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**"REALISTIC SOLUTIONS FOR
HAZARDOUS WASTE PROBLEMS"**

AR101167

SITE WORK PLAN
ASSESSMENT OF DRUM DISPOSAL AREAS
HUNTERSTOWN ROAD SITE
GETTYSBURG, PENNSYLVANIA

AR101168

SITE WORK PLAN
ASSESSMENT OF DRUM DISPOSAL AREAS
HUNTERSTOWN ROAD SITE
GETTYSBURG, PENNSYLVANIA

PREPARED FOR
WESTINGHOUSE ELECTRIC CORPORATION
PITTSBURGH, PENNSYLVANIA

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PROJECT NO. 87323

REMCOR, INC.
PITTSBURGH, PENNSYLVANIA

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1.0 INTRODUCTION

Under contract to Westinghouse Electric Corporation (Westinghouse), Remcor, Inc. (Remcor) is planning to perform the assessment of two suspected drum disposal areas at the Hunterstown Road site near Gettysburg, Pennsylvania (Figure 1). This project involves the determination of the extent of these areas, procurement of samples, characterization of contents of encountered drums, and preparation of detailed site maps.

This site work plan establishes procedures to be used by Remcor in the execution of this project. All activities will be conducted in accordance with the prescribed procedures; no variances are permitted without the prior approval of Westinghouse and the Remcor project manager.

1.1 SITE DESCRIPTION

Remcor understands that Mr. Frederick M. Shealer transported and disposed of waste material generated by several facilities in the Gettysburg region. Two of the waste disposal areas used by Mr. Shealer are located at the Hunterstown Road site (Figure 1). For purposes of this plan, these suspected disposal areas have been designated the "North Area" and "South Area." The North Area is estimated to be trapezoidal in plan with dimensions of approximately 50 by 100 by 300 feet. The South Area is smaller, with rectangular plan dimensions of 50 by 100 feet. The depth of waste burial is estimated to be four feet. Figure 2 provides detail plan views of both areas.

Drums of various waste materials were reportedly buried at these two sites, including paint sludges, spent solvents, and scrap wallboard containing asbestos. Handling of drums reportedly included, at times, puncturing holes in drums and pushing them into the pit.

1.2 OBJECTIVES OF THE WORK

The objectives of the assessment of the North and South Areas is to develop needed data relative to the following:

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- Actual plan areas and depths of drum disposal
- Reliable estimates of the numbers of drums disposed in each area
- Evaluation of drum contents and condition
- Estimates of the degree and extent of associated soil contamination
- The occurrence of perched water within the disposal area.

The developed information will allow Westinghouse to evaluate existing conditions associated with the sites, and, if necessary, provide for proper planning of remedial actions.

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2.0 WORK PROCEDURES

The following sections describe the work procedures to be followed in the execution of the North and South Area assessment.

2.1 TASK 1 - PREPARATION OF WORK PLAN AND HEALTH AND SAFETY PLAN

This document has been prepared to establish procedures for implementing the drum assessment. Chapter 3.0 provides the site-specific health and safety plan that will be adhered to during the entire operation. As established, no changes will be made to these procedures without prior approval from Westinghouse and the Remcor Project Manager.

2.2 TASK 2 - INTERVIEW COGNIZANT PEOPLE

To develop additional information concerning the areas, a brief interview and site inspection with Mr. Frederick M. Shealer will be conducted by the Remcor Site Supervisor and Field Geologist. The thrust of the interview will be determination of the general physical boundaries of both areas, possible contents of drums, and the methods used. Specific inquiries will be made relative to the time period of disposal, the physical condition of drums disposed, and pit configurations. The Westinghouse Project Manager, or his designee, will accompany Remcor in this interview.

At this same time, Remcor will use a high-sensitivity metal detector to survey the perimeters of the areas. This remote sensing will be performed in an attempt to refine the perimeter definition.

2.3 TASK 3 - MOBILIZE AND DELINEATE BOUNDARIES OF THE TWO BURIAL AREAS

After reviewing the information obtained in Task 2, Remcor will mobilize to the Hunterstown Road site and initiate the North and South Area assessment.

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2.3.1 Mobilization and Site Setup

Remcor will mobilize a team of trained professionals to perform the assessment. Primary equipment needs are a rubber-tired loader/backhoe to be used in excavation, a pickup truck, health and safety protection equipment, and hand tools. Needed materials and supplies include polyethylene sheeting, barrier tape, and sampling supplies.

Access to the North and South areas will be via existing gravel roadways (Figure 1). Limited needs for ingress and egress indicate that upgrading of these access routes will not be necessary.

Each work area will then be divided into work zones (Section 3.5.2), and zone boundaries will be delineated by barrier tape, flagging, or cones. The contaminated zone in each area will comprise the estimated limits of drum burial (as refined in Task 2) plus needed working room around perimeter test pits. Contamination reduction zones (CRZs) will be established between the estimated contaminated zones and the access route to each site. Temporary provisions for personnel and equipment decontamination (i.e., boot wash, hand wash, and plastic-lined area) will be within the CRZs. A small support zone will be located in each area to allow for temporary equipment storage. Preliminary zone layouts are shown in Figures 1 and 2.

The North Area (behind Mr. Shealer's house) may need to be cleared of vegetation (i.e., small trees) prior to further work. This requirement will be assessed during the Task 2 reconnaissance.

2.3.2 Perimeter Test Pits

Approximately six test pits will be excavated along the expected perimeter of each site using a rubber-tired backhoe/loader. Figure 2 shows tentative locations of the proposed perimeter test pits.

The test pits will typically be excavated perpendicular to the estimated perimeter boundary. Each excavation will begin at a point approximately

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five feet beyond the perimeter and will proceed in the direction of the burial site until drums or other waste materials are encountered. The trenches will extend within the burial area only as needed to verify multiple drum disposal at that location. The standard width of the test trenches will be on the order of two to three feet; the depths of excavations will extend two feet beneath the disposal horizon. One or more test pits at each site may be extended along the encountered waste disposal perimeter to provide confirming data on the areal limits.

As the backhoe excavates each pit, Remcor's on-site geologist will record/map the following:

- Physical dimensions of test pits
- Overburden thickness
- Visually identifiable contents of pits
- Organic vapor analyzer (OVA) readings at each pit, including variations over time (approximately one hour) after excavation
- Location (plan and elevation) in pit where waste material is first encountered
- Elevation and flow characteristics of any perched ground water.

