

C O V E R

S H E E T

FAX

To: eva chu, Hazardous Materials Specialist
 Fax #: 510-337-9335
 Subject: Printpack, San Leandro, CA Work Plan
 Date: June 22, 1998
 Pages: 16, including this cover sheet.

FROM: Ed Shaw - CTEC-ESCM, Inc.

Attached is work plan for obtaining soil gas samples.

Thanks,

Ed
Ed.

- ① GW sampling W-1, W-8, W-7, TW-3 for 8010
- ② SGV at up to 4 locations at 3' bgs only
along stream
- 1- near fence line ~~then~~ near W-5
 - 2- near building - near ramp/loading dock
 - 2- near wk room - one to west, one to east
- ③ Need \$1K

From the desk of...

CTEC-ESCM, Inc.
 P.O. Box 387
 Monroe, UT 84754

PH 435-527-3103
 Fax 435-527-3047



CTEC-ESCM, Inc.

"Saving the Earth"

June 22, 1998

P.O. Box 271
Pinellas Park, FL 33780
(813) 573-4471
Fax (813) 572-7831

Ms. eva chu
Alameda County Health Agency
Division of Environmental Protection
Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

RE: Soil Vapor Collection Work Plan
Printpack, Inc. Facility
2101 Williams Street
San Leandro, CA

Dear Ms. chu

Reference is made to our recent discussions regarding the subject facility. Attached is a work plan for collecting the subject soil gas samples. We plan to collect the samples the week of June 29, 1998.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward Shaw".

Edward Shaw, P.E.
President

Enclosures: Work Plan

bcc: Mr. Doug Cook, Printpack, Inc.
H.G. Shaw, CTEC-ESCM

SOIL GAS SAMPLING WORK PLAN

Printpack Facility
2101 Williams Street
San Leandro, CA
June 19, 1998

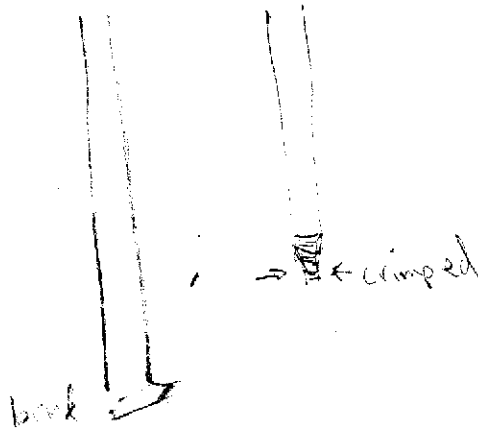
ESCM has been commissioned by Printpack, Inc. to provide environmental services at their facility in San Leandro, California. Recent discussions with Alameda County Health Care Services has identified a requirement for a Soil Vapor collection Study at the facility. This work plan and the attached "Injury and Illness Prevention Plan" are included for information to the Alameda County Health Care Services prior to start up of the work.

Soil Vapor Samples will be collected in two locations at the facility. One sample will be collected at along the northern fence. A second sample will be collected next to the northern edge of the building. (See Figure 1 attached.) Soil gas samples will be collected at depths of three feet and six feet at each location.

only from 3' by 5

Soil gas samples will be collected by driving a probe to the specified depth. Vapors will be pumped from the soil through the probe for one minute. The soil vapors will be permitted to stabilize in the soil for approximately ten minutes and then a soil gas vapor sample will be collected using a "Summa" cannister. After collection of the sample, the vapors will be field screened using an HNU-PID. The cannister from each sample location that exhibits the highest soil gas vapor concentration will be delivered to Air Toxics Laboratory in Sacramento, California, for analysis using EPA methodology TO14. (TO14 analyzes for 60 chlorinated hydrocarbon compounds to a detection level of 2 ppb.) If the concentrations for both the three foot and six foot soil vapor samples indicate similar concentrations, then the sample from the three foot depth will be sent to the laboratory for analysis.

The attached Injury and Illness Prevention Plan is hereby incorporated as part of this work plan.



