GALLAGHER BASSETT | TECHNICAL SERVICES

SOIL MANAGEMENT PLAN

For The

"Trailside Estates" Property
Town of Somers tax lot: Section 4.20, Block 1, Lot 12
Westchester County, New York

October 2025

GBTS File: 21003-0092

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SOIL MANAGEMENT PLAN

October 2025

GBTS File: 21003-0092

Prepared By

Gallagher Bassett Technical Services
22 IBM Road, Suite 101
Poughkeepsie, New York 12601

Prepared For

Kearney Realty & Development Group, Inc.
57 Route 6, Suite 207
Baldwin Place, New York 10505

The undersigned have prepared and reviewed this Soil Management Plan and certify to Kearney Realty & Development Group, Inc. that the information provided in this document is to the best of our abilities considered accurate as of the date of issuance by this office.

Richard Hooker
Gallagher Bassett Technical Services
Manager, Environmental Consulting

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1.0 INTRODUCTION

1.1 Purpose

This Soil Management Plan (SMP) provides a detailed description of the response actions that are proposed by Gallagher Bassett Technical Services (GBTS) to address ACM/LBP containing subsurface debris potentially present in the subsurface at the "Trailside Estates" Property Town of Somers, Westchester County, New York. All proposed work will be conducted according to a Site specific Health and Safety Plan (HASP), provided as Appendix B

1.2 Site Location and Description

The Site is a 18.2-acre vacant overgrown/wooded parcel. A Site Location Map is provided in Appendix A.

1.3 Development Plan

The proposed development plans for the site include new construction of passive recreation (dog park) and single-family residential buildings.

1.4 Previous Environmental Report

A Phase I Environmental Site Assessment (Phase I ESA) was prepared for the Site and an adjoining lot by this office, dated July 26, 2021.

The subject property is vacant wooded land located in a suburban setting, comprised of one tax lots totaling 18.2-acres. Available historical records document prior agricultural use of the property, including active orchard operations from as early as 1941 through at least 1996. Releases at orchard areas are likely to have resulted in contamination of surface soils with metals (arsenic and lead) and persistent organic compounds (e.g. DDT and breakdown products, and dieldrin). The Phase I ESA concluded that this suspect contamination represents a REC and a potential exposure hazard. The subject property was not considered likely to have been historically used for significant commercial purposes and has no history of manufacturing or industrial use.

1.5 Known Environmental Conditions

Fourteen (14) surface soil samples (S-1 through S-14) collected by Tim Miller Associates during the summer of 2025 were analyzed for pesticides, lead and arsenic. Nine of the samples contain pesticides or arsenic at concentrations likely from historical orchard operations and above NYSDEC regulations for Residential use indicating a potential exposure risk; contaminated surface soil, therefore, will require special handling during any future site development activities. Impacted soil, if disposed off-site, will require management as a regulated waste.

2.0 SOIL MANAGEMENT PLAN

This SMP details response actions to address surface and shallow soils (0-~18") at the Site, as identified in Section 1.4, above. All proposed work will be conducted according to a Site specific HASP, provided as Appendix B.

For the purpose of the work detailed in this SMP, the "Client" is defined Kearney Realty & Development Group, Inc., who will contract with the environmental consultant and/or remediation firm (hereafter referred to as the On-site Coordinator [OSC]) to provide the services detailed below.

2.1 Overview of Proposed Oversight Services

The proposed remedial services described in detail in subsequent sections of this SMP consist of the following:

1. Oversight of the on-site management and/or disposal of soils impacted with pesticides, arsenic and lead (Section 2.3.1, below);

2. Preparation of a Closure Report (CR) for the Client and NYSHCR (Section 2.3.2, below).

Prior to, or in conjunction with, the initiation of these actions (see Section 2.3), the tasks detailed in Section 2.2, below, will also be conducted.

2.2 Proposed Site Preparation Services

This section of the SMP provides details on activities and services necessary to be initiated and/or completed prior to the implementation of Site oversight services. The following Excavation Oversight tasks will be performed:

2.2.1 Equipment Calibration

A photo-ionization detector (PID) will be utilized to screen encountered materials for the presence of volatile vapors. The PID will be calibrated at the onset of each workday, and a written calibration log will be maintained for this project. The PID will be calibrated to read parts per million gas equivalents of isobutylene in accordance with protocols set forth by the equipment manufacturer.

2.2.2 Excavation Clean-Up Levels

Clean-up levels will aim to achieve concentrations of contaminants in excavation endpoint samples at or below NYSDEC Brownfield Cleanup Program (BCP) Residential Soil Cleanup Objectives (SCOs) category, as provided in 6 NYCRR Subpart 375.

2.2.3 Subcontractor Coordination

Subcontractors will perform requested services under the direct supervision of the OSC. Prior to the initiation of fieldwork, all subcontractors will be notified of the components of the HASP (see 2.2.5, below). All necessary insurance certificates will be secured from subcontractors by the Client and/or by the OSC. At this time, the following subcontractors are anticipated to be used on this project:

- Excavation Contractor
- Soil Removal Contractor (as necessary/appropriate)
- Analytical Laboratory

2.2.4 Health and Safety Plan

The site-specific HASP will be reviewed with on-site personnel (including subcontractors) prior to the initiation of fieldwork. All proposed work will be performed in "Level D" personal protective equipment; however, all on-site field personnel will be prepared to continue services wearing more protective levels of equipment should field conditions warrant.