After needed data are recorded, each test pit will be backfilled with the removed material and staked for future location in the field survey.

2.4 TASK 4 - EXCAVATE TEST PITS WITHIN BOUNDARIES

Two test pits will be excavated within the established boundaries of each drum disposal area; Figure 2 identifies tentative locations. Prior to digging, six-mil polyethylene sheeting will be placed on the ground in an area adjacent to the test pit to form a temporary staging area for encountered wastes.

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Excavation will begin by carefully removing overburden (thickness estimated in Task 3) and placing this material in a clean soil stockpile adjacent to the excavation. Overburden will be staged separately from any encountered wastes. When waste materials are first encountered, further staging of excavated materials will be atop the polyethylene.

Each interior test pit will be nominally 10 by 10 feet in plan dimensions and will extend two feet below the waste disposal horizon. As the test pits are developed, Remcor's geologist will record/map the needed data, as outlined in Section 2.3, will also map/count the drums encountered to provide a measurement of drum density (i.e., drums per 100 square feet).

Each encountered drum will be brought to the surface in the upturned bucket of the backhoe and inspected for the following:

- Discernible drum markings
- Material color, consistency, and phase (i.e., solid, liquid, sludge)
- Visual presence of asbestos.

If significant quantities of materials are uncovered that apparently contain asbestos, a light water spray will be used to wet such material before proceeding with any further digging.

At each site, an estimated five samples of representative, non-empty drum contents will be extracted, and hazard categorization will be performed at a qualified laboratory as follows:

- pH
- Water solubility
- Hexane solubility
- OVA screen
- Bielstein halogen test
- Open-cup ignitibility.

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In addition, three soil samples will be collected in each test pit as follows:

- Soil mixed with drums
- Soil in the zero- to one-foot depth interval below the drums
- Soil in the one- to two-foot depth interval below the drums.

These soil samples (12 total) will be analyzed for the following criteria at a qualified laboratory using methods developed or approved by the U.S. Environmental Protection Agency (EPA):

- Extraction procedure (EP) toxicity metals (copper will be substituted for silver)
- Indicator volatile organics (VOC):
 - 1,1,1-trichloroethane (TCA)
 - Trichloroethylene (TCE)
- Asbestos.

Each sample will be numbered and logged prior to shipment for categorization or analysis. Chain-of-custody forms will be completed, including signatures, time, and date.

2.5 TASK 5 - RESTORE SITE

After completion of necessary observations, mapping, and sampling, each interior test pit will be lined with six-mil polyethylene. These pits will then be backfilled first with exhumed waste material and drums, followed by the polyethylene staging area liner, and finally the overburden soil. The test pit boundaries will then be staked, and the disturbed area around each pit will be graded to the general contours found prior to excavation.

Provisions will be made in the field to overpack or repackage any drum that is breached in handling causing leakage of liquids or sludges. Any

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such overpacked or repackaged drum would also be returned to the lined excavation during site restoration activities.

2.6 TASK 6 - SURVEY

A Pennsylvania registered professional surveyor will perform a field survey of each drum burial area, locating all interior and perimeter test pits. A survey plat will be developed showing plan locations and topography of each area.

At this time the surveyor will also research property ownership data (e.g., deeds, tax maps) available at the Adams County courthouse to prepare an approximate property line map for both the North and South Areas. If property ownership is in doubt after preparation of this approximate map, a field survey will be performed as needed to define property boundaries.

2.7 TASK 7 - PREPARE AND SUBMIT REPORT

Remcor will prepare and submit a report to Westinghouse describing all data recorded during the drum burial area. This report will describe the following:

- Field procedures employed during drum assessment
- Geological descriptions of native soils, fill, and perched ground water (if any)
- Mapping of all interior and perimeter test pits
- Results of categorization of drum contents
- Analytical results of subsurface soil testing
- Full supporting documentation of all personnel, equipment, and materials used in the execution of the drum assessment.

Based on the results of the assessment, Remcor will compile our best estimate of the quantities of work tasks associated with site remediation.

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3.0 HEALTH AND SAFETY PLAN

This health and safety plan describes the program to be implemented by Remcor during the assessment activities at the suspected drum burial areas. The objective of this plan is to provide site-specific procedures to protect the health and safety of personnel during the conduct of this project and to mitigate the potential for off-site release of contaminants. All work will be performed in accordance with applicable federal, state, and local regulations, including:

- U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) - 29 Code of Federal Regulations (CFR) 1910 and 29 CFR 1926
- U.S. Environmental Protection Agency (EPA) - 40 CFR 260 to 267.

Requirements of this plan apply to all Remcor personnel. Westinghouse, and regulatory personnel, as well as other site visitors, will be expected to comply with the provisions of this plan.

3.1 PROGRAM DESIGN

The health and safety practices, procedures, and personnel protective equipment are based on site characterization and hazard assessment. Site characterization and hazard assessment are ongoing activities and the level of protective procedures and practices will be continuously evaluated during the conduct of this work to provide a safe working environment. All protective measures employed will be commensurate with hazards associated with specific work activities and job tasks.

All employees will be adequately trained in health and safety aspects of their specific job assignments and in all aspects of this plan, including:

- Program organization and responsibilities
- Site characterization and hazard assessment
- Medical surveillance requirements
- Work practices and site control

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- Personal protective equipment
- Monitoring
- Materials handling and decontamination
- Emergency response
- Record keeping.

3.2 PROGRAM ORGANIZATION AND RESPONSIBILITIES

The design and implementation of the health and safety plan are accomplished through an integral team effort of the following:

- Remcor Project Manager - Responsible for all project activities including continuous adherence to and implementation of the site health and safety plan
- Health and Safety Officer - Responsible for general development and administration of the site health and safety plan and monitoring of compliance with the plan
- On-Site Project Superintendent - Responsible for executing project requirements on site, including health and safety requirements
- Field Health and Safety Personnel - Responsible for field implementation and day-to-day operation of health and safety program.

All employees, including subcontract employees, are required to be familiar with and comply with the health and safety plan. Personnel are encouraged to offer ideas, suggestions, or recommendations regarding operational conditions, procedures, or practices which may enhance the health and safety of affected personnel.

