

## **VII. APPENDICES**

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### **B. ESA/Hazardous Materials**

Appendix B4

- EHASP/CAMP

**ENVIRONMENTAL HEALTH AND SAFETY PLAN/  
COMUNITY AIR MONITORING PLAN  
FOR  
PROPOSED COSTCO WHOLESALE RETAIL STORE  
3200, 3216, 3220 CROMPOND ROAD  
3220 OLD CROMPOND ROAD  
TOWN OF YORKTOWN  
WESTCHESTER COUNTY, NEW YORK**

Prepared for:

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**TABLE OF CONTENTS**

**Page**

1. INTRODUCTION..... 2

1.1 Background Information..... 2

2. HEALTH AND SAFETY/ENVIRONMENTAL MONITORING PROCEDURES..... 3

2.1 Project Scope ..... 4

2.2 Training Requirements..... 4

2.2.1. Environmental Monitoring Officer ..... 4

2.2.2. Training Requirements for On-Site Workers..... 5

2.2.3. Medical Surveillance ..... 5

2.2.4. Disclosure of On-Site Contamination..... 5

2.3 General Environmental Monitoring Procedures ..... 6

2.4 Hazard Ranking and Identification ..... 6

2.5 Exposure Limits ..... 8

2.5.1. New York State DEC and DOH Limits..... 8

2.6 Community Air Monitoring ..... 9

2.6.1. Air Monitoring Program Description ..... 9

2.7 Personal Protection/Protective Equipment ..... 10

2.7.1. Hearing Protection ..... 11

2.7.2. Protective Clothing (Personal Protective Equipment) ..... 11

2.8 Site Control ..... 11

2.9 Spill Containment ..... 12

3. EMERGENCY RESPONSE ..... 13

3.1 Plan ..... 13

3.2 Contacts ..... 13

3.3 Directions to Hospital ..... 13

## 1. INTRODUCTION

The following Environmental Health and Safety Plan/Community Air Monitoring Plan (EHASP/CAMP) provides the technical training requirements and general environmental health and safety procedures for personnel involved in the demolition, remediation, and site redevelopment of the property located at 3200, 3216, and 3220 Crompond Road and 3220 Old Crompond Road in the Town of Yorktown, Westchester County, New York (herein referred to as "site"). It also provides a real-time Community Air Monitoring Plan prepared in accordance with NYSDEC guidelines designed to ensure that permissible exposure limits are not exceeded for tenants, occupants, and residents of the properties surrounding the site.

### 1.1 Background Information

The site is improved with several dilapidated motel buildings, a former gasoline station, a landscape supply nursery, lawn mower repair shop, and two single-family residences. Phase I Environmental Site Assessment and Phase II Investigation activities identified several underground storage tanks, aboveground storage tanks, septic systems, volatile organic contaminated soils, and naturally occurring heavy metals in the soil at concentrations above NYSDEC soil cleanup criteria. In addition, lead-based paint and asbestos-containing materials were identified in conjunction with several of the buildings. This EHASP/CAMP outlines the technical training requirements and general environmental monitoring procedures that will be implemented during soil-related site development activities, underground storage tank removals, and lead-based paint demolition for the site and includes a community air monitoring program to ensure the safety of the occupants surrounding the site. **This EHASP/CAMP does not include procedures for air monitoring during asbestos abatement. Health and safety oversight during asbestos abatement activities will be the responsibility of the abatement contractor and an independent third party air monitor.**

## **2. HEALTH AND SAFETY/ENVIRONMENTAL MONITORING PROCEDURES**

The following EHASP/CAMP outlines the technical training requirements and general environmental monitoring procedures that will be implemented during soil-related site development activities, underground storage tank removals, PCB remediation, and lead-based paint demolition for the site and includes a community air monitoring program to ensure the safety of the occupants surrounding the site. This EHASP/CAMP incorporates training requirements, safety considerations, and contaminant exposure levels and has been prepared for field use. The Environmental Health and Safety Officer (EHSO) will monitor on-site activities for compliance with this EHASP/CAMP.

