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Revised Soil & Groundwater Management Plan and Health and Safety Plan

Hulsman Transportation 325 Yolanda Avenue, Santa Rosa, California NCRWQCB Site #1TSR050

Prepared for:

Hulsman Transportation Mr. Paul Hulsman P.O. Box 423 Santa Rosa, CA 95402

Prepared by:

Environmental Geology Services 6169 Amie Drive Windsor, CA 95492

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May 12, 2017Project No. 451.0711

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Distribution: PDF Version Only:

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State Geotracker Database

INTRODUCTION

Name of Project Site (Site): Hulsman Transportation

Site Address: 325 Yolanda Avenue, Santa Rosa, CA

NCRWQCB Case #: 1TSR050

Chemicals of Concern (COCs): Petroleum hydrocarbons: TPH-D/MO/G/BTEX

Metals: Lead

Area of Potential Residual Impact: Sonoma County APN 044-071-002

Environmental Geology Services (EGS) has prepared this Revised Soil & Groundwater Management Plan (SGMP) for the referenced site (Plate 1, Site Location Map) in accordance with the directives set forth in the NCRWQCB letter dated May 13, 2016, as well as their March 2, 2017 e-mailed comments.

Therefore, as based on this directive by the NCRWQCB, and to continue to move this site toward final case closure, EGS has prepared this SGMP which includes a Health and Safety Plan (HASP).

BACKGROUND

Site and Vicinity Description

The site is located on the north side of Yolanda Avenue, approximately 300 feet east of Santa Rosa Avenue in the southern portion of Santa Rosa, California (Plate 1, Site Location Map). The site has been owned by the Hulsman family since the 1940's, and has been operated by Hulsman Transportation (RP) since that time. The site has historically been used as a trucking and transportation company and more recently has been used for various construction related contractors for storage. The primary building was constructed on the property in approximately 1947. The site consists of Sonoma County APN 044-071-002, which totals 5.82 +/- acres (Plate 2, Site Map).

The site is zoned as CG (General Commercial) by the City of Santa Rosa, and has been nearly developed by both The Home Depot and Lowe's stores over the past 10 years. The site is located in an area of Santa Rosa that is mixed use commercial and industrial. However, there are a few intermixed residences as well.

UST Removals at the Site

- ► 500-gallon gasoline UST (*PRIMARY SOURCE*), removed in 1982 (current investigation focus, Plate 2)
- ▶ 4,000-gallon and 8,000-gallon diesel UST's, removed in 1988 (Plate 2)
- ► 175 cubic yards of soil (SECONDARY SOURCE) over-excavated in the area of former 500-gallon UST 1991

The areas of the former UST's and subsequent investigations are presented on Plates 2 and 3 attached to this SGMP.

Groundwater Supply Well

An active domestic groundwater supply well is located on the property as shown on Plate 3. The NC-RWQCB is not requiring destruction of the well as part of the UST case closure. However, during re-development of the property, if the well will be retained for site use, measures to protect the domestic well should be employed during construction. Should the future owner/developer decide to abandon the supply well, it must be completed under permit from the Sonoma County PRMD.

SOIL & GROUNDWATER MANAGEMENT PLAN

Project Management, Owner/Developer and Regulatory Consultation

EGS has reviewed previously collected data at the site, the project history and available background concentrations of related contaminants of concern to develop site specific objectives and cleanup goals included in this SGMP. In addition we developed the procedures and controls to be used during the work as described in subsequent sections of this document.

EGS will submit this SGMP to the NCRWQCB to be incorporated into their case closure summaries upon review and comments from the potential buyer.

This SGMP is issued with the understanding that the contents will be followed with the intent of protecting nearby human health and the environment, to provide guidance to the current or future property Owner(s)/Developer(s) in the event redevelopment or improvements of the site that require excavation or disturbance of soils and/or management of encountered

groundwater, or if materials (i.e. drums, UST's, piping, etc.), soils or groundwater are exposed that are suspected to be contaminated, and for proper identification, management, handling and disposal of excavated soils, exposed materials, or encountered groundwater.

