Mohawk Solar Project

Preliminary Health and Safety Plan

Prepared for:

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on behalf of Mohawk Solar, LLC
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June 2019

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1. PURPOSE

The purpose of this site-specific Preliminary Health and Safety Plan ("Plan") is to act as a companion to the Avangrid Corporate Safety Program and Policy. This plan illustrates safety issues specific to the Project.

Mohawk Solar, LLC ("Mohawk Solar"), a wholly owned subsidiary of Avangrid Renewables, LLC ("Avangrid"), is committed to the vision of a zero-injury organization and has established a corporate safety system entitled Zero Injury System of Safety Excellence. Mohawk Solar will foster and promote a zero-Injury culture through clearly explaining expectations during the orientation process and continually striving to eliminate at-risk behaviors and unsafe conditions. The Zero Injury System of Safety Excellence is comprised of eight key elements:

1. **Leadership** – Expectations to lead and support the safety processes.

   Without strong leadership, safety, quality, and productivity will suffer. Supervisors will be in the field with their employees the maximum extent possible. All supervisory personnel, including subcontractors, are accountable for their safety performance and will ensure employees within their control have proper tools and equipment to do the tasks safely.

2. **Training** – The training process and expectations for training.

   It is the company's intent to ensure every employee has the proper training and tools to perform their tasks in a safe/healthy work environment. The Corporate Safety Manual and Employee Handbook provide a foundation and resource to protect our people, equipment, materials, and property, along with maintaining compliance with company, federal, state and local safety and health regulations.

3. **People Process** – Observation processes (behavioral based program).
4. **Planning** – Pre-job planning activities utilizing the Job Hazard Analysis form.
5. **Incident Management** – Identifying improvement opportunities and establishing corrective opportunities.
6. **Assessments** – Monitoring success and identifying process improvements.
7. **Subcontractors** – Managing and working with Subcontractors to promote processes equal to or greater than base safety systems.
8. **Metrics** – Mohawk's process for identifying trends in at at-risk behaviors and unsafe conditions.

2. PROJECT DESCRIPTION

Mohawk Solar proposes to construct and operate the Mohawk Solar Project ("Project") in Montgomery County, New York. The Project would consist of an up to 90.5-megawatt (MW) commercial photovoltaic (PV) energy system located two miles south of the Village of Fort Plain. The footprint of the proposed Facility components within the Project Site will be approximately 830 acres.

Proposed Project components will include:

- PV panels
- access roads
- buried electrical collection
- overhead electrical collection (if determined necessary)
- construction staging/laydown areas
- POI switchyard
- collection substation

- O&M facility (if determined necessary)

Project construction is expected to begin in 2020 and is expected to take 12 months to complete. The in-service target for the Project is 2021. Mohawk Solar expects the Project to operate for approximately 40 years before being decommissioned.

3. PERSONNEL MANAGMENT

3.1. Key Personnel

The following are key personnel for this Project:

- Plant/Operations & Maintenance Manager
- Project Manager
- Safety Manager

3.2. Responsibilities

It is Project Management's responsibility to implement measures necessary to establish and maintain safe working conditions on the project. Prior to the commencement of any site work an individual will be designated, in writing, as a competent safety representative having extensive knowledge, training and experience and has successfully demonstrated his/her ability to solve or resolve problems related to the subject matter. This representative will make frequent and regular safety inspections of the jobsite daily. These inspections will be documented in writing. Field Supervisors will make and document daily safety inspections of their work area(s) and be available upon request. All at- risk behavior and/or unsafe conditions noted during inspections will be corrected immediately. A Job Hazard Analysis (JHA) is required to be performed for all hazardous work activities. Copies of JHA's will be provided to the Corporate Safety Department upon request. All employees will be instructed in the recognition and avoidance of unsafe acts and/or conditions applicable to its work environment to control or eliminate injuries. Project Supervision will enforce the project safety rules and OSHA regulations on its employees and subcontractors and require them to meet all requirements of this document.

Project Supervision is responsible for providing and requiring the use of appropriate personal protective equipment (PPE) in all operations where there is an exposure to hazardous conditions or where the hazard assessment results require PPE. Project Management will designate and submit to the Corporate Safety Department the names of competent persons as required by Federal, State or local safety and environmental standards for the Contractor's work activities. Project Management will ensure that competent persons understand their responsibilities and are capable of identifying existing or predictable hazards, as well as working conditions that are unsanitary, hazardous, or dangerous to employees, and understands that he/she has the authorization to take prompt corrective measures to eliminate them.

3.1. Project Safety Committee

The project may require the active involvement of a Project Safety Committee. The purpose of Committee is to allow unencumbered opportunity for craft personnel to explore, voice concerns or suggestions to promote craft employee involvement in improving their safe work environment and provide a forum for discussion and review of individual contractor efforts toward the project goal of Zero Accidents/Incidents. The Safety Committee will work with the full understanding that they may only comment or make suggestions to Project Management.

Committee membership and participation will be solicited and required from the non-supervisor craft level of all contractors/crafts and on-site vendors or suppliers. Members will be required to attend and participate in a

regularly scheduled meeting held on a weekly basis. Committee members will decide committee membership rotation, if any, based on factors that encourage Committee success. Committee Members will select a Chairman to lead the Committee and develop a weekly agenda. A Supervisor will act as a Committee Resource as well as documenting Committee Meeting Minutes. Contractor Site Safety Supervisors should be welcomed into Committee Meetings as Committee Resources. Individual representatives will have the responsibility to disseminate Committee information to their respective employer and fellow employees. Project Management is expected to support the Committee by addressing comments and suggestions made by the Committee promptly.

It is expected that most decisions by Project Management on Committee suggestions will be reached at the daily/weekly management meeting at which the Committee's Comments are distributed. Committee comments and Contractor decisions or actions requiring extended consideration or correction time may require a written response to the Project Superintendent.

3.1. Public Relations

Good public relations are essential to the success of a construction project. Mishandling of public relations can damage the reputation of the owner, Contractor and Subcontractors; and may subject all of us to unduly restrictive regulation by city, county, state or federal agencies. All workers on the Project will be professional and courteous in dealing with members of the general public, government inspectors, regulatory agency personnel, and representatives of the media.

Neighbors and other members of the general public may have questions regarding work activities or concerns about perceived problems such as odor, vibration, noise, visual nuisance, or structural support.