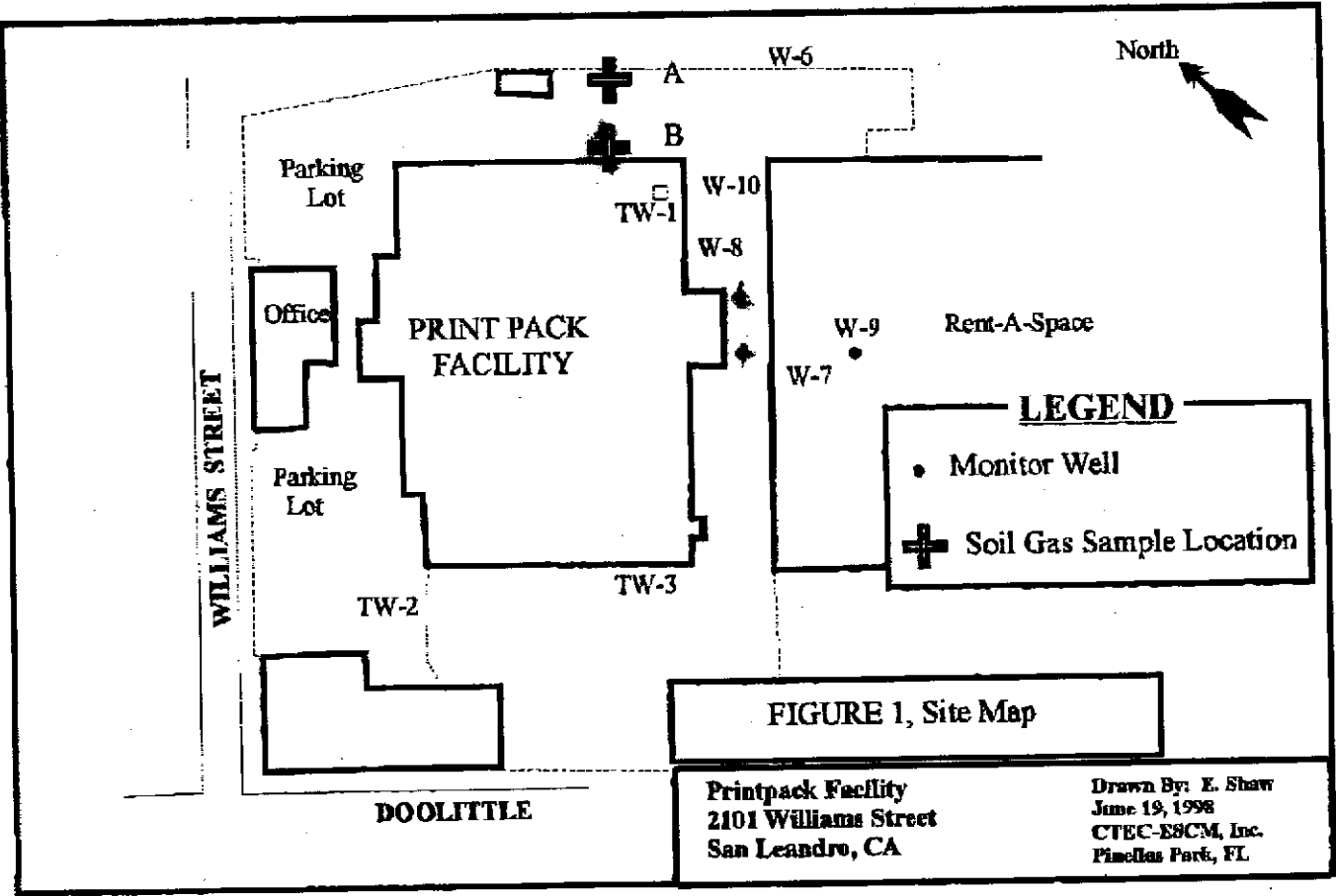


FIGURE 1, Site Map

Printpack Facility
2101 Williams Street
San Leandro, CA

Drawn By: E. Shaw
June 19, 1998
CTEC-ESCM, Inc.
Pinellas Park, FL

INJURY AND ILLNESS PREVENTION PLAN
June 19, 1998

CTEC-ESCM, Inc.
11443 43rd Street North
Clearwater, Florida 33762
(813) 573-4471

TABLE OF CONTENTS

<u>Sections:</u>	<u>Page:</u>
1. Written plan	1
2. Introduction to our program	1
3. Safety first priority	1
4. Individual cooperation necessary	1
5. Safety program goals	2
6. Safety policy statement	2
7. Safety rules for all employees	2
8. Duties	4
9. Agreement to participate	4
10. Safety and health training	4
11. Employee responsibility for training	5
12. Communication	6
13. Accident prevention responsibility	6
14. Information availability	7
15. Safety committees	7
16. Workplace inspections	7
17. Accident investigation	7
18. Records	8
19. OSHA records required	8
20. General statement on safety	8
21. Safety equipment	9
22. Housekeeping	9
23. Maintenance	9
24. Smoking and fire safety	10

INJURY AND ILLNESS PREVENTION PLAN

1. WRITTEN PLAN

This is the ESCM & Associates, Inc.(ESCM) written Injury and Illness Prevention Plan. Please read it carefully. While no program can guarantee an accident free work place, following the safety procedures set forth in this manual will significantly reduce the risk of danger to you and your co-workers.

2. INTRODUCTION TO OUR PROGRAM

State and federal law, as well as ESCM policy, make the safety and health of our employees the first consideration in operating our business. Safety and health in our work must be a part of every operation, and every employee's responsibility at all levels. It is the intent of ESCM & Associates, Inc. to comply with all laws concerning the operation of the business and the health and safety of our employees and the public. To do this, we must constantly be aware of conditions in all work areas that can produce or lead to injuries. No employee is required to work at a job known to be unsafe or dangerous to their health. Your cooperation in detecting hazards, reporting dangerous conditions and controlling workplace hazards is a condition of employment. Inform your supervisor immediately of any situation beyond your ability or authority to correct. Employees will not be disciplined or suffer any retaliation for reporting a safety violation in good faith.

3. SAFETY FIRST PRIORITY