**This HASP/EMP is limited to oversight of non-asbestos related environmental issues only and does not encompass construction health and safety (i.e. equipment operation, etc.) that would otherwise be associated with normal construction/earthworking activities, which will be the contractor's and/or client's responsibility. It is the responsibility of any on-site Contractor and/or Subcontractor, to comply with safe work practices in accordance with 29 CFR 1926.**

All field activities associated with the soil-related site development activities, underground storage tank removals, PCB remediation, and lead-based paint building demolition at the site will be conducted in accordance with Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120 and 29 CFR 1926.65), as applicable and NYSDEC Final DER-10 guidelines, 6 NYCRR Parts 375 and 612-14. 29 CFR 1910.120 and 29 CFR 1926.65 are applicable to the environmental remediation and soil handling operations that will be conducted at this site, unless the contractor can demonstrate that the activities being conducted do not involve employee exposure or the reasonable possibility for employee exposure to environmental health hazards. Those persons involved with the specified activities are required to understand and comply with all of the requirements of this EHASP/CAMP. This EHASP/CAMP is limited to environmental activities (i.e. soil-related site development activities, underground storage tank removals, PCB remediation, and lead-based paint demolition) and monitoring of ambient environmental conditions during the completion of such activities.

Technical training requirements, and general health and safety procedures for all personnel directly involved with the implementation of soil-related site development activities, underground storage tank removals, and lead-based paint demolition activities on the subject property are outlined in the following subsections. This EHASP/CAMP incorporates training requirements, safety considerations, and contaminant exposure levels and has been prepared for field use. This EHASP/CAMP will be implemented by the EHSO.

## **2.1 Project Scope**

The purpose of this EHASP/CAMP is to define the environmental monitoring protocols to be followed during the following site demolition and development activities:

- (1) Site preparation/mobilization
- (2) Demolition of buildings containing lead-based paint
- (3) Underground storage tank, aboveground storage tank, and hydraulic lift removals
- (4) PCB Soil Remediation
- (5) Excavation and offsite disposal of volatile organic (VO) contaminated soils
- (6) Excavation, movement, and handling of soils containing elevated concentrations of naturally occurring heavy metals

The content of this HASP/EMP may change or undergo revision based upon additional information that is derived during additional investigatory or remedial activities. EcolSciences must review and approve any changes proposed prior to implementing the changes to the EHASP/CAMP.

## **2.2 Training Requirements**

An onsite EHSO will be present during site demolition and development activities to ensure that all work is conducted in accordance with good environmental practices. The EHSO is responsible for enforcing the EHASP/CAMP.

Site personnel associated with remedial activities will be trained, as per the applicable OSHA requirements in 29 CFR 1910 and 1926, and will be provided with this site-specific EHASP/CAMP. The EHSO will provide tailgate meetings/safety briefings as necessary to communicate relevant health and safety issues associated with site impacts and site remedial work.

### ***2.2.1. Environmental Monitoring Officer***

The EHSO will be present as needed during field activities to ensure that the site demolition, remediation, and development activities are conducted in accordance with this EHASP/CAMP. The EHSO shall undergo minimum training requirements established by 29 CFR 1926.21 and 1926.22, and will have received the mandated 40-hour training course for Health & Safety for Hazardous Waste Site Personnel. Further, the site EHSO will have completed the requisite 8-hour training course for Hazardous Waste Site Supervisors.



### ***2.2.2. Training Requirements for On-Site Workers***

All personnel involved with the site demolition and development activities at the site will have undergone minimum training requirements established by 29 CFR 1926.21 and 1926.22, if applicable. These personnel will have received the mandated 40-hour training course for Health & Safety for Hazardous Waste Site Personnel, if required based on the task being completed. 40-hour training is required for all workers conducting the removal of ASTs, USTs, VOC-impacted soil, and PCB-impacted soil. It is the responsibility of the on-site worker's employer to ensure that all workers onsite have received the proper hazardous waste training and to maintain proof of such training.

### ***2.2.3. Medical Surveillance***

All applicable on-site personnel (i.e. personnel removing ASTs, USTs, VOC-impacted soil, and PCB-impacted soil) involved with the site demolition, remediation, and development activities must have undergone a baseline medical examination as required by OSHA 29 CFR 1910.120 (b)(4)(ii)(D). The examination must include an OSHA-type evaluation of the worker's ability to wear respiratory protective equipment. Personnel who have undergone medical examination within the past year will not need to be re-evaluated. Medical records are to be kept on file by the respective contractors/employers of the on-site workers.