Site personnel will actively demonstrate concern with the issues identified, explain what can be expected, and most importantly, direct the interested public to project management or designated spokesperson if questions arise after Project work has started. If necessary, a brief, factual response to the issues raised will be provided by a representative

3.2. Project Recognition

The Wooden Nickel program was created to provide rewards and recognition for employees recognizing and eliminating at risk behavior. The program focuses on the behaviors required to achieve a ZERO Injury Environment. Some areas where recognition may occur include:

- Pre-task Planning
- Jobsite Safety Auditing
- Identification and Correction of hazards
- Employees going above and beyond in their safety efforts
- Opportunities for Improvement (project specific upstream indicator development)

3.3. Enforcement

Workers should be advised that the provisions of the Plan, the rules expressed in the Employee Handbook and the use of proper personal protective equipment (PPE) are mandatory and will be enforced by the following:

- Recognition for compliance and injury free environment initiatives should include spot awards, and the use of safety as an evaluation criterion for promotion
- Subcontractors are responsible for all citations issues by all regulatory agencies, their related expenditures, both direct and indirect, and fines
- Progressive discipline should be enforced for non-compliance

- Plan or subcontractor's safety and health work rule, refer to the Disciplinary Action section of this part for additional details.

All workers should report unsafe conditions and practices and are encouraged to communicate with their supervisor and/or the Site Safety Professional. At any time, workers may anonymously report unsafe conditions and practices. There will be no reprisals or other job discrimination for expressing any concern, comment, suggestion or complaint about a safety related matter.

3.4. Consequences for Unsafe Work Behavior

Consequences for unsafe work behavior are as follows:

- Any employee involved in a safety violation, unsafe act/behavior, or accident/incident will be documented in accordance with disciplinary and safety policies.
- If it is determined upon further investigation that the violation was due to employee negligence, willful misconduct, or of the serious nature listed below, the suspension period could be extended, or result in termination.
  Some examples include:
  - Violation of fall protection policy
  - Violation of the red tape/flag policy
  - Lockout/Tag-out violation
- Failure to report safety incidents, enforce safety rules, policies, and procedures as outlined in this policy will fall subject to the suspension consequences listed above, up to and including termination.

When warranted, a meeting of personnel involved in a safety violation, to include direct supervisors and the site superintendent, will be held with the Site Manger and any other applicable party to review the details of the incident and actions taken to prevent reoccurrence of such incidents. All disciplinary action shall be documented and sent to the HR department.

3.5. Project Disciplinary Procedures

The Plant/O&M Manager is responsible for enforcement of the disciplinary program. They are ultimately responsible for the overall commitment to the safety goals and will abide by these same levels of disciplinary action stated below. Physical inspections by company officials that indicate violations showing overall lack of commitment to company safety goals will be under the same level of disciplinary action.

This policy defines the course of action when disciplining employees for safety violations, and applies to all employees, including supervision. The purpose of the policy is to address unsafe work behavior and help employees adjust to the company's safety culture.

We believe all workplace accidents can be prevented by encouraging employee ownership of the safety program. Providing our employees, a safe and healthful workplace by giving each employee the time and tools necessary to do every task in the safest manner possible will ensure the goal of our safety program is carried out to ensure the safety of all employees.

As a condition of employment, every employee is encouraged to make a commitment to work safely and obey the safety rules. Employees are responsible for following the company safety policies and safe work practices presented in job specific orientation and training. Employees are also responsible for performing their work in a safe and healthful manner that does not jeopardize the employee's own safety, and/or the safety of others.

4. SAFE WORK PRACTICES

4.1. Training and Inspections

4.1.1. Supervisor Safety Program

All onsite project supervision (Foreman and above) will be instructed in the Supervisor Safety Program. Instruction and training of all employees per site, corporate, and OSHA requirements, as it relates to an employee's duties, is required on the Project. Upon request, documentation of training will be provided to the Corporate Safety Department.

Examples of such training to be provided by are:

- Orientation - All project personnel will be instructed in the site safety policies and rules, as well as the JHA's and other safety practices required by their work assignments prior to starting work. Project management will document this training and ensure that employees know and understand the safety orientation and JHA/PTP process by means of a site orientation test
- Safety Meeting / Pre-Task Plan Meeting attendance is mandatory. At the start of each shift, each Foreman will hold a two-part Tailboard Meeting. The first part of the meeting is to be instruction on a safety topic related to the crew's work and is to be part of a continuing employee- training program. Topics are to be in writing. A Pre-Task Plan (PTP) sheet will be completed during the second part of the meeting and for all work assignments given throughout the day. The Foreman and the employees involved will complete and review the JHA/Tailboard sheet before beginning work. PTP sheet(s) and the parent JHA(s) are to be kept in the work area for immediate review and or revision. Employees assigned to a new activity that is already underway are to review the activities JHA and sign the activity's PTP sheet before beginning work. Documentation of all Safety Meetings and PTP/JHA's are to be maintained on site.
- Specific Instructions - OSHA requires that employees who perform specific tasks or operate specific equipment be trained in its use. Project Management will ensure only those personnel qualified by training or experience will be permitted to operate machinery. These qualifications will be documented and maintained at the jobsite; copies of qualifications will be provided to the Corporate Safety Department upon request.

4.1.2. Job Hazard Analysis

Contractor and Subcontractors are required to complete, within 2 weeks of work commencing, a JHA addressing the environmental, health and safety risks and subsequent hazard assessment which will be prepared for the individual major project tasks and operations.

It is critical that Site Project Management and first line supervisors as well as field employees are integrally involved in the development, review, and approval of site JHA's.

Job Hazard Analysis (JHA) is a tool that will be used by project teams to pre-plan high hazard tasks and procedures. Whereas a pre-task plan is task specific, the JHA is intended to be used as a high-level planning tool that will serve to breakdown an entire scope of work into tasks and define the potential hazards and controls for each task. The goal is the successful planning and elimination of hazards through such methods as engineering controls, training, site and craft coordination, etc. Written, detailed JHAs should be conducted for all high hazard activities for all scopes of work on our projects.

4.1.3. Ongoing Communications

Forms of employer-to-worker communications on safety topics on the project may include, but are not limited to:

- Providing workers with a copy of the Employee handbook
- Activity specific safety guidelines
- Safety bulletins
- Tailboard meetings
- Hazard alerts
- Communication boards
- Other verbal and written notices

Communication boards may be utilized to display progress on project sponsored safety indicators and milestones. Weekly safety meetings should be attended by all Contractor and subcontractor personnel and should be under the direction of project management. The purpose of these meetings is to discuss the findings of jobsite safety audits and corrective actions, upcoming project activities, etc. This meeting will also address pertinent safety regulations, any changes in scheduling, engineering, administration controls or PPE that are to be adopted for safety reasons.

