

HEALTH AND SAFETY PLAN
ADDENDUM A
UNDERGROUND STORAGE TANK REMOVAL

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CYPRESS FREEWAY RE-ALIGNMENT, CONTRACT A
STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION
OAKLAND, CALIFORNIA

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1.0 Introduction

This Tank Removal Plan was developed for Performance Excavators, Inc. by Rothwell Consulting Group (RCG). This plan pertains to site remediation operations performed for the prime contractor, MCM Construction, Inc., by Performance Excavators in contaminated areas of the Cypress Freeway Re-alignment Project, Section B, located in the City of Oakland, County of Alameda.

This Plan establishes the policies and procedures that protect the workers and the general public from potential health and safety hazards posed at this site. All contaminated soil removal activities will be conducted in a manner that minimizes the probability of injury, illness, property damage, or damage to the environment and will be performed in accordance with Performance Excavators' Injury and Illness Prevention Program. This Plan is prepared in accordance with and in reference to the following regulations and guidelines:

- United States Department of Labor, OSHA standards, specifically:
 - Title 29 CFR Part 1910.120 - Hazardous Waste Site Operations and Emergency.
 - Title 29 CFR Part 1926 - Health and Safety Regulations for Construction
- California Occupational Health and Safety Regulations, specifically:
 - Title 8 CCR §5192 - Hazardous Waste Site Operations and Emergency Response
 - Title 8 CCR §5094 - Hazard Communication
 - Title 8 CCR §5095-5100 - Hearing Conservation
 - Title 8 CCR Chapter 4, Subchapter 4 - Construction Safety Orders
 - Title 8 CCR §3203 - Injury and Illness Prevention Program
- United States Environmental Protection Agency's Standard Operating Safety Guides, July 1988.
- NIOSH/OSHA/USCG/EPA Occupational Health and Safety Guidance Manual for Hazardous Waste Activities, October 1985.
- Performance Excavators' Injury and Illness Prevention Program

Since site conditions are subject to change and unforeseen conditions may arise, amendments or additions may need to be made to this Plan during the course of work. Modifications to this plan can only be made by the Contractor with the assistance of Performance Excavators' Certified Industrial Hygienist.

1.1 Description of Site

On October 30, 1995, during excavation/construction activities at Caltrans Cypress-A Project located at 5th and Adeline Streets, Oakland, California, two underground fuel storage tanks were discovered. The tanks are approximately 55-gallons in capacity. They appear to contain petroleum hydrocarbons. They were found at an approximate depth of 5 feet below ground surface.

1.2 Site Conditions

Groundwater and soil data on this particular part of the Project is currently unavailable. However, petroleum hydrocarbon odor and soil discoloration was noticed during Jonas & Associates Inc.'s October 30, 1995 site visit.

1.3 Risk Assessment

Possible contaminants found during the tank removal activities may pose a potential health threat to employees working on the site during remedial activities. Theoretical Airborne

concentrations of total dust required to generate levels of aerosols exceeding their respective permissible exposure limits (and action levels) are shown below in Table 1.

Table 1 - Airborne Dust Concentrations at Which Permissible Exposure Limits Could Be Exceeded

Contaminant	Maximum Concentration Found in the Soil	PEL-TWA (Action Level) [Ceiling Limit]	Total Dust Concentration Above Which PEL Would Be Exceeded
Diesel	20,700 mg/kg	None established	N/A

Based on the type of operations, hazardous levels of airborne petroleum hydrocarbon vapors are possible during the course of work. However, theoretical airborne concentrations of petroleum hydrocarbons are difficult to calculate due to variables such as temperature, humidity, wind speed and direction, and employees' proximity to the contamination. Because of these variables, air monitoring will be performed in areas where petroleum contamination have been identified or is suspected. Proper personal protective equipment shall be worn during tank removal operations.

1.4 Pathways for Hazardous Substance Dispersion

Hazardous substances may have been and could possibly be dispersed from the source by air or groundwater. Further dispersion by air shall be controlled using dust control measures, work zones, and perimeter fencing.

1.5 Health and Safety Plan Availability

This written Health and Safety Plan shall be made available to any contractor or subcontractor or their representative who will be involved with the hazardous waste operation; to employees; to employee designated representatives; to Division representatives, and to personnel of other federal, state, or local agencies with regulatory authority over the site.

2.0 Organizational Structure

The organizational structure part of this Health and Safety Plan establishes the specific chain of command and specifies the overall responsibilities of supervisors and employees. The organizational structure shall be reviewed and updated as necessary to reflect the current status of site operations. The following are the key supervisory personnel:

2.1 Certified Supervisor

Mark Warner is named as the general supervisor (or certified supervisor for hazardous substance removal work). He has the responsibility and authority to direct all operations involving hazardous waste and materials.

2.2 Site Safety Officer

Greg Rainey is named as the Site Safety Officer. He has the responsibility and authority to develop and implement the site health and safety plan and verify compliance.

2.3 Qualified Person

Cliff Busekist is named as the Qualified Person. He has the responsibility and authority to implement the site health and safety plan and verify compliance. He is also responsible for operations defined as hazardous substance removal work. He is responsible for scheduling and overseeing any air sampling, calibration of sampling equipment, and for evaluation of soil or other contaminated materials sampling results.

2.4 Miscellaneous Personnel

All other personnel needed for hazardous waste site operations and emergency response and their general functions and responsibilities shall be determined and named on as as-needed basis. These personnel shall be briefed on the special hazards of the site and shall sign the signature page of this plan.

2.5 Employee Safety Responsibility

Although the employer is responsible for providing a safe and healthful workplace, each employee is responsible for his/her own safety, as well as the safety of those around him/her. The employee shall use all equipment in a safe and responsible manner, and as directed by supervisory personnel.

2.6 Logs, Reports, and Recordkeeping

Recordkeeping is a crucial component of any effective health and safety program. Site safety records shall therefore be updated daily. The following logs, reports, and records shall be maintained on site:

- Site safety meetings
- Employee training records - site specific and visitors
- Daily safety inspection logs

- Weekly safety reports
- Health and safety plan signature page
- Employee and visitor sign-in sheets
- Ambient and personal air monitoring results
- OSHA 200 log

3.0 Work Activities

The work will involve the following:

- Preparing the site for tank removal operations including placement of fencing, signs, and work zones;
- Securing the necessary permits and notifying the required regulatory agencies;
- Pumping the underground storage tanks of any remaining liquids;
- Testing the interior of the tanks for explosive potential and inerting with dry ice, if necessary;
- Excavating of soils from around and above the tanks;
- Field screening of excavated soils using a PID;
- Hauling and placement of the excavated soils at the staging area;
- Sampling and laboratory analysis of the staged soils to classify for re-use or disposal; and
- Performing confirmation sampling of the excavation.

4.0 Personnel Training Requirements

All employees working on site during the removal of underground storage tanks and the associated contaminated soils who may be exposed to hazardous substances, health hazards, or safety hazards, and their supervisors and management responsible for the site shall receive training meeting the requirements of this section before they are permitted to engage in hazardous waste operations that could expose them to hazardous substances, safety, or health hazards. They shall also receive annual refresher training as specified in this section. Employees shall not be permitted to participate in or supervise field activities until they have been trained to a level required by their job function and responsibility.

4.1 Hazardous Waste Site Training

For all hazardous waste operations taking place in exclusion zones during hazardous substance removal, personnel working at or visiting the site shall have received the following training in accordance with Title 8 CCR 5192.

General site workers (such as equipment operators, general laborers, and supervisory personnel) engaged in hazardous substance removal or other activities which expose or potentially expose workers to hazardous substances and health hazards shall receive a minimum of 40 hours of instruction off the site, and a

minimum of three days actual field experience under the direct supervision of a trained and experienced supervisor.

Workers on site only occasionally for a specific limited task (such as, but not limited to, groundwater monitoring, land surveying, or geophysical surveying) and who are unlikely to be exposed over Permissible Exposure Limits and published exposure levels shall receive a minimum of 24 hours of instruction off the site, and the minimum of one day actual field experience under the direct supervision of a trained, experienced supervisor.

On-site management and supervisors directly responsible for, or who supervise employees engaged in, hazardous waste operations shall receive 40 hours initial training, and three days of supervised field experience and at least eight additional hours of specialized hazardous waste operations management training at the time of job assignment on such topics as, but not limited to, the employer's health and safety program and the associated employee training program, personal protective equipment program, spill containment program, and health hazard monitoring procedure and techniques.

4.1.1 Hazardous Waste Site Training Elements

The hazardous waste site training shall thoroughly cover the following:

- Names of personnel and alternates responsible for site health and safety
- Engineering controls and work practices by which the employee can minimize risks for hazards
- Medical surveillance requirements, including recognition of symptoms and signs which might indicate overexposure to hazards
- The biological, chemical, radiological and physical hazards present on the site and their respective properties
- The potential routes of exposure to chemicals, the possible toxic effects, the IDLH and Permissible Exposure Limit values of chemical hazards, and the level of personal exposure which can be anticipated, acute and chronic effects of toxic chemicals
- Heat and/or cold stress prevention, treatment, and monitoring
- Personal cleanliness and restrictions on eating, drinking, and smoking on the job
- The availability of on-site potable water and toilet facilities
- Applicable provisions of the OSHA standards and the Injury and Illness Prevention Program
- Permit-required confined space entry procedures
- Spill containment program
- The functions, capabilities, limitations, use, and maintenance of monitoring equipment
- The use, care, and disposal of the specific PPE selected for this work. The PPE shall be available for hands-on familiarity and practice donning, as needed.

