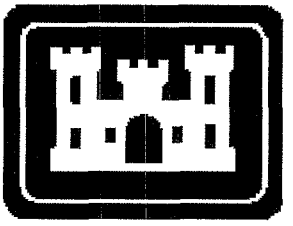

US Army Corps of Engineers
Buffalo District

# SITE SAFETY AND HEALTH PLAN FOR SITE VISITS AT THE GUTERL SPECIALTY STEEL SITE LOCKPORT, NEW YORK

**Authorized under the**
**Formerly Utilized Sites Remedial Action Program (FUSRAP)**

**Prepared by:**
**U.S. Army Engineer District – Buffalo**
**1776 Niagara Street**
**Buffalo, New York 14207-3199**
**CELRB-PM-F**

**Site Safety and Health Plan for Structural Inspection**
**Former Guterl Specialty Steel Corporation**
**FUSRAP Site, Lockport, NY**

By signing below, I acknowledge that I have reviewed and hereby approve the Safe Work Procedure for the Former Guterl Specialty Steel Corporation FUSRAP Site, Lockport, NY.

***Prepared by*:**
Raymond Pilon — Date
Project Manager

***Reviewed By:***
Anthony Cappella, IH — Date
Acting Safety Officer

***Accepted by:***
Raymond Pilon — Date
Project Manager

# FIGURES



# ATTACHMENTS

# Introduction

This Site Safety and Health Plan (SSHP) addresses the requirements to conduct a Site Inspection at the former Guterl Specialty Steel Corporation site located in Lockport N.Y. The requirements of this SSHP apply to all personnel visiting the site under U.S. Army Corps of Engineers supervision. No change to this SSHP that could affect the health or safety of personnel, the community, or the environment may be made without prior approval of the Project Manager (PM) and/or the Buffalo District Safety Officer.

## *Classification of Activities*

The work activities addressed in this SSHP are non-hazardous operations only, and do not meet the requirements for characterization as hazardous waste operations and emergency response (HAZWOPER) activities as defined in 29 CFR 1910.120 (a).

## *Organization and Responsibilities*

Raymond Pilon is the Project Manager and will serve as the Site Supervisor for this effort. Keith Hall is the Buffalo District Safety Officer and may be contacted at (716) 863-1319 in case of emergencies. Anthony Cappella, IH is the acting Site Safety Officer (SSO) and Thomas Papura HP is the acting Radiation Safety Officer and may support the effort. The Project Manager may designate additional staff responsibilities or alternate staff assignments, as required.

## *Regulatory Requirements*

This SSHP meets the requirements and follows the guidelines established by the Federal Occupational Safety and Health Administration (OSHA):

- Code of Federal Regulation Title 29, Part 1910 (29 CFR Part 1910), *Occupational Safety and Health Standards*, and
- Code of Federal Regulation Title 29, Part 1926 (29 CFR Part 1926), *Safety and Health Regulations for Construction.*

The requirements specified in this SSHP meets the basic requirements of the U.S. Army Corps of Engineers Safety and Health Requirements Manual EM 385-1-1.

# Site Description and Planned Work Operations

## *General Description*

The Guterl Specialty Steel Corporation site is located in Lockport N.Y. near the intersection of Rt. 93 and Ohio Street (see **Figure 1, Figure 2, and Figure 3**).

