

VERL'S CONSTRUCTION, INC.

CA LIC. #487537

753 PERALTA AVENUE
SAN LEANDRO, CA 94577
(415) 568-1234

September 17, 1990

Alameda County Health Department Hazardous Materials
80 Swan Way, Room 200
Oakland, CA. 94621
Att: Paul Smith

RE: Site Safety Plan

Dear Mr. Smith:

In response to your inquiries, we have submitted our Safety Procedures and Plan to you. To answer your questions about what we do to ensure job-site safety, we have found it necessary to entirely enclose pit with a 7 foot metal fence. When excavating commences, excavated dirt is immediately placed on 6 mill. visquine and dirt piles are also covered to reduce aeration of dirt piles. We then cover excavated areas with trench plating, when we see that this is necessary. If there are any further questions, please call me at 568-1234.

Sincerely Yours;



Merlin N. Bowen
Health and Safety Plan Officer

*
cc Respiratory Protection will be available on site for each employee.
Also a copy of the site safety plan will be available on site.

SITE HEALTH AND SAFETY PLAN

Introduction

This health and safety plan prescribes the work-place procedures which will be followed during the soil and groundwater assessment of the site located at OAKLAND, California. The provisions of this plan are mandatory for all VCI personnel and subcontractors assigned to this project. All authorized visitors to the site will be required to abide by the procedures. The requirements in this plan may change due to changes in the work conditions, however, no changes will be made without prior written approval of the Health and Safety Consultant and the Project Manager.

VERLINS CONSTRUCTION, INCORPORATED, is committed to providing a safe and healthful working environmental for all its employees and subcontractors.

ASSIGNMENT OF RESPONSIBILITY

Project Manager

VCI's Project Manager will be BOB WARD, who will be responsible for oversight and management of the project. MERLIN BOWEN will be responsible for the implementation and management of the Health and Safety Plan.

Health and Safety Consultant

Mr. EDWEN or his designee will visit the site periodically and during critical phases of the project. The Health and Safety Consultant is responsible for preparation of this plan.

VCI Site Representative/Safety and Health Officer

During most of this project there will be an VCI representative on site. That representative will be responsible for day to day implementation of the health and safety plan and overall direction of subcontractor personnel. The VCI representative is empowered to stop all site work in the case of violation of the requirements of the health and safety plan.

Other Project Personnel/Subcontractor

All project and subcontractor personnel will be responsible for understanding and complying with the project health and safety requirements.

HAZARD CHARACTERIZATION AND RISK ANALYSIS

Petroleum Contaminated Water and Soils

Gasoline and its constituents pose health hazards in two major classifications: explosivity and toxicity. The extreme flammability of gasoline is commonly known. The lower explosion limit (LEL) of gasoline vapor is 1.3 percent in air. If the concentration

of gasoline vapor in air exceeds 1.3 percent (13,000 parts per million) and sufficient quantities of oxygen are present, then the introduction of sufficient heat, spark, or flame will result in an explosion.

Prior to conducting any subsurface excavation in the vicinity of a fuel tank, the tank should be emptied of all liquid product and receive sufficient quantities of dry ice (frozen carbon dioxide) so that available oxygen is displaced from the tank atmosphere.

A lesser known health hazard resulting from exposure to gasoline is toxicity. Over exposure to petroleum hydrocarbon vapor can cause depression of the central nervous system. Inhalation of high concentrations of gasoline can cause chemical pneumonia and/or pulmonary edema. Repeated or prolonged skin exposure to gasoline or gasoline contaminated materials can cause dermatitis or even blistering of the skin. Several common constituents of gasoline have been linked to various health problems. The constituents of gasoline that have been shown to cause serious health problems resulting from relatively minor exposures include benzene, toluene, meta, para, and ortho xylenes, ethyl benzene and tetraethyl lead.

Typical percentages (by weight) of these constituents in gasoline are: benzene - 0.12-3.50%, toluene - 2.73-21.80%, meta xylene - 1.77-3.37%, para xylene - 0.77-1.58%, ortho xylene - 0.68-2.66%, and ethyl benzene - 0.36-2.86%. Typical percentage of tetraethyl lead is not available.