EGS will revise this SGMP or prepare an Addendum to satisfy regulatory comments as needed. We have also prepared a Site Health & Safety Plan (HASP) which is attached to this SGMP in Appendix A. EGS will work closely with the Owner, potential buyer/developer and regulatory agencies to assist with the implementation of this SGMP, if needed.

Responsibility

The property Owner and/or Developer will be charged with responsibility of implementing this SGMP. The Owner/Developer will retain the services of a qualified and trained individual (Environmental Professional, EP). Additionally, during the implementation of the SGMP, a qualified Site Health & Safety Officer (HSO), will direct the implementation of the SGMP. The EP/HSO may be the same person

The HSO will work directly with the EP (or may be the same individual) and will be present onsite, as needed, to ensure the proper identification, management, characterization, and disposal (or onsite reuse) of potentially contaminated soil and groundwater during SGMP implementation.

Regulatory Notification and Inspection

Prior to implementing the SGMP, all proposed development plans shall be submitted to the regulatory agencies listed below. If soils or shallow groundwater is encountered within the site that is suspected of containing residual petroleum contamination that require additional remediation, or if potentially hazardous materials such as drums, UST's, or piping are discovered the EP will be notified. If the EP confirms that the soils or groundwater are contaminated, or if hazardous materials are identified, the work shall be temporarily ceased in that location and the following regulatory agencies will be notified:

- Santa Rosa Fire Department, <u>707-543-3542</u>
- North Coast Regional Water Quality Control Board, 707-576-2220

The Santa Rosa Fire Department (SRFD) is the primary agency responsible for overseeing the proper implementation of the SGMP during site redevelopment. The NC-RWQCB works with the SRFD to oversee implementation of the SGMP.

Regulatory agencies will be notified at least one week prior to beginning the grading process and soil disturbance work, and at least 48 hours prior to sampling of soil stockpiles and/or excavation/trench confirmation sampling.

Site Meeting

Prior to starting the construction activities, an onsite meeting shall be held with the property Owner/Developer, contractors, the EP and HSO to discuss the SGMP and implementation objectives. Involved regulatory agencies (SRFD and NC-RWQCB) shall be invited to this meeting. A copy of the SGMP shall be provided to the construction supervisors and a copy of the SGMP shall be kept onsite during all phases of redevelopment.

SGMP Implementation, Procedures and Controls

If the Owner(s) or Developer(s) conducts redevelopment or improvements of the site that requires disturbance (i.e. grading) or excavation/trenching of soils at the site, or exposes hazardous materials (i.e. drums, UST's, piping, etc.), soils or shallow groundwater that are suspected to be contaminated or may otherwise require special inspection and handling, the Owner/Developer should contact the EP/HSO.

A field inspection during the subsurface work should be completed by the EP and/or HSO in an effort to identify soils or groundwater, or other encountered materials, that contain potential residual contamination from past site activities. If it is apparent that residual contamination is present in exposed soils and groundwater, then the soils and groundwater will require proper analytical identification, management and containment.

The suspected impacted soils will be stockpiled and sampled by a qualified and trained individual to determine if the material may reused onsite, or if off haul and disposal is required. Special profiling and acceptance to a facility that accepts the waste, and appropriate handling and disposal under manifest will be completed if the Owner/Developer choose to dispose of the generated material, based on sampling and analytical results. All soils excavated or produced during trenching must be tested prior to being placed back into the excavation or trench per NC-RWQCB directives.

It will be the responsibility of the Environmental Professional and/or HSO to notify the regulatory agencies during the work, based on their observations during the implementation of the SGMP. The following procedures and controls are included in this SGMP for use by the Owner/Developer of the subject site during redevelopment work. It is recommended that the following will be completed during the work, and EGS will be available to assist the property Owner/Developer during the work.