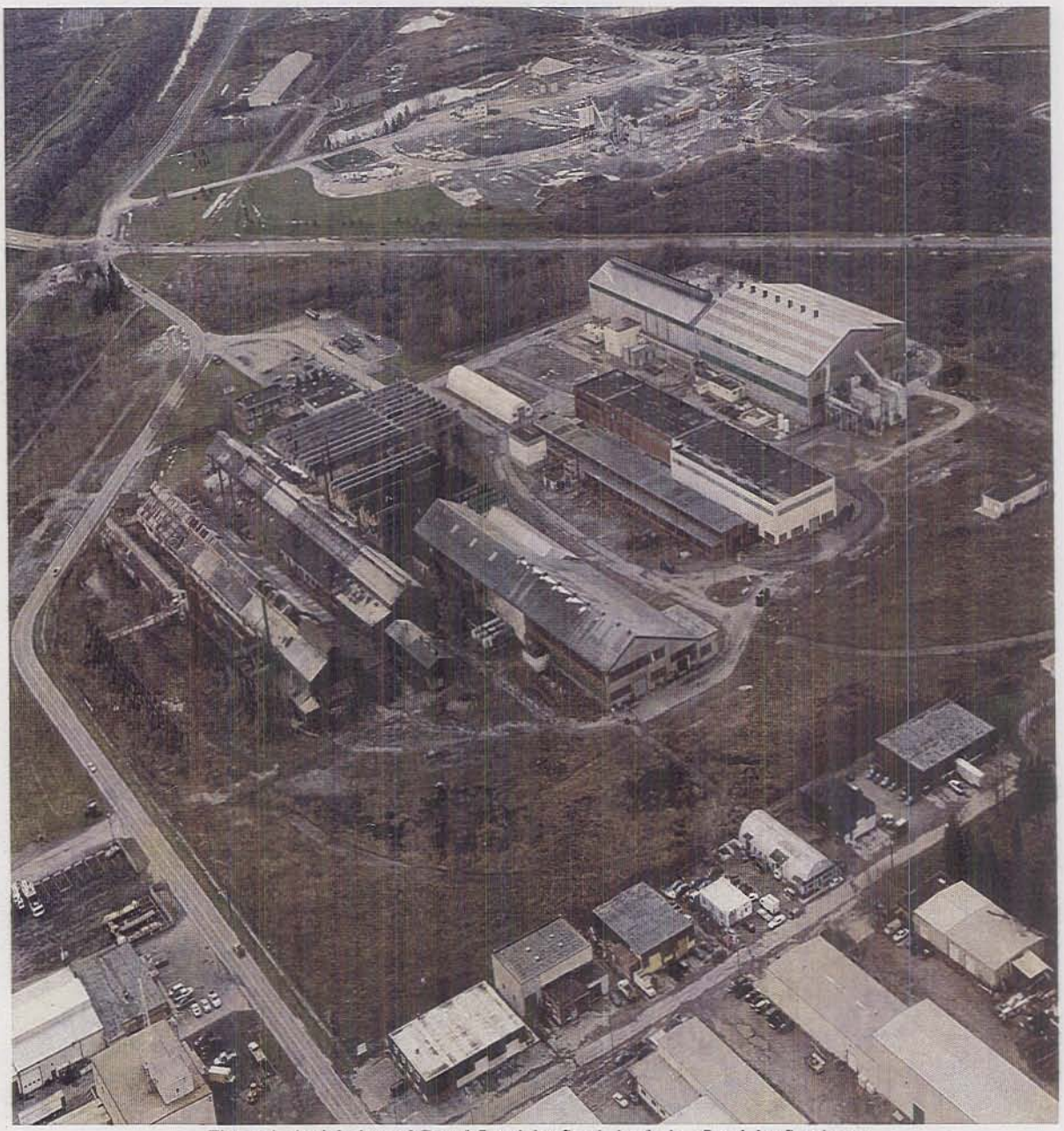

Figure 1. Aerial view of Guterl Specialty Steel site facing South by Southwest

Figure 2. Aerial view of Guterl Specialty Steel site facing North by Northeast

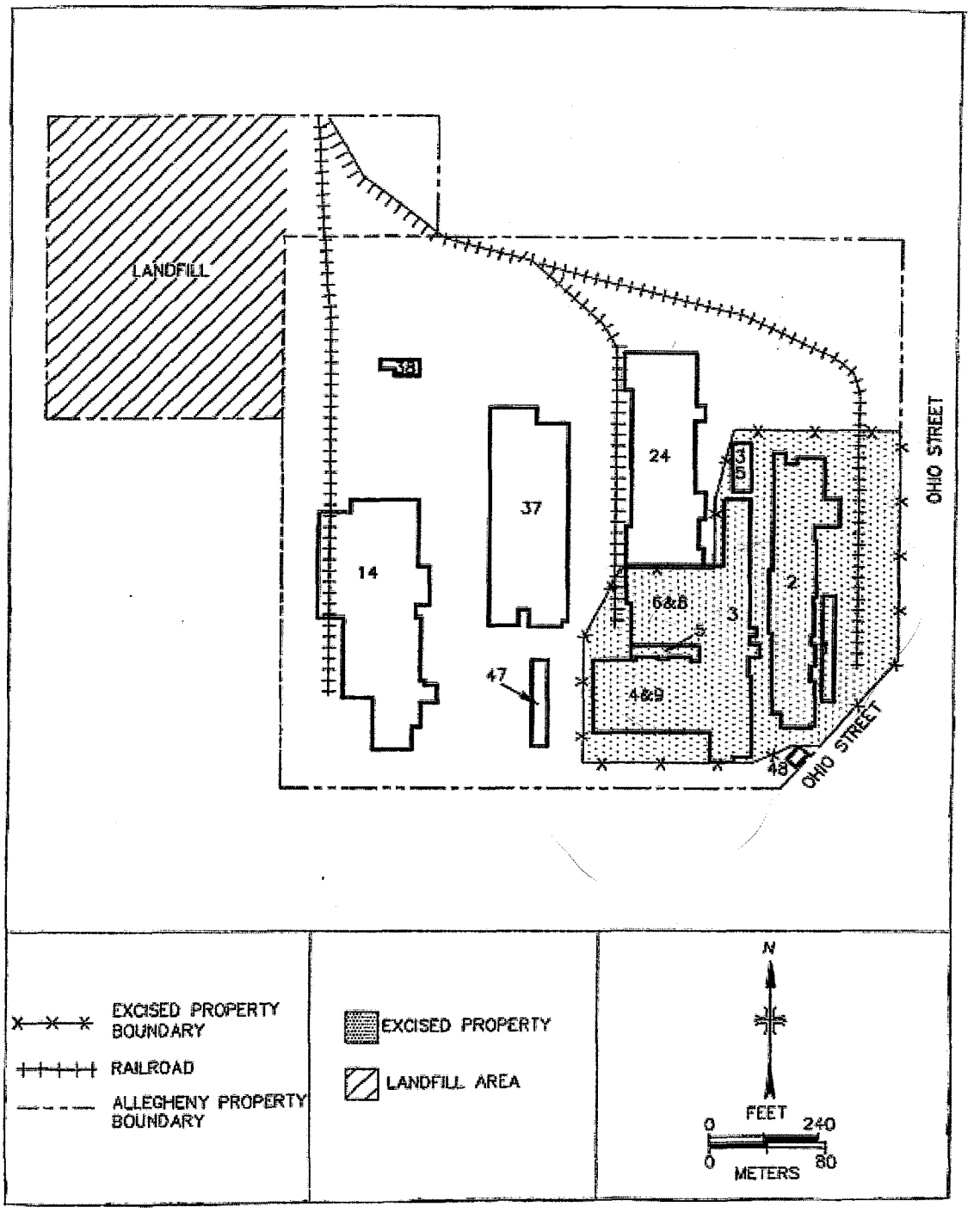


Figure 3. Excised Property, Landfill, Guterl Specialty Steel Corporation
(Source: ORISE, 1999)

## *Planned Work Operations*

**Scope of Work**

Personnel visiting the site may be performing a visual survey of the former Guterl Specialty Steel Corporation site to take pertinent photographs and denote locations of applicable features at the site. Coordination of all site visits must be coordinated with the Project Manager, Raymond L. Pilon. If necessary, USACE Engineer/Scientist(s) shall accompany the site inspection.

Site Reconnaissance will observe structural integrity concerns associated with the buildings that have not been fully characterized to date in and around the Excised Area (see Figure 3.) Reconnaissance may consist of only a visual inspection of the structures (e.g., ladders, catwalks, frames, floors, roofing, etc.) that are accessible without specialized equipment. Reconnaissance may identify structures that pose a risk to the safe conduct of future characterization surveys.

# HAZARD ANALYSIS

During site inspections at the site, personnel may be exposed to a number of occupational and environmental hazards. In general, the following hazards can be expected:

- ***Walking/Working Surfaces:*** Uneven and/or rough terrain walking surfaces.
- ***Poor Lighting:*** Associated with lack of electricity to power lights.
- ***Slips/Trips/and Falls:*** Due to the lack of housekeeping, pits, and wet floor. Special attention to snow and ice.
- ***Fall Hazard/Elevated Surfaces:*** Movement associated with walking near pits and trenches.
- ***Vehicle Operation Hazards:*** Associated with the operation of motor vehicles.
- ***Cold Stress Environments:*** Associated with site-specific work activities, PPE usage and geographical project locations.
- ***Fire, and natural disasters:*** Reconnaissance team shall regroup at designated point identified prior to entry.