Units used to describe occupational exposures to hazardous substances include: exposure limit, also known as the "threshold limit value" (TLV), ceiling limit, and the concentration level that is "immediately dangerous to life and health" (IDLH). The exposure limit defines the maximum concentration of a substance to which one can be exposed during an 8 hour period without suffering significant health effects. The ceiling limit is the concentration level that cannot be exceeded at any time; i.e., a suitable respirator must be worn if concentration values reach the ceiling limit. The IDLH level represents a maximum concentration from which one could escape within 30 minutes of respirator failure without experiencing escape-impairment or irreversible health damage. IDLH values are not listed for substances that are potential human carcinogens.

EXPOSURE TABLE

<u>Substance</u>	<u>Exposure Limit</u>	<u>Ceiling Limit</u>	<u>IDLH</u>
Benzene	0.1 ppm (8 hrs)	1 ppm (15 min)	Carcinogen
Toluene	100 ppm (10 hrs)	200 ppm (10 min)	2000 ppm
Xylene	100 ppm (8 hrs)	200 ppm (10 min)	1000 ppm
Ethyl Benzene	100 ppm (8 hrs)	N/A	2000 ppm
Tetraethyl Lead	0.0067 ppm	N/A	3.6 ppm

Prolonged exposures to concentrations above the limits noted may affect the central nervous system, cardiovascular system, respiratory system, eyes, skin, kidneys, bones and bone marrow. Research has shown that benzene is a carcinogen.

Immediate symptoms of over-exposure include: eye irritation, nose irritation, throat irritation, headache, nausea, dizziness, drowsiness, weakness, confusion, euphoria, excitement, staggered gait, abdominal pain, respiratory difficulties, muscle fatigue, and coma.

In order to protect against over-exposure to these compounds, the ambient air will be monitored with a "lower explosion limit/oxygen content" meter and/or a handheld photo ionizing detector (PID). As soon as vapor concentrations approach 75% of the exposure limit value, work will cease until all on-site personnel have donned protective clothing and suitable respiratory devices.

Due to the inherent physical danger of working in the vicinity of moving heavy machinery, all personnel will wear hardhats and steeltoed footwear at all times.

Personnel exposures to excessive job-related hazards are expected to be minimal using these safeguards.

It should be noted that summertime heat may initiate weather stress-related problems and decrease productivity on the job site.

Based upon VCI's experience with investigations of potentially gasoline contaminated soils and water, overexposure of personnel to gasoline vapor is unlikely. Personnel

however may be exposed to short term vapor concentrations approaching 100 ppm. Respiratory protection plans will be directed to protecting personnel from the transient exposures.

Drilling Activities

Various hazards are present during excavating procedures.

- electrical hazards due to overhead and underground utility lines
- excessive noise
- confined space
- moving portions of the drill rig
- falling of heavy overhead objects
- fall hazards due to working at heights

SITE CONTROL

A site map has been attached to this plan. The areas where work will occur, will be on the site, and may be barricaded to prevent unauthorized access. Only authorized personnel shall be allowed in the work areas and any unauthorized visitors must remain outside any barricaded area.

The site is small enough that normal voice communication can be used. In the vicinity of the excavation, common hand signals will be used.

TRAINING

VCI Personnel

All VCI project personnel shall have completed 40 hours of off-site health and safety training, related to hazardous waste operations. In general, the VCI personnel will have completed a combination of paid training courses which meet the requirements of both the interim and final Occupational Safety and Health Administration (OSHA) rule for Hazardous Waste and Emergency Response Operations (29 CFR 1910.120). All VCI supervisory personnel on site will have completed an additional 8 hours of relevant health and safety training.

VCI personnel who may visit the site occasionally, and are unlikely to be exposed to chemical hazards will have completed at least 24 hours of relevant health and safety training.

Any VCI or contractor personnel operating specialized industrial equipment such as forklifts, heavy equipment, drilling equipment, etc. shall be able to demonstrate their competency in the safe operation of such items.

Subcontractor Personnel

All subcontractor personnel who are likely to be exposed to hazardous materials either by inhalation or dermal contact shall have completed 40 hours of off-site health and safety training, in accordance with the OSHA interim and final Hazardous Waste and Emergency Operations rule. Subcontractor personnel who are required to work on the site for short periods of time (1-day or less), and who will not be required to wear any protective equipment, shall have completed at least 24 hours of off-site health and safety training.

All Site Personnel

Prior to starting off the project, a kick-off safety meeting will be held on the site. During this meeting all personnel will be briefed on the requirements contained within the health and safety plan, and will be told the site safety rules. The kick-off safety meeting will be conducted jointly by the project manager and the HSO.