SGMP Objectives

The objective of this SGMP is to provide guidance to the Owner(s) or Developer(s) in the event redevelopment or improvements of the site area that require disturbance or excavation of soils, or if groundwater is encountered during site redevelopment work, or if materials or soils that are suspected to be contaminated or may otherwise require special inspection and handling are exposed during site redevelopment work. Examples of this might be exposure of a pocket of soils with hydrocarbon or chemical odors and / or are unusually stained, exposure of a buried drum, tank or piping, etc., or if soils are excavated and shallow groundwater is encountered. Based on the results of the UST investigation and clean up, we believe the potential for such encounters is low since impacted soils and groundwater appear to be at depth beneath the site (18-20 feet bgs and greater), and primarily located on the southwest margin of the property and beneath Yolanda Avenue (Plates 2 and 3).

If obviously contaminated soil or groundwater, with odors, PID readings and/or soil staining are observed during the site work, the contractors shall notify the EP/HSO, who will notify the regulatory agencies if deemed to be required. The regulatory agencies will respond within 48 hours to their being notified, and it will be determined if additional investigation, sampling, and/or excavation is required. Soil sampling and additional excavation, if needed, shall occur as describe din this SGMP, or as otherwise directed by regulatory agency personnel onsite.

Implementation of the SGMP will incorporate the following procedures and controls during the work at the site to minimize exposure of potential residual contaminants, properly identify, manage, handle and dispose of impacted materials, soils and groundwater to protect human health and the environment:

- 1) Soils disturbed or excavated as part of a potential redevelopment or improvement to the site may contain residual contaminants, although concentrations of these residual contaminants will likely be very low. It is expected that the site will be a balanced development, and it is expected that a limited amount of soil will require off hauling. However, such soils will require proper management, handling, profiling, acceptance, hauling, and disposal based on analytical results and landfill acceptance if residual contamination is identified. All excavated or trenched soil must be analyzed prior to being placed back into the excavation or trench.
- 2) If shallow groundwater is encountered as part of a potential redevelopment or improvement at the site, it may contain residual contaminants, although concentrations of these residual contaminants will likely be very low. However,

encountered shallow groundwater will require proper temporary containment, sampling, management, handling, profiling, acceptance, hauling, and disposal based on analytical results and facility acceptance *if residual contamination is identified*.

- 3) Minimize exposure to dust for construction workers, nearby residences and business operations, and passers-by near the site to minimize inhalation, dermal absorption, and ingestion.
- 4) Traffic control measures, including loading and hauling routes, during potential excavation work at the site.
- 5) Secure excavation and work area, if needed, until backfilling has been completed.
- 6) Notify construction crews to be on the alert for soils with possible chemical or petroleum odors, and / or tanks, pipes or other materials that may require special inspection and handling, as well as if shallow groundwater is identified.
- 7) If such conditions are encountered, the Owner/Developer should notify EGS or other EP/HSO immediately for site inspection and consultation on how to proceed in accordance with the SGMP.

Soil Cleanup Goals

1

With regard to clean up goals, this SGMP focuses on potential excavated soil and groundwater waste identification, management, handling and re-use or proper disposal. Since residual contamination has been encountered in soils and groundwater, at depth, during the UST related investigation on the site (Plates 2 and 3), the NCRWQCB has directed the preparation of this SGMP prior to final case closure.

Therefore, the following cleanup goals for potential contaminants at this site are in accordance with the NC-RWQCB e-mail dated March 2, 2017, and based on the following published regulatory criteria¹: California DTSC June 2016 HERO Note 3, EPA Region 9 May 2016 RSL's, and SFB-RWQCB February 2016 Commercial ESL's.

A) DTSC's Human Health Risk (HERO) Note 3, June 2016, http://www.dtsc.ca.gov/assessingrisk/humanrisk2.cfm

B) EPA Region 9 Regional Screening Levels (RSL's), May 2016,

https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables-may-2016

C) SFB-RWQCB "Environmental Screening Levels, Commercial/Industrial Settings, February 2016,

If encountered, the following soil cleanup goals for the Constituents of Concern (CoC's) will be used to determine if soils may be reused onsite:

- TPH-Gasoline 500 mg/kg (ESL)
- TPH-Diesel 880 mg/kg (ESL)
- TPH-Motor Oil 32,000 mg/kg (ESL)
- Benzene 1.4 mg/kg (Note 3)
- Toluene 5,400 mg/kg (Note 3)
- Ethylbenzene 25 mg/kg (RSL)
- Xylene 2,500 mg/kg (RSL)
- Lead 320 mg/kg (Note 3)

The reporting detection limits for the laboratory results in soil shall be as follows:

- TPH-Gasoline 5.0 mg/kg
- TPH-Diesel 5.0 mg/kg
- TPH-Motor Oil 50 mg/kg
- BTEX 1.0 mg/kg
- Lead 3.0 mg/kg

This SGMP is produced and submitted with the intent that it is to be a working document that may be revised based additional information from field observations, or as reported to EGS or the NCRWQCB. It should also be noted that landfill facilities, if soil is to be off hauled, will have their own acceptance criteria that may differ from the above.

Soil Management and Sampling

During the redevelopment of the site area, specified in this SGMP (APN 004-071-002, Plate 2), disturbance of near surface soils by grading will likely occur. As indicated in an earlier section of this SGMP, it is currently anticipated that the site will likely balance with respect to the soil use although final development plans are not available at this time. However, if excess soil is generated during the site grading, the contractor will stockpile the soils for proper management and sampling for either 1) re-use on the site, or 2) disposal at a landfill facility.

Soils will be screened periodically in the field during the redevelopment work by the site EP/HSO using a PID. Soils will be initially screened with a PID and visual observation, but stockpiled soil to be reused onsite requires analytical testing to confirm.

In general, soils produced during the grading effort will not be screened using a PID unless

the EP/HSO is notified by the contractor due to identified possible contamination. Field screening using a PID will be more frequent during trenching or excavation work. When onsite, the EP/HSO shall screen soils with a PID as needed.

Additionally, if contaminated soils are encountered, based on visual inspection and field screening using a PID, the Owner/Developer will be required to contact the EP/HSO who would then notify the regulatory agencies, if needed. If the EP/HSO determines that additional remedial excavation is needed, the work in that area will be temporarily ceased so that regulatory agencies may be notified.

Stockpiled Soil Sampling

If soils are to be re-used on site, stockpiled soils generated during the site work will be sampled at a frequency of one (1) discrete sample for every 40 CY, with at least ten (10) soil samples collected from every stockpile. Per the USEPA, a minimum of ten soil samples for a statistically valid estimate of the 95 percent upper confidence limit of the mean (95UCLM) for risk assessment purposes is required².

The 95UCLM will be calculated for site CoC's using the USEPA statistical software, ProUCL³. The CoC 95UCLM will be calculated and compared to the cleanup goals as presented in an earlier section of this SGMP. Soils that have a 95UCLM value for COC's at or below the cleanup goals may be re-used on the site. Soils that exceed this level will be disposed of properly offsite.

If the contractor decides to simply off-haul excess soils, the soil stockpiles will be sampled at a frequency determined by the landfill facility, which will include a rate of four (4) discrete samples for every 250 CY. All landfill requirements, above what is indicted in this SGMP, will be satisfied if disposal is completed. The discrete soil samples will then be composited by the analytical laboratory at a maximum ratio of 4:1 for analysis of one 4:1 composite sample for every 250 CY for disposal.

Additional analysis maybe required by the landfill after they review the analytical results for acceptance. All waste manifests will be included in the final report. Soil samples will be collected in glass jars achieving zero head space, with the support of a backhoe or other suitable equipment to ensure that representative samples throughout each stockpile are

collected. All soil samples to be analyzed for VOC's will be collected and preserved in the field in accordance with EPA preservation method 5035, in accordance with NC-RWQCB requirements.

Excavation and Trenching Soil Sampling

Excavation and/or trenching is expected to generate soils during the course of the site development. Soil sampling of the excavation or trench soil will be completed to determine if onsite reuse is acceptable. Stockpiled soil produced from excavation or trenching will be sampled in accordance with the previous section of this SGMP. Excavation and trench soils that are suspected to contain residual contamination will be screened in the field using a PID. Any stockpiled soil removed from excavations or trenches on the site will be placed on visqueen sheeting, and covered with the same, until sampling and analysis can be completed, and reuse or disposal is determined.