### *Task Hazard Analyses*

Task hazard analyses (THA) can be found in Attachment A for each planned work task. Each THA specifies the major performance steps involved in the activity, and identifies the related hazards and applicable safety procedures. However, to meet hazard communication requirements the following information is provided regarding the hazards of the known contaminants. Should other contaminants be encountered, appropriate supplemental information shall be provided.

## Known Radioactive Material at Work Site

The Radionuclides Of Potential Concern (ROPC) for the Guterl Specialty Steel Corporation site include Uranium-238 (U-238), Uranium-235 (U-235), Uranium-234 (U-234) and Thorium -232 (Th-232). These radionuclides emit alpha, beta, and gamma radiation. When these radionuclides are present in large enough quantities they can pose a hazard to humans and the environment.

Because of the primordial origin of these ROPC, they are also found in naturally occurring radioactive material (NORM) at concentrations that are characteristic of the general area background conditions. Other NORM radionuclides are also present on the work site, but since they are either not elevated above the background levels or are not co-located with elevated levels of the ROPC, these radionuclides are thought to be associated with normal steel mill operations and do not pose any significant hazard to the planned tasks.

When on the work site personnel are encouraged to be aware of their surroundings and limit their movements to what is necessary to accomplish the assigned task. Visual identification of the ROPC at the current regulatory level of concern is not possible. Even though prior radiological surveys have shown that very little material is removable, there is a risk of personnel or equipment contamination. To decrease the possibility of contamination and ingestion, no consumables shall be allowed on site. Personnel may be surveyed for radioactive contamination prior to exit the site if determined necessary by the RSO.

# General Facilities Conditions

Due to the age of the facility, lack of proper maintenance and routine housekeeping, the current condition of Guterl Specialty Steel Corporation site poses numerous physical hazards. The buildings have many physical dangers such as, but not limited to, poor lighting, uneven floor surfaces, standing water, insufficient postings, failed roofing materials, open pits, open trenches, flooded basements, unsupported stacks and vents, storage of unknown materials, and perhaps weakened building materials. Other potential hazards may include elevated platforms and equipment that are currently present in the building. Attention to these hazards is necessary to minimize the risk of bodily injury. In the construction of these buildings, trenches and other depressions are present and pose a risk to walking and movement. As mentioned before, poor housekeeping has led to miscellaneous items throughout the complex and care should be taken not to disturb these items. Another hazard that is likely to be encountered is "asbestos containing material" due to the prolific use of the material during the era of operation. This hazard should be easily mitigated because of the non-intrusive, hands off nature of the site reconnaissance.

## HEALTH AND SAFETY REQUIREMENTS

The following requirements will be observed during performance of this project.

### *General Safety Requirements*

Standard Operating Procedures are generally applicable to all work operations to be conducted on site and must be followed by all personnel present on site. Some of the procedures are:

*Injury, Illness, and Near-Miss Reporting*
*Personal Protective Equipment*
*Cold Stress Prevention Program*
*As Low As Reasonably Achievable (ALARA)*
*General Safety Rules*
*Stop Work Authority*
*Manual Lifting*
*Fire Extinguishers*
*Traffic Safety*

~~Copies of these procedures will be available at the site.~~
In addition to these procedures, the following supplemental requirements will also be observed at all times while on the site:

## Tobacco Use, Eating, and Drinking

No personnel will be allowed to enter a controlled work area. Tobacco use, eating or drinking will not be permitted. Consumption of alcoholic beverages is prohibited.

## Housekeeping

During site activities, at no time will debris or trash be intermingled with waste, PPE or contaminated materials. Anyone observed throwing contaminated material or PPE away with municipal wastes will be removed from the site.