2.2.5 Community Air Monitoring Plan

A CAMP will be initiated during all ground intrusive activities described in this SMP that are reasonably likely to generate significant dust and/or vapors. The implementation of the CAMP will document the presence or absence of specific compounds in the air surrounding the work zone, which may migrate off-site due to fieldwork activities. This plan provides guidance on the need for implementing more stringent dust and emission controls based on air quality data. Air monitoring will be conducted for dust. See Appendix C for a copy of the CAMP.

2.3 Proposed Specific Oversight Services

This section of the SMP provides a detailed description of the remedial tasks that will be conducted at the Site. Appropriate measures (e.g., vehicle traffic patterns, stormwater run-off controls, etc.) will be implemented to ensure that contaminated soil is minimally disturbed during the course of all remedial activities.

2.3.1 Excavation and Management of Soils impacted with pesticides and arsenic.

The project site contains vacant areas that will be subject to construction excavation that had been previously been used as orchards and residual pesticides and arsenic are present in surface soils.

The OSC will retained and be responsible for identifying any soils which, based on previous environmental reports and additional sampling as necessary/appropriate, require special handling including on-site internment and/or off-site disposal.

On-Site Management

In consultation with the developer the OSC will coordinate with the architect, GC and structural engineer to ensure that remaining arsenic and pesticide impacted soils are rendered inaccessible by the installation of a composite cover system comprised of the new building slab; concrete and asphalt pavement; and, soil cover in vegetative areas.

Where a soil cover is to be used it will be a minimum of two feet of soil placed over a demarcation layer, with the upper six inches of soil of sufficient quality to maintain a vegetative layer. Soil cover material, including any fill material brought to the site, will meet the RRU SCOs for cover material for the use of the site as set forth in 6 NYCRR Part 375-6.7(d). Substitution of other materials and components may be allowed where such components already exist or are a component of the tangible property to be placed as part of site redevelopment. Such components may include, but are not necessarily limited to: pavement, concrete, paved surface parking areas, sidewalks, building foundations and building slabs.

All concrete foundation components of the cover system and any exterior pavement will have a minimum thickness of four (4) inches. Imported or existing on-site clean soil (or similar materials, e.g., gravel) at exterior areas will have a minimum thickness of two (2) feet.

Off-Site Disposal

Where a determination is made that contaminated material requires to be disposed of off-site, the OSC will monitor the removal of contaminated material, including monitoring the trucks and establishing the designated truck routes. The OSC will also ensure that any unforeseen environmental conditions (e.g., previously unknown USTs) are managed in accordance with applicable federal and state regulations.

Soils will be excavated and removed from the Site consistent with the following procedures:

- Soils will be tested and/or characterized in a manner satisfactory to the repository(ies) selected to accept these soils. Approximate volumes of waste soils will be calculated and repository(ies) approvals will be secured.

- Soils will be excavated and, as warranted, segregated and stockpiled for off-site disposition. Soils requiring special handling will be stockpiled on 6 mil plastic and overlain with plastic.

- Excavation of soils will be conducted in a manner consistent with field conditions and technical observations from field personnel.

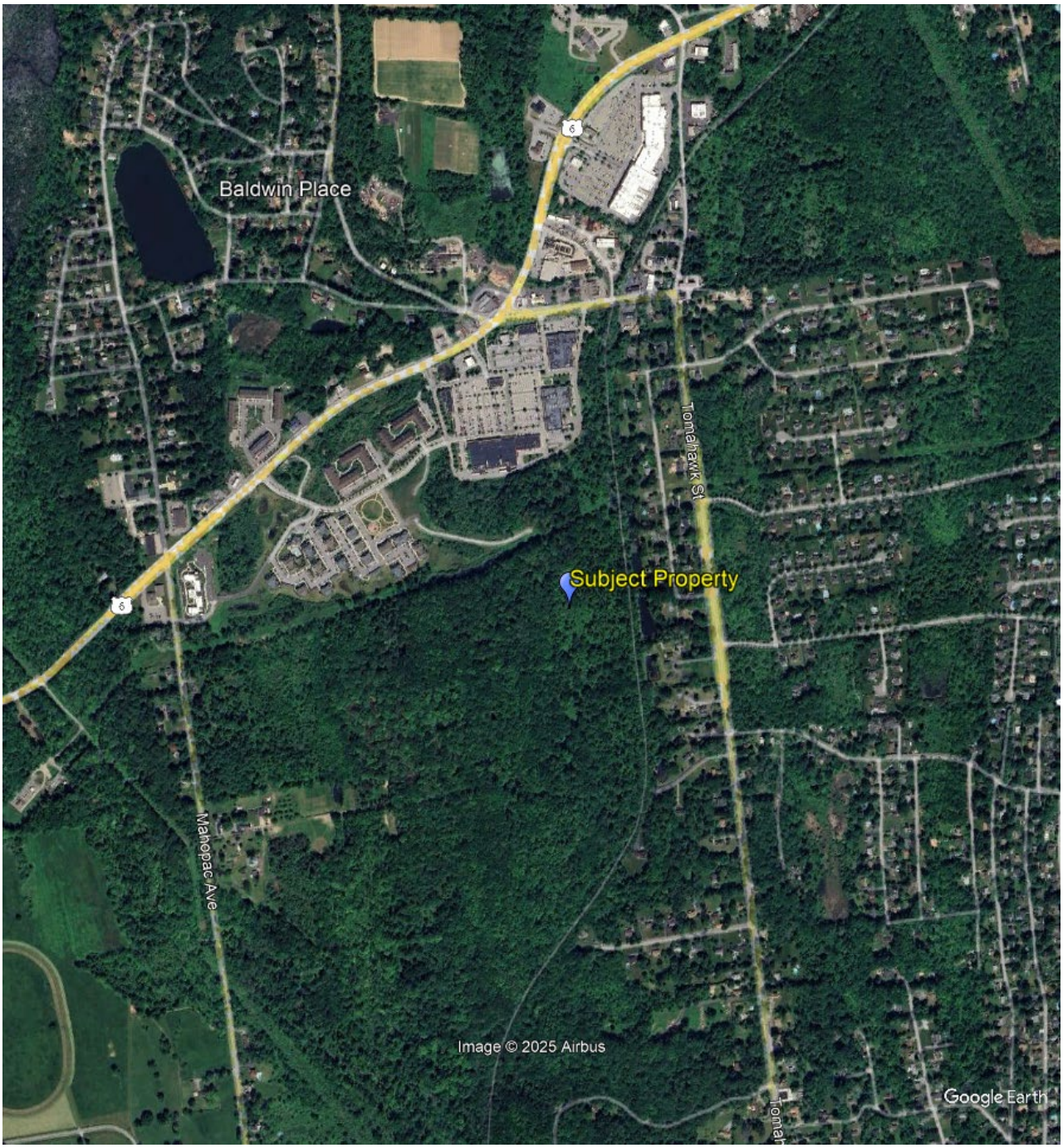
- Any contaminated soils and/or regulated debris will be loaded on properly permitted (e.g. NYSDEC "Part 364 Permits") and all manifests will be signed by the Site Owner or the OSC prior to the trucks exiting the Site. All manifests and other records of soil management will be maintained by the OSC for inclusion in the Closure Report (see Section 2.3.2).