The personal safety and health of each employee of ESCM is of primary importance. Prevention of occupationally-induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity. To the greatest degree possible, management will provide all mechanical and physical protection required for personal safety and health, but our employees must bear primary responsibility for working safely. A little common sense and caution can prevent most accidents from occurring.

4. INDIVIDUAL COOPERATION NECESSARY

ESCM & Associates, Inc. maintains a safety and health program. To be successful, such a program must embody proper attitudes towards injury and illness prevention on the part of supervisors and employees. It requires the cooperation in all safety and health matters, not only of the employer and employee, but between the employee and all co-workers. Only through such cooperative effort can a safety program in the best interest of all be established and preserved. Safety is no accident; think safety and the job will be safer.

5. SAFETY PROGRAM GOALS

The objective of ESCM & Associates, Inc. is a safety and health program which will reduce the number of injuries and illnesses to a minimum.

6. SAFETY POLICY STATEMENT

It is the policy of ESCM & Associates, Inc. that accident prevention shall be considered of primary importance in all phases of operation and administration. It is the intention of ESCM's management to provide safe and healthy working conditions and to establish and insist upon safe practices at all times by all employees.

The prevention of accidents is an objective affecting all levels of our business and its operations. It is, therefore, a basic requirement that each project manager make the safety of all employees an integral part of his or her regular management function. It is equally the duty of each employee to accept and follow established safety regulations and procedures.

Every effort will be made to provide adequate training to employees. Each ESCM employee is required to be 40 hour HAZWOPER trained. Annual refresher courses are also required. However, if an employee is ever in doubt about how to do a job or task safely, it is his or her duty to ask a qualified person for assistance. Employees are expected to assist management in accident prevention activities. Unsafe conditions must be reported immediately. Fellow employees that need help should be assisted. Everyone is responsible for the housekeeping duties that pertain to safety in their jobs.