At the beginning of each work shift, or whenever new personnel arrive on the site, a tailgate safety meeting will be held. The purpose of such meetings is to highlight health and safety concerns and to ensure that employees are fully briefed on the site work procedures to be followed during the shift. The tailgate safety meetings will be conducted by the first line supervisors. The project manager will review records all tailgate safety meetings.

MEDICAL SURVEILLANCE

All VCI subcontractor personnel shall provide proof of having successfully completed a preplacement or annual update physical examination. This examination shall have been designed to comply with regulatory requirements for hazardous waste operations and shall include the following:

- medical and occupational history form
- physical examination
- blood analysis
- urinalysis
- chest x-ray
- pulmonary function test
- audiogram
- electrocardiogram (if indicated during the physical exam)
- alcohol and illegal drug screening

GOVERNMENT AND VCI STANDARDS

Currently the health and safety of workers performing hazardous waste activities regulated by OSHA (29 CFR 1910.120).

The OSHA PEL for gasoline vapor is 300 ppm averaged over an eight-hour period.

The 15-minute short term exposure limit is 500 ppm. To ensure that no project workers

are over-exposed to hydrocarbon vapor, VCI has instituted a project standard of 50 ppm for gasoline vapor. Respiratory equipment is required above this level.

PROTECTIVE MEASURES

Personnel Protection

All project personnel shall wear safety glasses, safety boots or shoes, long-sleeved shirts and pants. When in the immediate vicinity of drilling operations, personnel shall also wear hearing protection. Personnel will wear nitrile gloves, neoprene boots and polytyvek coveralls when handling potentially gasoline contaminated soils and liquids.

Utilities

During drilling or boring activities, the drill rig shall be at least ten feet from overhead power lines. All underground utilities shall be located as near as possible before boring and drilling activities commence. When in areas known to contain underground utilities, all such utility lines will be exposed by hand digging and probing.

AIR MONITORING

Site air monitoring will be carried out to ensure that VCI personnel are not over-exposed to hydrocarbon vapor. The airborne hydrocarbon vapor levels will be

monitored several times each day using either a photoionization detector (PID) or colorimetric indicator tubes.

If the PID or colorimetric indicator tube samples indicate that hydrocarbon vapor levels are 50 ppm or greater, then daily air samples will be collected from representative project personnel using charcoal tube sampling methods (OSHA Method 1M1S1340). Personnel will be notified in writing of the results of any personal air samples and their significance. A copy of this report will be maintained in the employee's medical surveillance file.

ACCESS AND DECONTAMINATION

Access

Access to the project work area zones shall be regulated and limited to authorized persons. A daily log shall be kept of all persons entering such areas. The work area itself shall be cordoned off using barrier tape or other suitable barriers.

Decontamination

Due to the low toxicity of the material involved (gasoline), the anticipated low levels of contamination, and the minimal hazard posed by spread of contaminated soil, formal decontamination procedures will not be required. The following site requirements will be enforced:

- Eating, drinking and smoking within the work area are prohibited.
- Project personnel may eat, drink or smoke outside the work area, only if they have washed their hands and face.
- An emergency eye wash station shall be located on the job site adjacent to the work area.

Any potentially contaminated equipment will either be disposed of, or washed off with soap and water.

Any equipment used in the contaminated zone should be washed with soap and water before it is removed from the site.

EMERGENCY RESPONSE

In the event of an emergency such as a sickness, injury or fire, the following procedures will be followed:

- Emergency procedures will be initiated by the first person recognizing the emergency situation. This person shall immediately notify the VCI site representative.

- The designated VCI First Aid/CPR provider and a project member shall provide assistance to any injured or sick employee. In the case of suspected release of toxic material, these personnel shall first don protective suits and self-contained breathing apparatus. The injured employee will first be moved to a safe location, before any attempt at treatment is made.
- A project member will be designated to call the emergency services number (911) to obtain paramedic or fire department assistance if it is needed. Any injured employees will be taken to:
PROVIDENCE HOSPITAL
3100 SUMMIT ST.
OAKLAND, CA. 94609
- In the event of a fire on the project site, VCI personnel will immediately notify the Fire Department at:
STATION 1
1603 MARTIN LUTHER KING
OAKLAND, CA. 94612
- While waiting for assistance from the fire department, project personnel will use available fire extinguishers (if safe to do so) to extinguish the fire.

Any injuries or incidents which have the potential to result in an injury will be recorded by the VCI site representative on the supervisor's employee injury report form. This form, when completed by the site representative, shall be forwarded to the VCI project manager, and the VCI Corporate Health and Safety Department.