The Medical Surveillance Program shall be instituted by the employer for applicable employees, as per 29 CFR 1910.(f)(2) – which includes: all employees who are or may be exposed to hazardous substances or health hazards at or above the established permissible exposure limit, above the published exposure levels for these substances, without regard to the use of respirators, for 30 days or more a year; all employees who wear a respirator for 30 days or more a year or as required by 1910.134; all employees who are injured, become ill or develop signs or symptoms due to possible overexposure involving hazardous substances or health hazards from an emergency response or hazardous waste operation. The description of the Medical Surveillance Program is as per 29 CFR 1910.120 (f)(3),(4),(5),(6),(7), and (8) as applicable. It is the responsibility of the on-site worker's employer to ensure that all workers onsite undergo appropriate medical surveillance.

### ***2.2.4. Disclosure of On-Site Contamination***

Environmental monitoring procedures will be discussed with the primary contractors working in direct contact with on-site soils, tanks, lifts or lead-based paint. A copy of this EHASP/CAMP will be provided to the client and the primary contractors involved with the site demolition and development activities. The primary contractors will be responsible for notifying

their employees and all subcontractors as to the potential of coming in contact with on-site contaminants and will be responsible for keeping a log of the hours worked on-site as per OSHA 29 CFR 1910.20.

### **2.3 General Environmental Monitoring Procedures**

The following general procedures will be implemented to minimize contact with soil and/or groundwater contaminants:

- Potential contact with contaminants will be minimized.
- Eating, drinking, chewing gum or tobacco, taking medication, and smoking will be prohibited in work areas where the possibility for the transfer of contaminants exists.
- A copy of this site-specific EHASP/CAMP will be provided to the client and primary site-contractor prior to commencing work. It is the responsibility of the Client to provide copies of this plan to all applicable contractors and workers.
- Any required protective outer clothing will be removed and left at a designated drop-off point prior to leaving the work area;
- Upon leaving the work area, hands and face will be thoroughly washed; and
- Any accidents or injuries occurring during the remediation of on-site soils will be reported to the EHSO. All injured personnel will submit a return to work approval signed by a physician prior to returning to work.

### **2.4 Hazard Ranking and Identification**

On-site hazards are classified into four major categories: A) physical; B) chemical; C) physiological stress; and D) biological. These categories are defined as follows:

- A. Physical Hazards** – Physical hazards include close proximity to buildings, motor vehicle and heavy equipment, compressed gas cylinders, hand and power tools, electric hazards (i.e., overhead wires, underground utilities), noise, and falls (i.e., slip and trip hazards and falls in open trenches).
- B. Chemical Hazards** – Chemical hazards include accidental exposure to residual chemicals in on-site soils and groundwater encountered during excavation, if any.
- C. Physiological Stress** – Physiological stress hazards include heat stress and/or cold stress.
- D. Biological Hazards** – Biological hazards include stray animals, insect pests, and contact with irritant plants.



This EHASP/CAMP analyzes the potential site hazards and safety and health risks as described below.

<b>HAZARD IDENTIFICATION</b>		
<b>PHYSICAL HAZARDS</b>	<input checked="" type="checkbox"/> Overhead Wires	
	<input checked="" type="checkbox"/> Underground Utilities	
	<input checked="" type="checkbox"/> Heavy Equipment	
	<input type="checkbox"/> Confined Space - Permit Required	
	<input checked="" type="checkbox"/> Trips and Falls	
	<input checked="" type="checkbox"/> Power and Hand Tools	
	<input checked="" type="checkbox"/> Slips, Trips, Falls	
<b>CHEMICAL HAZARDS</b>	<input checked="" type="checkbox"/> Noise	
	Chemical Types	<input checked="" type="checkbox"/> Solid
		<input type="checkbox"/> Liquid
		<input type="checkbox"/> Sludge
		<input type="checkbox"/> Vapor
	Chemical Characteristics	<input type="checkbox"/> Volatile
		<input checked="" type="checkbox"/> Toxic
<input type="checkbox"/> Ignitable		
	<input type="checkbox"/> Corrosive	
	<input type="checkbox"/> Caustic	
<b>STRESS HAZARDS</b>	<input checked="" type="checkbox"/> Heat	<input checked="" type="checkbox"/> Cold
<b>BIOLOGICAL HAZARDS</b>	Poison Ivy and biting insects	
<b>RADIATION HAZARDS</b>	None	