If residual contamination is suspected or identified during the excavation or trench work, the EP will be notified. If the EP confirms that the soil is contaminated, the work will be temporarily ceased, regulatory agencies will be notified, and additional excavation will then be implemented. After it is determined that additional excavation has removed suspected contamination based on visual, olfactory, and PID field screening, confirmation soil sampling will occur in the presence of a regulatory agency. Confirmation soil samples will be collected from the bottom of an excavation or trench every 50 SF, and from the sidewalls of an excavation or trench every 20 lineal feet.

All soil samples for VOC analysis will be preserved in the field in accordance with EPA preservation method 5035, in accordance with NC-RWQCB requirements. Soil samples for analysis of heavier petroleum related compounds (diesel and motor oil) as well as metals will be collected in glass jars achieving zero head space, with the support of a backhoe or other suitable equipment.

If soils removed from excavations or trenches are determined unsuitable for re-use, then the excavation and trenches will need to be backfilled with clean import material.

Groundwater Management and Sampling

As indicated in the NC-RWQCB's March 2, 2017 e-mail, all groundwater extracted from the site shall be considered contaminated until testing proves otherwise.

If groundwater is encountered during the site work, likely only possible in deeper trenches or possible excavations associated with the site redevelopment, all groundwater that needs

to be removed will be pumped and contained in a frac-tank or similar container until proper sampling and analysis can be performed. If groundwater is encountered in a trench located within the area of known contamination, then trench plugs shall be installed for utility corridors and piping runs. Groundwater contained in a holding tank (frac-tank or baker tank or similar) shall be analyzed for the site CoC's and, based on the analytical results, either 1) be discharged under permit to the City of Santa Rosa sewer system, or 2) hauled offsite and properly disposed under manifest.

In accordance with the comments made by the NC-RWQCB in their e-mail dated March 2, 2017, all groundwater generated from the site during redevelopment, for dewatering of excavations or trenches, for example, shall NOT be discharged to storm drains or surface water conveyances, including drainage ditches, creeks, or culverts.

Storm water will be managed pursuant to the site redevelopment SWPPP

Utility Clearance

Prior to completing any site grading and/or excavation, the site boundaries, as shown on Plate 2, will need to be marked, and Underground Services Alert (USA) will need to be notified of excavation dates to gain utility clearance.

Dust Control and Air Monitoring

During all redevelopment grading and excavation procedures on the site, the operation should incorporate dust control measures. Soils should be continually wetted to control fugitive dust to protect worker safety as well as human health in the nearby area and the environment from potential contaminants contained within the dust.

Traffic Control and Loading Routes

A traffic control plan should be prepared to control traffic along Santa Rosa Ave and Yolanda Avenue during a potential construction project at the site, and the route for waste disposal trucks used during the excavation off haul should be clearly annotated.

Excavation Site Security

After completion, all excavation(s) should be secured to protect human health until the excavation(s) have been backfilled.

Soil and Groundwater Profiling and Disposal

Upon receipt of soil and/or groundwater samples, a waste profile will be completed and the waste accepted by a licensed facility, if this is the decision of the Owner/Developer or if analytical results indicate soils cannot be re-used onsite. The soil and/or groundwater will then be loaded, hauled and disposed under waste manifest to be documented and submitted to the involved regulatory agencies.

Excavation Backfilling and Paving

Upon completion of an excavation, it must be backfilled with clean imported soils. EGS recommends compaction in accordance with project engineer's design and in accordance with the Owner(s)/Developer(s) approved and permitted redevelopment plan.

Health and Safety Plan

Attached to this SGMP is the site specific Health and Safety Plan (HASP). The HASP has been prepared to provide site specific information for workers during an excavation process to protect worker safety, human health and the environment. It is recommended that the HASP be reviewed prior to completing the work.

