- 7) Internal and external communications;
- 8) Medical surveillance program;
- 9) Personal protective clothing and equipment;
- 10) Respiratory equipment including training and qualitative fit-testing for full facepiece respirators;
- 11) Air monitoring program;
- 12) Decontamination procedures;
- 13) Evacuation, first aid and emergency procedures dealing with fire and medical situations;
- 14) Work zones established at the site;
- 15) Safe work practices associated with employee's work assignment, including dust control measures, hazardous materials recognition, and use of the buddy system;
- 16) Basic operational safety, emphasizing hazards expected on site, and
- 17) Prohibitions (inside EZ and CRZ), including:
 - a) Glasses or facial hair, such as beards or long sideburns, which interfere with respirator fit;
 - b) Contact lenses;
 - c) Eating, drinking, smoking, chewing in the EZ or CRZ;
 - d) Wearing of personal articles, e.g., watches, rings, etc.;
 - e) Working when ill.

All personnel assigned to the site will receive this site specific training. Upon completion of this training, a training acknowledgment log will be completed and submitted to GE. GE will be notified at least 5 days prior to the initial site specific training.

A sample of a Training Acknowledgment Log is included in Appendix D.

There will be daily safety meetings conducted by the SSHO. The purposes of this training are to reinforce the proper procedures, to correct any deficiencies noted in

the safety and health program, and to prepare the workers for any change in the health and safety plan due to changes in the operations or unanticipated problems. Documentation of this training will be submitted to GE. Documentation will include the topic(s) covered and a signed list of attendees.

All visitors will be required to undergo a training program conducted by the SSHO providing the training does not prevent the SSHO from performing his designated duties consequently causing a delay in site work. The training will consist of:

- 1) Hazards present at the site.
- 2) Effects of these hazards.
- 3) Progress of work and the relationship of the present work in regard to the type of hazards that may be encountered.
- 4) Emergency signals and procedures.
- 5) Type and limitations of personal protective equipment in use.
- 6) Proper use of protective equipment.
- 7) General safety rules and policies in effect at the site.
- 8) Completion of a training acknowledgment log.

If a visitor does not, for any reason, obtain the required training nor have the required OSHA training and medical examination, they will not be permitted on the site.

13.0 CONSTRUCTION

The following general rules will be adhered to during construction activity:

- 1) All mobile equipment will be provided with working back-up alarms, brakes, and shut-off switches.
- 2) Operators shall not leave their equipment while it is running.
- 3) A daily inspection will be made by the SSHO to determine compliance with this plan.
- 4) Illumination in the working zone will be a minimum of 10 foot candles. Supplementary lighting will be provided, if necessary.
- 5) Electrical installations will be in compliance with the National Electric Code.
- 6) All electrical equipment will be grounded and further protected by the use of ground fault circuit interrupters.
- 7) An adequate number of toilet facilities will be provided.
- 8) A source of potable water will be provided.
- 9) Food will only be consumed in prescribed clean locations.

14.0 COMMUNICATIONS

The following emergency telephone numbers will be posted at all on-site telephones:

- | | | | |
|----|-------------------------------------|---|----------------|
| 1) | Ambulance | - | 911 |
| 2) | Police Department (Pittsfield) | - | 911 |
| 3) | Fire Department (Pittsfield) | - | 911 |
| 4) | Physician | - | (714) 978-7488 |
| | a) Name: Dr. Peter Greaney | | |
| | b) Address: Work Care | | |
| | Orange, California | | |
| 5) | National Poison Control Center | - | (800) 424-8802 |
| 6) | National Response Center | - | (800) 424-8802 |
| 7) | Chemtrec | - | (800) 424-9300 |
| 8) | Berkshire Medical Center | - | (413) 447-2000 |
| 9) | Paul J. Hitcho, PhD, CIH - Severson | - | (716) 284-0431 |

15.0 EMERGENCY EQUIPMENT and FIRST AID REQUIREMENTS

Severson will provide the following emergency and first aid equipment:

- 1) Industrial type first aid kits;
- 2) A:B:C Fire extinguishers;
- 3) Emergency eye wash units;
- 4) Spill kit consisting of shovels, drums, and absorbent material; and

One emergency eye wash unit and one 2A:10B:C fire extinguisher will be placed in each CRZ. First Aid units will be located at a manned location. In isolated work areas they will be located in close proximity to the work.

16.0 HEARING CONSERVATION

When noisy operations make normal conversation difficult, sound level meter readings will be taken to document noise exposure to on-site personnel. If sound pressure levels are equal to or greater than 85 dBA, employees will participate in a hearing conservation program. The hearing conservation program consists of the use of personal protection (ear plugs or muffs), audiometric examinations, and employee training.

17.0 RECORD KEEPING

Sevenson will maintain all records documenting the implementation of this plan. The records will include:

- 1) Training logs
- 2) Daily logs
- 3) Weekly reports
- 4) Real time air monitoring
- 5) Documentation of safety meetings
- 6) Decontamination logs
- 7) Monitoring equipment calibration sheets
- 8) Confined space entry permit
- 9) Accident report
- 10) Employee/visitor register
- 11) Medical certifications
- 12) Training certifications

A copy of the forms to be used can be found in Appendix D.

If an accident, an explosion or fire, or a release of toxic materials occurs during the course of the project, GE will be telephoned immediately and receive a written report within 24 hours. The report will include the following items:

- Name, organization, telephone number, and location of the Contractor.
- Name and title of the person(s) reporting.
- Date and time of the accident/incident.
- Location of the accident/incident, i.e., site location, facility name.
- Brief summary of the accident/incident giving pertinent details including type of operation ongoing at the time of the accident/incident.
- Cause of the accident/incident.
- Casualties (fatalities, disabling injuries).
- Details of any existing chemical hazard or contamination.
- Estimated property damage, if applicable.
- Nature of damage, effect on contract schedule.
- Action taken by the Contractor to ensure safety and security.
- Other damage or injuries sustained, public or private.

Weekly reports will include:

- Summary sheet covering the range or work being done
- Any incidents of:
 - Non-use of protective devices in an area where required
 - Non-use of protective clothing
 - Disregard of buddy system

- Violation of eating, smoking, and chewing in prohibited areas
- Misuse of any of the above
- Job related injuries and illness
- Site Safety and Health Officer signature and date
- Date specified for the weekly report to be in the office of the Contracting Officer.
- Copies of daily logs

Employee's and Visitor's Logs shall include:

- Date
- Name
- Address
- Representing Agency or Company

18.0 EMERGENCY RESPONSES

All accidents and unusual events will be handled in a manner to minimize health risks to site workers. In the event that an accident or other unusual event occurs, the following procedure will be followed:

- First aid or other appropriate initial action will be administered by those closest to the accident or event. This assistance will not place those rendering assistance in a situation of unacceptable risk.
- All accidents and unusual events will be reported to the SSHO. The SSHO is responsible for conducting the emergency response in an efficient, rapid, and safe manner. The SSHO will decide if off-site assistance and/or medical treatment is required, and arrange for that assistance. A list of emergency telephone numbers - Section 14.0 will be posted at all site telephones.
- All workers on-site will conduct themselves in a mature, calm manner in the event of an accident or unusual event. All personnel will conduct themselves so as to minimize risks to themselves and to other workers.
- After the emergency has been mitigated, the SSHO will contact GE. GE will contact any additional agencies or personnel requiring notification.

- 18.1 Worker Injury** - If an employee is injured, Red Cross first aid procedures will be followed. Depending on the severity of the injury, emergency medical assistance may be sought. If the accident occurred in the EZ and if the employee can be moved, he will be taken to the edge of the EZ where any affected protective clothing can be removed and emergency first aid administered. The worker will then be transported to a local emergency medical facility via ambulance or a field truck. Copies of

the appropriate MSDS will be provided to personnel of the local emergency facility. In the event that a worker cannot be moved, emergency personnel will be summoned and brought to the worker's location. If the injured person can be moved, but cannot be decontaminated, he will be wrapped in a blanket for transport to the hospital. Specific health and safety procedures and PPE requirements will be used by the emergency personnel, appropriate to the location of the accident on the site.

If the injury is chemical in nature, the following first aid will be instituted.

Eye Exposure - If affected solids or liquids get into the eyes, wash eyes immediately at the emergency eyewash station using large amounts of water and lifting the lower and upper eyelids occasionally. Obtain medical attention immediately.

Skin Exposure - If affected solids or liquids get on the skin, promptly wash the skin using soap or mild detergent and water. Obtain medical assistance immediately if exposure to concentrated constituents is suspected.