<b>SITE HAZARD RANKINGS/ANALYSES</b>			
<b>Task 1: Site preparation/mobilization</b>			
Identified Physical Hazards	Heavy equipment, power tools, underground utilities, slips, trips, falls, noise		
Identified Chemical Hazards	Volatile organics and heavy metals		
Hazard Ranking	<input type="checkbox"/> High	<input checked="" type="checkbox"/> Medium	<input type="checkbox"/> Low
<b>Task 2: Demolition of buildings containing lead-based paint</b>			
Identified Physical Hazards	Heavy equipment, power tools, underground utilities, slips, trips, falls, noise		
Identified Chemical Hazards	Heavy metals		
Hazard Ranking	<input type="checkbox"/> High	<input checked="" type="checkbox"/> Medium	<input type="checkbox"/> Low
<b>Task 3: Underground storage tank, aboveground storage tank, and hydraulic lift removals</b>			
Identified Physical Hazards	Heavy equipment, power tools, underground utilities, slips, trips, falls, noise		
Identified Chemical Hazards	Volatile organics and heavy metals		
Hazard Ranking	<input type="checkbox"/> High	<input checked="" type="checkbox"/> Medium	<input type="checkbox"/> Low
<b>Task 4: Excavation and offsite disposal of volatile organic (VO) contaminated soils</b>			
Identified Physical Hazards	Heavy equipment, power tools, underground utilities, slips, trips, falls, noise		
Identified Chemical Hazards	PCBs		
Hazard Ranking	<input type="checkbox"/> High	<input checked="" type="checkbox"/> Medium	<input type="checkbox"/> Low

<b>Task 4: Excavation and offsite disposal of volatile organic (VO) contaminated soils</b>			
Identified Physical Hazards	Heavy equipment, power tools, underground utilities, slips, trips, falls, noise		
Identified Chemical Hazards	Volatile organics and heavy metals		
Hazard Ranking	<input type="checkbox"/> High	<input checked="" type="checkbox"/> Medium	<input type="checkbox"/> Low
<b>Task 5: Excavation, Handling, Site Development with metals contaminated soil</b>			
Identified Physical Hazards	Heavy equipment, power tools, underground utilities, slips, trips, falls, noise		
Identified Chemical Hazards	Volatile organics and heavy metals		
Hazard Ranking	<input type="checkbox"/> High	<input checked="" type="checkbox"/> Medium	<input type="checkbox"/> Low

## 2.5 Exposure Limits

Ambient environmental conditions will be routinely monitored by the on-site EHSO to ensure that on-site personnel and residents are not exposed to the harmful constituents in on-site soils during the normal course of fieldwork.

### 2.5.1. New York State DEC and DOH Limits for VOCs and Dust

According to the New York State DEC and DOH, if the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds five (5) ppm above background (but is less than 25 ppm), work activities must be temporarily halted and corrective actions taken. Work can then proceed after corrective actions have been taken to reduce the organic vapors provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or occupied structure (which ever is less) is below five (5) ppm over background for the 15 minute average. If the organic vapor level is above 25 ppm at the perimeter of the work area after corrective actions have been taken, work must be shutdown.

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. Monitoring should consist of real-time monitoring equipment capable of measuring particulate matter less than 10 microns (PM-10) in size. If the downwind PM-10 particulate level is 100 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) greater than background for a 15-minute period or if airborne dust is observed leaving the work area, dust suppression activities must be employed. Work may proceed provided that PM-10 levels do not exceed  $150 \mu\text{g}/\text{m}^3$  of the background concentration and no visible dust is observed migrating from the work area.

### 2.5.2. Permissible Exposure Limits for PCB Remediation

The Occupational Health and Safety Administration (OSHA) Permissible Exposure Limit (PEL) for PCBs is 1.0 milligram per cubic meter ( $\text{mg}/\text{m}^3$ ). Continuous air monitoring for particulate

will be conducted by the EHSO during the PCB remediation activities in order to document compliance with the NYSDEC, NYSDOH, and OSHA PEL for total particulates of 0.15 mg/m<sup>3</sup>, which is lower than the PCB PEL of 1.0 mg/m<sup>3</sup>.