Report Preparation Documenting SGMP Implementation

Upon completion of the SGMP implementation, and following the receipt of the waste disposal manifests, EGS will complete the final report documenting the work. The report may include topics such as a description of field procedures and controls incorporated in accordance with the SGMP, results of additional sampling (if needed), to-scale site map (including additional sample locations, if needed), and documentation of soil off haul and disposal waste manifests. The final report will also include copies of all analytical reports.





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Hulsman PROJECT: 451.0711 DRAFTED BY: DLB MAY 2017

SOIL & GROUNDWATER MANAGEMENT PLAN

Hulsman Transportation 325 Yolanda Avenue Santa Rosa, California NC-RWQCB Case #1TSR050 **PLATE**



KEY 7/24/09 AG

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DATE: MAY 2017

Santa Rosa, California

NC-RWQCB Case #1TSR050

PLATE

onstitute legal lots. To verify legal parcel status neck with the appropriate city or county ammunity development or planning division.





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MAY 2017

PREVIOUS INVESTIGATION AREAS

SOIL & GROUNDWATER MANAGEMENT PLAN

Hulsman Transportation 325 Yolanda Avenue Santa Rosa, California NC-RWQCB Case #1TSR050 PLATE

3

APPENDIX A

Site-Specific Health and Safety Plan (HASP)

SITE HEALTH & SAFETY PLAN

GENERAL INFORMATION:

SITE: Hulsman Transportation

325 Yolanda Avenue Santa Rosa, California

OWNER: Property Owner: Paul Hulsman

Address: P.O. Box 423

City/State: Santa Rosa, CA 95402

Telephone: 707-479-9023

PLAN PREPARED BY: Environmental Geology Services

6169 Amie Drive Windsor, CA 95492 707-528-0810

OBJECTIVES: To protect worker safety and the safety of surrounding human health

and the environment during shallow soil grading and excavation work at the site specified in the Soil & Groundwater Management Plan.

The objective of the work is to identify, manage, handle, and dispose of potentially impacted soils and/or groundwater if encountered at the site during redevelopment of site improvements in these areas. Excavated soils and shallow groundwater may contain concentrations of residual petroleum hydrocarbons, VOC's and metals. This HASP provides information to protect EGS worker safety during the work, as well as surrounding human health and the environment. Contractors need to have their own HASP, but may use information in this plan, as well as other sources, to develop a plan appropriate to their needs.

PROPOSED DATE OF

SITE WORK: HASP completed and to be implemented in the event work is needed.

DOCUMENTATION/SUMMARY:

Residual concentrations of petroleum hydrocarbon products, VOC's and metals may be present in soils; caution is advised. Site work may include excavation of shallow soils, including possible de-watering of the excavation, followed by and backfilling and paving, and off haul / disposal of excavated soils and removed groundwater.

SITE/WASTE CHARACTERISTICS:

POSSIBLE WASTE TYPES: Residual concentrations of petroleum hydrocarbon

products including TPH-D, TPH-G, BTEX, MTBE,

VOC's, and metals.

CHARACTERISTICS: Toxic, caution advised

FACILITY DESCRIPTION: Former petroleum UST's

HAZARDOUS EVALUATION:

PARAMETER: Visual and odors

HEALTH: Ingestion, Inhalation, Absorption, preliminary indicators:

odors, dizziness, nausea. Move away to fresh air if

odors noted.

SPECIAL PRECAUTIONS

AND COMMENTS Correct safety procedures must be followed per HASP.

Underground utilities will be identified and marked accordingly. Primary concern is personnel and pedestrian safety related to earth moving equipment.

SITE SAFETY WORK PLAN:

PERIMETER ESTABLISHMENT: Use chain linked fence, barricades, or orange

traffic cones to secure work area and identify work area to nearby pedestrian and vehicle traffic

flow as needed.

PERSONAL PROTECTION: Level of Protection: Max. EPA Level D

Modifications: Hard Hats, gloves

Surveillance Equipment: PID/FID to be used by the

EPO to monitor VOC's

Dust Control: Light water spray during

excavation and loading

operations

SITE ENTRY PROCEDURES: Control as necessary traffic away from

excavation equipment and workers.