2.3.2 Closure Report

A Closure Report (CR) will be submitted following implementation of the excavation management defined in this SMP. The CR will provide the documentation that the oversight work required under this SMP was completed and performed in compliance with this plan. The CR will provide a comprehensive account of the locations and characteristics of all material removed from the Site.

APPENDIX A

Site Location Map



Site Location Map
Trailside Estates
Town of Somers
Westchester, County, New York

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File No: 21003-0092

October 2025

Appendix A

APPENDIX B

Health and Safety Plan

GALLAGHER BASSETT | TECHNICAL SERVICES

HEALTH AND SAFETY PLAN

FOR

SITE REMEDIATION

(INCORPORATING COMMUNITY HEALTH AND SAFETY PLAN)

"Trailside Estates" Property
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October 2025

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1.0 INTRODUCTION

1.1 Purpose

This Health and Safety Plan for Site Remediation (HASP) has been developed to provide the requirements and general procedures to be followed by Gallagher Bassett Technical Services (GBTS) and on-site subcontractors while performing remedial services at the "Trailside Estates" Property Town of Somers, Westchester County, New York. This document supersedes all other health and safety plans prepared by GBTS for this Site.

This HASP incorporates policies, guidelines, and procedures that have the objective of protecting the public health of the community during the performance of fieldwork activities, and therefore serves as a Community Health and Safety Plan (CHASP). The objectives of the CHASP are met by establishing guidelines to minimize community exposure to hazards during fieldwork, and by planning for and responding to emergencies affecting the public.

This HASP describes the responsibilities, training requirements, protective equipment, and standard operating procedures to be utilized by all personnel while on the Site. All on-site personnel and visitors shall follow the guidelines, rules, and procedures contained in this safety plan. The Project Manager or Site Health and Safety Officer (SHSO, see Table 1, below) may impose any other procedures or prohibitions believed to be necessary for safe operations. This HASP incorporates by reference the applicable Occupational Safety and Health Administration (OSHA) requirements in 29 CFR 1910 and 29 CFR 1926.

The requirements and guidelines in this HASP are based on a review of available information and evaluation of potential on-site hazards. This HASP will be discussed with Site personnel and will be available on-site for review while work is underway. On-site personnel will report to the SHSO in matters of health and safety. The on-site project supervisor(s) are responsible for enforcement and implementation of this HASP, which is applicable to all field personnel, including contractors and subcontractors.

This HASP is specifically intended for the conduct of activities within the defined scope of work in specified areas of the Site. Changes in Site conditions and future actions that may be conducted at the Site may necessitate the modification of the requirements of the HASP. Although this HASP can be made available to interested persons for informational purposes, GBTS has no responsibility over the interpretations or activities of any other persons or entities other than employees of GBTS or GBTS's subcontractors.

1.2 Site Location and Description

The subject property is a 18.2-acre vacant overgrown/wooded parcel. No structures are currently located on the property. A Site Location Map is included as an Attachment to this HASP.

1.3 Work Activities

Environmental remediation activities are detailed in the Soil Management Plan (SMP), dated October 2025. The specific tasks detailed in the SMP are wholly incorporated by reference into this HASP. The SMP was prepared to oversee excavation of potential subsurface debris/urban dill from the site.