State of California
Department of Consumer Affairs



CONTRACTORS STATE LICENSE BOARD

License Number

487537

Entity

CORP

Name/Nameplate

VERI'S CONSTRUCTION INC.

Classification(s)

A B HAZ

Expiration Date

02/29/92

**STATE
COMPENSATION
INSURANCE
FUND**

P.O. BOX 807, SAN FRANCISCO, CA 94101-0807

CERTIFICATE OF WORKERS' COMPENSATION INSURANCE

JULY 24, 1990

POLICY NUMBER: 758432-90
CERTIFICATE EXPIRES: 7/3/91

CITY OF OAKLAND
DEVELOPMENT SERVICES
1530 BROADWAY, 2ND FLOOR
OAKLAND, CA 94612

This is to certify that we have issued a valid Workers' Compensation insurance policy in a form approved by the California Insurance Commissioner to the employer named below for the policy period indicated.

This policy is not subject to cancellation by the Fund except upon ten days' advance written notice to the employer.

We will also give you TEN days' advance notice should this policy be cancelled prior to its normal expiration.

This certificate of insurance is not an insurance policy and does not amend, extend or alter the coverage afforded by the policies listed herein. Notwithstanding any requirement, term, or condition of any contract or other document with respect to which this certificate of insurance 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.

FAX #415-295-7

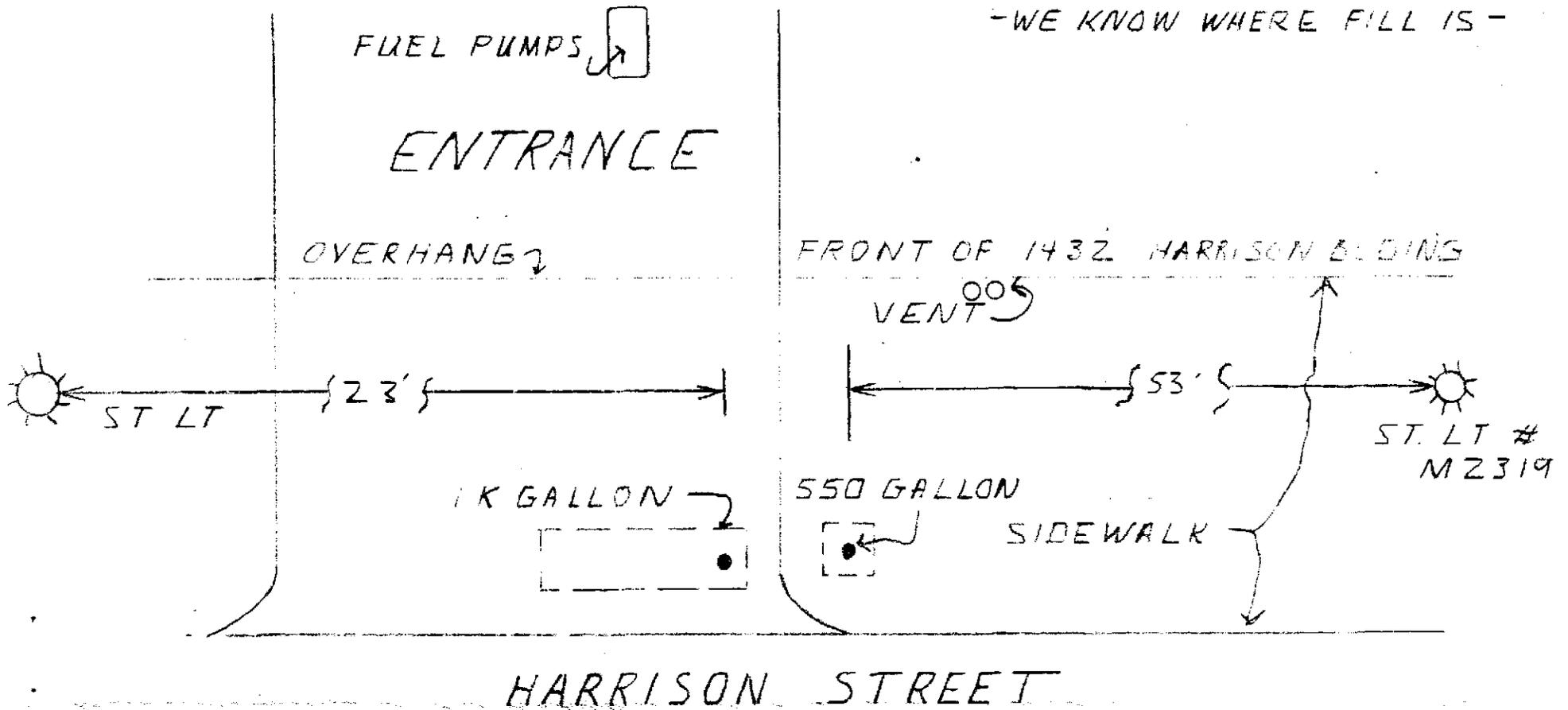

PRESIDENT

EMPLOYER

VERLIE CONSTRUCTION, INC.
753 PERALTA AVENUE
SAN MENUNDO, CA 94577

HARRISON ST GARAGE

NOTE: EXACT LOCATION
OF TANKS UNKNOWN.
- WE KNOW WHERE FILL IS -



EMPLOYEE SAFETY

We would like to extend to you a cordial Welcome! We hope your stay with the Company will be long, Safe, and prosperous.

As an employee of this corporation, you are expected to observe all rules and regulations set forth by Management, in particular the Safety Rules and Regulations.

A study of most companies show that 9 out of 10 accidents could have been prevented if a few common-sense practices had been followed. This outlines many of those safe practices and you are encouraged to become familiar with each one so that you will not be injured or cause an injury to one of your fellow employees. Each accident causes suffering and usually financial loss to you as well as your family.

Your life is largely in your own hands. So that you will not be injured or killed it is necessary that you work safety into everything you do and every thought you have, each and every day. Only then, will it be possible for you to eliminate the accident that could result in an end to your happiness and your enjoyment of life.

Your cooperation is necessary for the overall success of the Safety Program; it requires conscientious assistance.

So, for your protection and that of your fellow workers, we ask that you **THINK, TALK, and ACT SAFELY** in the performance of every task you undertake.