- Handling of medical emergencies including the locations of telephones and numbers for ambulance service, and hospital locations.
- The decontamination procedures
- The emergency contingency procedures
- The fire and accident response procedures
- Basic operational safety, emphasizing the hazards expected on the site
- Employee rights and responsibilities under OSHA
- Site-specific, task-specific activity hazard analysis.

4.2 Qualifications for Trainers

Trainers shall be qualified to instruct employees about the subject matter that is being presented in training. Such trainers shall have satisfactorily completed a training program for teaching the subjects they are expected to teach, or they shall have the academic credentials and instructional experience necessary for teaching the subjects. Instructors shall demonstrate competent instructional skills and knowledge of the applicable subject matter.

4.3 Training Certification

Employees and supervisors that have received and successfully completed the training and field experience shall be certified by their instructor or the head instructor and trained supervisor as having successfully completed the necessary training. A written certificate shall be given to each person so certified. Any person who has not been so certified or who does not meet these training requirements shall be prohibited from engaging in operations where exposures to hazardous substances are possible.

4.4 Refresher Training

Employees, managers and supervisors specified in section 4.1 shall receive eight hours of refresher training annually on the items specified in subsection 4.1.1, any critique of incidents that have occurred in the past year that can serve as training examples of related work, and other relevant topics.

5.0 Medical Surveillance Program

The medical surveillance program shall be instituted for the following employees:

- Any employee who is or may be exposed to hazardous substances or health hazards at or above the Permissible Exposure Limits or, if there is no Permissible Exposure Limit above the published exposure levels for these substances, without regard to the use of respirators, for 30 days or more a year.
- Any employee who wears a respirator during any part of a day for a period of 30 days or more in a year, or as required by 8 CCR 5144.

- Employees exhibiting symptoms due to possible overexposure involving hazardous substances or health hazards from an emergency response or hazardous waste operation.

5.1 Frequency of Medical Examinations and Consultations

Medical examinations and consultations shall also be made available by the employer to each employee covered under Section 5.0 on the following schedules:

- Prior to assignment.
- At least once every twelve months for each employee covered, unless the attending physician believes a longer interval (not greater than biennially) is appropriate.
- At termination of employment or reassignment to an area where the employee would not be covered if the employee has not had an examination within the last six months.
- As soon as possible, upon notification by an employee either that the employee has developed signs or symptoms indicating possible overexposure to hazardous substances or health hazards or that the employee has been injured or exposed above the Permissible Exposure Limits or published exposure levels in an emergency situation.
- At more frequent times, if the examining physician determines that an increased frequency of examination is medically necessary.

For employees who may have been injured, received a health impairment, developed signs or symptoms which may have resulted from exposure to hazardous substances resulting from an emergency incident, or who have been exposed during an emergency incident to hazardous substances at concentrations above the Permissible Exposure Limits or the published exposure levels without the necessary personal protective equipment being used shall undergo a medical examination:

- As soon as possible following the emergency incident or development of signs or symptoms;
- At additional times, if the examining physician determines that follow-up examinations or consultations are medically necessary.

5.2 Content of Medical Examinations or Consultations

The content of initial medical examinations shall contain, at a minimum, the following:

1. Complete medical and occupational history;
2. General physical examination including an evaluation of all major organ systems;
3. Pulmonary function testing including FVC and FEV₁;

4. Urinalysis for heavy metals;
5. Serum lead; and
6. Serum ZPP.

5.3 Examination by a Physician and Costs

All medical examinations and procedures shall be performed by or under the supervision of a licensed physician certified in occupational medicine by the American Board of Preventative Medicine, and shall be provided without cost to the employee, without loss of pay, and at a reasonable time and place.

5.4 Information Provided to the Physician

The employer shall provide one copy of this standard and its appendices to the attending physician, and in addition, the following for each employee:

- A description of each employee's duties as they relate to the employee's exposures.
- Each employee's exposure levels or anticipated exposure levels.
- A description of any PPE used or to be used by each employee.
- Information from previous medical examinations of each employee which is not readily available to the examining physician.
- Information required by 8 CCR 5144 for each employee.

5.5 Physician's Written Opinion

The written opinion obtained by the employer shall not reveal specific findings or diagnoses unrelated to occupational exposures. The physician shall provide the results of the medical examination and tests to the employee if requested. The employer shall obtain and furnish the employee with a copy of a written opinion from the examining physician containing the following:

- The physician's opinion as to whether the employee has any detected medical conditions which would place the employee at increased risk of material impairment of the employee's health from work in hazardous waste operations or emergency response, or from respirator use.
- The physician's recommended limitations upon the employee's assigned work.
- A statement that the employee has been informed by the physician of the results of the medical examination and any medical conditions which require further examination or treatment.

5.6 Medical Surveillance Recordkeeping

An accurate record of the medical surveillance shall be retained. This record shall be retained for the period specified and meet the criteria of 8 CCR 3204. The record shall include at least the following information:

- The name and social security number of the employee.
- Physician's written opinions, recommended limitations, and results of examinations and tests.
- Any employee medical complaints related to exposure to hazardous substances.
- A copy of the information provided to the examining physician by the employer, with the exception of the standard and its appendices.

6.0 Site Safety Meetings

Tailgate safety meetings shall be held prior to the start of work and weekly thereafter. Topics to be discussed shall include health and safety hazards associated with the day's activities and any safety-related issues from the previous week's work.

Pre-entry briefings shall be held prior to initiating any site activity in contaminated areas, and at such other times as necessary to ensure that employees are apprised of the site health and safety plan and that this plan is being followed. For operations defined as hazardous substance removal work, a pre-job health and safety conference shall be held before the start of actual work. The conference shall include representatives of the owner or contracting agency, the contractor, the employer, employees, and employee representatives; and shall include a discussion of the employer's health and safety program and the means, methods, devices, processes, practices, conditions, or operations which the employer intends to use in providing a safe and healthy place of employment.

Visitors who are find it necessary to enter the Exclusion Zone or the Contamination Reduction Zone must receive a short orientation covering the relevant safety information contained in this plan.

6.1 Documentation of Site Safety Meetings

A detailed record of each safety meeting and health and safety conference shall be made on the Safety Meeting Form in Appendix G of the original Health and Safety Plan. Visitor training shall also be recorded on this form.

7.0 Site Characterization and Hazard Evaluation

The site has been previously characterized to identify any environmental contaminant and evaluate their human health risks. This information has been

evaluated by Rothwell Consulting Group to determine the appropriate health and safety control procedures needed to protect employees from the identified hazards during tank removal activities.

7.1 Preliminary Evaluation and Hazard Identification

A preliminary evaluation of a site's characteristics has been performed by a Certified Industrial Hygienist to aid in the selection of appropriate employee protection methods prior to site entry. After the start of work, a more detailed evaluation of the site's specific characteristics shall be performed by the qualified person, under the direct supervision of a Certified Industrial Hygienist, to further identify existing site hazards and to further aid in the selection of the appropriate engineering controls and personal protective equipment for the tasks to be performed. All suspected conditions that may pose inhalation or skin absorption hazards that are immediately dangerous to life or health (IDLH) or other conditions that may cause death or serious harm have been identified during the preliminary site investigation and evaluated during the contamination investigation.

7.2 Chemical Hazards

The chemical listed in Table 2 may be encountered during tank removal operations.

Table 2 - Summary of Chemical Contaminants

Compound	Cal/OSHA Permissible Exposure Limit†	Route of Exposure††	Characteristics and Signs and Symptoms of Overexposure.
Petroleum hydrocarbons (as diesel)	None established	Inhalation Absorption	Several types of petroleum hydrocarbons exist. All have a characteristic petroleum odor and may produce acute narcosis at high levels and can cause defatting dermatitis.

† Permissible Exposure Limit = Permissible Exposure Limit as an 8-hour time-weighted average.

STEL = Short-Term Exposure Limit as a 15-minute time-weighted average.

C = Ceiling Limit which shall never be exceeded at any time.

†† This indicates the most likely route of occupational exposure. While ingestion can be a route of exposure in nearly every instance, it is unlikely in the occupational setting when using effective decontamination procedures and good work practices.

7.3 Physical Hazards

Performance Excavators has developed standard operating procedures to minimize physical hazards. All personnel, contractors, and subcontractors shall become familiar with the field activities. Hard hats and safety shoes are required in all areas of the site. The following are physical hazards which may be present at the site:

7.3.1 Fire and Explosion Hazards

Tank pulling operations pose the risks of fire and explosion. Excavations have a tendency to trap heavy petroleum vapors and allow combustible vapors to accumulate. All excavations in petroleum contaminated areas shall be tested frequently using a combustible gas indicator that reads in percent of the lower explosive limit. Whenever combustible gas levels exceed 10% of the lower explosive limit, all personnel and equipment shall move upwind away from the excavation until vapor concentrations have dissipated to a safe level.