2.0 HEALTH AND SAFETY HAZARDS

2.1 Hazard Overview for On-Site Personnel

The possibility exists for on-site personnel to have contact with contaminated soils during site remedial work. Contact with contaminated substances may present a skin contact, inhalation, and/or ingestion hazard. These potential hazards are addressed in Sections 3.0 through 11.0, below.

2.2 Potential Hazards to the Public from Fieldwork Activities

The potential exists for the public to be exposed to pesticide, arsenic and lead contaminated soils, which may present a skin contact, inhalation, and/or ingestion hazard. Additional potential hazards to the public that are associated with fieldwork activities include mechanical/physical hazards, traffic hazards from fieldwork vehicles, and noise impacts associated with operation of mechanical equipment.

Impacts to public health and safety are expected to be limited to hazards that could directly affect on-site visitors and/or trespassers. These effects will be mitigated through site access and control measures (see Section 6.0, below). Specific actions taken to protect the public health (presented in Sections 3.0 through 11, below, and in the Community Air Monitoring Plan) are anticipated to minimize any potential off-site impacts from contaminant migration, noise, and traffic hazards.

3.0 PERSONAL PROTECTIVE EQUIPMENT

The levels of protection identified for the services specified in the SIWP represent a best estimate of exposure potential and protective equipment needed for that exposure. Determination of levels was based on data provided by previous studies of the Site and information reviewed on current and past Site usage. The SHSO may recommend revisions to these levels based on an assessment of actual exposures and may at any time require Site workers, supervisors, and/or visitors to use specific safety equipment.

The level of protective clothing and equipment selected for this project is Level D. Level D personal protective equipment (PPE) provides minimal skin protection and no respiratory protection, and is used when the atmosphere contains no known hazard, oxygen concentrations are not less than 19.5%, and work activities exclude splashes, immersion, or the potential for unexpected inhalation or contact with hazardous levels of chemicals. Workers will wear Level D protective clothing including, but not limited to, a hard hat, steel-toed boots, nitrile gloves (when handling soils and/or groundwater), hearing protection (foam ear plugs or ear muffs, as required), and safety goggles (in areas of exposed groundwater and when decontaminating equipment). PPE will be worn at all times, as designated by this HASP. Disposable gloves will be changed immediately following the handling of contaminated soils, water, or equipment. Tyvek suits will be worn during activities likely to excessively expose work clothing to contaminated dust or soil (chemically-resistant over garments will be required in situations where exposures could lead to penetration of clothing and direct dermal contact by contaminants).

The requirement for the use of PPE by official on-site visitors shall be determined by the SHSO, based on the most restrictive PPE requirement for a particular Work Zones (see Section 6.0 for Work Zone definitions). All on-site visitors shall, at a minimum, be required to wear an approved hardhat and be provided with appropriate hearing protection as necessary.

The need for an upgrade in PPE will be determined based upon encountered Site conditions, including measurements taken in the breathing zone of the work area using a photo-ionization detector (PID). An upgrade to a higher level of protection (Level C) will begin when specific action levels are reached (see Section 5.0, below), or as otherwise required by the SHSO. Level C PPE includes a full-face or half-mask air-purifying respirator (NIOSH approved for the compound[s] of concern), hooded chemical-resistant clothing, outer and inner chemical-resistant gloves, and (as needed) coveralls, outer boots/boot covers, escape mask, and face shield. Level C PPE may be used only when: oxygen concentrations are not less than 19.5%; contaminant contact will not adversely affect any exposed skin; types of air contaminants have been identified, concentrations measured, and a cartridge or canister is available that can remove the contaminant; atmospheric contaminant concentrations do not exceed immediately dangerous to life or health (IDLH) levels; and job functions do not require self-contained breathing apparatus (SCBAs). The need for Level B or Level A PPE is not anticipated for the planned remedial activities at this Site.

If any equipment fails and/or any employee experiences a failure or other alteration of their protective equipment that may affect its protective ability, that person will immediately leave the work area. The Project Manager and the SHSO will be notified and, after reviewing the situation, determine the effect of the failure on the continuation of on-going operations. If the failure affects the safety of personnel, the work site, or the surrounding environment, personnel will be evacuated until appropriate corrective actions have been taken.

4.0 CONTAMINANT CONTROL

Precautions will be taken during dry weather (e.g., wetting or covering exposed soils) to avoid generating and breathing dust-generated from soils. A PID and digital dust indicator (or equivalent equipment) will be used to monitor potential contaminant levels. Response to the monitoring will be in accordance with the action levels provided in Section 5.0.

5.0 MONITORING AND ACTION LEVELS

Concentrations of organic compounds in the air are expected to be below the OSHA Permissible Exposure Limits (PELs). A Community Air Monitoring Plan (CAMP) will be implemented for all fieldwork (a copy of the CAMP is provided in the SIWP). Air monitoring will be conducted for VOCs and dust. Monitoring will be conducted at all times that fieldwork activities which are likely to generate emissions are occurring. PID readings consistently in excess of 5 ppm, and dust levels in excess of 100 µg/m^3 of the background level (150 µg/m^3 after mitigation techniques have been instituted), will be used as an indication of the need to initiate personnel monitoring, increase worker protective measures, and/or modify or cease on-site operations in order to mitigate off-site community exposure.

PID and/or dust readings that consistently exceed background in the breathing zone (during any of the proposed tasks) will necessitate moving away from the source or implementing a higher PPE level.