Other meetings may include:

- Pre-Construction meetings with subcontractors
- Offloading
- Excavations/Trenching
- Overhead Transmission Lines

4.1.4. Job Site Safety Audits & Inspections

- Safety Pro Checks are expected at a frequency of 4 per week.
- Supervisor Checks are expected at a frequency of 4 per week.
- Team Checks are expected at a frequency of 4 per month. In addition, supervisors may choose to be accompanied on their team check by a safety pro or one of the following (Project Manager, Assistant Project Manager, General Superintend or Lead FE).

In addition to visits and inspections by corporate representatives, the Project may be inspected by authorized third parties. These may include representatives of the client, insurance companies, or OSHA. Third Party Inspectors are to be directed to the office prior to being allowed onsite. Third Party Inspectors entitled to access will be treated with respect and courtesy.

4.1.1. Daily Pre-Task Planning/Hazard Recognition

Prior to the start of any daily task, Contractor and its sub-contractors will develop a documented pre-task plan (PTP). The Foreman is responsible for the completion of the PTP with the assistance of his/her crew members. The crew should utilize the JHA to assist in the development of the PTP. The PTP, JHA and any associated permitting will remain at the task location for that portion of the project's work. At the end of each day, the PTP will be turned into the site's Plan representative for recordkeeping purposes. Each new task requires the development of the PTP.

4.1.1. Competent Person

OSHA Construction Standards and company policy requires a "Competent Person" be designated and present on the Jobsite to address certain specific hazards and safety responsibilities. OSHA defines a "Competent Person" as "One who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, who have authorization to take prompt corrective measures to eliminate them."

Prior to assigning a Competent Person, the employee will have documented training or certifications onsite and a level of experience that ensures they understand all aspects of OSHA law, company and client requirements.

Project Management will review the following list of construction standards requiring a competent person, determine which standards apply to the project and designate by name and job description the assigned competent person. The competent person log is a living document and will be updated and posted in various places on the project.

4.2. Policies

4.2.1. Site Access

Persons are not permitted onsite without checking in at the main office and having received permission to do so by the site General Superintendent or his/her designee. All personnel and deliveries are to be directed to the main office. Vehicles are not permitted past the designated parking areas unless for direct work purposes or with prior authorization by the Project Superintendent or his/her designee. All employees will receive the orientation and will take the orientation test. Upon completion, they shall receive a site orientation sticker to be placed on their hardhat. All personnel performing work or visiting the site will comply with all posted signs, barricades, fences, and/or signals. All means of ingress, egress and parking will be adequately marked as such and employees are to travel these routes only. Possession or use of firearms, threatening or violent behavior will result in removal from the site. Construction activities are limited to designated boundaries; Personnel are not to exceed these boundaries without prior approval and must stay on designated roads and string roads.

4.2.2. Clothing Requirement

- Shirts with at least 4-inch over the shoulder sleeve will be worn at all times.
- Tank tops are not permitted.
- Long pants are required.
- Steel toe/safety toe work boots will be worn at all times on site.
    - All sub-contractors will make sure safety toed work boots are worn by staff.
- Loose fitting clothes or jewelry will not be worn around moving machinery, grinding operations, welding operations, electrical operations, etc.
- All personnel will have their name or other positive identifier on their hard hat.

4.2.3. Personal Protective Equipment

- Hard hats will be worn at all times while within the site.
- Includes equipment that doesn't have a fully enclosed cab.
- Hard hats will be worn with the bill facing forward at all times.

- Safety glasses with side shields are required at all times and must meet the ANSI Z87.1 OSHA Standard.
- Approved double eye protection and face protection is required when the area of welding, grinding, chipping, chemical handling, drilling or sawing.
- Prescription glasses must meet ANSI Z87.1 standards with side shields or safety glasses must be worn over prescription glasses.
- Gloves, appropriate to the task, are to be worn by all personnel while on the job site.
- Safety toe/steel toe work boots are required at all times.
- Hearing protection and respirators will be worn when applicable
- Rubber boots will be worn when pouring concrete.
- High-visibility vests will be worn at all times while on the project.
- Face shields shall be used when operating high pressure water cleaning equipment.
- Foam back safety glasses are recommended when working in high wind areas.

4.2.4. Fall Protection

- All personnel will be required to maintain 100% tie off any time there is an exposure to a fall of 6 feet or more. Employees will be trained in the recognition of fall hazards and the proper use and inspection of fall protection equipment.
- Fall protection must be rigged in such a way to minimize free fall (6 feet or less) and avoid hitting obstructions at a lower level.
- Employees will be required to inspect fall protection equipment prior to each use. A competent person will inspect fall protection on a monthly basis and document their findings.
- When working in an extensible or articulating aerial boom platform the use of a full body harness and shock absorbing lanyard is required.

4.2.5. Walking and Working Surfaces/Floor and Wall Openings and Stairways

- Ladder hatches will be kept closed.
- Personnel passing through a hatch will close the hatch prior to performing any other task or continuing to climb. Fall protection will not be removed until hatch door is closed.
- Floor and wall openings will be guarded by a standard guardrail, including top rail, mid rail, and toe board or a cover installed and secured to prevent movement.
- Guardrails will be designed for a minimum of 200 lbs. of force in the outward and downward direction.
- Covers will be secured, able to withstand twice the intended load, and marked with the word “Hole” or “Cover”.
- Every flight of stairs having four or more risers will be equipped with standard stair railings.
- Stairs will not to be used until risers and railings are securely installed.
- Debris and other loose materials will not be allowed on stairways or at stairway access points.

4.2.6. Working around Transmission Lines

Except where electrical distribution and transmission lines have been de-energized and visibly grounded at point of work or where insulating barriers, not a part of or an attachment to the equipment or machinery, have been erected to prevent physical contact with the lines, equipment or machines will be operated proximate to power lines only in accordance with the following:

- For lines rated up to 350 kV or below, minimum clearance between the lines and any part of the lifting device or load will be 20 feet. If 20 feet clearance cannot be maintained, prior authorization must be obtained from the Field Safety Operations Manager or the Director of Plan prior to work.
- Lines rated from 350 kV to 500 kV – a minimum distance of 25 feet will be maintained
- Lines rated from 500 kV to 750 kV – a minimum distance of 35 feet will be maintained
- Lines rated from 750 kV to 1,000 kV – a minimum distance of 45 feet will be maintained
- Lines over 1,000 kV – will be determined by the local utility owner.