All tanks shall be tested using a combustible gas indicator prior to extraction. If combustible gas levels exceed 10% of the lower explosive limit within the tank, the tank shall be inerted with dry ice until vapor concentrations within the tank have dissipated to a safe level.

7.3.2 Tripping, Slipping, and Falling Hazards

Personnel will be reminded daily to maintain sure footing on all surfaces. Use of safety harnesses will be required for any personnel working six or more feet above any surface, including on manlifts. Use of hand rails when climbing stairs will be enforced, and handrails will remain secure until the support structure itself is removed and lowered to ground level.

Work surfaces of unknown or suspect integrity will be strengthened or overlain with a work platform capable of supporting all personnel and equipment in use in that area.

In order to minimize tripping hazards caused by construction debris, material will be removed daily from the work areas and stockpiled in appropriate designated storage areas. This "house cleaning" effort will be enforced by the Site Safety Officer at the end of each day.

7.3.3 Head, Eye, and Back Injuries

As minimum requirements, hard hats will be donned prior to performing any site activities. This will prevent minor injuries caused by bumping one's head while working around and under construction equipment. Personnel will be trained in and required to use proper lifting techniques when lifting heavy objects.

7.3.4 Falling Objects

All tasks can be accomplished without any object free-falling to the ground. All equipment and material will be slowly lowered to the ground using a crane or skip bucket. No personnel shall work under this equipment at any time. Also, the Site Safety Officer will ensure that an adequate area is clear of personnel while the equipment is in operation.

7.3.5 Heavy Equipment and Traffic

The use of heavy equipment on site presents the greatest potential for injury to personnel. In order to minimize these hazards, designated routes will be established for mobilization through the facility and specific traffic patterns will be established. All trucks will use spotters for backing procedures. All personnel working along roadsides are required to wear orange safety vests.

Personnel needing to approach heavy equipment during operation will observe the following protocols:

1. Make eye contact with the operator.
2. Signal the operator to cease heavy equipment activity.
3. Approach the equipment and inform the operator of intentions.

Only qualified personnel, as determined by the Site Superintendent, will operate heavy equipment. Those crew members directly involved with spotting for the operator will be the only personnel allowed within the operating radius of the heavy equipment. All other personnel will remain a safe distance away from these operations. Vehicles will yield to all bikes, pedestrians, and railroad crossings.

Equipment that is in safe working order will only be used. To maintain this policy, all equipment brought onto the project site will be inspected for structural integrity, smooth operational performance, and proper functioning of all critical safety devices in accordance with the manufacturer's specifications. This inspection will be performed by a qualified equipment operator and Site Safety Officer. Equipment not conforming to the operational and safety requirements during this inspection will not be put into service until all necessary repairs are made to the satisfaction of the inspection group. Only qualified operators familiar with the equipment will be permitted to operate equipment.

7.3.6 Electrical Hazards

In order to prevent accidents caused by electric shock, the Site Safety Officer will inspect all electrical connections on a daily basis. He will shut down and lock out any equipment which is found to have frayed wiring or loose connections until a

qualified electrician can be contacted and repairs effected. Electrical equipment will be de-energized and tested by an electrician before any electrical work is done. All equipment will be properly grounded prior to and during all work. Underground Service Alert will be notified at least two (2) working days prior to excavation in any area.

In addition, ground fault circuit interrupters (GFCIs) will be installed whenever possible in each circuit between the power source and tool, unless the presence of a potentially explosive atmosphere precludes this procedure. In the event that generators are used to supply power, these generators will be equipped with GFCIs.

7.3.7 Noise

When noise levels may exceed a time weighted average (TWA) of 85 dBA (decibels, A-weighted scale), hearing protection will be required by all exposed employees. Additionally, sound level monitoring will be conducted on-site. All Performance Excavators personnel undergo annual audiograms and will be restricted from high noise exposure should a standard threshold shift be detected. The Hearing Conservation Program is in compliance with both the California and Federal Hearing Conservation Standards.

7.4 Site Topography and Accessibility by Air and Roads

The sites are located in an urban, semi-industrial areas. Topography consists of flat terrain covered with concrete, asphalt, and some vegetation. The sites are readily accessible by adjacent city streets.

8.0 Site Control Program

Appropriate site control procedures shall be implemented to control employee exposure to hazardous substances before clean-up work begins and during removal operations. The site control program may be modified as necessary as new information becomes available.

8.1 Site Work Zones

To prevent migration of contamination caused by personnel or equipment, work areas and personal protective equipment are clearly specified prior to beginning operations. Designated work areas or zones shall be established and delineated, as suggested by the Occupational Health and Safety Guidance Manual for Hazardous Waste Site Activities. Each contaminated work area will be divided into three zones: an Exclusion Zone (EZ), a Contamination Reduction Zone (CRZ), and a Support Zone (SZ).

8.1.1 Exclusion Zone

The Exclusion Zone will consist of areas where inhalation, oral contact, or dermal contact with contaminants is considered to be possible. It is anticipated that the Exclusion Zone will encompass the immediate confines of the excavation area with a 10 foot buffer zone from the edge of the excavation to the Exclusion Zone boundary, if practical. The size and configuration of this area will vary with wind direction, type of operations being conducted, and perimeter air monitoring results. The Exclusion Zone boundary will be clearly and conspicuously marked using boundary tape or safety fencing and signs. The signs will specify that only trained and authorized personnel are allowed to enter. Authorization to be obtained from the foreman/site supervisor. A single entry and exit point will be established through the Contamination Reduction Zone. Entry shall be limited to essential personnel or pre-approved visitors.

8.1.2 Contamination Reduction Zone

The Contamination Reduction Zone will be established between the Exclusion Zone and support zone. In this area, personnel will begin the sequential decontamination process required to exit the exclusion zone. To prevent off-site migration of contamination and to facilitate personnel accountability, all personnel will enter and exit the exclusion zone through the Contamination Reduction Zone.

All waste materials generated in the Contamination Reduction Zone shall be collected and effectively contained through the use of drums, bags, plastic sheeting, and/or tanks. All waste materials shall be labeled as such and properly disposed of according to their hazard classifications.

8.1.3 Support Zone

The Support Zone will consist of a clearly marked area where the office, break areas, and changing facilities are located. Smoking, drinking, and eating will be allowed only in designated areas. Sanitation facilities (toilets, drinking and washing water) are provided in the Support Zone.

8.2 Access Controls During Removal Operations

Physical boundaries shall be established around each work zone using safety fencing and/or barricade tape during hazardous material removal operations as specified in Section 8.2. Supervisors shall instruct all workers and visitors on the limits of the restricted areas. No one shall be allowed to enter a restricted area without the required protective equipment for that area. The Site Safety Officer shall ensure compliance with all restricted area entry and exit procedures. A decontamination point shall be designated for personnel to exit from the contaminated area and enter into the clean area where they may rest and drink fluids. Visitors should check in

immediately upon arrival. Only authorized visitors will be allowed access to the contaminated areas. Each visitor will be required to provide and wear the necessary protective equipment during visits and shall be escorted by supervisory personnel while on site. All visitors, subcontractors and other personnel will be required to sign a safety plan acknowledgment sheet to certify that they have read and will comply with the site Health and Safety Plan. Failure to comply with this site entry procedure will result in expulsion from the site.

8.3 Buddy System

The buddy system shall be used at all times at the site. Employees shall be organized into work groups in such a manner that each employee of the work group is designated to be observed by at least one other employee in the work group. The purpose of the buddy system is to provide quick assistance to employees in the event of an emergency.

9.0 Personal Protective Equipment

Personal protective equipment (PPE) has been selected which will protect employees from the hazards and potential hazards they are likely to encounter as identified during the site characterization and analysis. The level of protection provided by PPE selection shall be increased when additional information on site conditions shows that increased protection is necessary to reduce employee exposures below established Permissible Exposure Limits and published exposure levels for hazardous substances and health hazards.

9.1 PPE Selection and Action Levels

Initial PPE requirements shall be EPA Level D as outlined in Table 3 at all locations in the designated exclusion zones. If photoionization detector levels are seen exceeding 5 ppm in the breathing zones of employees, PPE shall be upgraded to the level shown in Table 4. Also, if a previously unidentified material is discovered during work operations, PPE shall be modified as necessary and at the determination of the Certified Industrial Hygienist.