3.3 HAZARD ASSESSMENT

3.3.1 Organic Solvents

The drum disposal areas may contain a variety of nonhalogenated and halogenated organic solvents; specific compounds are not yet defined. The primary exposure pathway of concern is inhalation due to the volatility of organic compounds. Skin contact and ingestion are secondary to inhalation but still of concern.

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Control of the inhalation exposure pathway will be provided by the use of respiratory protection equipment. Control of the ingestion exposure pathway will be through the institution of good personal hygiene practices during site work. Appropriate protective clothing will be worn to mitigate skin contact as an exposure pathway during site operations.

3.3.2 Asbestos

Asbestos-containing fiberboard on site presents a hazard if dust containing asbestos fibers is released during excavation and subsequently inhaled. The inhalation pathway will be controlled through the use of respiratory protection equipment. Skin contact and ingestion pathways present no significant hazard. Protective clothing and good personal hygiene will negate skin contact and ingestion exposure pathways.

3.3.3 Heat Stress

There are three levels of physiological response to heat stress (in order of severity):

- Heat cramps
- Heat exhaustion
- Heat stroke.

Heat cramps occur within specific muscles due to the depletion of body electrolytes (salts) from excessive perspiration. Heat exhaustion is a systemic reaction to dehydration due to excessive perspiration. Symptoms may include weakness, fatigue, nausea, and/or headaches; sweating is profuse. Skin color is normally flush. Heat stroke is the most serious response and occurs when the body's system to regulate internal temperature fails. Symptoms are hot, dry skin; mental confusion or delirium; convulsions or unconsciousness; and body temperature of 105 degrees Fahrenheit (°F) or higher. In this situation, medical attention is needed immediately.

To prevent the potential effects of heat stress, breaks will be taken as needed. Drinking of liquids designed to replace lost body salts (e.g.,

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Gatorade™) due to sweating should prevent heat stress problems from occurring.

3.4 MEDICAL SURVEILLANCE

Medical screening provides a method of identifying those employees whose medical history indicates potentially increased health risk when exposed to chemicals present within the working environment. The medical screening directly and indirectly measures the functional activity of organs effected by potential chemical exposure during the work and includes physiological tests of parameters having a clinical relevance to the potential chemical exposure.

Employees are required to undergo medical examinations in compliance with Remcor's medical surveillance program. This includes a preemployment medical examination and laboratory studies along with an annual re-examination. Each employee whose work involves the potential to exposure to hazardous materials will have medical screening which includes a complete history and physical examination along with baseline laboratory studies.

The medical surveillance includes a judgment by the examining physician of the ability of the employee to use respirators. Only employees who have successfully completed Remcor's medical surveillance program are cleared to work with hazardous materials.

3.5 WORK PRACTICES AND SITE CONTROL

To protect the health and safety of project personnel, safe work practices will be established and implemented for each of the job tasks to be completed. Work practices to mitigate the potential for exposure to hazardous materials includes evaluation of the waste characterization data and selection of appropriate protective clothing to prevent skin contact with hazardous materials.

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The buddy system is an integral part of Remcor's safe work practices. All site activities that involve safety hazards and/or the potential for contact with hazardous materials will be performed by a work team of no fewer than two people. For high-hazard activities, an additional person will serve as a watcher or rescue person.

3.5.1 Personal Hygiene

Administrative procedures require hygienic practices consistent with work hazards. Eating and food preparation is prohibited in any area other than those designated and properly protected. No food or beverages will be permitted in the work area, including items such as candy, gum, snuff, cigarettes, and chewing tobacco.

Employees who handle contaminated materials or articles must wash with soap or mild detergent and water before eating. A hand wash station and emergency eyewash station will be established within the CRZ at each work area. To avoid potential hand-to-mouth contamination, smoking or carrying of tobacco products is prohibited in the work area. The site supervisor will perform inspections and document variations or violations.

Site activities could potentially contribute to the movement of contaminants from the work area to unaffected areas. Site personnel and equipment may become contaminated and, if preventative steps are not taken, carry the material into clean areas. To minimize the transfer of hazardous substances from the site due to site activities, contamination control procedures will be employed:

- Establishment of site work zones
- Establishment of decontamination procedures.

The work sites will be controlled to reduce the possibility of exposure to any contaminants present and their transport by personnel or equipment from the work areas.

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The possibility of exposure or transfer of contaminated substances will be reduced or eliminated in a number of ways, including:

- Setting up barriers to exclude unnecessary personnel from contaminated areas
- Minimizing the number of personnel and equipment at the site
- Establishment of work zones within the site
- Establishment of control points with regular access to and egress from work zones
- Conduct of operations in a manner to reduce the exposure of personnel and equipment
- Implementation of appropriate decontamination procedures.

3.5.2 Delineation of Work Zones

Work zones will be delineated with prescribed operations associated with each zone. Movement of personnel and equipment between zones and on to the site itself will be limited by access control points. By these means, contamination will be contained within certain relatively small areas on the site and its potential for transfer minimized. Three contiguous zones will be defined:

- Zone 1 - Exclusion Zone
- Zone 2 - Contamination Reduction Zone (CRZ)
- Zone 3 - Support Zone.

The exclusion zone or hot zone is the area where contamination exists. All personnel within the exclusion zone must wear the required level of protective gear. Personnel protective equipment is designated on the basis of site specific conditions, including the job task to be performed and the hazard which might be encountered. Occasionally, within the exclusion zone, different levels of protection are justified. The level of protection required is determined by the concentration of contamination present and the job task to be performed.

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Adjacent to the exclusion zone is the CRZ, which provides an area of transition between contaminated and clean zones. The CRZ serves as a buffer to reduce the probability of the clean zone becoming contaminated. Decontamination stations for both personnel and equipment are established in the CRZ.

The support zone is a noncontaminated or clean area. Support equipment is located in this zone. Normal work clothes are appropriate within this zone and potentially-contaminated personal clothing and equipment and samples are not permitted but are left in the contamination reduction zone until they are decontaminated.

The final locations of site work zones will be based on the judgment of the site Health and Safety Officer. Adequate room will be allowed for necessary operations within each zone, and will provide adequate distances to prevent the spread of contamination.