## Personal Hygiene

Not applicable at this time.
~~The following requirements may be observed (as required):~~
~~**Water Supply**: A water supply meeting the following requirements will be utilized:~~

- ~~Potable Water - An adequate supply of potable water will be available for field personnel consumption and use in cleaning activities. Potable water used for drinking can be provided in the form of water bottles, canteens, water coolers, or drinking fountains. Where drinking fountains are not available, individual use cups will be provided as well as adequate disposal containers. Potable water containers will be properly identified in order to distinguish them from non-potable water sources.~~
- ~~Non Potable Water - Non-potable water cannot be used for drinking or washing purposes, but may be used for non-hygiene related activities. No use of non-potable water will be allowed for this project.~~

### 4.1.4 Buddy System

All personnel shall use the buddy system when entering the site. No personnel will be allowed to enter any controlled work area. Personnel belonging to another organization onsite can serve as "buddies" for personnel. Under no circumstances shall any employee be present alone in the excised property area.

## 4.1.5 Injury Reporting

All accidents and incidents that occur on-site during any activity will be promptly reported to Keith Hall, Safety Officer (716) 863-1319. Accident reporting will be in accordance with EM 385-1-1, or the appropriate District-level incident reporting procedures. If any personnel is injured and requires medical treatment, Keith Hall should be notified as soon as possible. If any personnel is injured, documentation of the incident will be accomplished in accordance with established procedures. However, copies of all documentation (which at a minimum must include the OSHA Form 301 or equivalent) must be provided to the SSO within 24 hours after the accident has occurred.
All accidents/incidents will be investigated in accordance with established procedures. Copies of accident investigations will be provided to the Safety Officer and Project Manager within five (5) days of the accident/incident.

### *Task-Specific Safety Requirements*

For this project, the work tasks are stated in the Task Hazard Analyses included as Attachment A. The following requirements will be observed when performing the task.

# Slips, Trips, Falls, and Protruding Objects

Hazards from protruding objects, careless movements, or placement of materials on paths or foot traffic areas present a problem with regard to slips, trips, and falls. Injuries typically resulting from such activities may involve cuts, scrapes, bruises, and/or puncture wounds. Personnel will use a reasonable amount of effort to ensure the prevention of such injuries. Extra care shall be taken when walking in the snow and ice. This hazard is not only dangerous for slips, trips, falls but could be covering items such as pits, holes and planks, etc.

# Cold Stress

Cold stress is a common (and potentially serious) illness that can affect hazardous waste site workers in cold weather climates. The threat is greater when the wind chill factor is low. Adequate insulated clothing will need to be worn when air temperature is below 40°F. In addition, reduced work periods followed by rest in a warm area may be necessary in extreme conditions. The best treatment for cold stress is prevention. If the equivalent chill temperature exceeds 40°F a work/warm-up schedule most be implemented. Individuals will vary in their susceptibility and degree of response to the stress induced by decreased body heat. Factors which may predispose a worker to cold stress include: lack of physical fitness; lack of acclimatization to cold environments; degree of hydration; level of obesity; current health status (i.e., having an infection, chronic disease, diarrhea, etc.); alcohol or drug use;

and the worker's age and sex.

# Exposure Monitoring

Because of the limited nature of the site inspection and the low levels of exposure hazards associated with these operations, air monitoring will not be required during this work. Thermo-luminescent dosimeters (TLDs) will not be required on the site reconnaissance, since the expected exposure to radiation will be less than 10% of the limit for members of the public. The Radiation Safety personnel on-site will have sufficient equipment available to provide a record of the radiation received during the reconnaissance. These RP personnel will also provide real time radiological support in the field to ensure that all members in the site visit comply with the As Low As Reasonably Achievable (ALARA) principal.

### *Personal Protective Equipment Requirements*

The minimum requirement for PPE at the site will consist of the Level D ensemble, including:

1. Hard hat
2. Steel-toed boots
3. Safety glasses
4. Long pants (no shorts)
5. Leather gloves
6. Sleeved shirts (including short sleeves – no tank tops)
7. Hearing protection (when required)

After completing the site reconnaissance, before breaks, or at the end of the shift, personnel may be:

1. Be surveyed for contamination by RP personnel prior to departing from the Excised Area.

2. Use commercially available wet wipes to thoroughly clean hands. Disposable wipes will be placed in a designated waste container.

### *Emergency Response*

Field personnel will carry a cellular telephone. In the event of emergency (vehicle accident, injury, etc.) personnel should immediately phone **911**. The operator should be informed of the incident location and circumstances so that emergency help can be dispatched.