Respiratory Exposure - If a person breathes in large amounts of volatile constituents, move the exposed person to fresh air at once. If breathing has stopped, perform artificial respiration. Keep the affected person warm and at rest. Obtain medical assistance as soon as possible.

Ingestion - If affected solids or water have been swallowed, give the person large quantities of water immediately. Do not induce vomiting. Obtain medical assistance immediately.

All injuries will be thoroughly documented by the SSHO and a detailed report will be submitted to Owner within one working day of the injury. A map to Berkshire Hospital can be found in Figure 1.

18.2 Fires - Fire extinguishers will be provided on all heavy equipment. If a localized fire breaks out, chemical fire extinguishers will be used to bring the fire under control. Inert materials such as a fire blanket, soil, or grout may also be used to smother the flame. If an uncontrolled fire develops, the SSHO will order a site evacuation and notify the nearest Fire Department and other appropriate authorities who will then institute the agreed upon community emergency response plan.

18.3 Unusual Objects or Events - Although unlikely, unusual objects such as buried sewer lines, gas cylinders, or power lines may be encountered during excavation operations. If such an event occurs, the SSHO will halt operations and decide on the next course of action after consultation with

the Project Manager. The SSHO is responsible for suspending site operations in the event of inclement weather.

18.4 Spills - In event of a spill of affected materials outside the EZ, the area will be isolated from normal traffic by the SSHO using high visibility taping. Depending on the nature of the spilled material and its volume, visual inspection will be used to determine the volume of soil to be removed. If visual inspection is insufficient to determine the affected area, soil samples will be collected around the excavated area to assure that the spill has been adequately contained and affected material removed. Spill containment materials will include absorbent, shovels and drums. Spilled materials and affected surficial soils will be drummed and disposed as appropriate, according to EPA regulations.

18.5 Notification and Documentation - The names and phone numbers of all personnel and agencies that could be involved in emergency response are listed in Section 14. This list will be available in a conspicuous location at the site, such as the dashboard of the field vehicle, at all times. After emergency personnel have been contacted, the SSHO will contact GE. The capabilities of the local emergency services and hospitals will be verified by the site SSHO prior to the start of field activities. This will be done by holding meetings.

The SSHO will provide a report to GE within 24 hours. The content of the report is outlined in Section 17.

19.0 AIR MONITORING

Sevenson's air monitoring program will detect and quantify any volatilization of soil contaminants or release of soil particles associated with work activities in the surrounding air. The program has two purposes; first, to assure worker health and safety, and second, to protect the surrounding community.

Sevenson's SSHO will be responsible for implementing the air monitoring strategies and protocols, using real time instrumentation and appropriate industrial hygiene sampling and analytical procedures in order to characterize and quantify the airborne release and transport of contaminants during remediation work.

Sevenson will establish and document baseline (background) air quality conditions prior to commencement of work and conduct continuous air monitoring during on-site work.

Information gathered during an air monitoring program will be used by the SSHO to follow action levels and determine appropriate levels of personal protection, to document on-site all employee exposures, and to assess off-site migration of

contaminants released during remedial activities so that appropriate control measures and/or contingency plans can be implemented. Information will be logged and included in the project records and safety and health file.

19.1 Real-Time Air Monitoring

Sevenson will furnish and maintain, air monitoring equipment to monitor for all chemical and physical hazards. These include the following:

- a particulate monitor
- all necessary calibration/audit equipment and supplies

Sevenson will perform ambient air monitoring prior to commencement of work in order to establish baseline conditions. Baseline monitoring will be conducted for a minimum of one full work shift before intrusive work begins. Monitoring will be provided during active cleanup operations both on-site, near each active work zone, and perimeter air monitoring locations. Real-time air quality monitoring is required during excavation, backfilling and handling of potentially contaminated soils or liquids.

Monitoring for respirable particulate will consist of measurements taken in the Breathing Zone (BZ) downwind of each of the following areas: each active excavation area in the EZ, the CRZ, and the Support Zone as well as the site perimeter.

19.2 Action Levels

Based upon the concentration of the contaminants in the soil and the ability of these contaminants to become airborne the following action levels have been established. The action level for worker protection for particulate is based on the TLV for respirable dust for particulate. The perimeter action level for respirable particulate is based upon EPA's PM-10 requirement.

CONTAMINANT	CONCENTRATION	ACTION Respiratory/Protective Clothing
Total Particulate	Background – 2500 ug/m ³ 2500 – 5000 ug/m ³ >150 ug/m ³ at site perimeter nearest residential dwelling	Level D Level C Institute dust control (i.e. water suppression or plastic barriers in soil)

19.3 Data Recording

All real-time analysis readings will be logged and recorded as to location, time, type of monitoring equipment and summarized values of each reading. Copies of daily log sheets will be included in the daily report. Severson's SSHO will record the following real-time monitoring data information:

- Date and time of monitoring.
- Instrument, model number, serial number or appropriate identification.
- Calibration/background levels.
- Type of measurement - breathing zone, point source, worst case, perimeter, work area.
- Results of monitoring.
- SSHO (or other appropriate person) signature.
- Interpretation of the data and any further recommendations by the CIH or SSHO.

These results will be given verbally to GE (if requested) during the site day scan and documented in writing by the end of each work day.

19.4 Calibration - All monitoring equipment will be calibrated daily (pre and post use) in accordance with manufacturer's instructions.

19.5 Air Monitoring Program

The following table outlines the air monitoring program.

CONTAMINANT	METHOD	LOCATION	FREQUENCY
Respirable Particulate	Dust Trak	Active Work Areas and Perimeter	1 time every 4 hours

20.0 STANDARD OPERATING PROCEDURES

Materials Handling and Safe Lifting - Training will be given by the SSHO on the proper lifting form and technique to all personnel on site.

Eye Protection - All prescription eyeglasses brought to the site will be safety glasses. Contact lenses will not be permitted on site. Prescription lenses for on-site employees requiring vision correction will be provided in spectacle kits designed by the manufacturer of the respirators.

Physical Hazards - Unfilled holes or other slip, trip and fall hazards that are created during the day's work but are no longer within an active work zone, or must be left SSHO will, also, ensure that all on-site personnel are familiar with the location of each demarcated hazard.

Illumination - Work activities will be restricted to the time from sunrise to sunset. Five-foot candles will be used for the illumination of all work areas, 29 CFR, 1926.26, Subpart D.

Drum Handling - The handling and moving of drums or other heavy non-moving equipment will be accomplished by means of a dolly or similar apparatus.

Surface Encumbrances - Surface encumbrances that poses a hazard to employees will be removed or supported as applicable.

Daily Inspections - Severson's competent person will conduct daily inspections of excavations and trenches, the adjacent areas and protective systems and evaluate potential indications for cave-ins, failure of protective systems, hazardous atmospheres or any other hazardous conditions. These inspections will be conducted prior to start of each day's work and periodically throughout the shift. Inspections will also be conducted after every rainstorm or other hazard increasing occurrence.

Confined Space Entry - If necessary, Severson will develop standard operating procedures (SOP) for his employees entering confined spaces. The SOP will include inspections for structural integrity, means of entry and egress, air monitoring, standby personnel, rescue procedures and communications. It is anticipated that there will be no confined space entry during the course of this project.

Drilling Safety - All drilling will be conducted in a safe manner including inspections of the drill rig, testing of the emergency shut down switches; prohibiting the wearing of loose clothing, jewelry, etc.; no driller will work alone; following safe work practices when using the cathead, winches and when handling rods and augers.

Ignition Sources - Smoking and ignition sources in the vicinity of potentially flammable or contaminated material are prohibited. When working in areas where flammable vapors may be present, care must be exercised with tools and equipment that may be sources of ignition. All tools and equipment provided must be properly bonded and/or grounded.

Heavy Equipment - Excavation and trenching operations, movement of vehicles and equipment, and other activities will be planned and performed with consideration for the location, slope and natural features such as trees, boulders, water bodies, and terrain.

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

Beards - Beards are not allowed for personnel using respirators because they do not allow for proper respirator fit.

No smoking, eating, or drinking will be allowed in the contamination areas.

Horseplay is prohibited in the work area.

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

FIGURE 1
Directions to Hospital

APPENDIX A
MSDS

PCBs

The information in this sheet applies to workplace exposure resulting from processing, manufacturing, storing or handling and is not designed for the population at large. Any generalization beyond occupational exposures should not be made. The best industrial hygiene practice is to maintain concentrations of all chemicals at levels as low as is practical.

Chemical Names: Polychlorinated biphenyls.