  In transit with no load and boom lowered, the equipment clearance will be a minimum of 4 feet for voltages up to 0.75 kV, and 10 feet for voltages over 0.75 kV, up to and including 345 kV, and 16 feet for voltages over 345 kV up to and including 750 kV, over 750 kV up to 1,000kV must maintain a minimum clearance of 20 feet. If it is over 1,000 kV will be established by the utility professional engineer who is a qualified person with respect to electrical distribution.

- A person will be designated to observe clearance of the equipment and give timely warning for all operations where it is difficult for the operator to maintain the desired clearance by visual means.

Tag lines will be used unless their use creates an unsafe condition.

Crane outrigger pads will be used at all times and crane mats will be used when necessary, when moving the crane if ground bearing pressure is inadequate.

4.2.7. Medical/First Aid Services and Procedures

Contractor will make provisions prior to commencement of the project for prompt medical attention in case of serious injury or medical emergency.

1. Minor injuries will be treated on site an individual certified in first aid.
2. A local occupational health clinic or physician knowledgeable of construction work will be established at the start of the project to treat injuries that require a doctor visit. The local emergency room will be utilized as a last resort only if a local clinic/physician is unavailable. Utilization of an Emergency Room should be followed as soon as possible by a more thorough and accordingly more accurate evaluation by the Contractors local clinic/physician.
3. Return to work policies will be developed and implemented by all contractors on site.

Project management will ensure that first-aid supplies are easily accessible around the site and documented inspection and refilling of the contents will be conducted at least weekly. Project management will post telephone numbers and addresses of the EMS providers and hospitals at each desk within every office. Each occupational illness or injury will be reported immediately to the Corporate Safety Department. For emergency cases, ambulance services will be contacted first by the quickest means available. If medical treatment is required, project management must provide transportation of the injured to a hospital or physician. A supervisor will accompany the injured employee and remain at the facility until the employee is ready to return. All reports from the physician concerning treatment, diagnosis, return to work status and restrictions will be brought back to the project and a copy(s) provided to the Corporate Safety Department.

4.2.8. Thermal Safe Work Practices

Employees will be advised of safe work practices relating to hot and cold work environments during Orientation to include:

- Appropriate clothing for the environmental conditions.
- Adequate breaks and fluid intake.

- Signs and symptoms of heat/cold related illnesses.

4.2.9. Concrete Work

When working around fresh, wet concrete there is always the potential for concrete to come into direct contact with your skin and eyes. Safe work practices must always be employed to protect yourself and others from any hazards caused by working with wet concrete.

- Always were Personnel Protective Equipment (PPE), especially proper eye wear. Concrete being pumped, dumped or poured from the back of a concrete truck is subject to splattering.
- Wear water proof rubber gloves when directly handling or placing concrete.
- Avoid getting wet concrete inside your gloves or boots.
- Wear a long sleeve shirt and full length pants, or coveralls when hazard present.
- Wear rubber boots when standing in concrete.
- Clothing worn to protect from fresh concrete should not be allowed to become saturated with the moisture from the concrete.
- Ensure that we are in compliance with the new OSHA Crystalline Silica Rule.

4.2.10. Reinforcing Steel

Employees will not work above vertically protruding reinforcing steel unless it has been protected to eliminate impalement. This can be accomplished by bending steel over or covering the protruding ends of the steel.

Good housekeeping will be maintained at all times to reduce tripping and falling hazards.

Bundles of reinforcing steel moved by any type of crane must be securely tied together to prevent slipping. Steel bundles over 20 feet in length are to be handled by properly spaced two-part slings.

Steel bundles will not be rigged to the bundle tie when moving. A proper sling must be used that is capable of supporting the full bundle.

Impalement hazards must be protected at all times when a fall exposure exists.

4.2.11. Confined Space Entry

A confined space by definition means any space having a limited means of egress, which is subject to the accumulation of toxic or flammable contaminants or has an oxygen deficient atmosphere.

Contractor is committed to protect workers from the hazards of entry into confined spaces. Every effort will be made to identify and classify potential confined spaces throughout the course of construction and to pre-plan accordingly. Any employee or sub-contractor entering confined spaces will obtain approval from Plan. Coordination with contractor and any sub-contractors is required. A review of the confined space entry plan, to include written, detailed pre-task planning, will be approved in writing prior to any entry. Entry plans will be submitted for approval prior to entry.

Employees will be trained on understanding the assigned task and ensure understanding, knowledge and skills necessary for the safe performance of their duties. Training will be documented by site safety professionals.

4.2.1. Excavations and Trenching

The Responsible Contractor will complete the excavation checklist prior to opening any excavation or trench.

1. All excavations will be properly marked for utilities and all personnel and organizations will be notified within (10) days prior to commencing any digging.
2. Excavations will be inspected by a competent person daily and after every rainfall event to determine if they are safe.
3. Inspections will be documented and copies should be provided within 3 working days.
4. Daily Pre-Task Plans will be completed every day prior to starting work.
5. All excavations/trenches 5 feet or more will be sloped, shored or have trench shields installed.
6. Spoil piles, tools, and equipment must be kept at least 2 feet back from the edge of the excavation.
7. Ladders or steps or other safe means of egress will be located in trench excavations that are 4 feet or more in depth so as to require no more than 25 feet of lateral travel to an egress point.
8. All open trenches and other excavations will be provided with suitable barriers, signs and lights to the extent that adequate protection is provided.
9. Barricades may be removed if necessary to allow unrestricted access while working in an excavation.
10. Barricades will be reinstalled prior to the end of shift or personnel otherwise leaving the area.
11. All walkways or ramps crossing over excavations will be secured in place and equipped with standard guardrails.

4.2.2. Alcohol and Drug Policy

Employees or applicants, including but not limited to drivers, must submit to the following types of tests:

- Pre-employment testing
- Post-accident testing
- Random testing
- Reasonable suspicion testing
- Return-to-Duty testing
- Follow-up testing

Consumption of alcohol on Construction premises (including parking lots), within Company vehicles, or on any job site is strictly prohibited. At no time may any employee operate a motor vehicle or any equipment while impaired.

The possession, storage, transfer or consumption of liquor on Company premises, within Company vehicles, or on any job site will result in discipline, up to and including discharge. Employees who report to work under the influence of alcohol will not be admitted into the building or onto job sites, and will also be subject to discipline, up to and including discharge.