3.6 PERSONAL PROTECTIVE EQUIPMENT

The objective of Remcor's protective equipment program is twofold:

- To protect workers from safety and health hazards present at hazardous waste sites
- To prevent injury to workers from incorrect use and/or malfunction of personal protective equipment (PPE).

Anyone entering hazardous waste sites must be protected against potential hazards. The purpose of PPE is to shield or isolate individuals from the chemical, physical, and biological hazards that may be encountered at a hazardous waste site.

No single combination of protective equipment and clothing is capable of protecting against all hazards. Thus, PPE should be used in conjunction with other protective measures such as good work practices. The use of PPE can itself create significant worker hazards, such as heat

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stress, physical and psychological stress, impaired vision, mobility, and communication. In general, the greater level of PPE protection, the greater the associated risks. For any given work situation, equipment and clothing will be selected to provide an adequate level of protection. Overprotection as well as underprotection can be hazardous and will be avoided.

3.6.1 Levels of Protection

Personnel must wear protective equipment when work activities involve known or suspected air contamination, when vapors, gases, or particulates may be generated, or when direct contact with skin affecting substances may occur. Respirators are used to protect the lungs, gastrointestinal tract, and eyes against air toxicants. Chemical-resistant clothing can protect skin from contact with skin destructive and absorbable materials. Good personal hygiene limits or prevents ingestion of materials.

Equipment to protect the body against contact with chemical hazards is divided into four categories according to the degree of protection accorded:

- Level A - Should be worn when the highest level of respiratory, skin, and eye protection is needed
- Level B - Should be worn when the highest level of respiratory protection is needed, but a lesser level of skin protection is needed
- Level C - Should be worn when the types of airborne substances are known, the concentrations have been measured, and the criteria for using air-purifying respirators are met
- Level D - Should not be worn on any site where respiratory or skin hazards are present. Level D is primarily a work uniform providing minimal protection.

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The level of protection selected is based primarily on:

- The type, toxicity, and measured concentrations of the chemical substances
- The potential or measured exposure to substances in the air, splashes of liquids, or other direct contact with materials due to the work being performed.

While PPE reduces the potential for contact with harmful substances, insuring the health and safety of personnel requires, in addition, safe work practices, decontamination, and other safety considerations. Together, these practices establish a combined approach for reducing potential harm to workers.

3.6.2 General Site Level of Protection

Due to potential for exposure to asbestos during all site activities, the minimum level of protection to be worn during site activities will be Level C protection.

3.6.3 Specific Operations

3.6.3.1 Perimeter Test Pits

The level of protection selected for these activities is Level C, which includes the following personal protective equipment:

- Chemical-resistant outer clothing (overalls, coveralls, hooded one- or two-piece chemical splash suit, and/or disposable chemical resistant coveralls)
- Chemical-resistant outer gloves
- Chemical-resistant inner gloves
- Chemical-resistant steel-toe boots or boot covers over safety shoes
- Hard hat
- Safety glasses and/or face shield

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- Air-purifying respirator with Type GMC organic vapor/acid gas cartridges and high-efficiency particulate filters.

3.6.3.2 Interior Test Pits

The level of protection selected for these activities is Level B, consisting of the following protective equipment:

- Chemical-resistant outer clothing (overalls, coveralls, hooded one- or two-piece chemical splash suit, and/or disposal chemical-resistant coveralls)
- Chemical-resistant outer gloves
- Chemical-resistant inner gloves
- Chemical-resistant steel-toe boots
- Hard hat
- Pressure-demand air-line respirator.

An air monitoring program has been designed and the use of respiratory protective equipment will be determined based on monitoring results. The air monitoring program is fully described in Section 3.7.

3.7 AIR MONITORING

Air quality monitoring is an integral part of the health and safety program; the collected data serves as input to decisions regarding worker protective measures, routing work procedures, and emergency events. The air quality monitoring program requirements will include intermittent, real-time measurement of organic concentrations.

A portable OVA will be used to conduct air monitoring of the test pits. Prior to use, the meter will be calibrated according to the manufacturer's instructions.

Due to the fact that asbestos can be present and exact make up of the organic solvents is unknown, Level C protection will be worn regardless

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of OVA readings. If sustained OVA readings of 25 parts per million (ppm) or greater are obtained in the breathing zone, supplied air respirators will be required (Level B protection). After each interior test pit is dug, if the OVA readings are consistently below 25 ppm, personnel will be permitted to downgrade to Level C protection.

3.8 EMERGENCY PROCEDURES

The health and safety program for the project has been established to allow site operations to be conducted without adverse impacts on worker health and safety. In addition, supplementary emergency response procedures have been developed to cover extraordinary conditions that might possibly occur at the site.

3.8.1 General

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

- First aid or other appropriate initial action will be administered by those closest to the accident/unusual event. This assistance will be conducted in a manner to assure that those rendering assistance are not placed in a situation of unacceptable risk.
- All accidents/unusual events must be reported to the Site Supervisor. The Site Supervisor is responsible for conducting the emergency response in an efficient, rapid, and safe manner. He will decide if off-site assistance and/or medical treatment is required and arrange for assistance.
- All workers on site are responsible to conduct themselves in a mature, calm manner in the event of an accident/unusual event. All personnel must conduct themselves in a manner to avoid spreading the danger to themselves and to surrounding workers.

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The following emergency equipment will be available at each site support or contamination reduction zone:

- First-aid kit
- Fire extinguisher
- Emergency eyewash station.

The Site Supervisor will be responsible for documenting all accidents/injuries.

3.8.2 Responses to Specific Situations

Emergency procedures for specific situations are given in the following paragraphs.

3.8.2.1 Worker Injury

If an employee working in a contaminated area is physically injured, Red Cross first-aid procedures will be followed. Depending on the severity of the injury, emergency medical response may be sought. If the employee can be moved, he will be taken to the edge of the work area (on a stretcher, if needed) where contaminated clothing will be removed, emergency first aid administered, and transportation to a local emergency medical facility awaited. Emergency numbers will be posted on site.