SAFETY INSPECTION CHECK LIST

GENERAL

1. Are all the workers wearing hard hats? (Including workmen and visitors.) Keep a supply of extra hard hats for visitors and new men. Necessary on some jobs if you are not sure ask foreman.
2. Water trucks, pickups and car requirement:
 - A. License must be current and valid. Combination license where required.
 - B. Regular drivers given physicals.
 - C. All employees past driving record checked with licensing authority.
 - D. No one to drive except those designated by supervision.
3. Has an accident report been made on any accident which has happened? Accident reports are to be phoned into main office immediately, and accident forms are to be mailed or delivered to main office so they can be forwarded on to the insurance company.
4. Is work area clear of unnecessary articles which could be stumbled over or stepped on, thus causing an accident?
5. Is there a first aid kit on the job?
6. All buildings must have a fire extinguisher within 75 feet of any worker.
7. Are all air hoses and fittings sound and in good condition?

8. Are any wire rope lines kinked or do they have broken strains?
9. Are all welders wearing protective glasses?
10. All equipment left unattended at night, adjacent to a highway in normal use, or adjacent to construction areas where work is in progress, shall have appropriate lights or reflectors, to identify the location of the equipment.
11. All accident reports shall contain corrective procedures which will help reduce the potential for a reoccurrence.

REPORTING INJURIES - FIRST AID

- A. If you are injured, report it to your foreman immediately, and he will see that you get proper first aid or medical attention. Even the slightest scratch should be treated promptly to avoid the possibility of infection and lock-jaw which is usually fatal.
- B. Report all accidents and/or injuries immediately for proper first aid or medical treatment.
- C. Do not attempt to treat injuries yourself or allow anyone else to do so. Only qualified persons designated by Management are to perform such services.
- D. In case of serious injury, do not attempt to move the injured employee until qualified assistance arrives.
- E. In case of "Stoppage of Breathing" caused by electric shock, drowning, or asphyxiation, start artificial respiration immediately.
- F. Provide a written report. Include description of what happened and list names of all witnesses.

IN CASE OF EMERGENCY

- A. Check the emergency number chart for adequate assistance.
- B. State your name and the company name.
- C. Give brief description of the accident.
- D. Give exact location of accident.
- E. WAIT - Be sure you have given all important information, let the person you called hang up first.

