

## 6 Construction Activities

Lead-impacted soil has been documented at Nanue Bridge during the 2024 site investigations. This C-EHMP is specific to the maintenance and repairs at Nanue Bridge. It is anticipated that steel girders and beams will be removed, replaced, or modified to repair the bridge. The footings will remain in position.

Per the Remedial Action Memorandum (EQI 2024), the remedial action objectives for Nanue Bridge as identified by the site owners and as recommended by the state guidance was listed as Alternative 7a in the RAA. This alternative calls for a construction and site-specific EHMP that outlines the locations of lead-impacted soil so that current and future workers can plan appropriate responses and PPE for site work. It is the responsibility of the contractor to implement the remedial alternative to plan the process as efficiently as possible to prevent contaminated soil from leaving the site.

This EHMP will be updated periodically and the effectiveness of this alternative will be reviewed every 5 years. This alternative will have two additional updates over the next 30 years to accommodate bridge maintenance changes.

The Remedial Action Contractor will be responsible for updating this C-EHMP or preparing a C-EHMP Addendum describing their specific means and methods that will provide site-specific information about what type of construction activities will be conducted in detail and provide construction plans or drawings on where these activities take place. The following will also be provided by the Remedial Action Contractor:

- NPDES Permit
- Remedial Design approach
- Stormwater Pollution Prevention Plan (SWPPP)
- Site-Specific Health and Safety Plan
- Erosion and Sediment Control Plan (ESCP)
- Activity Hazard Analysis
- Spill Prevention and Response Plan
- Best Management Practices for Erosion and Stormwater Control

An archaeological consultation and monitoring are not anticipated as only limited excavation using hand tools in previously disturbed areas around the footing is planned.. However, if site conditions change this will be implemented.

As soil will be left onsite, a site-specific EHMP will be necessary. Once the repairs are completed, the primary maintenance at Nanue Bridge is vertical tree trimming from the bridge deck, limiting workers from direct contact with soils on-site.

The specific equipment and Contractor means and methods will be provided by the Contractor's Remedial Design.