Drugs are defined as any behavior-modifying product, including marijuana. Employees are prohibited from possessing, storing, transferring or using such substances, or reporting to work under the influence of narcotics or other illegal drugs. If the prescription medication affects the employee's ability to perform the essential functions of his or her position, or if the drug poses a threat to the health and safety of the employee, co-workers or the public, the Employer may restrict or prohibit its use.

Any employee found guilty of carrying, storing, transferring or consuming such drugs during employment, on Company property (including parking lots), within Company vehicles, or on any job site, will be subject to discipline up to and including dismissal and to possible civil and/or criminal prosecution.

4.2.3. Smoking Policy

Contractor will limit the exposure of all its workers and the public to environmental tobacco smoke. Smoking is only allowed where expressly permitted and designated. The smoking policy and clear expectations will be communicated during the Site Orientation. Smoking is prohibited in all enclosed areas, to include but not limited to: field offices, maintenance shop(s), tool vans, Construction vehicles and building stairwells. Smoking will be allowed in designated outdoor smoking areas only and limited to break(s). Designated safe outdoor smoking areas are expected to be:

- Clearly identified by workers and the public with smoking area signs
- Equipped with appropriate receptacles
- Located away from hazardous locations
- In compliance with federal, provincial and municipal legislation where applicable.

4.2.4. Office Safety

- Good Housekeeping practices must be followed to avoid injury.
- Use caution when walking around blind corners. Keep to the right when walking in hallways or aisles to avoid collisions.
- Use handrails when climbing or descending stairs, and always walk – do not run.
- Arrange electrical cords and equipment off the floors and out of aisles where they may present a tripping hazard.
- Remove any type of spilled liquid from the floor immediately. Arrange furniture and other fixtures to prevent a tripping hazard.
- Stack materials in a stable manner to prevent them from falling over.
- Do not lean too far back in a chair and ensure your feet remain on the floor at all times.

4.2.5. Pedestrian Safety (Internal Traffic Control Plan)

An ITCP will be developed and will assist in protecting all persons at the site as follows:

- Isolates workers from equipment.
- Reduces the need to backup.
- Limits vehicle access points to work area and creates designated parking areas.
- Coordinates truck and equipment movements.
- Provides guidance to personnel on foot and in equipment and trucks.

4.2.6. Housekeeping

All field trash, debris and scrap material will be promptly disposed of and all work areas will be kept clean and orderly. Form and scrap lumber with protruding nails, and all other debris, will be kept cleared from work areas, passageways, and stairs, in and around buildings or other structures.

Containers will be provided for the collection and separation of waste trash, oily rags and other refuse. Metal (Dumpster type) containers must be used and emptied promptly.

Garbage and other waste will be disposed of at frequent and regular intervals in a manner approved by the Project Superintendent.

All sub-contractors will notify contractor in writing of any hazardous waste that will be generated during performance of the work. The Contractor has the direct responsibility of maintaining proper storage of these wastes while onsite and will verify in writing that the wastes have been disposed of in a legal manner.

Contractor, Sub-Contractors and Employees will not pour, bury, burn, nor in any way dispose of any chemical on the jobsite.

The Contractor will dispose of all combustible debris to a solid waste disposal site. No open burning of debris or rubbish will be permitted on the project.

Materials and supplies will be stored in locations that will not block access ways, and will be arranged to permit easy cleaning of the area.

All hoses, cables, extension cords, and similar materials will be located, arranged, and grouped so they will not block any access way and will permit easy cleaning and maintenance.

4.2.7. Sanitation

Contractor and sub-contractors are required to provide, at minimum, basic general requirements for health and sanitation for their workers. These include, but are not limited to:

- Potable water
- Portable toilets
- Hand wash facilities or sanitizing hand cleaner
- Adequate covered garbage containers

4.3. Equipment and Materials

4.3.1. Storage, Containment and Disposal of Hazardous Materials

Project Management is responsible for notifying the Corporate Safety Department of any hazardous chemicals or substances that are to be brought on the jobsite. The legal storage, use, and disposal of hazardous chemicals or substances are the responsibility of the Project Management. If hazardous chemicals are going to be used, Project management will implement a hazard communication program that will include training, SDS, and labeling.

All containers will be labeled without regard for duration of use or quantity. Use of chemicals may result in hazardous waste; in such cases, the Contractor will institute a program to address hazardous waste storage and disposal in accordance with the code of federal regulations, state regulations, and other requirements delineated in the bid and contract documents. When personnel exposure to chemicals, particulates, aerosols or fumes is reasonably expected to exist and exceed allowable limits, then Project management will put an industrial hygiene program in place. SDS sheets are to be found on file and available for review in the Contractor's offices by all site personnel.

Equipment will be made available on site to be used for hazardous substance containment and cleanup. Absorbent pads will be carried in all maintenance vehicles, readily available to clean up any oil discharges. Plastic bags will be carried in all maintenance vehicles, readily available for storage absorbent pads and/or containment soil that must be removed from the jobsite. Any spill recovery supplies used for spill cleanup will be stored in a protected, dry area until such time that the materials can be removed from the site and shipped to a proper disposal facility.

Diesel Fuel, Fuel Oil and Gasoline

The Project Superintendent will ensure control and prevent accidental discharge during storage and transfer. Any on-site storage will be in approved containers. Absorbent pads and other recovery equipment will be available to contain and recover any fuel which is accidentally spilled. Any spills and contaminated soils will be cleaned up and will be disposed of in accordance with applicable requirements of the State of New York and the U.S. Environmental Protection Agency.

Petroleum Contaminated Materials

Petroleum contaminated materials, such as used in oil filters and old hydraulic hoses, will be retained and safely stored, until disposal, in an area or container where discharge of petroleum is prevented or contained. Disposal will be in accordance with regulations.

Grease and Gear Lube

Solid lubricants will be stored in a protected area where containers will not be damaged. Spent containers will be appropriately disposed of in accordance with regulations. Accidental discharges will be recovered.

Motor Oil, Hydraulic Oil and Liquid Gear Lube

Unused motor oil, and other liquid lubricants, will be stored in protected areas where the containers will be not damaged. Bulk containers will be placed in a lined area. Spent containers will be disposed of in accordance with regulations. Absorbent material will be available and used to recover any oil which is accidentally discharged during transfer operations or at any other time. Used oil will be recovered, stored in the same manner as new oil, and disposed of in accordance with regulations. Used oil cannot be stored in open containers. All equipment using hydraulic hoses and cylinders will be inspected on a regular basis, absorbent pads and other spill recovery materials will be available to mitigate discharges to the environment in case of equipment failure. When equipment operating on or adjacent to waterways is found to have a petroleum leak which cannot be immediately repaired or controlled, it will be removed from service until repairs can be made.