EYE PROTECTION: Suitable goggles, hoods or face shield will be provided and must be worn when:

- A. Chipping concrete, steel, etc.
- B. Using grinders (all types), table saws, chain saws, jack hammers, chipping guns, stud guns, masonry saw, welding or cutting torches (under welding hood in arch welding).
- C. Cleaning a weld or when the wind is such that it is blowing dust, sand, rust or other particles about.
- D. Handling material in a powder form such as cement or when mixing or cleaning brick with muriatic acid.
- E. There is danger of concrete or mortar splashing in the eye.
- F. Filing or buffing any material.
- G. Working near persons whose work requires them to wear goggles.

- H. Changing teeth on augers or buckets.
- J. Avoid looking at the arc of an electric welder without proper eye protection, the rays of the arc may cause serious injury to unprotected eyes.

SAFETY MEETINGS: So employees will attend regularly scheduled safety meetings on your job. You'll get the latest information on what the company is doing with safety and what you can do to keep from getting hurt. A safety meeting will be held at that beginning of every new job and on fridays thereafter.

HORSEPLAY: So that you will not be injured, refrain from indulging in horsplay, practical jokes, and wrestling on the job.

LADDERS

- A. Make sure the bottom of your shoes are clean so you will not slip when going up or down a ladder.
- B. Always keep hands free and face the ladder when going up or down.
- C. Do not use the top half of an extension ladder alone. There are no feet and it will fall over easily.
- D. Before using ladder, make sure no rungs are broken or loose.
- E. Always use a line to hoist or lower objects. Never attempt to climb a ladder, stairs, etc. while carrying materials, tools, or other items.
- F. Never leave hand tools on steps of ladders and keep all hoses, light heads, welding cables and other debris clear of ladder rungs, stairways, and approaches.
- G. Tie of the top of all extension ladders.
- H. Position a ladder so that the base spread is 1/4 the working length of a ladder.
- I. Destroy all non-repairable ladders.

PROTECTION OF THE PUBLIC: Anytime you see children or sightseers in the work area, ask them to leave so they will not be hurt. If there is danger of pedestrians, automobiles, etc., being struck by falling materials which you are working with, tell you foreman so he can arrange the necessary protection.

CLEARING OR GRADING EQUIPMENT: Always operate a dozer, loader, scraper, grader, etc. at a safe speed. Only the operator should be on the grading equipment.

WORKING CONDITIONS: No worker is required to work in an unsafe place unless the work is being done to correct the hazard and proper precautions have been taken.

GLOVES: Gloves should be worn when scraping or when handling jagged, sharp, or splinted materials, when welding or acting as a welder's helper, or when wrecking our forms. The

employee is expected to provide his own work gloves; however, if you are doing a special job that requires rubber gloves, check them out at the job office.

SHOES: The wearing of **SAFETY SHOES** is encouraged. Heavy duty work shoes are required. Canvas, loafer-type shoes, or high-heeled, pointed-toed boots shall not be worn.

NAILS: Remove or bend down all nails which are hazardous; in boards, in heads of nail kegs, barrels, etc. Do not bend nails by stepping on them, use a hammer.

ALCOHOL: No drinking of a alcohol beverage shall be allowed on any job at anytime. Anyone known to be under the influence of intoxicating liquor shall not be allowed on the job while in that condition.

SUGGESTIONS: Any unsafe working conditions that you see, or anyway that you can help in keeping our company at a no accident company, will be very much appreciated and help everyone. Any suggestions to this safety and health program will help fellow employees which inturn will benefit all of us. **SAFETY IS EVERYONE'S RESPONSIBILITY** and we take it very seriously.

**OPERATIONAL SAFETY PLAN FOR UNDERGROUND
TANK REMOVAL**

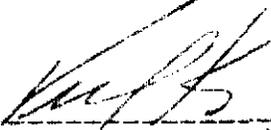
Underground alert phone number (800) 642-2444 shall be notified at least 48 hours before digging. Workmen have been trained on tank removal and they shall wear hard hats and work boots. Fire extinguishers are readily available.

We first expose the tank (s) to make sure there are no overlaying lines or obstructions to prevent the tank (s) from being easily removed.

Before the tanks are lifted the fumes are neutralized by inserting a small amount of water along with 22 pounds of dry ice per 1,000 gallons of tank. This is accomplished at least 2 hours before lifting. An explosion meter is used to determine if the tank is safe to move.

A machine is used that has the capacity of lifting the tank safely. We place the tank directly from the ground to a truck which is permitted to haul for disposal, provided the tank is externally clean and if not we scrape it before loading.

Sincerely,



Verl K. Rothlisberger
President