If the injury to the worker is chemical in nature (e.g., overexposure), the following first aid procedures are to be instituted:

- Eye Exposure - If contaminated solid or liquid gets into the eyes, wash eyes immediately at the emergency eyewash station using large amounts of water and lifting the lower and upper lids occasionally. Obtain medical attention immediately. Contact lenses will not be worn when working.
- Skin Exposure - If contaminated solid or liquid gets on the skin, promptly wash the contaminated skin using soap or mild detergent and water. If solids or liquids penetrate through the clothing, remove the clothing immediately and wash the skin using soap or mild detergent and water. Obtain medical attention immediately.

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- Swallowing - If contaminated solid or liquid has been swallowed and the person is conscious, give the person large quantities of salt water immediately and induce vomiting. Do not make an unconscious person vomit. Obtain medical attention immediately if signs of overexposure develop.
- Breathing - If a person breathes in large amounts of organic vapor, move the exposed person to fresh air at once. If breathing has stopped, perform artificial respiration. Keep the affected person warm and at rest. Obtain medical attention as soon as possible.

3.8.2.2 Fires

Fire extinguishers will be provided on site. If a localized fire breaks out, chemical fire extinguishers will be used to bring the occurrence under control. If necessary and feasible, soil or other inert materials will be placed on the burning area to extinguish the flames and minimize the potential for spreading. If appropriate, local fire-fighting authorities will be contacted for notification and/or assistance.

If an uncontrolled fire develops releasing potentially toxic gases, persons in the immediate vicinity will be evacuated. Only personnel trained in fire fighting and outfitted with proper protective equipment will be allowed in the immediate fire area. The Site Supervisor will alert local fire-fighting companies.

3.8.3 Public Response Agencies

Following is a list of public response agencies which may be contacted dependent on the nature of the situation. They may assume authority for emergency response. In the event that this occurs, Westinghouse personnel shall assist the agency in charge. Telephone numbers for the emergency agencies are listed below:

<u>Agency</u>	<u>Telephone No.</u>
Fire Department	- 717/334-8300
Police Department	- 717/334-1168
Hospital: Annie M. Warner Hospital	- 717/334-2121

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Poison Control Center:

- Local: Annie M. Warner Hospital - 717/334/2121
- National: - 1-800-424-8802

3.9 TRAINING

All Remcor employees have received hazardous waste operations training in compliance with OSHA regulations. In addition, site employees will receive an initial health and safety briefing and regular on-site training during the course of this project.

Initial training will cover this Health and Safety Plan. Additional training sessions will deal with specific job-related tasks. All training sessions will be documented using Form HS-3 (Appendix A).

3.10 RECORD KEEPING

All site health and safety activities will be properly documented using forms contained in Appendix A. In addition, the following notification and records will be posted on site:

- OSHA poster
- OSHA 200 Form
- Pennsylvania Right-to-Know poster
- Equal Employment Opportunity (EEO) poster.

Any unusual events will be recorded in the site daily log.

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4.0 COMMUNITY RELATIONS PLAN

The assessment of drum disposal sites at the Hunterstown Road site may create significant local interest; careful planning and execution of all project activities is required for successful project completion. Formal community relations are the responsibility of Westinghouse and the EPA. The following paragraphs describe the policy to be employed by Remcor personnel working on this project.

Any formal inquiries (e.g., media, local governmental bodies) relative to the scope of activities or project objectives will not be addressed by Remcor personnel but immediately referred to the Westinghouse Project Manager:

Mr. Paul P. Jack
Project Engineer
Environmental Control
Westinghouse Electric Corporation
Westinghouse Building
Gateway Center
Pittsburgh, PA 15222
412/642-3192

In addition to formal inquiries, there may be casual/informal questions or inquiries by local residents. Remcor's policy in addressing these questions or comments is to provide a response that is brief, factual, and courteous. The standard reply to questions such as "what are you doing?" is simply that we are performing a site assessment project for Westinghouse. Any further questions would then be referred to the Westinghouse Project Manager. Remcor will provide the Westinghouse Project Manager a list of all persons/agencies who contact Remcor personnel about this project and prepare a short summary of each question or concern.

All correspondence to regulatory agencies will be conducted by Westinghouse.

AR101195

5.0 SCHEDULE

Remcor will initiate site work within two days after receipt of approval of this work plan. Site work is planned to be completed within seven work days after mobilization. The final project report, including analytical data, will be presented to Westinghouse 14 days after completion of the field site assessment. Severe inclement weather or unforeseen delays in laboratory analysis turnaround could adversely affect this schedule. Westinghouse will be notified immediately regarding any anticipated schedule changes.

AR101196

6.0 RECORD KEEPING AND REPORTING

6.1 SITE RECORDS

Appendix A contains the forms that will be used to document site activities on a day-to-day basis. The following routine forms will be completed daily:

- Foreman's Daily Report
- Field Activity Daily Log
- Training Session Documentation Record
- Health and Safety Equipment Log.

Other (non-routine) forms will be completed as required. These include:

- Sample Log and Chain-of-Custody Forms
- Initial Accident Report Form
- Visitor's Log.

Completion of all routine and non-routine forms is the responsibility of the Remcor Site Supervisor. These forms will be filed at the job site as they are completed and transmitted on a weekly basis to the Remcor Project Manager for review, office filing, and forwarding to Westinghouse.

AR101197

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FIGURES

AR101198



APPENDIX A
HEALTH AND SAFETY FORMS

AR101199

JOBSITE SAFETY CHECKLIST

Project _____

Project No. _____ Person Making Inspection _____

Jobsite Location _____

Date of Inspection _____

- | | |
|---|--|
| A. Adequate at time of inspection.
B. Needs immediate attention. | C. Item not applicable.
N/A No items in section applicable. |
|---|--|

Check one of the following:

Check one of the following:

A. Posters & Records N/A

- | | A | B | C |
|--|--------------------------|--------------------------|--------------------------|
| 1. OSHA poster displayed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Foremen holding weekly safety meetings — recording? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Emergency medical numbers posted? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Explosives inventory current? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Copy of OSHA regulations on jobsite? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Have utility contacts been made/recorded? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Are safety talk subjects available? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. Blank accident report forms available? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. Using Employment Applications before hiring? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. Are Safety posters being displayed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