Solvent and Paints

Solvent and paints will be stored in a protected area where the containers will not be damaged. Spent solvents will be retained and disposed of in accordance with regulations, as will left over paints. Accidental discharges will be recovered.

Cement and Epoxies

Cement and epoxies will be stored in dry protected areas. Cleaning of ready mix trucks and disposal of left over ready mix will only be accomplished in an appropriate manner. Left over epoxy will be stored and disposed of in accordance with regulations.

Lead/Acid Batteries

Lead / acid batteries will be stored in a protected area. Used batteries, which cannot be recharged, will be returned to the dealer or to a battery recycling facility.

Antifreeze

Antifreeze will be stored in the same manner as liquid petroleum. Spent antifreeze will be recovered and retained until proper disposal is accomplished. Antifreeze accidentally discharged will be recovered with absorbent materials.

4.3.2. Electrical Safety

- All extension cords will be three wire types and protected from damage.
- No cord or tool with a damaged ground plug may be used.
- Worn or frayed cords will not be used.
- All temporary power sources must be protected with the use of Ground Fault Circuit interrupters (GFCI)'s.
- All cords and electrical equipment will be inspected by employees for external defects or indications of internal damage prior to use.
- Damaged items should be tagged "Do Not Use" and removed from service until repaired and tested.
- Lock-out/Tag-out program also applies to any other energy source (Steam, Hydraulic, Gravity, etc.)
- All temporary lighting will be protected from accidental contact or damage.

4.3.3. Lock-out/Tag-out

All authorized and affected employees will:

1. Adhere to the Lock-out/Tag-out Program (LOTO) whenever they must:
   - Isolate machines or equipment
   - Installation of equipment
   - Maintenance Activities
   - Repair work
   - Servicing of equipment
2. Be trained in the LOTO procedure;
3. Complete the LOTO Clearance Form prior to commencing work on equipment; and
4. Complete a Pre-Task-Plan with all parties involved prior to starting work.

Electrical Lock-out/Tag-out

Each contractor and supplier will submit a lockout/tagout plan that is specific to their duties on this project. Boundaries will be defined during construction and parties working under another's program will be trained on those procedures.

In each LOTO program it will remain that each employee places his/her own lock and tag (tag if a tag only isolation) and no one can remove another's lock and tag. If the owner of the lock anticipates being off work for any period of time, he will turn the key and the responsibility of removing the lock/tag over to his immediate supervisor.

Upon the completion of all construction and commissioning activities, the Owners LOTO program will be implemented.

Employees working with the collection system on the project will follow the procedures for such work that is found within the Collection System Energization Plan developed by contractor. The Energization Plan will be developed at least 3 weeks prior to of any work.

4.3.4. Projector Color Code

Prior to being placed into service on the project and within the first week (transition period) of each month thereafter, inspections by Competent or Designated Persons of required electrical equipment, GFCI's, fall protection equipment, fire extinguishers and ladders will be made visible to all project personnel by use of a Project Color Code System. Only items which have passed inspection and have had the appropriate color tape (per the chart below) attached will be used on the project. Electrical equipment not protected by a GFCI

while in service or otherwise subject to monthly inspection having a cord and plug will have the color coding tape applied at the male end. GFCI receptacles will have an appropriate piece of tape placed on or near the faceplate. Items found not in accordance with the applicable color code are to be removed from service until they have passed a proper inspection and been properly color coded.

4.3.5. Signs, Signals, Barricades and Lights

- Signs and barricades will be visible at all times where a hazard exists.
- All excavations should be properly barricaded and marked to display excavation boundaries.
- Signs and barricades will be removed when a hazard no longer exists.

4.3.6. Hand and Power Tools/Machine Guarding

- All hand and power tools will be maintained in a safe work condition.
- Electrical power tools will be grounded or double insulated and protected from a GFCI at the power source.
- Pneumatic power tools will be secured to hose or whip by a positive means.
- Air compressors will be equipped with check valves to prevent unrestricted airflow.
- Powder Actuated Tools will only be operated by properly trained and certified employees.
- Cords, leads, and hoses will be kept at least seven feet off the ground or placed out of the way to prevent a tripping hazard.
- The use of razors or any types of knives to strip cable or wire is forbidden.
- Grinders will be guarded at all times.
- All abrasive wheels will be inspected for damage at the time of unpacking. Damaged wheels WILL NOT BE USED.
- Wheels over 4 inches in diameter will be given a ring test prior to use as follows:
    - Obtain a non-metallic tool (e.g., the head of a screwdriver) for tapping.
    - Wheels must be free of dust and be dry.
    - Tap wheels about 45 degrees on each side of vertical centerline and about 1 to 2 inches in from the edge. Rotate 45 degree and tap again.
    - An undamaged wheel will give a clear metallic tone. If cracked there will be a dead sound, not a clear ring.
- Do not stand in front of the grinder when it is started up.
- Any defective equipment will be reported to the Foreman/supervisor immediately.
- Powered machinery and tools will be guarded to prevent contact with dangerous, moving parts by any part of the body. Guards will be firmly secured and will not create additional hazards by having a shear point, jagged edge or unfinished surface.

4.3.7. Compressed Gas Cylinders

- Compressed gas cylinders will be stored in racks or carts at all times.
- Oxygen cylinders will be separated from fuel gas cylinders or combustible material a minimum of 25 feet.
- A non-combustible barrier at least five feet high having a fire-resistant rating of at least one-half hour may also be used.
- Empty cylinders will be stored separate from full and stored with like cylinders.
- “No Smoking” signs will be posted at storage areas and should clearly indicate the contents of the cylinders.

- Valve protection caps will be in place when moving, transporting, or storing cylinders will be in place and secured.
- Cylinders will not be hoisted by choker slings or magnets. Valve caps will not be used to hoist cylinders.
- Cylinders will be kept away from sparks, hot slag, flames
- Cylinders will not be placed where they can become part of an electrical circuit. Anti-flash back valves will be provided on all oxygen and acetylene lines.