Trade Names: Aroclor, Arochlor, Kaneclor, Clophen, Phenoclor, Pyralene, Askarel, Asbestol, Inerteen, Pyranol, Santotherm, Clorextol, Saf-Ti-Kuhl, No-Flamol, Chemko and others.

Uses: As an insulating, non-flammable, thermally conductive, fluid in electrical capacitors and transformers.

PHYSICAL INFORMATION

Appearance: May be a clear, colorless oily liquid, light to dark yellow resin or wax, or white to yellow powder.

Odor: Aromatic, acrid.

Evaporation: Very slow.

Behavior In Water: Does not mix; sinks.

HEALTH HAZARD INFORMATION

OSHA Standard: Average 8 hour exposure -- 1.0 mg/m³ (42% chlorine).
Average 8 hour exposure -- 0.5 mg/m³ (54% chlorine).

NIOSH Recommended Limit: Average 10 hour day/40 hour week -- 0.001 mg/m³.

ACGIH Recommended Limit: Average 8 hour exposure -- 1.0 mg/m³ (42% chlorine).
Average 8 hour exposure -- 0.5 mg/m³ (54% chlorine).

Short Term Exposure:

Inhalation: May produce irritation to nose, throat and lungs. Levels above 10 mg/m³ are reported to be unbearable. Inhalation may contribute significantly to all symptoms of long term exposure.

Skin: Absorption moderate. Contributes significantly to all symptoms of long term exposure. Sensitized individuals may develop a rash after 2 days exposure by contact or inhalation.

Eyes: May produce irritation. Levels of 10 mg/m³ are severely irritating.

Ingestion: Absorption in digestive system contributes significantly to all symptoms of long term exposure. There are no reported deaths of humans due to a single ingestion. However, experiments in animals suggest that ingestion of 6 to 10 fluid ounces would cause death to a healthy 150 pound adult.

Long Term Exposure:

PCBs are readily absorbed into the body by all routes of exposure. They may persist in tissues for years after exposure stops. The symptoms below may be due to PCBs or to chemical contaminants.

High levels of PCB vapor, 1 to 10 mg/m³, may produce burning feeling in eyes, nose and face; dry throat; lung and throat irritant; nausea; dizziness and aggravation of acne. These may be felt immediately or be delayed weeks or months.

Chemical acne, black heads, dark patches on skin, and unusual eye discharge have been reported by all routes of exposure. Although some sensitive individuals have reported these effects after two days, onset may not occur for months. These effects may last for months. Liver damage and digestive disturbance have been reported in some individuals. PCBs may impair the functioning of the immune system.

PCBs at high levels have been shown to produce cancer and birth defects in laboratory animals. Whether PCBs produce these effects in humans is not known.

*Prepared by the Bureau of Toxic Substance Assessment, New York State Department of Health. For an explanation of the terms and abbreviations used, see "Toxic Substance: How Toxic Is Toxic", available from the New York State Department of Health.

EMERGENCY AND FIRST AID INSTRUCTIONS

Inhalation: Move person to fresh air and get medical attention if symptoms continue.

Skin: Remove contaminated clothing immediately. Blot excess with paper towels. Wash affected area thoroughly with soap and water for at least 15 minutes.

Eyes: Rinse eyes with water for at least 15 minutes. A drop of vegetable oil may be added to relieve irritation. Seek medical attention if necessary.

Ingestion: Get immediate medical attention.

Note to Physician: Serum SGOT, SGPT and triglyceride levels have been used to monitor liver damage.

FIRE AND EXPLOSION INFORMATION

General: Non-flammable.

REACTIVITY

Conditions to Avoid: High heat and electrical discharge may produce the highly poisonous substances phosgene, hydrochloric acid and chlorinated dibenzofurans.

PROTECTIVE MEASURES

Storage and Handling: Store in a tightly closed container with proper EPA labelling. Storage for more than 30 days must be in an EPA approved facility.

Engineering Controls: Provide local exhaust ventilation system. Sinks, showers and eyewash stations should be readily available.

Protective Clothing (Should not be substituted for proper handling and engineering controls): Wear gloves and aprons made of neoprene, viton or polyethylene, safety glasses with side shields and impervious shoes.

Protective Equipment: For any detectable levels use a self-contained breathing apparatus with a full facepiece operated in a positive pressure mode or a supplied-air respirator with a full facepiece and an auxiliary self-contained breathing apparatus both operated in positive pressure mode. For escape from a contaminated area wear a gas mask with an organic vapor canister and a high-efficiency particulate filter or an escape self-contained breathing apparatus.

PROCEDURES FOR SPILLS AND LEAKS

Get workers out of spill area. Wearing protective clothing and equipment, ventilate area to reduce vapor levels. Absorb on nonreactive material such as sand or vermiculite. In the event of a spill and for disposal information, contact your regional office of the New York State Department of Environmental Conservation and the U.S. Environmental Protection Agency.

For more information:

Contact the Industrial Hygienist or Safety Officer at your worksite or the New York State Department of Health, Bureau of Toxic Substance Assessment, 2 University Place, Albany, New York 12203.

APPENDIX B
Hazard Analysis

ACTIVITY HAZARD ANALYSIS

MOBILIZATION

ACTIVITY	POTENTIAL HAZARDS	RECOMMENDED CONTROLS
General site reconnaissance	Chemical/Toxicological Hazards:	Chemical/Toxicological Hazards:
Site preparation	<ol style="list-style-type: none"> 1. No exposure to contaminated material. 2. Exposure to chemicals brought onsite. 	<ol style="list-style-type: none"> 1. Level D PPE 2. Hazard Communication Program
Mobilize and inspect equipment	Biological Hazards:	Biological Hazards:
Install erosion control	<ol style="list-style-type: none"> 1. Slight possibility of wild animals. 2. Slight possibility of stinging and biting insects. 3. Possibility of exposure to poison ivy, sumac, and/or oak. 	<ol style="list-style-type: none"> 1. Avoid physical contact with wild animals. Do not threaten and/or corner animals. Make noise to get the animal to retreat. Stay in or return to vehicle or equipment. 2. Use appropriate insect repellants i.e., DEET. 3. Learn to identify poisonous plants. Avoid contact. Use of barrier creams.
Temporary access road	Physical Hazards:	Physical Hazards
Construct work zones	<ol style="list-style-type: none"> 1. Moving equipment 2. Falls from elevations 3. Slips and trips 4. Heat and Cold Stress 5. Noise exposure 6. Caught between/struck by or against 7. Severe weather 8. Manual lifting 9. Electrical 10. Traffic 11. Fueling operations 	<ol style="list-style-type: none"> 1. Moving equipment <ul style="list-style-type: none"> • Only trained, experienced operators • Equipment inspected daily • Personnel restricted in area of operation • Back up alarms functional • One set of signals given for movement of equipment 2. Falls from elevations <ul style="list-style-type: none"> • Maintain three points of contact when climbing on or off equipment 3. Slips and trips <ul style="list-style-type: none"> • Keep walking and working surfaces dry • Housekeeping - remove trip hazards • Alert employees to hazards of uneven terrain 4. Heat and Cold Stress <ul style="list-style-type: none"> • Refer to attached programs 5. Noise exposure <ul style="list-style-type: none"> • Hearing control program which consists of audiometric examination, training, use of ear plugs, and sound level pressure monitoring 6. Caught between/struck by or against <ul style="list-style-type: none"> • Stay out of swing radius of equipment • Ground personnel near operating heavy equipment will wear hard hats and traffic vests • Do not walk, work, or stand near equipment being loaded or unloaded • Backup alarms to be in operable condition. No unnecessary backing. • Steel toe footwear required 7. Severe weather <ul style="list-style-type: none"> • As determined by Site Safety Officer, operations are to cease during severe weather • Office trailers tied down 8. Manual lifting <ul style="list-style-type: none"> • Proper lifting technique utilized. Back straight and lift with legs. • Split heavy loads into smaller loads • Use mechanical aid, whenever possible • Make sure the path of travel is clear prior to the lift 9. Electrical <ul style="list-style-type: none"> • Licensed electrician to perform installation • Installation in compliance with OSHA, National Electric Code, and local codes • Equipment kept at least 10 feet from energized power lines 10. Traffic <ul style="list-style-type: none"> • Posted speed limit of 15 mph • Signage • Workers in traffic area to wear reflective vests 11. Fueling operations <ul style="list-style-type: none"> • All equipment will be shut down prior to fueling • All spilled fuel will be wiped up immediately • No smoking in the area of fueling operations
Survey		