Every injury that occurs on the job, even a slight cut or strain, must be reported to the supervisor as soon as possible. Under no circumstances, except emergency trips to the hospital, should an employee leave the work site without reporting an injury. When you have an accident, everyone is hurt. Please work safely. Safety is everyone's business.

7. SAFETY RULES FOR ALL EMPLOYEES

It is the policy of ESCM & Associates, Inc. that everything possible will be done to protect you from accidents, injuries and/or occupational disease while on the job. Safety is a cooperative undertaking requiring an ever-present safety consciousness on the part of every employee. If an employee is injured, positive action must be taken promptly to see that the employee receives adequate treatment. No one likes to see a fellow employee injured by accident. Therefore, all operations must be planned to prevent accidents. To carry out this policy, the following rules will apply:

- All employees shall follow the safe practices and rules contained in this manual and such other rules and practices communicated on the job. All employees shall report all unsafe

conditions or practices to their supervisor, and if corrective action is not taken, report to the next level of authority with proper jurisdiction over such practices.

- The supervisors and management shall be responsible for implementing these policies by insisting that employees observe and obey all rules and regulations necessary to maintain a safe work place and safe work habits and practices.
- Good housekeeping must be practiced at all times in the work area. Clean up all waste and eliminate any dangers in the work area.
- Suitable clothing and footwear must be worn at all times. Personal protection equipment (hard hats, respirators, eye protection) will be worn whenever needed.
- All employees will participate in safety meetings as conducted by their supervisor or management.
- Anyone under the influence of intoxicating liquor or other legal or illegal substances, which might impair motor skills and pose a safety hazard, shall not be allowed on the job.
- Horseplay, scuffling, and other acts which tend to have an adverse influence on safety or well-being of other employees are prohibited.
- Work shall be planned and supervised to avoid injuries in the handling of heavy materials and while using equipment.
- No employee shall be permitted to work while ability or alertness is impaired by illness, or other causes, that expose the employee or others to injury.
- There will be no consumption of alcohol or illegal drugs at the workplace.
- Employees should be alert to see that all guards and other protective devices are in proper places and adjusted and shall report deficiencies promptly to their supervisor.
- Employees shall not handle or tamper with any electrical equipment, machinery, or air or water lines in a manner not within the scope of their duties, unless they have received specific instructions.
- All injuries should be reported to the supervisor so that arrangements can be made for medical or first aid treatment.
- When lifting heavy objects, use the large muscles of the leg instead of the smaller muscles of the back.

- Do not throw things, especially material and equipment. Dispose of all waste properly and carefully.

8. DUTIES

Overall responsibility and authority for implementing the injury and illness prevention program is vested in the supervision and management of ESCM.

9. AGREEMENT TO PARTICIPATE

Every employer is required to provide a safe and healthful workplace. ESCM is committed to fulfilling this requirement. A safe and healthful workplace is one of the highest priorities of ESCM & Associates, Inc.

The information in this manual constitutes a written injury and illness prevention program. While ESCM & Associates, Inc. cannot anticipate every workplace hazard, the following general principals should guide your conduct. To be safe, you must never stop being safety conscious.

Study the guidelines contained in this manual. Discuss the workplace situation with your supervisor. Attend all training and safety meetings. Read all posters and warnings. Listen to instructions carefully. Participate in accident investigations as requested. Accept responsibility for the safety of others. Maintain all required documentation.

10. SAFETY AND HEALTH TRAINING

Training is one of the most important elements of any injury and illness prevention program. Such training is designed to enable employees to learn their jobs properly, bring new ideas to the workplace, reinforce existing safety policies and put the injury and illness prevention program into action.

Training is required for both supervision and employees alike. The content of each training session will vary, but each session will attempt to teach the following:

- The success of the injury and illness prevention program depends on the actions of individual employees as well as a commitment by the management.
- Each employee's immediate supervisor will review the safe work procedures unique to that employee's job, and how these safe work procedures protect against risk and danger.