6.0 SITE CONTROL/WORK ZONES

Site control procedures will be established to reduce the possibility of worker/visitor contact with compounds present in the soil, to protect the public in the area surrounding the Site and to limit access to the Site to only those persons required to be in the work zone. Notices will be placed near the Site warning the public not to enter fieldwork areas and directing visitors to report to the Project Manager or SHSO. Measures will be taken to limit the entry of unauthorized personnel into the specific areas of field activity and to safely direct and control all vehicular traffic in and near the Site (e.g., placement of traffic cones and warning tape).

The following Work Zone will be established:

Exclusion Zone ("Hot Zone") - The exclusion zone will be that area immediately surrounding the work being performed for remediation purposes (i.e. the area where contaminated media are being handled). It is anticipated that much of the work will be accomplished with heavy equipment in the exclusion zone. Only individuals with appropriate PPE and training are allowed into this zone. It is the responsibility of the Site Health and Safety Officer to prevent unauthorized personnel from entering the exclusion zone. When necessary, such as in high traffic areas, the exclusion zone will be delineated with barricade tape, cones, and/or barricades.

Decontamination Area - A decontamination area for personnel and equipment is not anticipated being required during completion of the SIWP; however, care will be taken to remove gloves, excess soil from boots, and soiled clothing (if necessary) before entering the Intermediate Zone.

Contamination Reduction Zone and Support Zone - Not anticipated being required during the completion of the SIWP.

Intermediate Zone (Decontamination Zone) - The intermediate zone, also known as the decontamination zone, is where patient decontamination should take place, if necessary. A degree of contamination still is found in this zone; thus, some PPE is required, although it is usually of a lesser degree than that required for the hot zone.

Command Zone - The command zone is located outside the decontamination zone. All exposed individuals and equipment from the "hot zone" and decontamination zone should be decontaminated before entering the command zone. Access to all zones must be controlled. Keeping the media and onlookers well away from the Site is critical and will be the responsibility of both the SHSO and the Project Manager, and other Site personnel as appropriate.

7.0 NOISE CONTROL

All fieldwork activities will be conducted in a manner designed to reduce unnecessary noise generation, and to minimize the potential for both on-site and off-site harmful noise levels. The Project Manager and SHSO will establish noise reduction procedures (as appropriate to the Site and the work) to meet these requirements.

8.0 PERSONNEL TRAINING

Work zones that will accomplish the general objective stated above will be established by the Project Manager and the SHSO. Site access will be monitored by the SHSO, who will maintain a log-in sheet for personnel that will include, at the minimum, personnel on the Site, their arrival and departure times, and their destination on the Site. All workers will be properly trained in accordance with OSHA requirements (29 CFR 1910). Personnel exiting the work zone(s) will be decontaminated prior to exiting the Site.
Site-specific training will be provided to each employee. Personnel will be briefed by the SHSO as to the potential hazards to be encountered. Topics will include:

- Availability of this HASP;
- General site hazards and specific hazards in the work areas, including those attributable to known of suspect on-site contaminants;
- Selection, use, testing, and care of the body, eye, hand, and foot protection being worn, with the limitations of each;
- Decontamination procedures for personnel, their personal protective equipment, and other equipment used on the Site;
- Emergency response procedures and requirements;
- Emergency alarm systems and other forms of notification, and evacuation routes to be followed; and,
- Methods to obtain emergency assistance and medical attention.

9.0 DECONTAMINATION

The SHSO will establish a decontamination system and decontamination procedures (appropriate to the Site and the work) that will prevent potentially hazardous materials from leaving the Site. Trucks will be brushed to remove materials adhering to their surfaces. Sampling equipment will be segregated and, after decontamination, stored separately from splash protection equipment. Decontaminated or clean sampling equipment not in use will be covered with plastic and stored in a designated storage area in the work zone.

10.0 EMERGENCY RESPONSE

10.1 Notification of Site Emergencies

In the event of an emergency, the SHSO will be immediately notified of the nature and extent of the emergency (the names and contact information for key site safety and management personnel, as well as other site safety contact telephone numbers, shall be posted at the Site).

Table 1 in this HASP contains Emergency Response Telephone Numbers, and immediately following is a map detailing the directions to the nearest hospital emergency room. This information will be maintained at the work Site by the SHSO. The location of the nearest telephone will be determined prior to the initiation of on-site activities. In addition to any permanent phone lines, a cellular phone will be in the possession of the SHSO, or an authorized designee, at all times.

10.2 Responsibilities

Prior to the initiation of on-site work activities, the SHSO will:

- Notify individuals, authorities, and/or health care facilities of the potentially hazardous activities and potential wastes that may develop as a result of the remediation.
- Confirm that first aid supplies and a fire extinguisher are available on-site.
- Have a working knowledge of safety equipment available.
- Confirm that a map detailing the most direct route to the hospital is prominently posted with the emergency telephone numbers.

The SHSO will be responsible for directing notification, response, and follow-up actions and for contacting outside response personnel (ambulance, fire department, or others). In the case of an evacuation, the SHSO will account for personnel. A log of individuals entering and leaving the Site will be kept so that everyone can be accounted for in an emergency.

Upon notification of an exposure incident, the SHSO will contact the appropriate emergency response personnel for recommended medical diagnosis and, if necessary, treatment. The SHSO will determine whether and at what levels exposure actually occurred, the cause of such exposure, and the means to prevent similar incidents from occurring.