ACTIVITY HAZARD ANALYSIS MOBILIZATION

ACTIVITY	POTENTIAL HAZARDS	RECOMMENDED CONTROLS
<ul style="list-style-type: none"> • General site reconnaissance • Site preparation • Mobilize and inspect equipment • Install erosion control • Temporary access roads • Construct work zones • Survey 		<ul style="list-style-type: none"> • Fueling will be accomplished in well ventilated areas away from ignition sources • Equipment and fuel tank do not need to be bonded or grounded if the metal nozzle is in contact with the metal of equipment's fuel tank

EQUIPMENT TO BE USED	INSPECTION REQUIREMENTS	TRAINING REQUIREMENTS
<ul style="list-style-type: none"> 1. Pickup trucks 2. Track excavator 3. Loader 4. Bulldozer 5. Air monitoring equipment 	<p>Site Inspection:</p> <ul style="list-style-type: none"> 1. Daily inspection by Health and Safety Officer <p>Motor Vehicles:</p> <ul style="list-style-type: none"> 1. Before initial use vehicles will be inspected and found to be in a safe operating condition. <p>Equipment:</p> <ul style="list-style-type: none"> 1. Before equipment is placed in use it will be inspected and tested by a competent person. 2. Inspections and tests will be done in accordance with manufacturer's instructions. 3. All equipment will be inspected daily when in use by the operator. 	<p>Site Specific:</p> <ul style="list-style-type: none"> 1. OSHA HAZWOPER 2. HTRW activity training 3. Initial site specific 4. Daily tailgate safety meetings 5. Hazard communication <p>Supervisory Personnel:</p> <ul style="list-style-type: none"> 1. OSHA supervisor's training <p>Motor Vehicle:</p> <ul style="list-style-type: none"> 1. Operators shall hold a valid license for the type and class of vehicle they are operating. <p>Heavy Equipment:</p> <ul style="list-style-type: none"> 1. Trained and qualified operators. <p>Equipment General:</p> <ul style="list-style-type: none"> 1. Employees will be qualified and trained to operate or service mechanical equipment.

ACTIVITY HAZARD ANALYSIS

EXCAVATION AND MATERIAL HANDLING

ACTIVITY	POTENTIAL HAZARDS	RECOMMENDED CONTROLS
<ul style="list-style-type: none"> Positioning of track excavator Excavation of material to prescribed elevations Loading stockpiled material into trucks Transport to staging area and place in stockpile 	<p>Chemical/Toxicological Hazards:</p> <ol style="list-style-type: none"> 1. Possible contact to PCB contaminated material. 2. Exposure to chemicals brought onto site. 	<p>Chemical/Toxicological Hazards:</p> <ol style="list-style-type: none"> 1. Use of personal protective equipment. 2. Personal decontamination prior to consumption of food, beverage, or tobacco. 3. Results of air monitoring used to determine proper type of control program. 4. Level D modified PPE. 5. Hazard communication program.
	<p>Biological Hazards:</p> <ol style="list-style-type: none"> 1. Slight possibility of wild animals. 2. Sting and biting insects. 3. Possibility of exposure to poison ivy, sumac, and/or oak. 	<p>Biological Hazards:</p> <ol style="list-style-type: none"> 1. Avoid physical contact with wild animals. Do not threaten and/or corner animals. Make noise to get the animal to retreat. Stay in or return to vehicle or equipment. 2. Use appropriate insect repellants i.e., DEET. 3. Learn to identify plants. Avoid contact. Use of barrier creams.
	<p>Physical Hazards:</p> <ol style="list-style-type: none"> 1. Falls from elevations 2. Slips and trips 3. Heat stress 4. Noise exposure 5. Caught between/struck by or against 6. Severe weather 7. Manual lifting 8. Manual shoveling 9. Fueling operations 10. Traffic 11. Moving equipment 	<p>Physical Hazards</p> <ol style="list-style-type: none"> 1. Falls from elevations <ul style="list-style-type: none"> • Maintain three points of contact when climbing on or off equipment 2. Slips and trips <ul style="list-style-type: none"> • Keep walking and working surfaces dry • Housekeeping - remove trip hazards • Alert employees to hazards of uneven terrain 3. Heat Stress <ul style="list-style-type: none"> • Refer to attached program 4. Noise exposure <ul style="list-style-type: none"> • Hearing control program which consists of audiometric examination, training, and use of ear plugs 5. Caught between/struck by or against <ul style="list-style-type: none"> • Stay out of swing radius of equipment • Ground personnel near operating heavy equipment will wear hard hats and traffic vests • Do not walk, work, or stand near equipment being loaded or unloaded • Backup alarms to be in operable condition. No unnecessary backing. • Steel toe footwear required 6. Severe weather <ul style="list-style-type: none"> • As determined by Site Safety Officer, operations are to cease during severe weather 7. Manual lifting <ul style="list-style-type: none"> • Proper lifting technique utilized. Back straight and lift with legs. • Split heavy loads into smaller loads • Use mechanical aid, whenever possible • Make sure the path of travel is clear prior to the lift 8. Manual shoveling <ul style="list-style-type: none"> • Select the proper shovel for the task. A long handled, flat bladed shovel is recommended for shoveling loosened material. • Inspect the handle for splinters and/or cracks; determine that the blade is securely attached to the handle. • Use your legs and shoulders and not your back. Bend at the knees. • Never be more than 15 inches from the material you are shoveling. • If possible, throw the spoil behind you, rotating your body. • Be alert for signs of stress such as pain, numbness, burning, and tingling. 9. Fueling operations <ul style="list-style-type: none"> • All equipment will be shut down prior to fueling. • All spilled fuel will be wiped up immediately. • No smoking in the area of fueling operations. • Fueling will be accomplished in well ventilated areas away from ignition sources.

ACTIVITY HAZARD ANALYSIS

EXCAVATION AND MATERIAL HANDLING

ACTIVITY	POTENTIAL HAZARDS	RECOMMENDED CONTROLS
<ul style="list-style-type: none"> - Positioning of track excavator - Excavation of material to prescribed elevations - Loading stockpiled material into trucks - Transport to staging area and place in stockpile 		<ul style="list-style-type: none"> - Equipment and fuel tank do not need to be bonded or grounded if the metal nozzle is in contact with the metal of the equipment's fuel tank. 10. Traffic <ul style="list-style-type: none"> - Posted speed limit of 15 mph. - Signage. - Workers in traffic area to wear reflective vest. - Obeying all local traffic regulations. 11. Moving equipment <ul style="list-style-type: none"> - Only trained, experienced operators - Equipment inspected daily - Personnel restricted in area of operation - Back up alarms functional - One set of signals given for movement of equipment

EQUIPMENT TO BE USED	INSPECTION REQUIREMENTS	TRAINING REQUIREMENTS
<ol style="list-style-type: none"> 1. Track excavator 2. Dump trucks 3. Air monitoring equipment 	<p>Site Inspection:</p> <ol style="list-style-type: none"> 1. Daily inspection by Health and Safety Officer <p>Motor Vehicles:</p> <ol style="list-style-type: none"> 1. Before initial use vehicles will be inspected by a mechanic and found to be in a safe operating condition. <p>Equipment:</p> <ol style="list-style-type: none"> 1. Before equipment is placed in use it will be inspected and tested by a competent person. 2. Inspections and tests will be done in accordance with manufacturer's instructions. 3. All equipment will be inspected daily when in use by the operator. 4. Inspections and tests will be documented and records will be maintained at the site. 	<p>Site Specific:</p> <ol style="list-style-type: none"> 1. OSHA HAZWOPER 2. HTRW activity training 3. Initial site specific 4. Daily tailgate safety meetings at which the affected employees can voice their concerns and/or recommendations of the site specific training requirements. 5. Hazard communication <p>Supervisory Personnel:</p> <ol style="list-style-type: none"> 1. OSHA supervisor's training <p>Motor Vehicle:</p> <ol style="list-style-type: none"> 1. Operators shall hold a valid license for the type and class of vehicle they are operating. <p>Heavy Equipment:</p> <ol style="list-style-type: none"> 1. Trained and qualified operators. <p>Equipment General:</p> <ol style="list-style-type: none"> 1. Employees will be qualified and trained to operate or service mechanical equipment.