- Each employee will learn when personal protective equipment is required or necessary, and how to use and maintain the equipment in good condition. If you have any questions about personal protective equipment, ask a project manager.

- Each employee will learn what to do in case of emergencies occurring in the work place. Supervisors are also vested with special duties concerning the safety of employees. The supervisors are key figures in the establishment and success of ESCM's injury and illness prevention program. They have primary responsibility for actually implementing the injury and illness prevention program, especially as it relates directly to the workplace. Supervisors are responsible for being familiar with safety and health hazards to which employees are exposed, how to recognize them, the potential effects of these hazards, and rules and procedures for maintaining a safe workplace. Supervisors shall convey this information to the employees at the workplace, and shall investigate accidents according to the accident investigation policies contained in this manual.

11. EMPLOYEE RESPONSIBILITY FOR TRAINING

Teaching safety is a two-way street. ESCM & Associates, Inc. can teach safety, but only employees can practice safety. Safety education requires employee participation.

An annual meeting of employees will be conducted for the purpose of safety instruction. This meeting will take place during the annual eight hour OSHA refresher course. The employees may discuss the application of the injury and illness prevention program to actual job assignments.

Remember, the following general rules apply to all situations:

- No employee should undertake a job that appears to be unsafe.
- No employee is expected to undertake a job until he/she has received adequate safety instructions, and is authorized to perform the task.
- No employee should use chemicals without fully understanding their toxic properties and without knowledge required to work with these chemicals safely.
- Mechanical safeguards must be kept in place.
- Employees must report any unsafe conditions to the project manager.
- Any work related injury or illness must be reported to the supervisor or personnel office immediately.

- Personal protective equipment must be used when and where required. All such equipment must be properly maintained.

12. COMMUNICATION

ESCM & Associates, Inc. communicates with its employees verbally, in the form of directions and statements from your supervisor, written, in the form of directives and this manual, and by example. If you see a supervisor or manager doing something unsafe, please tell that person. We sometimes forget actions speak louder than words.

13. ACCIDENT PREVENTION RESPONSIBILITY

Each employee has a personal responsibility to prevent accidents. You have a responsibility to your family, to your fellow workers and to ESCM. You will be expected to observe safe practice rules and instructions relating to the efficient handling of your work.

Your responsibilities include the following:

- Incorporate safety into every job procedure. No job is done effectively unless it has been done safely.
- Know and obey safe practice rules.
- Know that disciplinary action may result from a violation of the safety rules.
- Report all injuries immediately, no matter how slight the injury may be.
- Caution fellow workers or supervisors when they perform unsafe acts.
- Don't take chances.
- Ask questions when there is any doubt concerning safety.
- Don't tamper with anything you do not understand.
- Report all unsafe conditions or equipment to your supervisor immediately.

14. INFORMATION AVAILABILITY

A copy of this manual will be available for review by each employee, and a copy will be provided to each employee upon request. Each employee will be made aware of this policy on the first day of reporting to work.

15. SAFETY COMMITTEES

The Safety Committee, composed of an equal number of employees and management representatives, has been established to study the safety of all operating methods and practices. A list of names of committee members is available from your supervisor. The Safety committee will meet at least quarterly, and may take time to perform its duties without loss of pay. The committee evaluates all accident reports, employee hazardous situation reports and makes recommendations for improving safety. In addition, the committee will recommend programs to educate and train employees in safety aspects of the facility. Safety meetings for employees will be held periodically. The Safety Committee invites employees who have a specific concern about company safety to address those concerns first through their appropriate supervisor and secondly, if unresolved, to the committee in writing. The committee will assure that your concern receives attention. If you would like to serve on the Safety Committee, contact your supervisor.

16. WORKPLACE INSPECTIONS

In addition to the examination of records, workplace safety inspections may occur. ESCM & Associates, Inc. makes periodic inspections workplace.