## 2.6 **Community Air Monitoring**

In order to ensure that the New York State limits are not exceeded for workers and occupants of the surrounding properties, continuous air monitoring will be performed using organic vapor monitoring equipment and/or real-time aerosol monitoring equipment, as applicable, during all demolition and site development work involving soil movement. The Air Monitoring Program is described in the following subsections.

### 2.6.1. *Air Monitoring Program Description*

The primary objective of the air-monitoring program is to ensure that organic vapors and/or fugitive dust (as applicable) are not generated during demolition and site development activities. In order to protect the environmental integrity of surrounding site improvements and the health of onsite worker and offsite building occupants, organic vapors and/or the generation of fugitive dust will be monitored with a series of photoionization detectors (VOC monitoring) and/or dust meters (lead-based paint, PCBs, metals) situated around the portion of the site where work is occurring. The following table presents a summary of the monitoring elements that will be employed during demolition and site development activities at the site.

Type of Monitoring	Equipment/ Personnel	Action Level	Planned Action Level Response
Visual	Health & Safety Officer	Visual observation of dust	Cease activities; apply water mist or dust-suppressant foam.
Organic Vapors	Photoionization Detectors	5 ppm for 15 minutes	Temporarily suspend work. If concentration does not drop below 5 ppm, apply vapor suppressant foam. If concentrations are above 25 ppm, cease work.
Fugitive Dust	Dust Meters	100 µg/m <sup>3</sup> above background	Cease activities; apply water mist or dust-suppressant foam. Work may continue provided dust concentrations do not exceed 150 µg/m <sup>3</sup> .
Weather/Wind Direction	Weather Station	None	PIDs and Dust meters will be repositioned as needed based on wind direction

Real-time organic vapor and dust monitors will be used to continuously monitor for the presence of organic vapors and/or dust generation during all applicable demolition and site development activities. The type of monitoring will be based on the specific task being conducted onsite. Organic vapor monitoring will only be conducted during activities that may generate organic vapors (i.e. tank removals, VO-impacted soil removal, etc.). Dust monitoring will be conducted during the demolition of buildings containing lead-based paint, removal of the PCB-impacted soil,

and earth moving activities with the potential to generate fugitive dust. Ambient atmospheric conditions (i.e. wind speed and direction) will be continuously monitored using a weather station. The initial locations of the monitors will be established at the start of each workday and will be adjusted accordingly to account for wind direction. If the prevailing wind direction changes by greater than 30 degrees (as monitored via an on-site weather station), the designation of the upwind and downwind units will be altered accordingly.

The level of particulates originating from off-site sources will be determined by the reading from the upwind meter. The upwind concentration will then be subtracted from the readings from the downwind monitoring unit. The background readings must be incorporated into calculations to account for variables such as humidity, smog, and dust and diesel exhaust originating from off-site sources. The background-corrected downwind readings will subsequently be used as the benchmark to evaluate the extent that fugitive dust is being generated by the on-site activities and carried to off-site locations, and to determine whether additional dust suppression measures are required.

These background-corrected downwind values will be compared to the NYS established guideline of 5 ppm for organic vapors. If levels exceed an average of 5 ppm above background (but there are no instantaneous readings that exceed 25 ppm) for a 15-minute period, work activities must be temporarily halted and corrective actions taken (i.e. application of vapor suppressant foam). Monitoring will continue throughout the work stoppage and corrective actions and work can resume provided that the total organic vapor concentration averages less than 5 ppm for a 15 minute period at a location 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or occupied structure (which ever is less). If the organic vapor level is above 25 ppm at the perimeter of the work area after corrective actions have been taken, work must be shutdown.

With regard to total particulates, fugitive dust will be monitored for compliance with the NYS established guideline of  $100 \mu\text{g}/\text{m}^3$  for total particulates ( $\text{PM}_{10}$ ). Specifically, if background-corrected downwind particulate readings reach  $100 \mu\text{g}/\text{m}^3$ , or if visible dust is observed, the dust control measures, including the wetting of the soils with a fine mist of water or the application of biodegradable, short-lived dust suppressant foam, will be implemented to return dust levels to acceptable levels. After mitigation measures have been implemented, work will continue as long as  $\text{PM}_{10}$  levels do not exceed  $150 \mu\text{g}/\text{m}^3$ . If levels exceed  $150 \mu\text{g}/\text{m}^3$ , work will be suspended until the levels drop below  $150 \mu\text{g}/\text{m}^3$ , at which time work can proceed as long as the levels remain below  $150 \mu\text{g}/\text{m}^3$ .