Table 3 - Level D PPE Requirements

Location	Tasks	EPA Level	Equipment Required
Exclusion Zones	All tasks involving contact with contaminated materials.	D	<ul style="list-style-type: none"> • Hard hat • Tyvek coveralls • Rubber overboots • Nitrile gloves • Cotton inner gloves • Orange safety vests

Contamination Reduction Zone	All tasks.	D	<ul style="list-style-type: none"> • Hard hat • Tyvek coveralls • Rubber overboots • Nitrile gloves • Cotton inner gloves • Orange safety vests
Support Zone	All tasks.	D	<ul style="list-style-type: none"> • Hard hat • Orange safety vests

Table 4 - Level C PPE Requirements

Location	Tasks	EPA Level	Equipment Required
Exclusion Zones	All tasks.	C	<ul style="list-style-type: none"> • Half-mask air purifying respirator equipped with HEPA/organic vapor combination cartridges • Hard hat • Tyvek coveralls • Rubber overboots • Nitrile gloves • Cotton inner gloves • Orange safety vests
Contamination Reduction Zone	All tasks.	D	<ul style="list-style-type: none"> • Hard hat • Tyvek coveralls • Rubber overboots • Nitrile gloves • Cotton inner gloves • Orange safety vests
Support Zone	All tasks.	D	<ul style="list-style-type: none"> • Hard hat • Orange safety vests

9.2 PPE Limitations

The PPE selected for use at the site provides limited protection against chemical contaminants. Tyvek protective clothing must not be worn in areas where splashing of hazardous liquids on the skin is possible. In addition, Tyvek clothing must not be worn by persons performing hot work such as welding, brazing, and metal cutting.

Half mask air-purifying respirators, as specified in the Table 3, must not be worn in an oxygen deficient atmosphere or where concentrations exceed the capabilities of the respirator cartridge. Also, respirator cartridges must conform to the chemical hazards present at the site. Always read the respirator cartridge prior to use to ensure that it is the correct type.

9.3 PPE Work Mission Duration

Disposable protective clothing is to be disposed of after each use. Disposable protective clothing must be replaced upon re-entry into the Exclusion Zone, or if the suit becomes damaged or saturated during use. Repairs to small rips may be made to protective clothing using duct tape.

9.4 PPE Maintenance and Storage

All PPE, including overboots and gloves, shall be maintained in good condition. Any PPE found to be torn, cut, punctures, or otherwise damaged shall be disposed of immediately. After use and decontamination, respirators shall be stored overnight in a closed container. The following day, the closed container shall be transported to the PPE donning area for reuse.

9.5 PPE Training and Proper Fitting

All personnel shall be thoroughly trained in the proper use and limitations of the equipment they are assigned to wear. Annual qualitative respirator fit tests are required of all personnel wearing negative pressure respirators. Qualitative fit tests will utilize isoamyl acetate or irritant smoke. Fit tests must incorporate the make and size of respirator to be used. Additionally, a positive and negative fit test shall be conducted each time a respirator is donned.

9.6 PPE Donning and Doffing Procedures

All PPE shall be donned prior to entering the Exclusion Zone. PPE shall be donned with the assistance of a "buddy" to verify that equipment is worn properly. All PPE shall be worn in accordance with the manufacturer's recommendations. At no time shall a person remove the designated PPE while in the designated work zones. Disposable PPE shall only be removed in the Contamination Reduction Zone upon exiting the Exclusion Zone. Personnel shall utilize seating (during decontamination and doffing procedures) to prevent tripping and falling.

9.7 PPE Inspection Procedures

PPE shall be inspected by employees prior to donning. Boots, gloves, and disposable clothing found to be defective shall not be worn and shall be disposed of. Defective respirators, safety glasses, and hard hats shall be reported to the Site Safety Officer.

9.8 Evaluation of the Effectiveness of the PPE Program

Periodic inspections and observations of personnel using PPE shall be made by the Site Safety Officer to ensure that the PPE Program elements are being followed.

10.0 Respiratory Protection Program

This respiratory protection program provides the minimum requirements for respiratory protection whenever Level C or higher levels of personal protection are required.

10.1 Respirator Cartridges

The crew members working in an EPA Level C ensemble shall wear half-mask air purifying respirators equipped with HEPA/organic vapor cartridges, depending on site conditions. HEPA/organic vapor cartridges hold approval for dust, mists, fumes, asbestos, and radionuclides, as well as organic vapors at concentrations less than 1,000 ppm.

10.2 Cartridge Changes

All cartridges will be changed a minimum of once daily. However, increased airborne concentrations and breathing rates may necessitate more frequent changes. Changes will occur when personnel begin to experience increased breathing resistance, notice any unusual odor inside the respirator, or experience excessive heat generation in the cartridges. All cartridge changes will take place in the CRZ after decontamination of the exterior part of the PPE ensemble.

10.3 Respirator Inspection, Cleaning and Storage

Respirators shall be maintained by the employee to whom they are assigned. All respirators and associated equipment shall be inspected and cleaned, as necessary, prior to use. Respirators shall be decontaminated, cleaned, and disinfected by the user during each decontamination episode. Harsh detergents or solvents must not be used to clean respirators. Cleaned respirators must be thoroughly dried before storing. Respirators will be checked periodically by the Site Safety Officer. Respirators shall be stored in a clean, dry container and out of direct sunlight. Respirators must also be stored in such a way that the facepiece is not misshapen.

10.4 Respirator Use with Facial Hair

No personnel with facial hair which interferes with the respirator's sealing surface shall be permitted to wear a respirator.

10.5 Respirator Use With Corrective Lenses

Full-face respirator use is not anticipated at the site. However, normal eyeglasses cannot be worn under full-face respirators because the temple bars interfere with the respirator's sealing surfaces. For workers requiring corrective lenses who also must

don full-face respiratory protection, special spectacles designed for use with respirators will be provided.

10.6 Respirator Use With Contact Lenses

Contact lenses shall not be worn with any type of respirator.

10.7 Medical Certification for Respirator Use

Only workers who have been certified by a physician as being physically capable of respirator usage will be issued a respirator.

10.8 Respirator Limitations

The respirators specified for this site have their limitations. Respiratory protection specified in Table 3 may not be worn in atmospheres immediately dangerous to life or health (IDLH), or in oxygen deficient atmospheres. They may not be worn in concentrations which exceed ten times the Permissible Exposure Limit of any airborne contaminant. HEPA/organic vapor cartridges may not be worn in organic vapor concentrations exceeding 1000 ppm.

11.0 Monitoring

Air monitoring shall be performed to quantify airborne levels of hazardous substances in order to determine the appropriate level of employee protection needed on site, and to evaluate engineering controls and work practices. Monitoring shall be performed continuously where airborne concentrations of hazardous substances are anticipated to be the highest, as determined by the Certified Industrial Hygienist. Perimeter monitoring shall also be conducted upwind and downwind of each tank removal.

11.1 Employee Air Monitoring

Tank removal excavations have a tendency to trap heavy petroleum vapors and allow combustible vapors to accumulate. Employee exposures shall be quantified using a PID held in the breathing zones. All excavations in petroleum contaminated areas shall be tested frequently using a combustible gas indicator that reads in percent of the lower explosive limit. Whenever combustible gas levels exceed 10% of the lower explosive limit, all personnel and equipment shall move upwind away from the excavation until vapor concentrations have dissipated to a safe level.

All tanks shall be tested using a combustible gas indicator prior to extraction. If combustible gas levels exceed 10% of the lower explosive limit within the tank, the

tank shall be inerted with dry ice until vapor concentrations within the tank have dissipated to a safe level.

11.2 Types of Monitoring Equipment, Locations, and Frequencies

Table 5 - Employee Monitoring Requirements

Type	Frequency and Location	Calibration Schedule
Petroleum Hydrocarbons Photoionization detector.	Continuously in the EZs during excavation.	Once per day.

Table 6 - Work Area Monitoring Requirements

Type	Frequency and Location	Calibration Schedule
Flammable vapors LEL/Oxygen meter	Continuously in the work areas during excavation.	Once per day.
Petroleum Hydrocarbons Photoionization detector.	Continuously in the work areas during excavation.	Once per day.

11.3 Training Requirements of Monitoring Personnel

11.4 Documentation of Monitoring

Records of monitoring results shall be maintained at the site. Records shall include the date, time, contaminants or hazards monitored, person conducting monitoring, calibration date and method, operations and location of monitoring, and results. An air monitoring data sheet shall be completed for each sample.

12.0 Informational Programs

The contractor shall inform employees, contractors, and subcontractors (or their representatives) actually engaged in hazardous waste operations shall be informed of the nature, level, and degree of exposure likely as a result of participation in such hazardous waste operations. Any information concerning the chemical, physical, and toxicological properties of each substance known or expected to be present on site that is available to the employer and relevant to the duties an employee is expected to perform shall be made available to the affected employees prior to the commencement of their work activities.

The company's Injury and Illness Prevention and Hazard Communication Programs shall be available in the job trailer. Employees, contractors, and subcontractors shall also be informed and shall share information on chemical

hazards at the site, as required by the Hazard Communication standard. MSDS for all hazardous materials used on site shall be made readily available to site personnel. Employees, contractors, and subcontractors working outside of the operations part of a site shall only be notified of chemical hazards as required by the Hazard Communication standard.

13.0 Material Handling

Hazardous substances and contaminated soils, liquids, and other residues shall be handled, transported, labeled, and disposed of in accordance with this section.

13.1 Drums and Containers

If unlabeled drums and containers are encountered, they shall be considered to contain hazardous substances, work shall stop, and the Engineer shall be notified of the discovery.