10.3 Accidents and Injuries

In the event of an accident or injury, measures will be taken to assist those who have been injured or exposed and to protect others from hazards. If an individual is transported to a hospital or doctor, a copy of the HASP will accompany the individual.

The SHSO will be notified and will respond according to the severity of the incident. The SHSO will perform an investigation of the incident and prepare a signed and dated report documenting the investigation. An exposure-incident report will also be completed by the SHSO and the exposed individual. The form will be filed with the employee's medical and safety records to serve as documentation of the incident and the actions taken.

10.4 Communication

No special hand signals will be utilized within the work zone. Field personnel will utilize standard hand signals during the operation of heavy equipment.

10.5 Safe Refuge

Vehicles and on-site structures will serve as the immediate place of refuge in the event of an emergency. If evacuation from the area is necessary, project vehicles will be used to transport on-site personnel to safety.

10.6 Site Security and Control

Site security and control during emergencies, accidents, and incidents will be monitored by the SHSO. The SHSO is responsible for limiting access to the Site to authorized personnel and for oversight of reaction activities.

10.7 Emergency Evacuation

In case of an emergency, personnel will evacuate to the safe refuge identified by the SHSO, both for their personal safety and to prevent the hampering of response/rescue efforts.

10.8 Resuming Work

A determination that it is safe to return to work will be made by the SHSO and/or any personnel assisting in the emergency, e.g., fire department, police department, utility company, etc. No personnel will be allowed to return to the work areas until a full determination has been made by the above-identified personnel that all field activities can continue unobstructed. Such a determination will depend upon the nature of the emergency (e.g., downed power lines -- removal of all lines from the property; fire -- extinguished fire; injury -- safe transport of the injured party to a medical facility with either assurance of acceptable medical care present or completion of medical care; etc.).

Before on-site work is resumed following an emergency, necessary emergency equipment will be recharged, refilled, or replaced. Government agencies will be notified as appropriate. An Incident Report Form will be filed.

10.9 Fire Fighting Procedures

A fire extinguisher will be available in the work zone during on-site activities. This extinguisher is intended for small fires. When a fire cannot be controlled with the extinguisher, the area will be evacuated immediately. The SHSO will be responsible for directing notification, response, and follow-up actions and for contacting ambulance and fire department personnel.

10.10 Emergency Decontamination Procedure

The extent of emergency decontamination depends on the severity of the injury or illness and the nature of the contamination. Whenever possible, minimum decontamination will consist of washing, rinsing, and/or removal of contaminated outer clothing and equipment. If time does not permit decontamination, the person will be given first aid treatment and then wrapped in plastic or a blanket prior to transport.

10.11 Emergency Equipment

The following on-site equipment for safety and emergency response will be maintained in the on-site vehicle of the SHSO:

- Fire extinguisher;
- First-aid kit; and,
- Extra copy of this Health and Safety Plan.

11.0 SPECIAL PRECAUTIONS AND PROCEDURES

The activities associated with this remediation may involve potential risks of exposure to both chemical and physical hazards. The potential for chemical exposure to hazardous or regulated substances will be significantly reduced through the use of monitoring, personal protective clothing, engineering controls, and implementation of safe work practices.

11.1 Heat/Cold Stress

Training in prevention of heat/cold stress will be provided as part of the site-specific training. The timing of this project is such that heat/cold stress may pose a threat to the health and safety of personnel. Work/rest regimens will be employed, as necessary, so that personnel do not suffer adverse effects from heat/cold stress. Special clothing and appropriate diet and fluid intake regimens will be recommended to personnel to further reduce this temperature-related hazard. Rest periods will be recommended in the event of high/low temperatures and/or humidity to counter the negative effects of heat/cold stress.

11.2 Heavy Equipment

Working in the vicinity of heavy equipment is the primary safety hazard at the Site. Physical hazards in working near heavy construction equipment include the following: overhead hazards, slips/trip/falls, hand and foot injuries, moving part hazards, improper lifting/back injuries, and noise. All workers will be properly trained in accordance with OSHA requirements (29 CFR 1910). No workers will be permitted within any excavated areas without proper personal protective equipment (PPE), including, as warranted, any necessary Level C equipment (e.g., respirators and protective suits). Air monitoring in excavation areas will be conducted for VOCs in accordance with Section 5.0 and the Community Air Monitoring Plan.

11.3 Additional Safety Practices

The following are important safety precautions which will be enforced during this remediation:

- Medicine and alcohol can aggravate the effect of exposure to certain compounds. Controlled substances and alcoholic beverages will not be consumed during remediation activities. Consumption of prescribed drugs will only be at the discretion of a physician familiar with the person's work.
- Eating, drinking, chewing gum or tobacco, smoking, or other practices that increase the probability of hand-to-mouth transfer and ingestion of material is prohibited except in areas designated by the SHSO.
- Contact with potentially contaminated surfaces will be avoided whenever possible. Workers will not unnecessarily walk through puddles, mud, or other discolored surfaces; kneel on the ground; or lean, sit, or place equipment on drums, containers, vehicles, or the ground.
- Personnel and equipment in the work areas will be minimized, consistent with effective site operations.
- Unsafe equipment left unattended will be identified by a "DANGER, DO NOT OPERATE" tag.
- Work areas for various operational activities will be established.