**ACTIVITY HAZARD ANALYSIS
SITE RESTORATION**

ACTIVITY	POTENTIAL HAZARDS	RECOMMENDED CONTROLS
Spreading of backfill material in affected area Hydroseeding Restoration of surface feature	Chemical/Toxicological Hazards: 1. Minimal exposure to contaminated material. 2. Exposure to chemicals brought onto site.	Chemical/Toxicological Hazards: 1. Level D protection for majority of work 2. Hazard communication program
	Biological Hazards: 1. Slight possibility of wild animals. 2. Slight possibility of stinging and biting insects.	Biological Hazards: 1. Avoid physical contact with wild animals. Do not threaten and/or corner animals. Make noise to get the animal to retreat. Stay in or return to vehicle or equipment. 2. Use appropriate insect repellants i.e., DEET.
	Physical Hazards: 1. Moving equipment 2. Falls from elevations 3. Slips and trips 4. Cold / Heat Stress 5. Noise exposure 6. Caught between/struck by or against 7. Severe weather 8. Manual lifting 9. Traffic 10. Fueling operations	Physical Hazards 1. Moving equipment <ul style="list-style-type: none"> · Only trained, experienced operators · Equipment inspected daily · Personnel restricted in area of operation · Back up alarms functional · One set of signals given for movement of equipment 2. Falls from elevations <ul style="list-style-type: none"> · Maintain three points of contact when climbing on or off equipment 3. Slips and trips <ul style="list-style-type: none"> · Keep walking and working surfaces dry · Housekeeping - remove trip hazards · Alert employees to hazards of uneven terrain 4. Heat/Cold Stress <ul style="list-style-type: none"> · Refer to attached program 5. Noise exposure <ul style="list-style-type: none"> · Hearing control program which consists of audiometric examination, training, use of ear plugs, and sound level pressure monitoring 6. Caught between/struck by or against <ul style="list-style-type: none"> · Stay out of swing radius of equipment · Ground personnel near operating heavy equipment will wear hard hats and traffic vests · Do not walk, work, or stand near equipment being loaded or unloaded · Backup alarms to be in operable condition. No unnecessary backing. · Steel toe footwear required 7. Severe weather <ul style="list-style-type: none"> · As determined by Site Safety Officer, operations are to cease during severe weather 8. Manual lifting <ul style="list-style-type: none"> · Proper lifting technique utilized. Back straight and lift with legs. · Split heavy loads into smaller loads · Use mechanical aid, whenever possible · Make sure the path of travel is clear prior to the lift 9. Traffic <ul style="list-style-type: none"> · Posted speed limit of 15 mph · Signage · Workers in traffic area to wear reflective vests

ACTIVITY HAZARD ANALYSIS SITE RESTORATION

ACTIVITY	POTENTIAL HAZARDS	RECOMMENDED CONTROLS
<ul style="list-style-type: none"> • Spreading of backfill material in affected area • Hydroseeding • Restoration of surface feature 		10. Fueling operations <ul style="list-style-type: none"> • All equipment will be shut down prior to fueling • All spilled fuel will be wiped up immediately • No smoking in the area of fueling operations • Fueling will be accomplished in well ventilated areas away from ignition sources • Equipment and fuel tank do not need to be bonded or grounded if the metal nozzle is in contact with the metal of equipment's fuel tank

EQUIPMENT TO BE USED	INSPECTION REQUIREMENTS	TRAINING REQUIREMENTS
<ul style="list-style-type: none"> • Track excavators • Hydroseeder • Dump trucks • Bulldozers 	<p>Site Inspection:</p> <ol style="list-style-type: none"> 1. Daily inspection by Health and Safety Officer <p>Motor Vehicles:</p> <ol style="list-style-type: none"> 1. Before initial use vehicles will be inspected and found to be in a safe operating condition. <p>Equipment:</p> <ol style="list-style-type: none"> 1. Before equipment is placed in use it will be inspected and tested by a competent person. 2. Inspections and tests will be done in accordance with manufacturer's instructions. 3. All equipment will be inspected daily when in use by the operator. 	<p>Site Specific:</p> <ol style="list-style-type: none"> 1. OSHA HAZWOPER 2. HTRW activity training 3. Initial site specific 4. Daily tailgate safety meetings 5. Hazard communication <p>Supervisory Personnel:</p> <ol style="list-style-type: none"> 1. OSHA supervisor's training <p>Motor Vehicle:</p> <ol style="list-style-type: none"> 1. Operators shall hold a valid license for the type and class of vehicle they are operating. <p>Heavy Equipment:</p> <ol style="list-style-type: none"> 1. Trained and qualified operators. <p>Equipment General:</p> <ol style="list-style-type: none"> 1. Employees will be qualified and trained to operate or service mechanical equipment.

APPENDIX C
Heat Stress

HEAT STRESS CONTROL PROGRAM

1.0 PURPOSE

Heat-related illness is a common occupational hazard in physically demanding work activities associated with hot weather and the use of impermeable, chemical-resistant clothing. This procedure describes minimum requirements for preventing occupational injury and illness due to heat stress in work operations.

2.0 SCOPE

This procedure applies to work activities in temperatures greater than 70°F (21°C) with or without the use of impermeable, chemical-resistant clothing.

3.0 HEAT STRESS CONDITIONS

Environmental factors- temperature, radiant heat (such as from the sun) and air velocity-affect the amount of stress a worker experiences in a hot work area. Also important to the level of stress a worker faces are personal factors such as age, weight, fitness, medical condition and acclimatization.

The body reacts to high external temperature by circulating blood to the skin for release of heat. This is evidenced by increased pulse rate and dilation of peripheral blood vessels. However, if muscles are being used for labor, less blood is available to flow to the skin and release heat.

Sweating is another means the body uses to maintain a stable internal body temperature. However, sweating is only effective if the humidity level is low enough to permit evaporation, if the lost fluids and salts are replaced and if permeable clothing is worn.

If the body cannot release excess heat via the homeostatic mechanisms listed above, it will store it. When this happens the body's core temperature rises. As the body continues to store heat, the individual is at increased risk for heat stress disorders.

4.0 HEAT STRESS DISORDERS

4.1 Heat Rash

Heat rash, also called prickly heat, is caused by continuous exposure to heat and/or humidity. Profuse sweating while wearing impermeable clothing causes moisture to remain on the skin. This results in plugging of the sweat glands resulting in retention

of sweat and inflammation. Signs and symptoms of heat rash include many tiny raised red blisters on affected areas with pricking sensations during heat exposure. Heat rash is usually mild and transitory in nature.

The condition can be discouraged by resting in a cool area during break times to allow the skin to dry. Also taking frequent showers provides relief.

4.2 Heat Cramps

Heat cramps are caused by depletion of body electrolytes during sweating. If lost fluid is replaced only with water, body electrolyte levels are diluted. This results in painful cramping of the large muscle groups such as the arms, legs and abdomen, during or after work hours.

Cramps may be relieved or prevented by replacing lost fluids with fortified drinks such as Gatorade and eating a well balanced diet with foods containing sodium and potassium.

4.3 Heat Exhaustion

Heat exhaustion, or heat fatigue, occurs with sustained work in hot environments when the worker is not acclimatized and does not replace lost fluids. Dehydration and pooling of blood in the periphery causes decreased circulating blood volume to vital organs, particularly the brain and heart. While the condition is not life-threatening, if the worker faints while performing hazardous work, the injury could be serious.

4.4 Heat Stroke

Heat stroke is a life-threatening heat stress disorder resulting from the body's inability to regulate its core body temperature. Heat stroke occurs with sustained exertion in hot environments, usually coupled with several other predisposing factors mentioned above. The worker stops sweating with hot dry skin, which may be reddish, mottled or bluish. The worker will also have elevated body temperature (in excess of 104 degrees Fahrenheit), mental confusion, loss of consciousness, seizures and/or coma. The worker will die unless treated promptly.

Call 911 (or other appropriate emergency phone number) immediately for help. Rapid cooling is essential while awaiting the arrival of medical help. Remove the worker to a cool, shaded area and immerse the worker in cool water using a tub, hose or wetted material such as towels. Vigorously fan the worker to promote cooling. Prompt first aid can prevent permanent injury to the brain and other vital organs.

5.0 RESPONSIBILITIES

5.1 Project Supervisors

- Manage field operations to reduce heat stress and prevent heat strain.
- Ensure that work schedules allow for work acclimatization and appropriate work/rest regimens.
- Provide adequate drinking water, electrolyte replacement fluids, and break areas.
- Provide appropriate personnel protective equipment for protection against thermal stresses.
- Verify that at least two individuals are trained in First Aid/CPR.

5.2 Site Safety and Health Officers (SHO)

- Notify project supervision when heat stress prevention measures should be implemented.
- Review heat stress prevention and treatment at a daily tailgate safety meeting for job sites where heat stress may exist.
- Ensure that subcontractor employees are given this information.
- Ensure at least two workers on each shift are trained in first aid and CPR.
- Document vital signs of all personnel that enter the exclusion zone wearing PPE. The vital signs shall be taken before entry and directly after exiting the exclusion zone. All vital signs shall be taken by the SHO or assigned person.
- Monitor and document the ambient temperature in the work zone as needed.
- Document notable physical appearance observations of personnel.