Drums and containers used during the clean-up shall meet the appropriate U.S. Department of Transportation (DOT), OSHA, and EPA regulations for the wastes that they contain. When practical, drums and containers shall be inspected and their integrity shall be assured prior to being moved. Drums or containers that cannot be inspected before being moved because of storage conditions (i.e., buried beneath the earth, stacked behind other drums, stacked several tiers high in a pile, etc.) shall be moved to an accessible location and inspected prior to further handling.

Site operations shall be organized to minimize the amount of drum or container movement. Prior to movement of drums or containers, all employees exposed to the transfer operation shall be warned of the potential hazards associated with the contents of the drums or containers. Drums and containers that cannot be moved without rupture, leakage, or spillage shall be emptied into a sound container using a device classified for the material being transferred. Drums and containers under pressure, as evidenced by bulging or swelling, shall not be moved until such time as the cause for excess pressure is determined and appropriate containment procedures have been implemented to protect employees from explosive relief of the drum.

13.2 Shipping and Transport of Drums and Containers

Drums and containers shall be identified and classified prior to packaging for shipment. Drum or container staging areas shall be kept to the minimum number necessary to safely identify and classify materials and prepare them for transport. Staging areas shall be provided with adequate access and egress routes.

14.0 Decontamination Procedures

All employees leaving the exclusion zone shall be appropriately decontaminated; all contaminated clothing and equipment leaving a contaminated area shall be appropriately disposed of or decontaminated.

Decontamination procedures shall be monitored by the Site Safety Officer to determine their effectiveness. When such procedures are found to be ineffective, appropriate steps shall be taken to correct any deficiencies.

14.1 Personnel Decontamination Procedures

Upon exiting the Exclusion Zone, personnel shall remove all visible contamination from their PPE using soap, water, and brushes. Personnel shall use the following decontamination procedure:

- Step 1: Hardhat removal
- Step 2: Boot, glove, and coverall wash
- Step 3: Boot, glove, and coverall rinse
- Step 4: Tape removal
- Step 5: Overboot removal
- Step 6: Suit removal
- Step 7: Outer glove removal
- Step 8: Respirator removal (optional)
- Step 9: Respirator cartridge removal (optional)
- Step 10: Cotton inner glove removal
- Step 11: Wash hands, face.

All disposable protective clothing shall be removed during decontamination and shall be disposed of in a lidded container lined with a labeled drum liner. All waste generated at the site shall be disposed of according to the hazard classification of the debris.

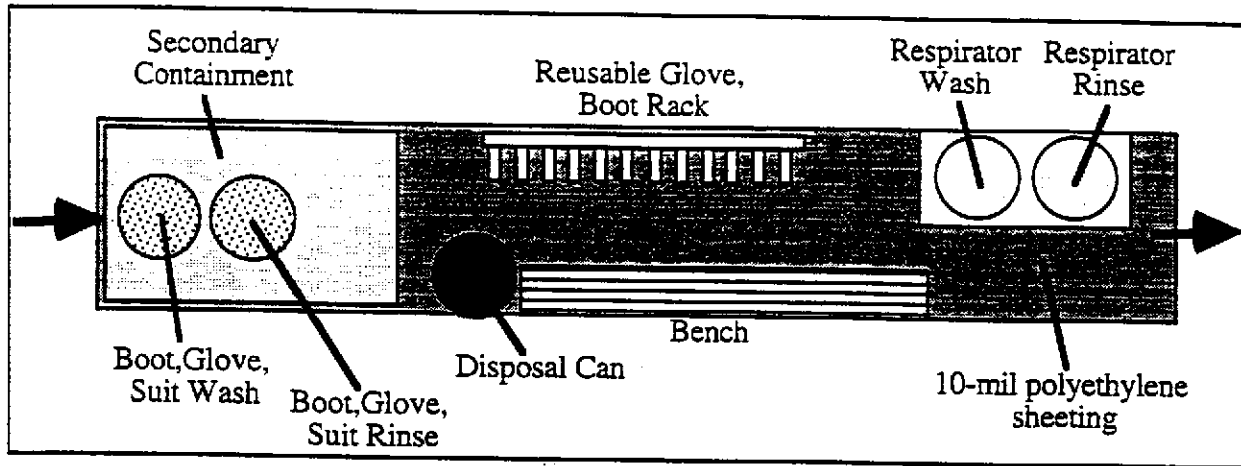


Figure 1 - Personnel Decontamination Layout

14.2 Equipment Decontamination Procedures

Upon exit from the Exclusion Zone, personnel shall drive equipment onto the decontamination pad in the Contamination Reduction Zone and remove all visible contamination from their equipment using soap, water, and brushes. The tracks and tires of equipment shall be scraped to remove the gross contamination before driving onto the decontamination pad. Water from the decontamination pad will be collected in a sump and transferred to a larger storage tank or pumped and properly disposed of when full.

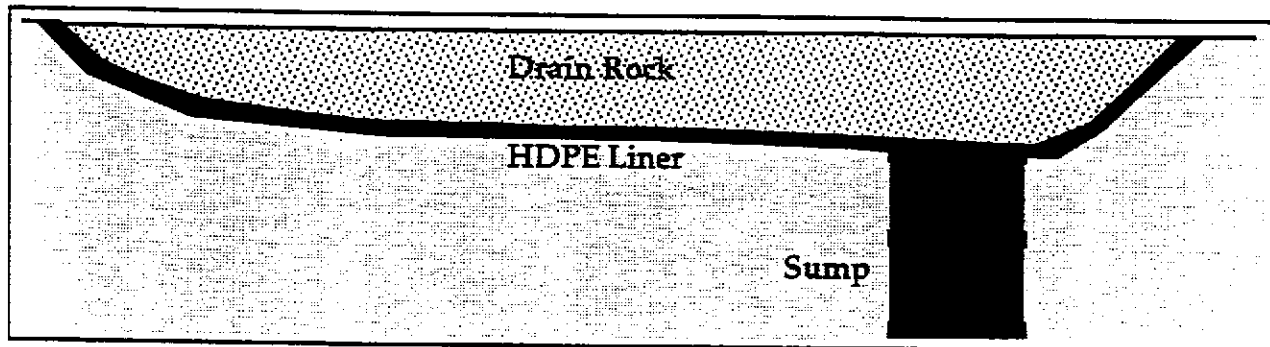


Figure 2 - Equipment Decontamination Layout

14.3 Location and Layout of Decontamination Facilities

Employee decontamination shall be performed at the southwest corners of each Exclusion Zone, adjacent to the Support Zone. This location will minimize the

exposure of uncontaminated employees, areas, and equipment to contaminated employees or equipment. The decontamination facility shall be arranged in such a way that personnel and equipment must exit the Exclusion Zone only through the CRZ. Equipment decontamination facilities shall be established at locations within the staging areas.

14.4 Employee Wash Facilities

After employee exit the Contamination Reduction Zone (where they have decontaminated and removed their PPE), they shall proceed to a wash facility to wash hands and face prior to eating, drinking, smoking, or leaving the site. Disposable towels shall be provided for drying.

14.5 Storage and Disposal of Decontamination Water

All water used for decontamination shall be contained and stored in storage tanks. All decontamination water shall be sampled for the contaminants of concern so that a proper disposal plan can be devised.

15.0 Emergency Response Plan

This emergency response plan explains how to handle anticipated emergencies prior to the commencement of hazardous waste operations.

15.1 Emergency Procedures

Employees may respond to low danger emergencies, such as administration of first aid, fighting small fires (with fire extinguishers), and clean-ups of small chemical spills (of less than 55 gallons or 500 pounds). All employees shall evacuate from the danger area when an emergency not listed above occurs, and shall not assist in handling the emergency.

Should outside medical or other emergency assistance be required, personnel shall notify the job trailer of the nature of the emergency and a call shall be to 9-1-1.

If the injury or illness appears to be minor, the affected person appears to be minor, the person may be driven to the emergency room of Brookside Hospital.

15.2 Site Communications and Alerting Means for Emergencies

Temporary radio and telephone communications are to be established at the job trailer and at the site. Emergency alerts shall be made using two-way radios from the job trailer to the site, or vice versa. Personnel working on the site shall be alerted by air horns using the following alerts:

3 short blasts in sequence..... Exit the work area
1 long blast..... All clear

15.3 Places of Refuge

All personnel, when alerted during emergencies, shall exit the Exclusion Zone through the Contamination Reduction Zone and muster in the Support Zone. Personnel are to remain in the staging area and await further instructions.

15.4 Identification of Nearest Medical Assistance

Summit Medical Center
350 Hawthorne Avenue
Oakland, CA 94609
(510) 655-4000

In an emergency, call 911

The Hospital Location Map and Emergency Telephone Numbers are found in Appendix C. They shall be posted at the site and at all phones in the main office trailer.

15.5 Status and Capabilities of Emergency Response Providers

Local emergency responders (fire department, medical providers and transporters) are on full time alert and have the capabilities to respond to any anticipated site emergency.

15.6 Pre-emergency Planning

The types of emergencies anticipated include personal injuries, fire, and small chemical spills. An OSHA-approved first aid kit shall be made available at the site. Also, two employees trained and currently certified in first aid and CPR shall be on site at all times. A charged and inspected fire extinguisher shall be available on each piece of equipment. Spill containment equipment will be made available if hazardous materials are stored on site.