12.0 TABLE AND FIGURES

Table 1: Emergency Response Telephone Numbers

Emergency Agencies	Phone Numbers
EMERGENCY	**911**
Westchester Medical Center 100 Woods Road, Valhalla, NY 10595	**(914) 493-7000**
Police Department	**(914) 277-3651 or 911**
Town of Somers Supervisor	**(914) 248-5604**
Fire Department	**(914) 749-7626**
Water and Sewer	**(914) 248-5181**
Project Manager – Richard Hooker	**(845) 867-4715**
Site Supervisor and Health and Safety Officer – Richard Hooker and/or on-site GBTS personnel	**(845) 867-4715**

Figure 1: Directions to Hospital

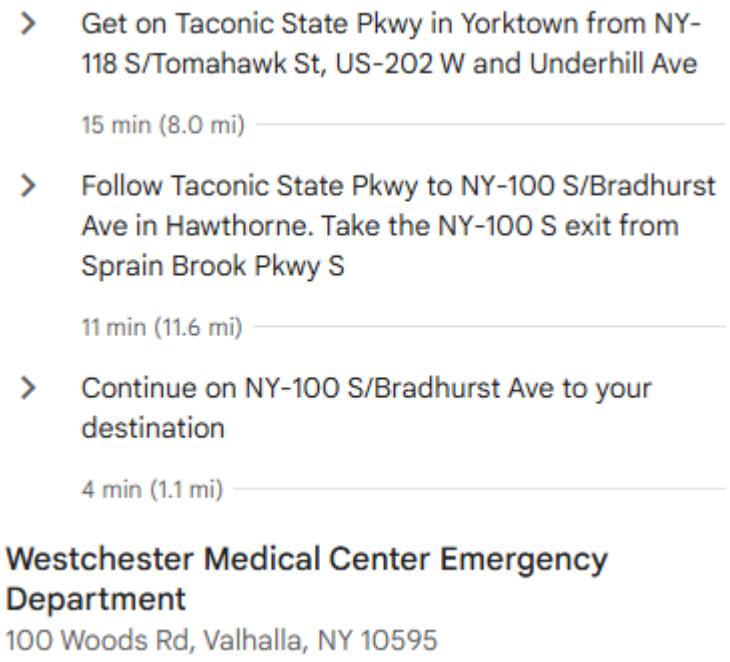
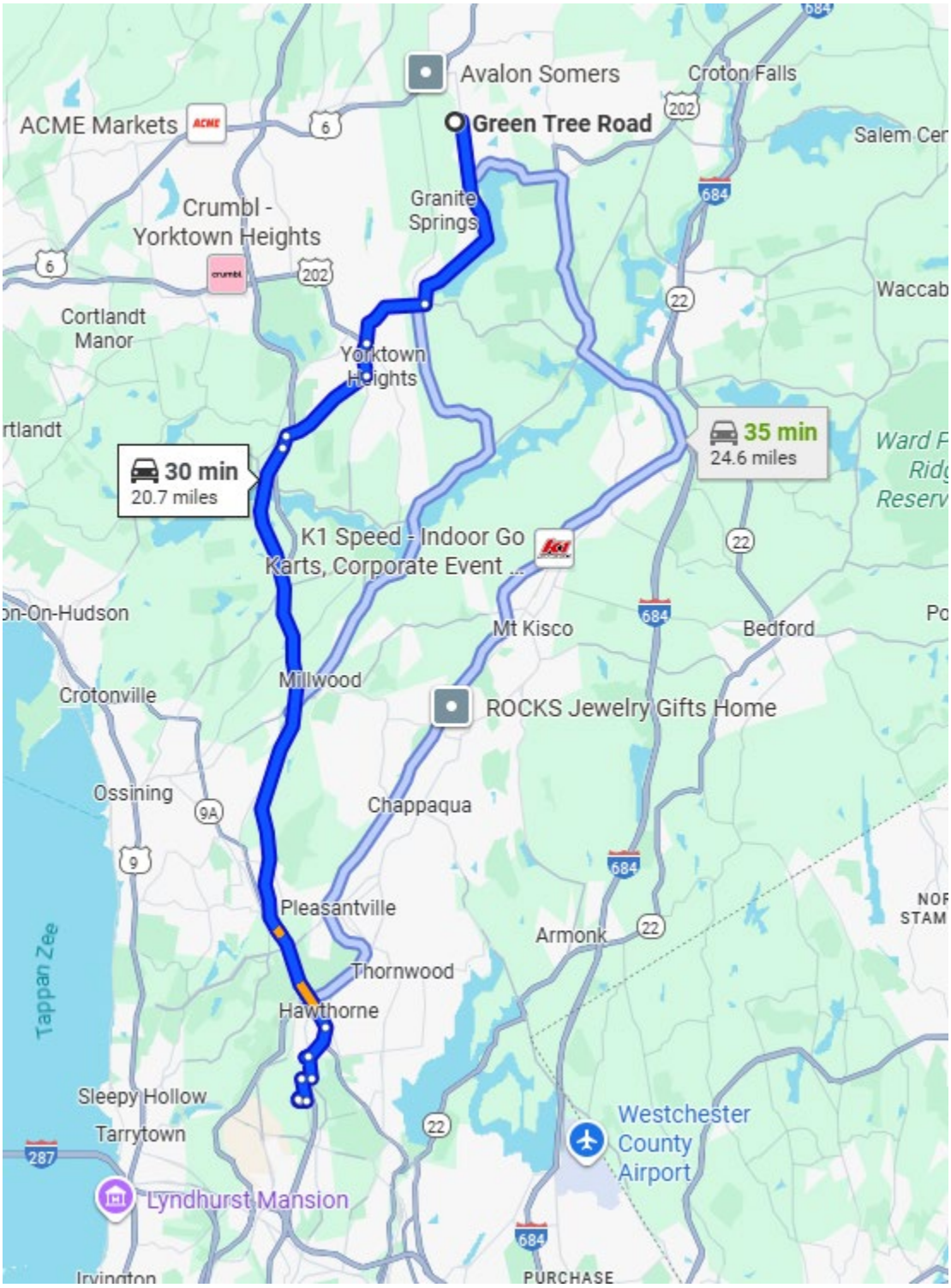
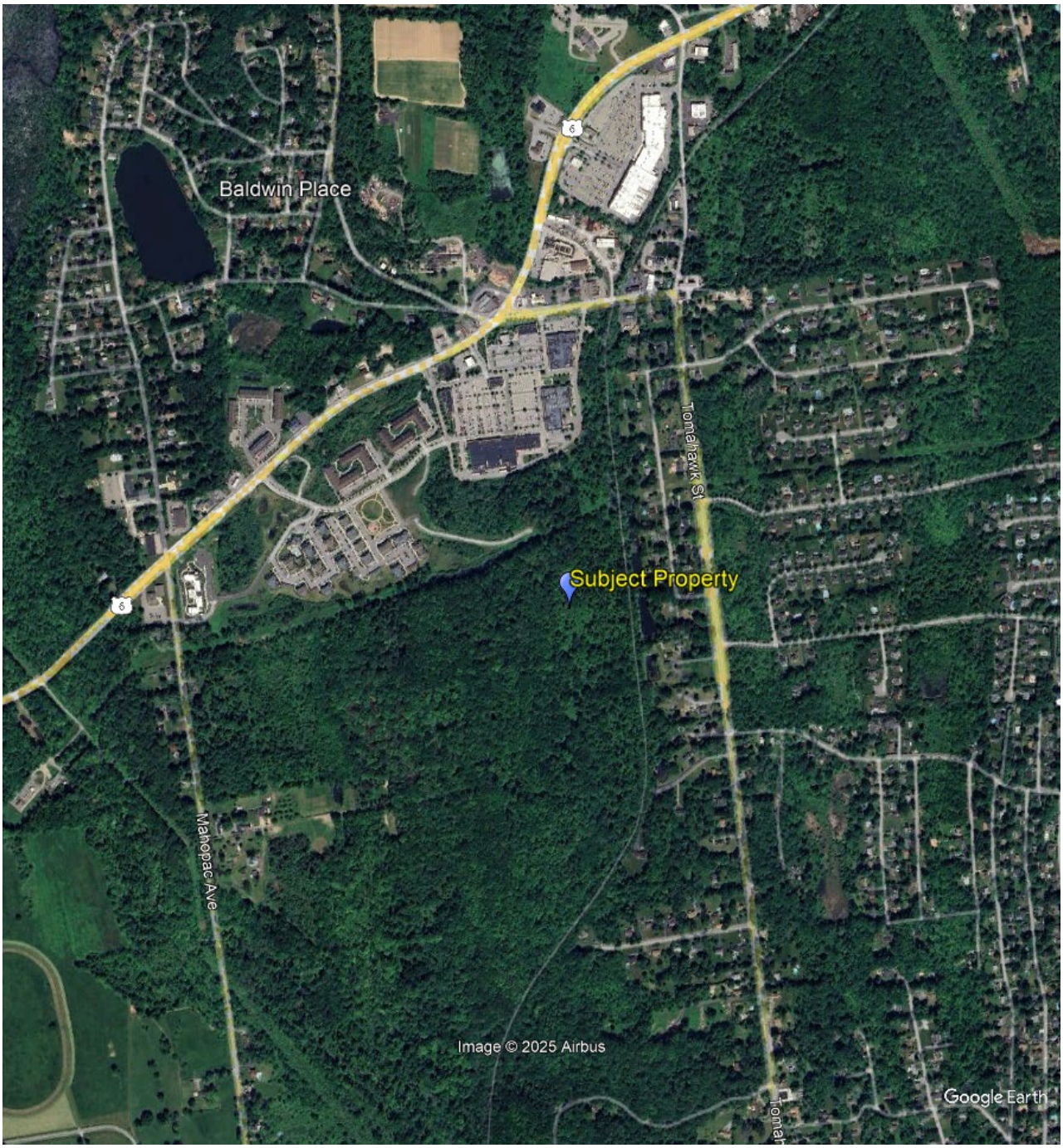


Figure 2: Map to Hospital (overview)





Site Location Map
Trailside Estates
Town of Somers
Westchester, County, New York

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File No: 21003-0092

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Attachment

APPENDIX C

Community Air Monitoring Plan

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

Overview

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

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

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

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

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

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. “Periodic” monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or

overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

VOC Monitoring, Response Levels, and Actions

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

1. If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

2. If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.

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

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

Particulate Monitoring, Response Levels, and Actions

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

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.

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

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

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