5.3 Workers

- Follow heat stress prevention procedures (See Sec. 6.0.).
- Be alert to self and coworkers' signs of heat stress.
- Immediately notify the site supervisor or the site safety officer of any worker who appears to be injured or ill.

6.0 PREVENTION AND TREATMENT

6.1 Prevention

Preventative measures for heat stress will be implemented when the ambient air temperature is greater than 70 degrees Fahrenheit in the work zone. Preventative measures will reduce the risk of serious injury and loss of work productivity.

All Severson employees receive pre-employment and periodic medical examinations that include an evaluation of their ability to work under thermal stresses while wearing respirators and personal protective equipment.

Workers will use the buddy system, always working in pairs or with at least one other worker within their line of sight at all times.

New workers or those unaccustomed to working under thermal stresses will be allowed to become acclimatized. During the first seven (7) days of work in a hot environment, their work load is modified to begin at approximately 50% of the expected work load, and is increased gradually each day. Workers can lose acclimatization in a few days. Therefore, those who have been away from the hot environment for more than four (4) days are allowed to re-acclimatize themselves as if they were new. The individual workloads will be based on the site safety officer's recommendations.

Workers are permitted to take rest breaks as needed during high heat conditions when the worker feels affected by the heat in conjunction with SHO recommendations. However, all workers working under potential thermal stress conditions will take at least one 15-minute rest break every two hours. Work/rest cycles will be established on a site-specific basis in conjunction with health and safety management for projects requiring respirators, chemical-resistant coveralls, physically strenuous work activities, and/or potential exposure to radiant heat. Work/rest cycles will vary throughout the duration of the project based on site conditions and vital sign monitoring. Work periods may have to be decreased and rest periods increased during times of high heat stress.

Cool shaded break areas will be provided. Under extreme heat stress conditions, consideration will be given to working in the cooler times of the day or at night.

Workers are required to increase their fluid intake when working under heat stress conditions. Cool water and/or electrolyte replacement beverages are provided in designated lunch and/or break areas.

Vehicles and heavy-equipment cabs are air-conditioned, wherever possible.

Mechanization of work tasks is used to reduce the need for manual labor, wherever possible.

The use of cooling devices such as ice vests and cool deluge showers may be implemented on a site-specific basis.

Workers will self-monitor for signs and symptoms of heat stress. Additional

monitoring for body temperature, peripheral pulse, respiratory rate, blood pressure and/or body weight will be considered under special circumstances.

6.2 Vital Signs

When vital signs are monitored, the following guidelines will be in place:

1. Workers will not re-enter the exclusion zone in impermeable PPE when oral body temperature exceeds 100.6°F.
2. If oral body temperature exceeds 99.6°F, the next work period will be shortened by one-third (1/3).
3. Workers will not re-enter the exclusion zone in impermeable PPE when heart rate (pulse) exceeds 110 beats per minute.
4. Workers may re-enter the exclusion zone once vital signs normalize.

6.3 First Aid

Workers experiencing symptoms of heat exhaustion such as headache, nausea, vomiting, or muscle cramps will immediately decontaminate, remove chemical-resistant clothing and respirators, and move to a shaded break area. Workers should sit or lie down. On-site first aid personnel will be summoned to evaluate ill associates. If fully conscious, the worker will be encouraged to drink cool water and the worker's head, neck, and clothing may be moistened with water to increase evaporative cooling. Workers may also be placed in an air-conditioned vehicle to facilitate cooling.

Medical personnel and emergency transport will be summoned immediately for any worker experiencing symptoms of heat stroke. The worker's respirator and chemical-resistant clothing will be removed immediately. The worker's clothing may be moistened with cool water to increase evaporative cooling. Fanning the worker and placing him/her in an air-conditioned vehicle will also facilitate cooling. Heat stroke is an immediate life-threatening condition. The worker will be transported to the nearest medical treatment facility as quickly as possible.

7.0 TRAINING

Workers and supervisors working in potential heat stress conditions are trained in the following subjects:

- How to identify potential heat stress situations,
- Signs and symptoms of heat stress disorders,
- First aid for heat illness and injuries,
- Maintaining fluid and salt intake,
- Acclimatization,
- Heat stress prevention program.

Initial training is performed at the time of hiring or placement in a potentially exposed work assignment. Subsequent training is provided as part of site-specific training in daily tailgate safety meetings. Training topics will also be reviewed during first aid/CPR classes.

Copies of training documentation are maintained in the worker's health and safety files.

8.0 MONITORING

Wet Bulb Globe Temperature (WBGT) readings will be taken and the following American Conference of Governmental Industrial Hygienists (ACGIH) recommendations will be used as an indicator of potential heat stress conditions:

<u>Work Load</u>	<u>Limit (WBGT)</u>
Light	30°C
Moderate	26.7°C
Very Heavy	25° C

APPENDIX D
Forms

Sevenson Environmental Services, Inc.
Daily Safety Log

DATE:

WORK PERIOD COVERED:

WEATHER CONDITIONS:

SUMMARY OF DAY'S WORK ACTIVITY:

EQUIPMENT USED BY SAFETY MONITORS:

PROTECTIVE CLOTHING AND EQUIPMENT BEING USED BY TASK:

PHYSICAL CONDITION OF WORKERS (any heat or cold stress or other medical problems):

ACCIDENT OR BREACH OF PROCEDURES:

DESCRIPTION OF MONITORING AIR SAMPLING TAKEN:

MISCELLANEOUS:

NAME:

TITLE:

SIGNATURE:

Job Address _____



Sevenson
Environmental
Services, Inc.

Report of Accident, Injury, or Illness

Instructions: Please print. Fill in all blanks. When completed, return this form to Sharon Lee at the main office.

Name _____ Sex: _____ Age: _____

Social Security Number _____ Birth Date: _____

Address _____ Phone Number _____

Marital Status Single Married Separated Divorced Widowed

of Dependents _____ Date of Accident _____ Time _____ AM/PM

Date Employee notified employer: _____ Who was notified: _____

Employment Start Date:	Wage Rate:
Occupation:	Average Hours Worked:
Date Last Worked:	Average Days Per Week:
Time Shift Began:	Was worker paid for day of injury?
Name of Witness:	Did salary continue?
Describe how the accident happened:	
What was employee doing when injured?	
Describe the injury in detail and indicate part of body affected:	
Name of object or substance that directly injured the employee:	

Date & Time medical attention was sought:

Name, address and phone number of hospital or doctor:

Was employee involved in any other incidents/accidents? If yes, describe:

Any history of work accidents, absenteeism, and/or disciplinary problems:

Substance abuse test administered: ___ Yes, ___ No - if no, why not?

Medical release obtained:

Corrective Action Taken:

Supervisor _____ Date _____

Safety Officer _____ Date _____

Comments: _____

Report of Accident, Injury, or Illness

Sevenson Environmental Services, Inc.

Daily Calibration Data

Date:

Day:

Technician(s):

MultiRAE Model PGM 50

Span Gas Concentration

Serial No.:

Response:

Carbon Monoxide	50 ppm
Hydrogen Sulfide	25 ppm
Methane	50 %
Oxygen	20.9 %
Isobutylene	100 ppm

TSI Dust Trak Model 8520

Serial No.:

Zeroed:

Background:

Readings in

mg/m³

Sevenson Environmental Services, Inc.
REAL TIME MONITORING

DATE:

AREA:

TIME

LOCATION / DESCRIPTION OF WORK

RESULTS

AIR MONITOR SIGNATURE:

Sevenson Environmental Services, Inc.
RESPIRATOR FIT TEST RECORD

EMPLOYEE NAME:

DATE:

RESPIRATOR MANUFACTURE:
 RESPIRATOR SIZE:

RESULTS

	Isoamyl Acetate	Irritant Smoke	Other
FIT			
NO FIT			
COMFORT:	Very Comfortable ___	Comfortable ___	Tolerable ___
	Uncomfortable ___	Very Uncomfortable ___	

COMMENTS:

EMPLOYEE SIGNATURE:

Sevenson Environmental Services, Inc.
RESPIRATOR FIT TEST RECORD

EMPLOYEE NAME:

DATE:

RESPIRATOR MANUFACTURE:
 RESPIRATOR SIZE:

RESULTS

	Isoamyl Acetate	Irritant Smoke	Other
FIT			
NO FIT			
COMFORT:	Very Comfortable ___	Comfortable ___	Tolerable ___
	Uncomfortable ___	Very Uncomfortable ___	

COMMENTS:

EMPLOYEE SIGNATURE:

Sevenson Environmental Services, Inc.
TRAINING ACKNOWLEDGMENT FORM

NAME:

ADDRESS:

SOCIAL SECURITY NO.:

EMPLOYER:

I have completed and understand the training program for work to be carried out during work at the Site, including the following topics:

- a. Work Rules and Safety Requirements
- b. Personal Protection Equipment
- c. Potentially Hazardous Chemicals
- d. Emergency Equipment and Plan
- e. Reporting Injuries and Illnesses
- f. Emergency Procedures
- g. Job Assignment
- h. Personal Hygiene
- i. Medical Tests
- j. Standard Operating Procedures
- k. Applicable Rules and Regulations

I further confirm that a respirator qualitative fit test was performed and that I have been issued a respirator of the same type.