DECONTAMINATION

PROCEDURES: Personnel: Wash with detergent and water

frequently and before food

consumption

Equipment: Remove excess soil before leaving

site

FIRST AID: First aid kit on site

WORK LIMITATIONS: Utilities to be identified & marked, USA notified at

least 48 hours in advance.

TEAM COMPOSITION: David L. Bush, PG - Chief Geologist

EMERGENCY INFORMATION:

LOCAL RESOURCES: Ambulance/Hospital

Dial 911

Police/Sheriff/Highway Patrol

Dial 911

Fire Department

Dial 911

ON SITE RESOURCES: Fire Extinguisher, First Aid Kit,

Telephone and Water.

EMERGENCY CONTACT: David Bush

(707)-528-0810 or (707) 953-1020

EMERGENCY ROUTES:

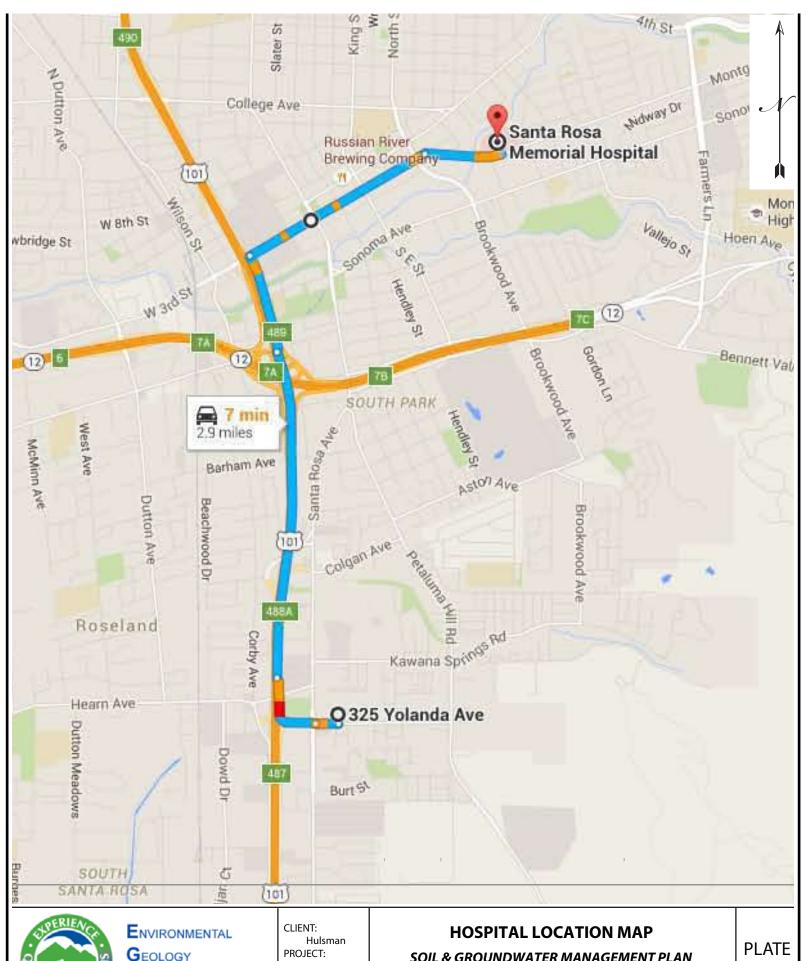
MEDICAL FACILITY - West on Yolanda Avenue, north on Highway 101, Exit 489 to Downtown Santa Rosa (Third Street), turn right onto Third Street, pass Brookwood Avenue, then turn slightly right onto Montgomery Drive. Santa Rosa Memorial Hospital on left at 1165 Montgomery Drive. Follow signs to emergency entrance.

Map Attached.

SIGN OFF SHEET

ΑII	personnel	on site l	nave read	and undei	rstand the	Safety	Plan. Al	II personnel	will	comply
witl	h safety pr	ocedure	s:							

NAME (Please Print)	RESPONSIBILITY	SIGNATURE





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SOIL & GROUNDWATER MANAGEMENT PLAN

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HASP