B. Housekeeping & Sanitation N/A

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| 11. General housekeeping of jobsite? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 12. Passageways and walkways clear? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 13. Nails removed from lumber? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 14. Materials of all types properly stockpiled? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 15. Is an area provided for waste and trash and is it removed regularly? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 16. Adequate lighting in passageways, stairways and work areas? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 17. Toilet facilities adequate and clean? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 18. Sanitary supply of drinking water? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 19. Disposable drinking cups and refuse container? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 20. Means provided for sanitizing personal protective equipment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

C. Fire Protection N/A

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| 21. Are "No Smoking" or "Flammable" signs posted at all storage and fueling locations? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 22. Clear access provided to all fire fighting equipment/are inspections recorded? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 23. Location of all fire fighting equipment prominently marked? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 24. Are flammable liquids stored in approved containers? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 25. Fire extinguishers adequate size? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 26. Large fuel tanks properly diked and separated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- D. First Aid** **ARAD 200**
- | | | | |
|--------------------------------------|--------------------------|--------------------------|--------------------------|
| 27. First Aid Kits well stocked? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 28. Trained first-aiders on jobsite? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

E. Electrical N/A

- | | A | B | C |
|---|--------------------------|--------------------------|--------------------------|
| 29. Distribution boxes covered or marked? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 30. GFI's in use or positive grounding been tested? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 31. Temporary lighting protected? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

F. Tools N/A

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| 32. Damaged or broken tools tagged out of service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 33. Proper storage space provided? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 34. Operative guards on all power tools? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 35. Persons using powder actuated tools certified? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 36. Are guards provided on grinders? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 37. Airhose couplers secured or safety valve in line? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 38. Tools being properly used? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 39. Correct personal protection being used? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 40. Extension cords tested for assured ground? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

G. Structures N/A

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| 41. Floor openings covered or guardrailed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 42. Standard guardrailing on scaffolds, bridge decks, floors of buildings, work platforms and walkways? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 43. Work areas clear of debris, snow, ice, and grease? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 44. Adequate fire protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 45. Stairways provided with handrails? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 46. Hollow pan-treads filled with solid material? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 47. Ladders properly constructed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 48. Side rails of ladders extend 36" above landing? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 49. Scaffolds properly anchored, braced and plumb? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 50. Protection provided over vertical rebars when working above? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 51. Safety belts in use when guardrails are absent? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 52. Employees clear of swinging crane loads? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 53. Tag lines used on suspended crane loads? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 54. Gas cylinders separated, secured upright and capped if not in use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 55. Safety lines in use on suspended scaffolds? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 56. Heating devices properly ventilated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 57. Gates functioning on all levels when material or personnel hoists used? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 58. Safe procedures being used to wreck forms? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |



A. Adequate at time of inspection.
B. Needs immediate attention.

C. Item not applicable
N/A No items in section applicable.

Check one of the following:

Check one of the following:

- H. Traffic Control N/A
59. Advance signing at approaches to work areas?
60. Correct message on signs?
61. Traffic control set-up on highways meet ODOT regulations?
62. Flag persons properly dressed and equipped?
63. Flag persons performing properly?

- I. Welding & Cutting N/A
64. Using right type eye protection?
65. Gages, valves, torches and lines in good condition and free of oil and grease?
66. Cylinders not in use capped?
67. Cylinders in use or storage secured upright?
68. Anti-flashback valves at torch?
69. Stored oxygen separated from acetylene by 20 ft.?
70. Fire extinguisher near welding or cutting operations?
71. Adequate ventilation provided?
72. Grounding for arc welding machine?
73. All parts of arc welding outfits properly insulated?

- J. Heavy Equipment N/A
74. Operators wearing hard hats?
75. Hearing protection being used?
76. Dust Control?
77. Haul road adequate and maintained?
78. Equipment speeds excessive for safety?
79. Horns and back-up alarms functioning?
80. Clearing cabs on machines when clearing?
81. Engines shut-down when refueling or lubricating?
82. Seat belts on machines with ROPS?
83. Steps and hand holds adequate and safe condition?
84. Adequate lighting of haul roads at night?
85. Parked or unattended equipment have blade lowered to the ground?
86. No hitchhikers riding on equipment?
87. Full fire extinguisher near refueling tank?
88. Dump man prominently located?
89. Overhead guard on fork lift truck?
90. Vehicles with restricted rear visibility equipped with operating back-up alarms?

- K. Cranes N/A
91. Power line distance from machines?
92. Annual inspection?
93. Cables in safe condition?
94. Rear swing protection and pinch point guarding?
95. Exposed gears, shafts and belts guarded?
96. Fire extinguisher, boom angle indicator, load capacity chart and hand signal poster in crane?
97. Signs and/or flags on cranes in transit?
98. Operator making daily inspections and tests?

- Trenching & Excavations N/A
99. Trench side shored, layed back or boxed?
100. Utilities contacted and located before digging?
101. Ladder in the trench?
102. Stop logs placed where necessary along top of the trench?

103. Excavated material stockpiled far enough from the edge of the trench?
104. Laser warning signs in place?
105. Adequate ventilation in pipe?
106. Traffic control adequate?
107. Sides of excavation for building shored or protected?
108. Oxygen level tested in tunnel, shafts or confined space?
109. Public protected from exposure to open excavation?

- M. Miscellaneous N/A
110. Sufficient quantities of approved personal protective equipment on the jobsite?
111. Procedures established to handle toxic and carcinogenic materials?
112. Sewers, vaults, tanks and bins tested for adequate oxygen levels before employees are permitted to enter?
113. Everyone wearing hard hat?
114. Fall protection being used on steel erection?
115. Walls properly braced (concrete and block construction)?
116. Toxic fumes, vapors and dusts present, is ventilation adequate?
117. Guards in place and used on wood working machines?
118. Explosives being used, transported and stored in compliance with regulations?
119. Blaster following all safety precautions?
120. Tunneling operations/lighting and ventilation adequate?
121. Belts, pulleys, shafts, gears and chains guarded on all machinery and equipment?
122. Masonry saws grounded and personal protective equipment being used?
123. Exit signs over doors in offices and storage buildings?

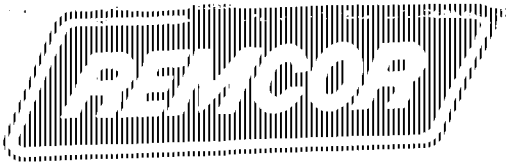
*This checklist does not include all hazards on every job, but is intended to remind you of most common hazards.