Site Personnel

Signature: _____

Date: _____

I certify that the above has received adequate safety training and instruction and that this person is proficient in the use of protective clothing and equipment and knowledgeable in all aspects of the Site Safety and Health Plan.

Safety Officer

Signature: _____

Date: _____

Sevenson Environmental Services, Inc.
Daily Safety Meeting

DATE:
DAY:

JOB NAME:
& NUMBER:

TOPIC:

PRINT

SIGNATURE:

Attachment C

Operations Plan

OPERATIONS PLAN

PHASE 3 FLOODPLAIN PROPERTIES GROUP 3C AND 3D REMOVAL ACTION AREA

Prepared by:

Sevenson Environmental Services, Inc.
2749 Lockport Road
Niagara Falls, NY 14305

August 4, 2005

OPERATIONS PLAN

1.0 List/schedule of equipment to be used on site

Sevenson will utilize the following equipment to excavate and backfill the Group 3C and 3D Floodplain Properties:

- Hydraulic excavator
- Front end loader
- Tandem dump trucks
- Track bulldozer
- Skid steer Loader
- Walk behind roller and/or plate compactor

2.0 Property protection procedures

Prior to clearing and grubbing areas, Sevenson will walk to areas with a representative from GE to determine which trees will be able to remain. All trees and brush in excavation areas will be removed in their entireties.

Sevenson will utilize existing haul roads to remove the majority of the required excavations. If necessary, Sevenson will construct addition haul roads using either geotextile and dense graded gravel or 14' wide Dura-Base composite road mats (Mabey Mats). Staging of equipment and clean fill materials will take place on existing haul roads and staging areas. Upon completion all haul roads and staging areas will be removed and the areas will be restored to original conditions.

3.0 Project work schedule

Sevenson's anticipated work schedule will consist of 5 - ten hour workdays per week. Work shift will be from 07:00 to 17:30. Schedule may be adjusted with approval from GE if required. The overall project bar chart schedule is attached as Figure 1 with a tentative start date of Monday, August 15, 2005.

4.0 Vehicular and pedestrian traffic plan

Sevenson will provide all necessary traffic warnings and controls. Controls will include existing warning signs, police officer and/or flagmen if conditions determine a need. Sevenson will

OPERATIONS PLAN

follow the proposed primary and secondary travels routes for excavated materials as shown on Figure 8-1, prepared by Blasland, Bouck, & Lee, Inc. Severson's site safety and health officer, along with GE will monitor construction activities to determine the need for flagmen and or Police detail.

5.0 Stormwater, erosion, noise, and dust control measures

Severson proposes to utilize silt fence and/or hay bales to prevent erosion at the removal areas and along the river. Silt fence and/or hay bale barriers will be constructed at the locations shown on Site Preparation Plans for Groups 3C and 3D, Sheets 3 and 4 dated June 2005, prepared by Blasland, Bouck, & Lee, Inc.

Severson will coordinate with GE subcontractor performing dust monitoring to determine needs for controls.

Severson uses the following methods to prevent and suppress the generation of fugitive dust:

- Educate, train, and reinforce workers at daily safety meeting of the necessity to perform their tasks in a manner that does not generate dust
- Reduce the pace of, or cease, the dust producing activity until the problem is corrected
- Notify the superintendant of dust conditions, and implement dust suppression procedures including the use on an on site water truck when needed
- Remove accumulated dirt and soil from problematic areas
- Increase frequency, volume, and/or coverage of water misting and sprays to prevent dewatered and excavated sediments from drying
- Provide additional dust suppression systems and operating personnel during the task duration of dust production conditions
- Modify operating procedures and methods to reduce or eliminate the dust producing conditions

These techniques will help prevent dust generation, ensure no visible emissions at the site boundary, and will prevent dust from leaving the work area.

OPERATIONS PLAN

6.0 Proposed excavation plan/approach

Soils will be removed to the horizontal and vertical limits shown on Sheets 5 and 6 of the technical drawings prepared by Blasland, Bouck, & Lee, Inc. On-site survey will be laid out and confirm soil excavations as they progress. Free liquids are not anticipated during removal operations. If saturated soils are encountered they will be stockpiled and allowed to drain within the excavation limits prior to loading into trucks for transport to the appropriate OPCA.

Two classifications of soils will be excavated during removal operations, TSCA and non-TSCA. To the extent possible, all TSCA soils will be removed from an area prior to removing non-TSCA soils. Equipment coming in contact with TSCA soils will be decontaminated prior to beginning the removal of non-TSCA soils. The delineations between TSCA and non-TSCA soils are shown on the technical drawings.

Sevenson intends to direct-load excavated soils for transport to the appropriate OPCA. If needed, Sevenson will construct stockpiles at locations and of volumes approved by GE. The stockpiles will be lined and covered at the end of each workday. Erosion controls will be installed around the perimeter of all stockpiles.

7.0 Materials handling

TSCA and non-TSCA soils will be excavated, stockpiled (if necessary), and transported separately to prevent commingling of wastes.

Sevenson does not anticipate excavation of saturated soils in the 3C and 3D floodplain excavations. If saturated soils are encountered, they will be temporarily stockpiled on similarly classified soils to allow excess water to drain. If decanted water will adversely affect the underlying soils it will be collected and transported to the on site wastewater treatment plant.

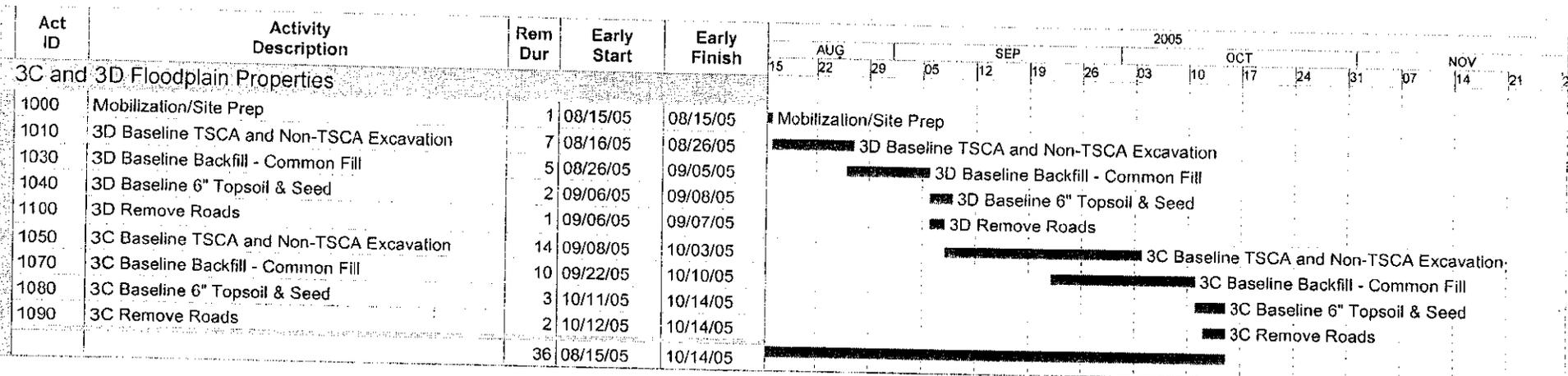
Soils excavated will be transported to Hill 78 OPCA (non-TSCA) and Building 71 OPCA (TSCA). TSCA loads will be loaded into lined trucks and will require hazardous bills of lading. Non-TSCA loads will be loaded into lined trucks and will require non-hazardous bills of lading. GE will supply all bills of lading. Sevenson will fill out the required paperwork and ensure loads are covered and placarded prior to transport to the appropriate OPCA. A transportation summary sheet will be completed for each day materials are transported.