15.7 Personnel Roles, Lines of Authority, and Communication

The Site Safety Officer shall act as the incident commander during an emergency response. He shall coordinate and direct emergency response procedures to all site personnel. An emergency shall be communicated to all persons on site by radio and/or verbal communications.

15.8 Emergency Recognition and Prevention

All site personnel shall be trained to recognize when an emergency situation has arisen and shall know how to notify the Site Safety Officer of the incident. Site personnel shall use safe work practices to minimize the potential for an incident. Regular safety meeting shall be held to identify and communicate problem areas at the site.

15.9 Site Security and Control

During an emergency situation, all personnel are responsible for assuring the public's safety and shall keep all bystanders and unauthorized personnel from entering the site. All no time shall personnel give statements regarding an emergency to persons not associated with emergency response or management.

15.10 Decontamination of Injured Workers

Due to the relatively low levels of contamination at the site, decontamination procedures for injured workers may be limited to removal of outer coveralls and boots so long as such action will not aggravate the injury. If the injury is minor, and does not require immediate medical attention, workers may decontaminate as usual.

15.11 Accident Reporting and Follow-Up

All incident scenes shall be preserved so that a thorough incident investigation may be performed. All causes of the incident shall be investigated and the findings presented to site personnel to prevent future incidents.

16.0 Spill Containment

It is not anticipated that large volumes of hazardous materials will be stored on site. However, if large volumes of hazardous or potentially-hazardous liquids are stored on site, adequate secondary containment shall be provided around the storage area. In addition, spill containment equipment (absorbent socks, clay, and shovels, and a salvage drum) shall be kept at the site to respond to small spills of hazardous liquids or solids. Should a spill occur, immediate steps to contain the spill must be taken. Such steps include shutting of valves, closing doors or vents, protecting sanitary sewers and surface waters, or shutting off pumps. At no time shall a spill be contained if such action presents a hazard. The Site Safety Officer must then be notified of the situation so that he may direct the clean-up.

17.0 Sanitation at Temporary Workplaces

17.1 Potable Water

An adequate supply of potable water shall be provided on the site. Portable containers used to dispense drinking water shall be capable of being tightly closed and equipped with a tap, and shall be otherwise designed, constructed, and serviced so that sanitary conditions are maintained. Water shall not be dipped from containers. Any container used to store, dispense, or distribute drinking water shall be clearly marked as to the nature of its contents and not used for any other purpose.

Where single service cups (to be used but once) are supplied, both a sanitary container for the unused cups and a receptacle for disposing of the used cups shall be provided.

17.2 Non Potable Water

Outlets for non potable water, such as water for equipment decontamination, dust control, or firefighting purposes, shall be identified to indicate clearly that the water is unsafe and is not to be used for drinking, washing, or cooking purposes. There shall be no cross-connection, open or potential, between a system furnishing potable water and a system furnishing non potable water.

17.3 Toilet Facilities

A minimum of one separate toilet facility shall be provided for each 20 employees or fraction thereof of each sex. Such facilities may include both toilets and urinals provided that the number of toilets shall not be less than one half of the minimum required number of facilities. EXCEPTION: Where there are less than 5 employees, separate toilet facilities for each sex are not required provided the toilet facilities can be locked from the inside and contain at least one toilet. Under temporary field conditions, provisions shall be made to assure that at least one toilet facility is available.

If the site is not provided with a sanitary sewer, it shall be provided with one of the following toilet facilities unless prohibited by local codes:

- Chemical toilets
- Recirculating toilets
- Combustion toilets
- Flush toilets

Doors entering toilet facilities shall be provided with entrance locks controlled from inside the facility. Toilet facilities shall be kept clean, maintained in good working order, and provided with an adequate supply of toilet paper.

Washing facilities shall be on site for washing of hands and face following decontamination procedures. Such facilities shall be in near proximity to the CRZ.

18.0 Site Illumination

Table 7 - Minimum Illumination Intensities in Foot-Candles

Foot Candles	Area or Operations
5	General site areas.
3	Excavation and waste areas, accessways, active storage areas, loading platforms, refueling, and field maintenance areas.
5	Indoors: Warehouses, corridors, hallways, and exitways.
5	Tunnels, shafts, and general underground work areas. (EXCEPTION: Minimum of 10 foot-candles is required at tunnel and shaft heading during drilling, mucking, and scaling. Mine Health and Safety Administration approved cap lights shall be acceptable for use in the tunnel heading.)
10	General shops (e.g., mechanical and electrical equipment rooms, active storerooms, barracks or living quarters, locker or dwelling rooms, dining areas, and indoor toilets and workrooms.)
30	First aid stations, infirmaries, and offices.

19.0 Confined Space Entry

In any confined space, dangerous air contaminants cannot always be prevented from accumulating or be removed by natural ventilation. Whenever an employee works in this type of environment, the chance always exists that an oxygen-deficient, explosive, or toxic atmosphere may be present upon entry or develop while working or even as a result of work being performed in the space.

Since all confined spaces represent a potential hazard, special precautionary measures must be implemented to protect the workers. This program outlines the precautionary measures necessary for each entry into a confined space during hazardous material removal operations. With thorough training, quality equipment, clear thinking, and responsible actions, the employee who enters the confined space should exit alive and unharmed.

19.1 Definitions of Confined Spaces

A confined space as a space that is:

- Large enough and so configured that an employee can bodily enter and perform work.
- Has limited or restricted means of entry or exit
- Is not designed for human occupancy

19.2 Permit-required Confined Spaces

An area is considered a permit-required confined space if it presents or has the potential to contain hazards related to atmospheric conditions, engulfment, configuration or any other recognized serious hazard. If excavations or bridge interiors have any of these potential hazards, they shall be considered confined spaces.

The Site Safety Officer shall conduct evaluations of the workplace and determine if there are any permit-required confined spaces. He/she then shall inform workers through signs or other means and prevent unauthorized entry.

19.2.1 Permit System

The Site Safety Officer shall act as entry supervisor. The entry supervisor must authorize entry, prepare and sign written permits, order corrective measures and cancel permits when work is completed. A permit is found in Appendix E.

19.4 Entry Supervisor

The entry supervisor must know the hazards of confined spaces, verify that all tests have been conducted and procedures and equipment are in place. The entry supervisor shall terminate entry and cancel permits and verify that rescue service are available. He/she is also responsible for removing unauthorized workers who enter confined spaces and determine that acceptable conditions continue.

19.5 Rescue Services

The fire department shall be called whenever a confined space entry is performed. They shall be notified of the location and nature of the entry so that they can provide prompt assistance, if needed.

19.6 Lockout/Tagout Procedures

Any equipment (electrical or mechanical) that is capable of being reenergized remotely or dissipating potential energy must have all switches, valves, etc. capable of doing so physically disconnected or locked out prior to commencement of work.

The steps of a lockout/tagout procedure include:

- Inform the operator and all area personnel of work to be performed.
- Lockout device is attached, with tag, to switch, valve, or other actuator.
- All involved personnel attach separate locks to lockout device and pocket keys.
- All locks and therefore lockout device remain in place until work is complete and all personnel are clear of hazard.

- Lockout device is removed and operator and area personnel are informed of work completion.

19.7 Atmospheric Testing of Confined Spaces

19.7.1 List of Equipment

- Photoionization detector equipped with a 10.6 eV lamp if a toxic environment is possible.
- Catalytic hot wire combustible gas indicator that reads in percent of the lower explosive limit and oxygen combination meter that reads in percent oxygen if flammability and/or oxygen deficiency are possible.
- Ten foot non-sparking pole
- Tygon tubing

19.7.2 Testing for Explosive Atmosphere

Explosivity should always be the first test due to the immediate danger of explosion whether or not personnel actually enter the space. A hot wire combustible gas indicator should be used.

Warning

1. The catalytic hot wire LEL does not detect many hazardous gases.
2. Leaded gasoline and chlorinated solvents can poison the meter very quickly causing malfunction.
3. The LEL does not detect explosive dust atmospheres.
4. Nearby electrical equipment may cause erratic readings.

19.7.3 LEL Monitor Preparation

- The meter should be calibrated within 5 days of use.
- Start and check the meter according to manufacturer's instruction.
- Warm up and zero the meter in a clean area.
- Test the meter with a known positive source (such as an unlit butane lighter).
- Zero the meter at 5%. This allows the operator to see negative reactions which may indicate unexpected gases.

19.7.4 LEL Monitor Operation

It is best to provide a pole and a tube to collect the sample from a distance. The retention time for the tubing should be considered. Sample in an imaginary diamond very slowly.

- If the needle goes to 100% and then drops to zero, the UEL has been exceeded.

- If the needle quickly drops below zero, this indicates an oxygen deficient atmosphere.
- If the needle deflects upscale and then comes back down to zero, this may be caused by a gas that is heavier than air.
- If there is a constant upscale erratic deflection of the needle, there may be high levels of chlorinated solvents and some heavier inert gases.
- If more than 100% of the LEL, this is very dangerous and must be made explosive before it is safe to enter.
- If 100% of the LEL, it is immediately explosive and must be made ventilated before it is safe to enter.
- If more than 10% of the LEL, it is illegal to enter according to OSHA regulations and must be ventilated.
- If less than 10% of the LEL, it is legal to enter but may still be toxic.