Unsafe acts and/or practices observed:

I the undersigned superintendent have reviewed the indicated hazards and will take the necessary action to immediately correct them.

AR101201

Signature of Project Supervisor



EQUIPMENT DAMAGE/LOSS REPORT

1. PROJECT: _____ PROJECT NO. _____

AM

2. DATE AND TIME OF LOSS _____ PM

3. LOSS LOCATION: _____

4. EQUIPMENT DAMAGED _____ 5. COMPANY NO. _____

6. SERIAL NO. _____ 7. PLATE NO. _____ 8. STATE _____

9. OWNER: _____

10. OPERATOR AND ADDRESS: _____

11. DESCRIBE LOSS: _____

12. LIST OUR DAMAGE: _____

13. ESTIMATED REPAIR COST: _____ 14. WHAT POLICE NOTIFIED _____

15. PROPERTY DAMAGE _____

16. OTHER OWNER/OPERATOR: _____

17. OTHER INSURANCE COMPANY: _____

18. LIST OTHER DAMAGE _____

19. WITNESS: _____

20. TYPE OF LOSS: _____ Coll _____ Theft _____ Fire _____ Water _____ Wind _____ Other _____

REPORTED BY _____ SUPERINTENDENT _____

APR 10 1964



3/1/78

ORGANIC VAPOR MONITORING CHECKLIST

Project:

Location:

Instrument:

Serial Number:

Calibration Gas: 1. Compound _____ 2. Concentration _____

Calibrate Daily Before Use

<u>Date</u>	<u>Time</u>	<u>Reading</u>	<u>Analyst</u>	<u>Notes</u>
-------------	-------------	----------------	----------------	--------------

AR101207



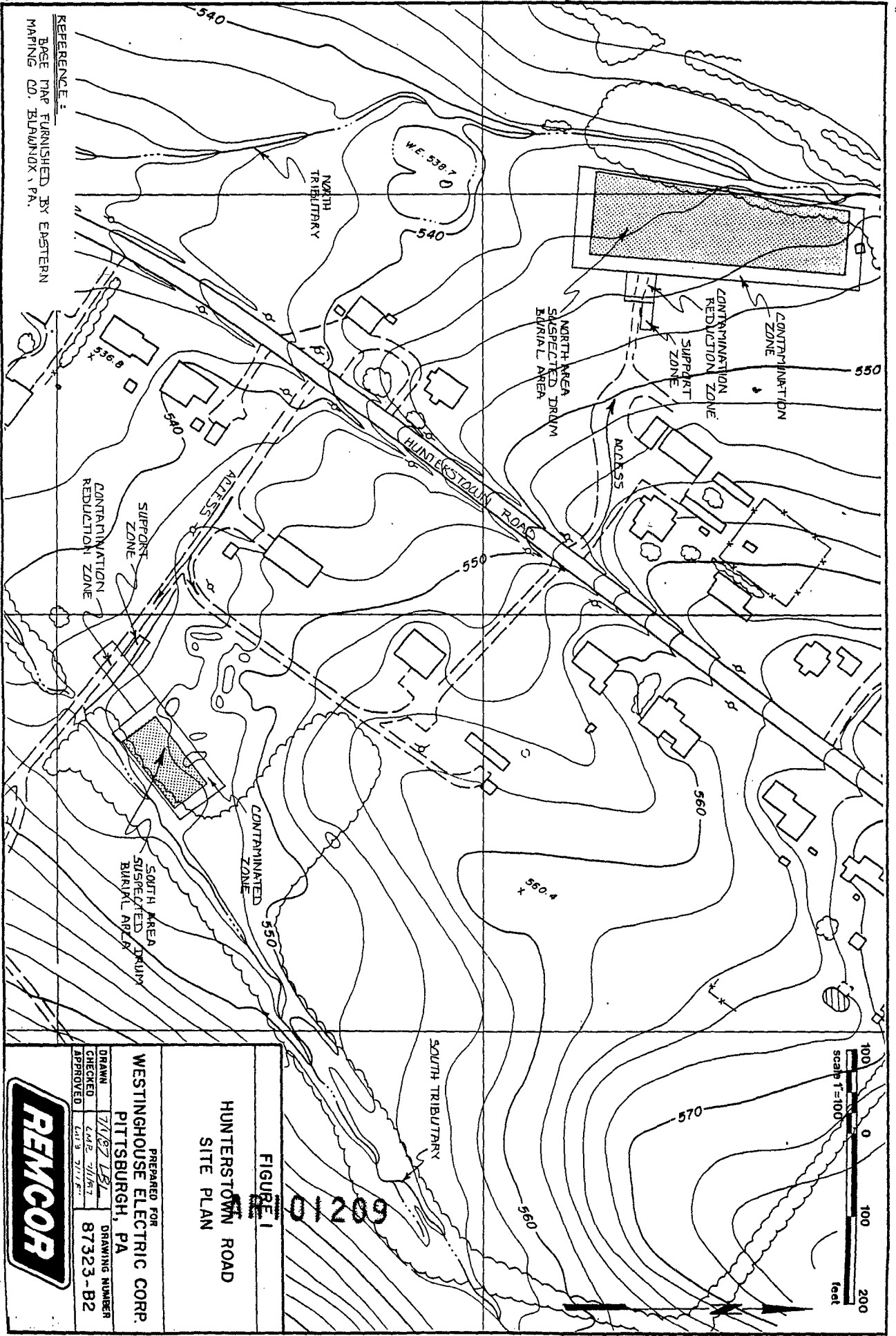
**"REALISTIC SOLUTIONS FOR
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REFERENCE:
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MAPPING CO., ELDON, PA.