OPERATIONS PLAN

8.0 Equipment cleaning procedures

Equipment used for excavating soils will be cleaned to remove accumulated soils prior to leaving the work site. The bucket and tracks, if they came in contact with potentially contaminated soils, will be cleaned of accumulated soils (dry decon) on site. Equipment will be decontaminated before handling non-TSCA materials, before handling clean backfill materials, and prior to leaving the site. Upon completion of work and before leaving the site, cleaned equipment will be wipe sampled.

Transport vehicles that may have been in contact with contaminated materials will be washed with high pressure, low volume water spray prior to hauling clean backfill materials and prior to leaving the site. Wash water will be collected and transported to the on site wastewater treatment plant.



Start date 08/15/05 7:00AM
 Finish date 10/14/05 4:59PM
 Data date 08/15/05 7:00AM
 Run date 08/04/05 2:00PM
 Page number 1A
 © Primavera Systems, Inc.

Figure 1 - Severson Environmental
3C and 3D Floodplain Properties

Attachment D

Identification of Proposed Fill Sources



August 10, 2005

Mr. Richard Gates
GE
159 Plastics Avenue
Pittsfield, MA 01201

**SUBJECT: General Electric/ Housatonic River Project
 Group 3C and 3D Flood Plain Properties
 Pittsfield, Massachusetts**

Dear Mr. Gates:

Sevenson Environmental Services, Inc. plans to utilize common fill and topsoil from the same sources previously tested for the Group 3A and 3B Floodplain Properties. The sample results previously submitted are representative of the material to be used in the 3C and 3D Properties.

Sevenson is currently investigating a backup topsoil source in the event that there is not enough topsoil at the current topsoil source.

If there are any questions regarding these sources, please call me at 413-236-5676. Thank you for your continued cooperation.

Sincerely,

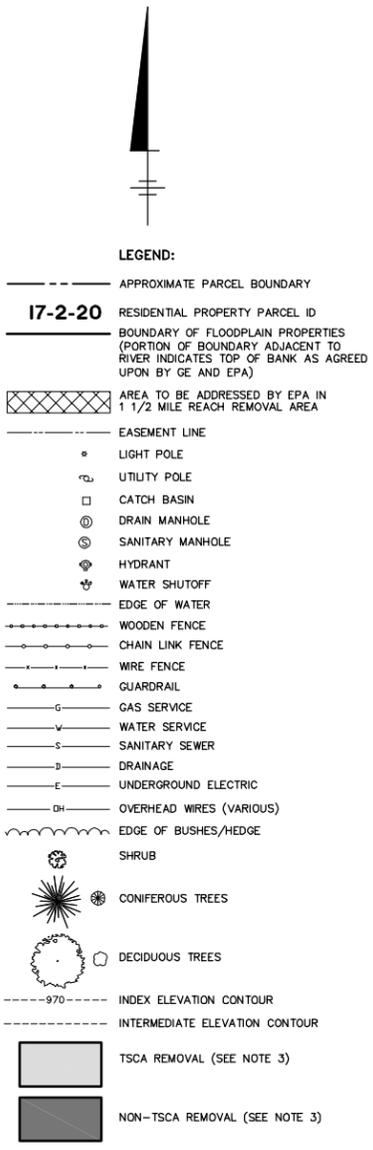
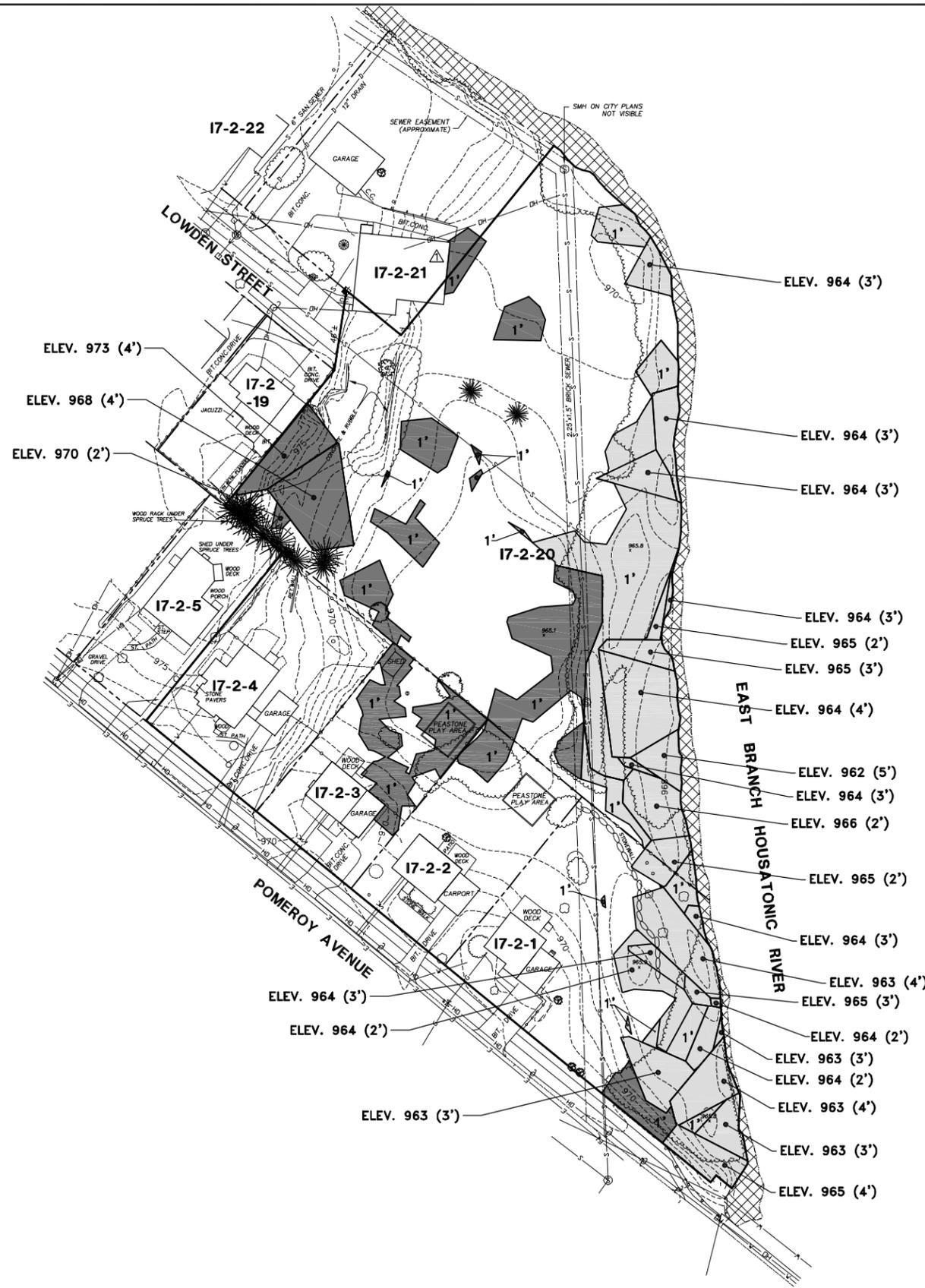
SEVENSON ENVIRONMENTAL SERVICES, INC.

A handwritten signature in black ink, appearing to read 'Joe Mahoney', is written over the typed name.

Joseph W. Mahoney, Jr.
Project Manager

Attachment E

Revised Technical Drawing 5



X: 4012203.DWG
 L: ON=*, OFF=REF*, [3C-AVELIMIT,
 [3c-PR-EXCAVATION, FLOOD,
 CENT, SampleLocations_0-05
 P: PAGESET/SYR-CDL
 8/16/05 SYR-85-DMW DMW BGP
 N/40122004/RDRA/3C3D/CONTRACT/40122G12.DWG

Graphic Scale 1"=40'		8/1/05	ADDED SOIL REMOVAL ON PARCEL 17-2-21.	Professional Engineer's Name
				Professional Engineer's No.
				State
				Date Signed
No.	Date	Revisions	Init	Project Mgr.
				Designed by
				Drawn by
NO ALTERATIONS PERMITTED HEREON EXCEPT AS PROVIDED UNDER SECTION 7209 SUBDIVISION 2 OF THE NEW YORK STATE EDUCATION LAW				ACC

Professional Engineer's Name	
Professional Engineer's No.	
State	Date Signed
Project Mgr.	Designed by
ACC	DMW



GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
 SUPPLEMENTAL INFORMATION PACKAGE FOR THE GROUP 3C AND 3D FLOODPLAIN PROPERTIES

EXCAVATION LIMITS FOR GROUP 3C

TECHNICAL DRAWINGS

BBL Project No. 401.22
Date JUNE 2005
Blasland, Bouck & Lee, Inc. Corporate Headquarters 6723 Towpath Road Syracuse, NY 13214 315-446-9120