**The nearest hospital address and phone number is (see Figure 4):**
**Lockport Memorial Hospital**
**521 East Ave.**
**Lockport, NY 14094**
**(716)514-5700**

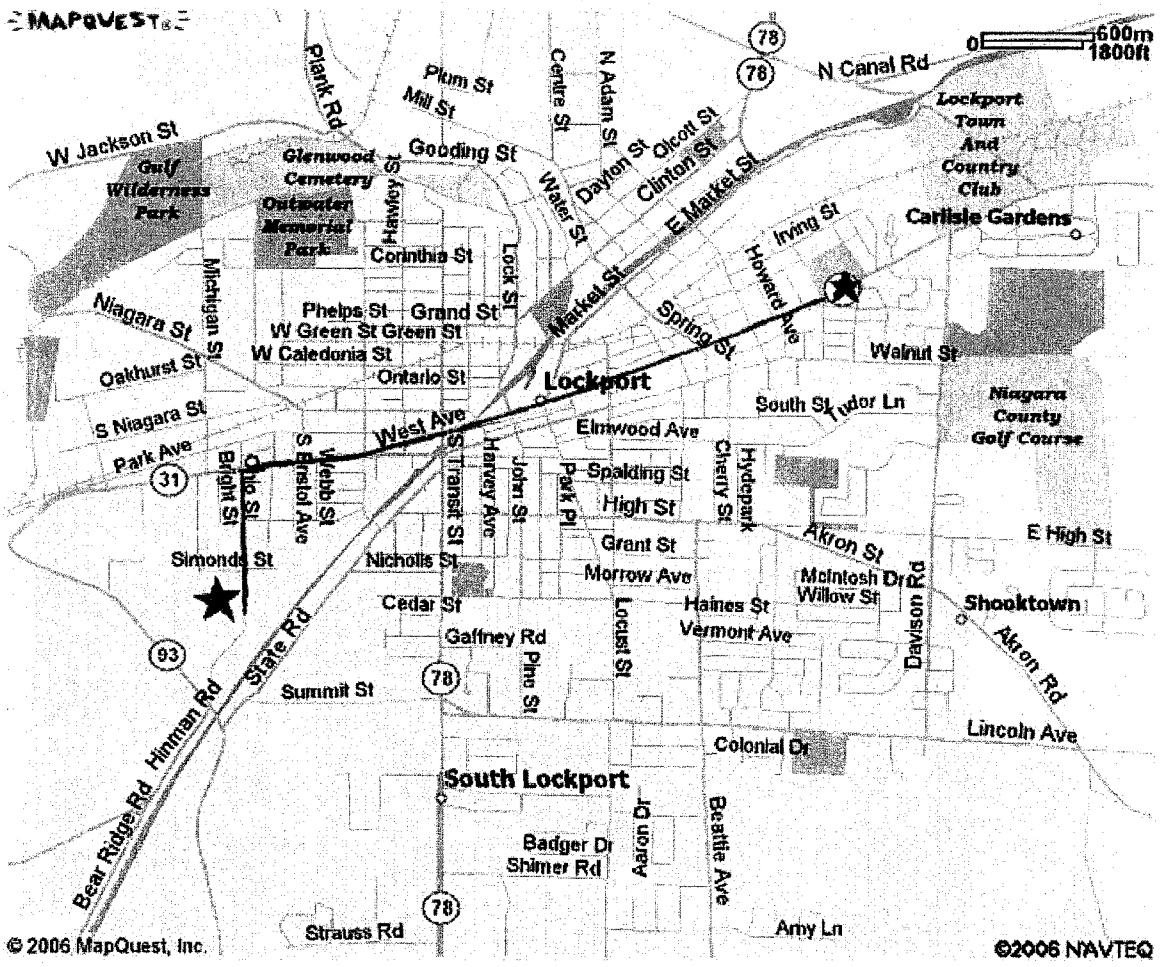


Figure 4. Route to the Hospital Map.