17. ACCIDENT INVESTIGATION

A tool used by ESCM to identify hazards associated with accidents is an accident investigation. The results of each investigation will be reduced to writing and submitted for review by management.

A written report should be prepared from notes and diagrams made at the scene, to record direct eyewitness statements as near to the actual time of observation as possible. All statements should include the time and date given, and the town or county where the statement was made.

An accident report should answer the following questions:

- What happened? The investigation report should begin by describing the accident, the injury sustained, the eyewitnesses, the date, time and location of the incident and the date and time of the report. Remember: who, what, when, where and how are the questions that the report must answer.

- Why did the accident occur? The ultimate cause of the accident may not be known. However, if an obvious cause suggests itself, include your conclusions as a hypothesis at the time you give your information to the person in charge of the investigation.
- What should be done? Once the cause of the accidents determined, a method for avoiding future accidents of a similar character should be determined. This is a decision that should be made by managers and the supervisor. Once a solution has been adopted, it is everyone's responsibility to implement it.
- What has been done? A follow up report will be issued after a reasonable amount of time to determine if the suggested solution was implemented.

18. RECORDS

ESCM & Associates, Inc. maintains records of employee training, hazard identification and abatement, and accident investigation. Baseline medical records are also maintained when applicable.

19. OSHA RECORDS REQUIRED

Copies of accident investigation and certification of employee safety training shall be maintained by management. A written report will be maintained on each accident, injury or on-the-job illness requiring medical treatment. A record of each such injury or illness is recorded on OSHA Log and Summary of Occupational Injuries Form 200 according to its instructions. Supplemental records of each injury are maintained on NWCC-Form 1. Every year, a summary of all reported injuries or illnesses is posted no later than February 1, for one month, until March 1, on OSHA Form 200. These records are maintained for five years from the date of preparation.

20. GENERAL STATEMENT ON SAFETY

Each employee has an individual responsibility to prevent accidents. It is to the benefit of all employees and ESCM that you report any situation or condition you believe may present a safety hazard, including any known or concealed dangers in your work area. ESCM encourages you to report your concern to your immediate supervisor or to management. The supervisor or management will take immediate action to investigate the matter. Where safety hazards are not remedied by reporting to supervisors and management, employees shall report potential hazards to the Safety Committee in writing.

21. SAFETY EQUIPMENT

Proper safety equipment is necessary for your protection. The company provides adequate protective equipment.

Use all safeguards, safety appliances, or devices furnished for your protection and comply with all regulations that may concern or affect your safety.

Your supervisor will advise you as to what protective equipment is required for your job.

Certain jobs require standard safety apparel and appliances for the protection of the employee. Your supervisor is aware of the requirements and will furnish you with the necessary approved protective appliances. These items shall be worn and effectively managed as a condition of your continued employment and part of our mutual obligation to comply with good safety practices.

22. HOUSEKEEPING

Good housekeeping not only improves the appearance of the work place, it also helps prevent fires, accidents and personal injuries. Clean work benches and machines also enable you to maintain a high standard of quality in your work.

For your safety, do not leave tools, scrap, or materials piled on the floor where someone may stumble over them, or overhead where there is a danger of them falling. When piling material, be careful not exceed a safe height. Do not pile anything in front of or against fire fighting apparatus, electrical equipment or drinking fountains.

If you are operating a heavy machine, give your machine the best possible care and be alert for signs of wear or faulty operations. Handle tools carefully and store them so that they cannot cause accidents.

23. MAINTENANCE

Maintenance is essential to safe and efficient operation. If you notice a situation that requires maintenance, report it to your supervisor. Emergency maintenance requirements may be reported direct to the Project Manager.

24. SMOKING AND FIRE SAFETY

Fire is one of the worst enemies of any facility. Learn the location of the fire extinguishers and alarms. Learn how to use them. Note the locations of all exits in each area of work.

- Smoking is not allowed in any work or client building.
- The local fire department may be reached by calling 911, or by dialing 911 from a business telephone.