19.7.5 Testing for Oxygen Deficiency

Monitoring for oxygen deficiency should be performed in the same manner as for explosivity.

- If oxygen concentration is less than 19.5%, it is oxygen deficient and illegal to enter according to OSHA regulations and must be ventilated.
- If oxygen concentration is more than 23.5%, it is oxygen enriched and illegal to enter according to OSHA regulations and must be ventilated.

19.7.6 Testing for Toxic Airborne Contaminants

If a toxic atmosphere is suspected, testing should be conducted for the contaminant(s) suspected and compared with their permissible exposure limits. Testing is most easily done using a photoionization detector.

19.8 Ventilation

Exhaust ventilation may be used to draw or push dense gases and vapors from bottom of space, allowing fresh air to replace them. The source of ventilating air must be uncontaminated. Consider destination of exhausted gases/vapors before beginning ventilation.

19.9 Extraction and Rescue Equipment

A rescue harness is to be worn at all times during entry into confined spaces with recognized hazards and limited and limited access or egress. A tripod shall be available for overhead rescue. Observer shall be in constant communication with entry personnel. The entry procedure shall be aborted at the first indication of difficulty.

20.0 Hot Work Permits

No hot work, including welding, torch cutting, and brazing shall take place without first acquiring a hot work permit from the Site Safety Officer. A copy of the hot work permit is in Appendix E.

21.0 Site Excavations

Site excavations created during initial site preparation or during hazardous waste operations shall be shored or sloped as appropriate to prevent accidental collapse in accordance with 8 CCR, Chapter 4, Subchapter 4, Article 6.

22.0 Safety Inspections

Inspections shall be conducted by the Site Safety Officer or, in the absence of that individual, another individual who is knowledgeable in occupational health and safety, acting on behalf of the employer as necessary to determine the effectiveness of the site health and safety plan. Any deficiencies in the effectiveness of the site health and safety plan shall be corrected by the employer. A record of the safety inspection are maintained in Appendix F.

MARK Warner, Performance Excavator	415-257-4640
Greg Rainey, Performance Excavator	↓
Cliff Busekist, Performance Excavator	↓
Romera Jones, Romera Jones	510-933-5360
Frank Cannizzaro, CalTrans	510-286-0670

AGORD. CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY)

08/15/95

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

PRODUCER
Holtemann, Ord & Smith
P. O. Box 4409
Petaluma CA 94955-4409

COMPANIES AFFORDING COVERAGE

COMPANY LETTER	A California Comp & Fire
COMPANY LETTER	B
COMPANY LETTER	C
COMPANY LETTER	D
COMPANY LETTER	E

INSURED
Performance Excavators, Inc.
3060 Kerner Blvd.
San Rafael CA 94901

faxed 415/257-4644

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN. THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A	GENERAL LIABILITY <input type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input type="checkbox"/> OCCUR <input type="checkbox"/> OWNERS & CONTRACTORS PROT.				GENERAL AGGREGATE \$ PRODUCTS-COMP/OP AGG. \$ PERSONAL & ADV. INJURY \$ EACH OCCURRENCE \$ FIRE DAMAGE (Any and All) \$ MED. EXP. (Any one person) \$
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS <input type="checkbox"/> GARAGE LIABILITY				COMBINED SINGLE LIMIT \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per occurrence) \$ PROPERTY DAMAGE \$ EACH OCCURRENCE \$
A	EXCESS LIABILITY <input type="checkbox"/> UMBRELLA FORM <input type="checkbox"/> OTHER THAN UMBRELLA FORM				AGGREGATE \$ STATUTORY LIMITS
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY	w958123672	08/01/95	08/01/96	EACH ACCIDENT \$ 1,000,000 DISEASE-POLICY LIMIT \$ 1,000,000 DISEASE-EACH EMPLOYEE \$ 1,000,000
	OTHER				

DESCRIPTION OF OPERATIONS/LOCATION/VEHICLES/SPECIAL ITEMS

Job: Cypress "A" Oakland @ 500 Kirkham Street & 1285 Fifth Street

Cancellation: Except for ten days for non-payment of premium.

faxed 510/337-9335
Alameda County Health Agency, Div. of Environ. Health
1131 Harbor Wy Prkwy 2Fl
Alameda CA 94502


CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE


[Signature]

ISSUING CORPORATION


 State of California
 COMMUNITY DEVELOPMENT DEPARTMENT
 HAZARDOUS WASTE DIVISION

License No. **667433** INC CORP
 Licensee **PERFORMANCE EXCAVATORS INC**

License Type **A HAZ**

Issue Date **03/31/97**


REMI

PERFORMANCE OF
REMEDIAL RESPONSE
ACTIVITIES AT UNCONTROLLED
HAZARDOUS WASTE SITES
CERTIFICATE OF TRAINING

This Certifies That

MARK JONAS

Has Successfully Completed

Basic Principles of Hazardous Waste Site Investigation

Seminar Date

August 5-9, 1985

Prepared by

CAMP DRESSER & McKEE INC.

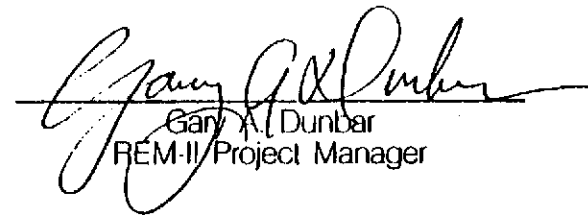
Roy F. Weston, Inc.

Woodward-Clyde Consultants

Clement Associates, Inc.

ICF Incorporated

C.C. Johnson & Associates, Inc.


Gary A. Dunbar
REM-II/Project Manager

Certificate of Completion

for

Field Safety Training

Awarded To

Romana Johns, Formerly Known as:

Glades Abdypour

this 2nd day of June, 1985

Phoenix Safety Associates, LTD.

Antonio Trucado

President

Jan G. Mann

Instructor

ONSITE ENVIRONMENTAL

This is to certify that

Ellis Dshay

552-83-5165

has successfully completed training in Onsite's 40 Hour "Hazwoper" training program and is in compliance with 29 CFR 1910.120(e). This also stands for completion of the following training:

Confined Spaces

Hearing Conservation

Lockout/Tagout

Electrical Safety

At

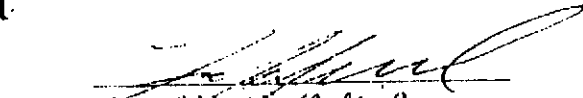
Santa Clara, CA

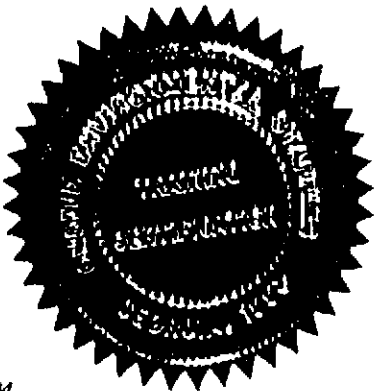
On

Feb. 25, 1994.

Feb. 25, 1995

Expiration Date


Louis M. Sheffield, Instructor





No. B1494

**Environmental
Health
Consultants
Givo Youmani**

has successfully completed a 40-hour course in health and safety
for hazardous waste operations
November 4, 5, 11, 12, 1994 Burlingame, CA

Course Date and Location

[Signature]
Instructor Signature

[Signature]
Instructor Signature

**MEDICAL EMERGENCY
RESPONSE TRAINING**

Givo Youmani

Has Successfully Completed

10 hr CPR/First Aid IA

11-11-94

Date of Issue

Instructor

11-11-95

Date of Expiration

Card Holder



No. B1493

**Environmental
Health
Consultants
Sarges Youmani**

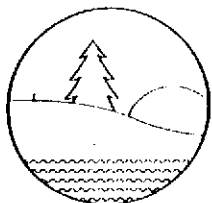
has successfully completed a 40-hour course in health and safety
for hazardous waste operations
November 4, 5, 11, 12, 1994 Burlingame, CA

Course Date and Location

[Signature]
Instructor Signature

[Signature]
Instructor Signature

R1981



Environmental Health Consultants

Certificate of Completion

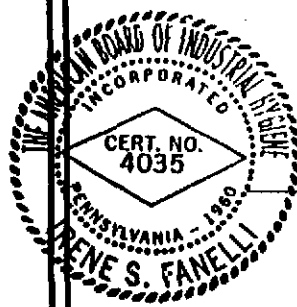
Romena Jonas

has successfully completed an eight hour refresher course in health and safety for hazardous waste site operations as required by 29 CFR 1910.120 (e) 8.