# Attachment A

***Task Hazard Analyses***

ATTACHMENT B
PPE Training Card – not required for site visits

EarthTech
A tyco International Ltd. Company

# Earth Tech Standard Work Ensemble Personal Protective Equipment Training Card

This training card will be used to document an employee's training regarding the use, care, maintenance, and limitations of Earth Tech's standard work ensemble (e.g., Level D) per SH&E 113, *Personal Protective Equipment (PPE)*. Specifically, the standard work ensemble consists of:

- Hard hat
- Eye protection (safety glasses or goggles, or a combination of safety glasses or safety goggles **and** a faceshield)
- Safety-toe work boots
- Hearing protection (ear plugs or muffs)
- Reflective traffic safety vest

| Item | Use | Care/Maintenance | Limitations | Inspect prior to use | Specification |
|---|---|---|---|---|---|
| **Hart hat** | 1. During all field activities<br>2. Identify where chin straps are required | 1. Keep free of dirt, oil, grease & paint<br>2. If cracked, discard<br>3. Make sure suspension straps are properly sized | 1. Impact limitation<br>2. Specific types for specific jobs<br>3. Only protects if worn<br>4. Chin strap required by some states and/or tasks | Yes | ANSI Z89.1 |
| **Eye Protection** | 1. During all field activities<br>2. Sideshields or molded fit req'd<br>3. Shaded for intense sunlight conditions | 1. Keep free of dirt, oil, & grease<br>2. If scratches reduce visibility, replace<br>3. Clean lenses regularly<br>4. Maintain eyewear prescription | 1. Impact limitation<br>2. Inappropriate in chemical environment (where irritating to or potentially absorbed through eyes) | Yes | ANSI Z87.1 |
| **Safety-toe Boots** | 1. During all field activities<br>2. Rubber boots in wet environment<br>3. At least six (6) inches high on ankle | 1. Keep free of dirt, oil, & grease<br>2. Worn or split soles should be replaced<br>3. Water resistant coatings or integrity<br>4. Keep interior dry<br>5. Keep clean/remove gross contamination | 1. Impact limitation<br>2. Not good in cold environment<br>3. Wet/dry environment<br>4. Poor traction on slick surfaces<br>5. Alternatives may be required for liner, roof or similar tasks<br>6. Chemical absorption may require use of booties | Yes | ANSI Z41PT91 |
| **Hearing Protection** | 1. When exposed to ≥85 dBA<br>2. Plugs: squeeze plugs, pull ear back, and insert plug into ear canal<br>3. Release ear<br>4. Identify project locations where usage is req'd | 1. Plugs one-time use<br>2. Keep free of dirt, oil, & grease<br>3. Rubber molding must be intact on ear muffs<br>4. If rubber molding is dry/cracked, discard<br>5. Clean ear muffs after each use | 1. Ineffective if donned improperly<br>2. Plugs can absorb chemicals<br>3. High noise (dBA) limitations<br>4. Must complete Hearing Protection training prior to use<br>5. Rubber molding on muffs can dry/crack<br>6. Safety glasses may break seal of ear muffs and affect attenuation | Yes | Minimum NRR of 26 |
| **Reflective Traffic Safety Vest** | 1. Exposed to traffic or heavy equipment hazards | 1. Keep free of dirt, oil, grease, or other covering material<br>2. Worn/torn, replace | 1. 360° reflectivity required<br>2. Reflective orange, white or fluorescent green<br>3. Low light impairs visibility | Yes | MUTCD 2003, SH&E 113, SH&E 513, & SH&E 517 |

NOW
NO OTHER WAY

| ADMINISTRATIVE INFORMATION | |
|---|---|
| Job/Task Name: | |
| Project/Office Name: | Project/Office Location: |
| Project/Office Manager: | Training Performed By: |
| Date Completed: | Type of Job/Task: ☐ One time ☐ Routine job/task |
| Responsible Organization: Earth Tech, Inc. | Job Supervisor: |

**I HAVE READ OR BEEN BRIEFED ON THE USE, CARE AND MAINTENANCE, AND LIMITATIONS OF THE PERSONAL PROTECTIVE EQUIPMENT FOR THE ABOVE-LISTED JOB/TASK AND FULLY UNDERSTAND THE PPE-SPECIFIC REQUIREMENTS THAT HAVE BEEN ESTABLISHED.**

| DATE | EMPLOYEE NAME | EMPLOYEE SIGNATURE | EMPLOYER NAME |
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