4.3.1. Rigging Equipment

- Rigging equipment will be free from defects and maintained in a safe condition.
- Rigging will be inspected before each use. Inspections will be documented on the day's Pre-Task Plan.
- Equipment will not be loaded beyond recommended load limits and tagged load capacities will be attached to the rigging.
- Rigging equipment that is not in use should be removed from the immediate work area as not to present/create a trip hazard.
- A designated competent person will thoroughly inspect and document rigging equipment inspections on the Pre-Task Plan prior to each use to ensure that they are in safe condition.
- All defective rigging will be immediately removed from service.
- Rigging that is damaged will be returned to the trailer for management and site safety personnel to destroy of properly.

4.3.2. Crane Suspended Personnel Platforms

The use of a Crane Suspended Personnel Platform will only be used in rescue situations or if special situations arise on the project, prior to platform use; it will be approved by Project Management and Site Safety Management. Contractor and its employees will not use suspended platforms for other reasons.

Prior to use the following will be completed:

- A pre-lift meeting attended by the crane operator, signal person, personnel to be lifted, and the supervisory personnel responsible for the task to be performed will be held to review work procedures, including a pre-JHA. This meeting will be held prior to the trial lift at each new work location and will be repeated for any employees newly assigned to the operation.
- The platform will not be used during high winds, electrical storms, snow, or other adverse weather conditions.
- Tag lines will be used unless their use creates an unsafe condition.
- Communication devices will be used at all times.

4.3.3. Critical Lift Plan

Contractor will provide details of each "main" erection crane and a critical lift plan for all lifts on-site that includes the selected crane at the proper configurations.

A critical lift plan must be submitted in advance of the anticipated lift. Critical lifts are defined as any lift that:

- Any pick that puts personnel, equipment or structures at risk
- Gross load weight exceeds 75% of cranes rated capacity
- Any lift which requires unusual rigging or procedures
- Any lift where the crane is supported on a structure

- Load or boom passes over an existing building during operation
- Tandem pick operations
- Net weight of load exceeds 20 tons
- Replacement time for damaged load that exceeds two months
- Crane suspended personnel platform lift

The developed lift plan will be reviewed with all involved for each lift and attached to the JHA/Tailboard for that task.

4.3.4. Cranes and Derricks

- Cranes will be inspected daily prior to use.
- A more through monthly inspection will be made according to manufacturer's recommendations.
- Any deficiencies will be repaired or replaced before continued use.
- All operators will be properly licensed and or certified.
- Copies of Operator Certifications will be maintained on the jobsite.
- National Commission for the Certification of Crane Operators (NCCCO) Certification.
- Swing radius of a crane will be barricaded to keep personnel out of this area.
- The crane fall zone shall be one and one half the boom length. All non-essential vehicles and equipment shall park at a distance equal to that and the employees shall walk into work area with the proper authorization.
- Related load capabilities, recommended operating speeds, special hazard warning and special instructions will be visible to the operator while at the control station.
- Hand signals prescribed by ANSI will be posted in an operator's station.
- Employees assigned to work with the crane will be trained in the use of hand signals; however, one person from the crew should be assigned to signal the crane.

4.3.5. Mobile Equipment

- All mobile equipment will be inspected daily before use. All equipment will have a fire extinguisher.
- Maintenance will be performed as recommended by the manufacturer.
- All inspections must be documented and copies will be provided to Site Management and Corporate Safety Department upon request.
- Defective equipment will be removed from service immediately and until repairs can be made. Equipment not in use do to damage should be tagged out**.**
- All rubber-tired self-propelled scrapers, rubber-tired front-end loaders, rubber-tired dozers, wheel-type agricultural and industrial tractors, crawler tractors, crawler-type loaders and motor graders will be equipped with rollover protective structures and seat belts and spotters shall be used when within 10' of components.
- All operators will be properly authorized and/or certified by a competent person.
- Operators will be listed in the Operator Training Record for the equipment that they are authorized to operate and shall carry their training certification card at all times.
- All mobile equipment will have an audible backup alarm.
- Not cell phone or similar distracting devices while operating equipment. Standing or riding on the back of a piece of equipment is prohibited.
- Creaked and broken glass will be replaced before bringing vehicles on the jobsite.
- Operator will maintain 3 points of contact while climbing into/out of the equipment.

4.3.6. Motor Vehicles

- All vehicles will have their headlights turned on while within the project boundaries.
- The use of communication devices (e.g. cell phones, pagers, two way radios) is prohibited while driving. Use includes answering the communication device, typing or reading electronic displays, etc.
- All vehicles must be equipped with an appropriately rated fire extinguisher, to include Company vehicles equipped with an external fuel tank.
- All personnel driving on site are required to have property damage and personal liability insurance on personal vehicles.
- All posted site speed limits will be observed on site.
- Horns are to be sounded at blind corners and when passing, etc.
- Riding in the back of any truck is strictly prohibited.
- No maintenance or lubrications will take place while in use.

4.3.1. Scaffolding

- Only designated contractor personnel will be permitted to erect, modify and/or disassemble scaffolding under the supervision of a Designated Competent Person. A tag system will be used to document daily inspections of scaffolding. The following color-coded tag system will be used when scaffolding is used on the Project.
- Tag Colors:
    - Red indicates Danger – Do Not Use. A Red Tag will be used to identify incomplete scaffolds. The tag will indicate the name of the person inspecting and a brief description of condition and/or special instructions.
    - Yellow indicates Special Instructions. A Yellow Tag will be used to inform the user of any special conditions that must be met prior to its use.
    - Green indicates Safe to Use. A Green Tag indicates that at the time of erection, the scaffold was safe; however, the scaffold will be inspected prior to use each shift.
    - All tags will show the date they were placed and the date of inspections, and they will be weather- resistant.
    - All tags will show the date they were placed and the date of inspections, and they must be weather- resistant.

4.3.1. Ladders

- Ladders will be inspected prior to use and documented on the day's Pre-Task Plan/Tailboard.
- The use of ladders with broken, cracked or missing rungs or steps, broken or split rails or other defective construction is prohibited.
- Damaged or defective ladders will be removed from the site.
- Ladders will extend at least 36 inches above a landing and secured to prevent displacement. Extension ladders will be placed at a 4:1 angle.
- Three points of contact will be maintained while ascending or descending the ladder.
- Stepladders must be set on level ground, with spreaders locked.
- Portable ladders must be equipped with safety shoes.
- Metal or conductive ladders will not be used on the site at any time.