May 19, 1995

Burlingame, California

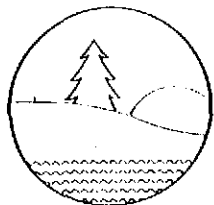
Course Date and Location



Rene S. Fanelli, CIH
Instructor

Instructor

R1982



Environmental Health Consultants

Certificate of Completion

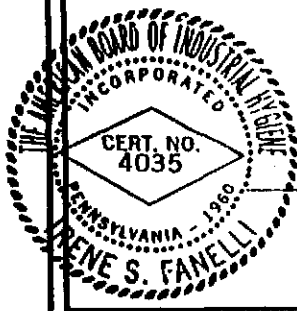
Mark Jonas

has successfully completed an eight hour refresher course in health and safety for hazardous waste site operations as required by 29 CFR 1910.120 (e) 8.

May 19, 1995

Burlingame, California

Course Date and Location

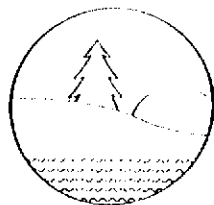


Gene S. Fanelli, CIH

Instructor

Instructor

S1306



Environmental Health Consultants

Certificate of Completion

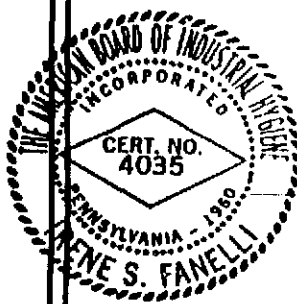
Ellis Ishaya

has successfully completed an eight hour course for supervision of hazardous waste site operations as required by 29 CFR 1910. 120 (e) 4.

January 26, 1995

Burlingame, California

Course Date and Location



Gene S. Fanelli, CIH
Instructor

Instructor

Certification

May it be known by all who read this that

ORIG. RATNEY

has met and surpassed all of the requirements of

8 HOUR REFRESHER TRAINING OSHA STANDARD, 29CFR 1910.120
HAZARDOUS WASTE OPERATIONS

Presented this 20 day of DECEMBER, 1994.

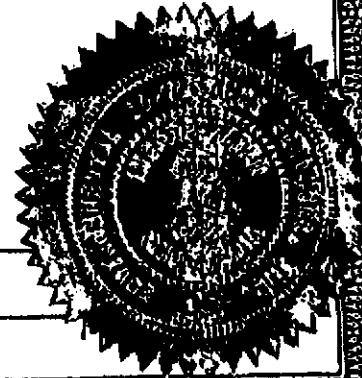
ENVIRONMENTAL COMPLIANCE SERVICES

ORGANIZATION

SIGNED



CONTROL # 122094-3576-8-C



Certification

May it be known by all who read this that

ALEC GIDDINGS

has met and surpassed all of the requirements of

8 HOUR REFRESHER TRAINING OSHA STANDARD, 29CFR 1910.120
HAZARDOUS WASTE OPERATIONS

Presented this 20 day of DECEMBER, 1994.

ENVIRONMENTAL COMPLIANCE SERVICES

ORGANIZATION

SIGNED



CONTROL # 122094-3930-8-F



Certification

May it be known by all who read this that

CLIFF HOSKIST

has met and surpassed all of the requirements of

8 HOUR REFRESHER TRAINING OSHA STANDARD, 29CFR 1910.120
HAZARDOUS WASTE OPERATIONS

Presented this 20 day of DECEMBER, 1994.

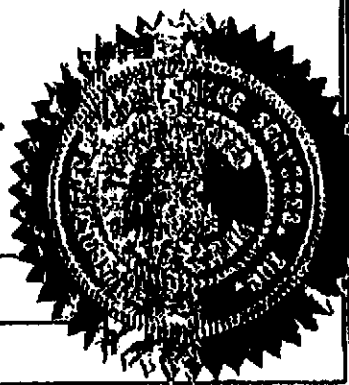
ENVIRONMENTAL COMPLIANCE SERVICES

ORGANIZATION

SIGNED



CONTROL # 122094-0777-8-J



Certificate of Award



THIS CERTIFIES THAT

1885S

Greg Rainey

successfully completed the 8 Hour Supervisory requirements
listed under OSHA Regulation 29 CFR 1910.120

HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE

this thirtieth day of March 1994



Geo Line

Provided by:

Geo Line

425 Stockton Avenue
San Jose, CA 95126



Dani Renan

Course Instructor

Certification

May it be known by all who read this that

RAFAEL G. ALVAREZ

has met and surpassed all of the requirements of

8 HOUR REFRESHER TRAINING OSHA STANDARD, 29CFR 1910.120
HAZARDOUS WASTE OPERATIONS

Presented this 20 day of DECEMBER, 1994.

ENVIRONMENTAL COMPLIANCE SERVICES

ORGANIZATION

SIGNED



CONTROL # 122094-0173-8-H



ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION
Declaration of Site Account Refund Recipient
SITE OWNER FILLS OUT FOR SITE
-- OPTIONAL --

The property owner will use this form to designate someone other than him- or her- self to receive any refund due at the completion of all deposit/refund projects at the site listed below. In the absence of this form, the property owner will receive any refund. Only one person at any one time may be designated to receive any refund.

SITE NUMBER/ADDRESS:

PROPERTY OWNER

Site Number	Caltrans
Container Freight	Owner's Name
Company Name	1121 7th Street
1285 5th Street	Owner's Address
Street Address	Oakland, CA 94607
Oakland, CA 94607	Owner's City State Zip
City Zip Code	

I designate the following person to receive any refund due at the completion of all deposit/refund projects:

Jess & Associates Inc.

Name

2815 Mitchell Drive, Suite 209

Street Address

Walnut Creek, CA 94598

City / Zip

Raymond Pang
Property Owner Signature

8-14-95
Date

Raymond Pang
Property Owner Name

RETURN FORM TO:
DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-4577

AUG 15 '95 04:24PM CALTRANS

ALAMEDA COUNTY PRESS AND ASSOCIATES 510 933 5362

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION
Declaration of Site Account Refund Recipient
SITE OWNER FILLS OUT PER SITE
-- OPTIONAL --

The property owner will use this form to designate someone other than him- or her- self to receive any refund due at the completion of all deposit/refund projects at the site listed below. In the absence of this form, the property owner will receive any refund. Only one person at any one time may be designated to receive any refund.

SITE NUMBER/ADDRESS:

PROPERTY OWNER

Site Number

J&A Truck Repair

Company Name

300 Kirkham Street

Street Address

Oakland, California 94607

City

Zip Code

Caltrans

Owner's Name

1121 7th Street

Owner's address

Oakland, CA 94607

Owner's City

State

Zip

I designate the following person to receive any refund due at the completion of all deposit/refund projects:

Jowac & Associates Inc.

Name

2815 Mitchell Drive, Suite 204

Street Address

Haiast Creek, California 94596

City / Zip

Raymond Pang

Property Owner Signature

8/14/95

Date

Raymond Pang

Property Owner Name

RETURN FORM TO:

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577

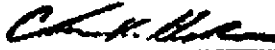
CERTIFICATE OF ACHIEVEMENT

This certifies that

GREG RAINEY

*has successfully completed a
Lead Awareness Course*

Meeting all the Requirements Set forth in CFR 1926.62 Paragraph L


Signature

December 20, 1994

Date

Environmental Compliance Services, Inc.
3678 Omec Circle Rancho Cordova, CA. 95742

CERTIFICATE OF ACHIEVEMENT

This certifies that

CLIFF BUSEKIST

*has successfully completed a
Lead Awareness Course*

Meeting all the Requirements Set forth in CFR 1926.62 Paragraph L



Signature

December 20, 1994

Date

Environmental Compliance Services, Inc.
3678 Omec Circle • Rancho Cordova, CA. 95742

CERTIFICATE OF ACHIEVEMENT

This certifies that

ALEC GIDDINGS

*has successfully completed a
Lead Awareness Course*

Meeting all the Requirements Set forth in CFR 1926.62 Paragraph L



Signature

December 20, 1994

Date

Environmental Compliance Services, Inc.
3678 Omec Circle • Rancho Cordova, CA. 95742



PERFORMANCE EXCAVATORS

FAX TRANSMITTAL

FROM: PERFORMANCE EXCAVATORS, INC.

SENT BY:

*Mary Lou*OUR FAX NUMBER IS (415) 257-4644
OUR TELEPHONE NUMBER IS (415) 257-4640

TO:	<i>Jonas & Assoc.</i>
ATTENTION:	<i>Romana</i>
FAX NUMBER:	<i>510-933-5362</i>
TELEPHONE NUMBER:	
TODAY'S DATE:	<i>8-16-95</i>
TIME:	<i>2:45 PM</i>
NUMBER OF PAGES (Including Cover Sheet):	<i>10</i>

MESSAGE:	<i>a long 10 minutes!</i>
	<i>I am faxing only the <u>8</u> hour refresher course.</i>
	<i>Please call if you have questions!</i>

CERTIFICATE OF ACHIEVEMENT

This certifies that

RAFAEL C. ALVAREZ

*has successfully completed a
Lead Awareness Course*

Meeting all the Requirements Set forth in CFR 1926.62 Paragraph L



Signature

December 20, 1994

Date

Environmental Compliance Services, Inc.
3678 Ormeo Circle • Rancho Cordova, CA. 95742