## **2.7 Personal Protection/Protective Equipment**

Use of Personal Protective Equipment (PPE) is designed to minimize potential exposure of

on-site personnel to chemical hazards. Selection of protective equipment is based upon one or all of the following considerations:

- Toxicity of contaminant(s)
- Physical state of contaminant(s)
- Concentration of contaminant(s) in question
- Permeability of contaminant(s) through PPE
- Abrasion resistance of PPE
- Work functions
- Work load

#### ***2.7.1. Hearing Protection***

Noise is defined as unwanted sound. OSHA regulations generally apply to 8-hour exposure and consider 85 DBA as an action level for a hearing conservation program. In the absence of sound level measuring instrumentation, any noise/sound preventing normal vocal discussion at arms length distance will dictate the need for hearing protection. Hearing protection will be afforded by disposable ear plugs or ear muffs.

#### ***2.7.2. Protective Clothing (Personal Protective Equipment)***

In those portions of the site where ambient air reflects normal background conditions, contact with materials during demolition and site development activities will require Level D protection. Level D protection is primarily a work uniform which includes the following:

- Cloth coveralls (uncoated tyvek, as needed).
- Protective gloves (as needed);
- Leather or rubber boots with steel toe and steel shank;
- Hard hat;
- Safety eye wear.
- Hearing protection, as needed

### **2.8 Site Control**

Site control will include: 1) restriction to active work areas via temporary fencing or another means of site control; 2) proper handling of demolition debris and onsite soil; and 4) organic vapor and fugitive dust control via vapor suppressant foam or spraying with water, if necessary. To ensure worker safety, all site workers will log-in and out with the EHSO, and the “buddy system” will be

employed for on-site operations.

The support zone will be designated by the EHSO at the beginning of each task (i.e. demolition, tank removals, site development) and will vary based on the work being conducted. The contaminant reduction zone is the area between the support zone and exclusion zone (i.e. immediate area of demolition, tank removals, or active earthwork). To enter the exclusion zone personnel must have – a buddy, proper PPE, and medical authorization and training as appropriate under OSHA guidelines and maintained by their employer.

## **2.9 Spill Containment**

In the event of a reportable spill, the NYSDEC will be notified. On-site heavy equipment operators and waste disposal contractors associated with the transfer, transport and disposal of site wastes will be equipped with appropriate spill containment provisions. For example, projected items that could be used on-site in the event of a spill may include dedicated brooms, vacuum truck, disposal containers, etc. Any spills would be mitigated, as necessary, to provide protection of human health and the environment. Appropriate post-spill measures (sampling, reporting to NJDEP, etc.) would be conducted in accordance with the NYSDEC DER-10 Technical Guidance to ensure that there are no unmitigated impacts remaining at the site associated with a spill.

### **3. EMERGENCY RESPONSE**

#### **3.1 Plan**

The site EHSO will serve as the emergency coordinator. In the unlikely event of an emergency situation (such as fire, explosion, significant release of toxic gas) an air horn or other appropriate device will be sounded for approximately 10 seconds indicating that immediate evacuation procedures are being implemented. All site personnel will evacuate and assemble near the entrance to the site then proceed offsite in a safe manner. The EHSO will ensure that appropriate calls for outside assistance are made, as necessary and coordinate a head-count and verify that all personnel are accounted for. After placing the appropriate calls for outside assistance, the Environmental Monitoring Officer will canvas the emergency area in a safe manner to ensure that the site has been evacuated. Upon the arrival of emergency personnel, this responsibility will be transferred to the appropriate authorities (i.e. police, fire, and/or other emergency personnel). If necessary, the site will ultimately be evacuated and the directions to the hospital are provided, below.

No personnel or residents will be permitted to return to the site until the emergency situation is appropriately resolved.

#### **3.2 Contacts**

Emergency Contacts 911

Hospital (Name): Hudson Valley Hospital Center ☎ : 914-737-9000  
(Address): 1980 Crompond Road  
Cortland Manor, New York 10567

#### **3.3 Directions to Hospital**

Upon exiting the site, make right turn onto Crompond Road heading west.

Proceed approximately 3.8 miles and arrive at Hudson Valley Hospital Center on the right.



See Map Below