4.3.2. Aerial/Scissor Lifts

Only designated personnel will be permitted to operate aerial or scissor lifts. Before each shift a lift inspection will be completed prior to operation.

Inspection will include:

- Fluid checks
- Lift controls both ground and basket
- Tires
- Alarms
- Inspection will be documented on the Aerial/Scissor Lift Inspection Form.

Policies:

- Always stand on the floor of the basket, so not sit or climb on the edge of the basket.
- Full body harness will be worn and shock absorbing lanyard attached to the manufactured anchor point when working from an aerial lift.
- Tying off to an adjacent structure or other equipment is not permitted while positioned in the basket.
- A minimum of 10 feet clearance will be maintained from energized power lines.
- A spotter should be used with aerial lifts when there is the potential for operator injury due to physical contact with facility systems or structures and in congested areas.
- Spotters should also be used when there is a potential for damage to sensitive facility systems or structures.

4.3.1. Rough Terrain Forklifts (Powered Industrial Trucks)

- Operators will be trained on the equipment they will be operating and competency verified by having training card. Proof of training must be provided prior to the operator using the forklift.
- All employees operating forklifts on-site must be trained to recognize the hazards associated with forklifts and understand the procedures to control or minimize those hazards.
- Only operators authorized will be allowed to operate forklifts on this Project.
- Forklifts will be inspected prior to use to determine if it is in safe working conditions.
- All operators will review and understand the manufacturer's recommendations and user manual and operate within the limits of the machine.

5. REPORTING AND RECORD KEEPING

5.1. Record Keeping

It is the Contractor and the sub-contractor's responsibility to maintain all records required by Federal, State and local safety and environmental standards, Worker Compensation Insurance or similar regulations.

Specific items required to be submitted to, or maintained at the jobsite and made available upon request are as follows:

- Copy of Contractors Safety Program –Corporate Plan Manual
- Copy of Contractors Hazard Communication Program
- Copy of indexed SDS's
- Designated (in writing) Competent Safety Representative
- Field Supervisor Daily and Competent Safety Representative Safety Inspections
- Names of Competent Persons

  - Scaffolds
  - Rigging Equipment for Material Handling
  - Fall Protection
  - Excavations and Trenching
  - Electrical
  - Ladders and Stairways
  - Other areas as need on project
- Safety Meeting Minutes and Attendance Sign-in Sheet
- All Accident/Incident Reports
- Notification of any hazardous chemicals brought on site
- Daily Excavation Inspection Reports
- Updated Personnel Roster Including Employee Name and Position (Weekly)
- Copy of all Job Hazard Analysis and Pre-Task Plan
- First Aid/Recordable Injury Statistics (Monthly)
- Verification of Employee Orientation including JHA(s)/PTP Training as well as orientation test
- Specific Instructions - Pre-lift Meetings, Operator Training, Hazcom Training, and powder actuated tool training, etc.
- Regulatory Posters
- Emergency Response plan
- Crane inspections (annual, monthly, daily)
- Heavy Equipment inspections (monthly, daily)
- Equipment inspections (Rigging, Ladder, etc.) daily, monthly and as required by OSHA 1926
- Inspection of First-Aid Kit(s) – weekly
- Crane/Equipment Authorized Operator documentation
- Keep First Aid Log

5.2. Accident Investigation and Reporting Process

All injuries and near misses will be reported immediately to Project Management and Site Safety Coordinator. In addition to other reporting requirements, at the end of their shift, each employee is required to verbally report to their supervisor whether or not they have sustained any injury or other safety concern. Supervisors are to relay any items discussed, or lack thereof, up the chain of command until the site superintendent has spoken with the Project Management. All injuries will be reported no later than the end of shift. Late report of injuries will not be accepted. In the event of an OSHA recordable case or near miss on the Project, the Project Superintendent will convene a meeting with the injured employee, the supervisor, and other attendees as deemed necessary by the Project Superintendent.

Notification and investigation will be performed in the following manner:

- The Superintendent will contact the Corporate Safety Department upon notification of an incident, to include the following:
  - Description of the incident
  - Immediate corrective action taken
  - Condition of the injured
  - Medical treatment administered
- Prior to the Project Superintendent's meeting, a follow-up report to the Corporate Safety Department will be provided with the following:
  - Detailed incident description and investigation results including Root Causes
  - Corrective action and implementation plan

    - Contractors first report of injury
- Project management with the Corporate Safety Department may amend the Follow-Up report to include any additional information found relevant during the Project Superintendent's meeting and this will serve as the Final Report.

  All accidents, injuries, near misses or incidents will be thoroughly investigated regardless of severity. It is Contractors' intent to complete the initial accident/ incident investigations as soon as possible. Corrective actions, persons responsible for corrective actions and date of completion should be established. Final incident investigation report will be submitted within 30 days from incident occurrence. Corrective actions should be tracked through completion.

5.3. Reporting Requirements for Spills/Releases (Uncontrolled Hazardous Waste Site Cleanup)

In the event of a Hazardous Material Spill/Release the following procedure will be followed:

Notification to Project Management and to the appropriate state regulatory agency when required by the SWPPP of the discharge of oil or hazardous substances is required as follows:

1. Discharge to water – as soon as discharge is noticed.
2. Discharge to land – as soon as discharge is noticed.
3. Spills/ Releases that are Immediately Dangerous to Life or Health (IDLH):
    - Notify Project Management Immediately
    - Call 911 from a safe location and provide the following information to the dispatcher:
        - Nature of the emergency
        - Chemical involved
        - Location of Spill/Release
    - Remain on the scene to meet response personnel and provide additional information.
4. Spill/Releases that can be cleaned up by contractor:
    - Attempt to clean up spill/release if superintendent has determined it is safe to do so. Guidelines include:
        - You are thoroughly familiar with the hazards of the material (reference SDS)
        - You have been trained to deal with spills/releases of the size in question
        - You have the proper Personal Protective Equipment (PPE), should it be necessary
        - The appropriate absorbent/neutralizers are readily available
5. Spills/Releases that are not IDLH but require technical assistance:
    - If superintendent has determined that clean up requires technical assistance, contact local authorities immediately.

It is essential that you collect/contain all spill cleanup waste for proper disposal. **DO NOT PLACE IN OR AROUND REGULAR TRASH.** Contact local authorities for waste removal and provide GPS coordinates.

All employees will be briefed on emergency response procedures and the use of emergency response equipment and materials. The contact phone numbers for spill reporting, spill or hazardous material emergency response organizations, and the fire department will be posted at the jobsite.