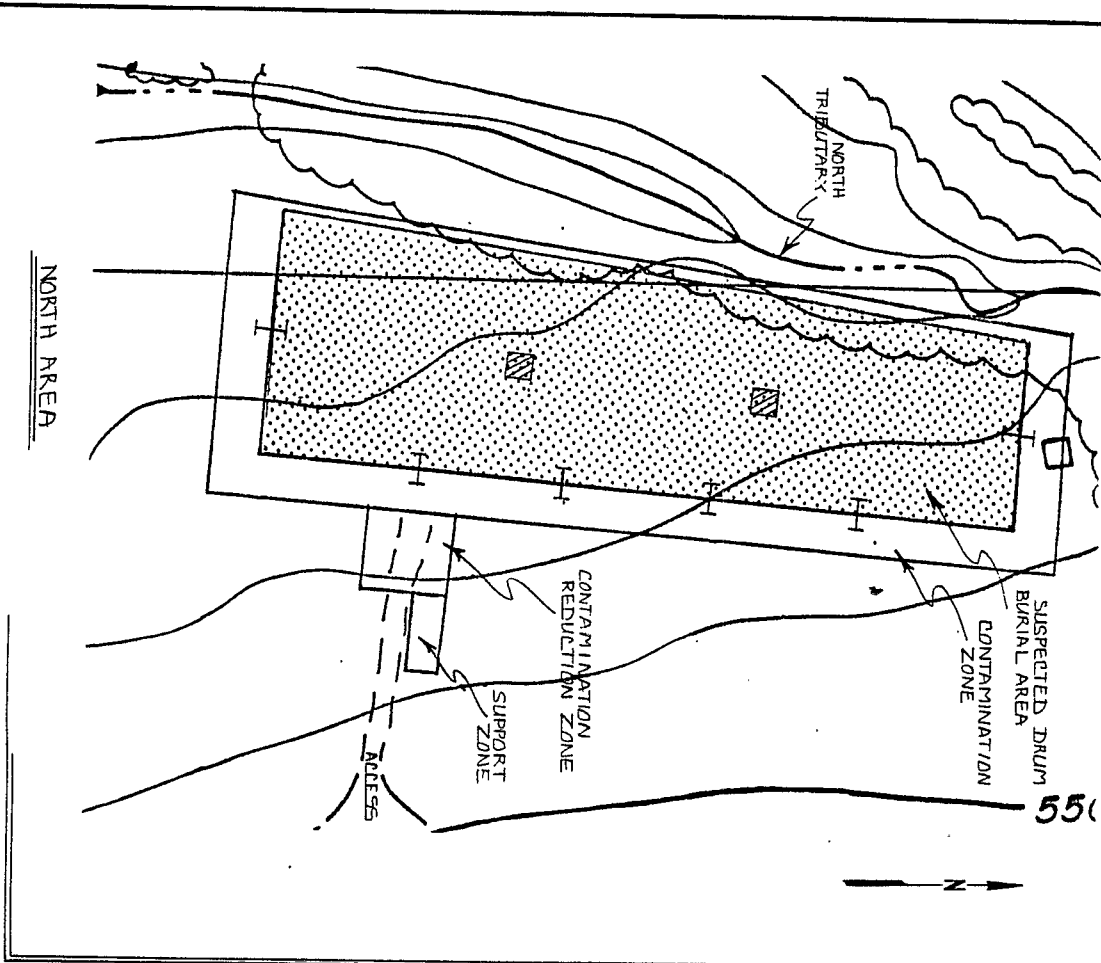
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FIGURE 1
HUNTERSTOWN ROAD
SITE PLAN

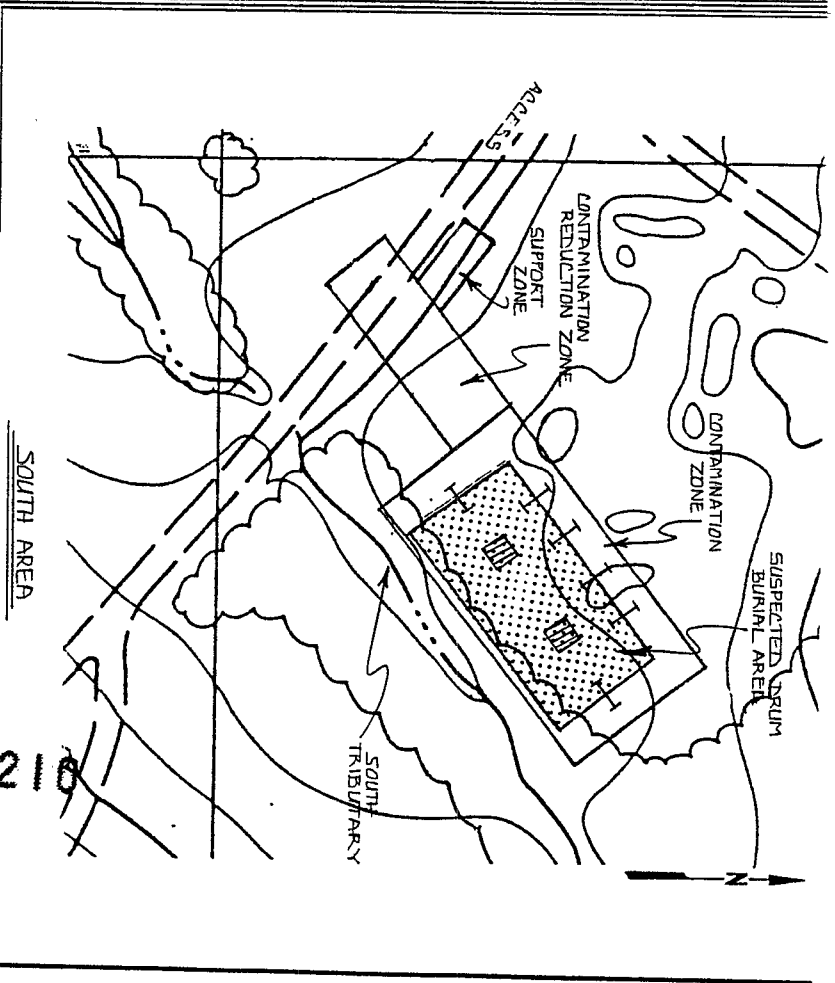
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CHECKED	4/18/87	7/1/87	87323-B2
APPROVED	4/13/87	7/1/87	





550






- LEGEND:
-  SUSPECTED DRUM BURIAL AREA
 -  INTERIOR TEST PTT
 -  PERIMETER TEST PTT



FIGURE 2

DETAIL PLAN OF DRUM BURIAL

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DRAWN	7/1/87 LAB	DRAWING NUMBER
CHECKED	LMB 3/1/87	87323-B3
APPROVED	LMB 7/1/87	

