

PRELIMINARY HEALTH AND SAFETY PLAN

FOR

UNDERGROUND STORAGE TANK REMOVAL

AT

FABCO AUTOMOTIVE CORPORATION

PREPARED BY

IT CORPORATION

PROJECT NO. 190317

RECEIVED
FEB 8 1988
HAZARDOUS WASTES/
WASTE PROGRAM

1.0 HEALTH AND SAFETY PLAN

1.1 INTRODUCTION

It is the policy of IT Corporation to provide a safe and healthful work environment for all personnel working on storage tank removal projects. IT considers no phase of operations or administration to be of greater importance than injury and illness prevention. Safety takes precedence over expediency, production, or short cuts and every attempt will be made to reduce the possibility of injury, illness, or accident occurrence.

The purpose of the safety program is to assign project personnel health and safety responsibilities, to prescribe mandatory operating procedures, and to establish personal protective equipment requirements for this project, in order to successfully and safely perform the work.

The proposed activities of this project can potentially expose site personnel to a variety of chemical and physical materials. These hazards may include toxic airborne contaminants, noise, vibration, and being pinched or struck by moving or rotating equipment. To the extent feasible, such hazards will be addressed through engineering controls. The Health & Safety Coordinator (HSC), who is an industrial hygienist, shall assist field supervisors in identifying and controlling physical hazards not addressed by engineering controls.

Selected site personnel, engineers, and technicians, may be evaluated by the site HSC for exposure to airborne contaminants. Techniques employed in this evaluation are discussed in Section 1.7. Results of any monitoring will be evaluated and compared with OSHA PEL's and ACGIH TLV's.

The provisions of this plan are mandatory for all site personnel and subcontractors assigned to the project. All authorized visitors to the site will be required to abide by these procedures. Work conditions can be expected to change as the operation progresses. As appropriate, addenda to the plan will be provided by the on-site HSC. No changes to the plan will be implemented without prior approval of the site HSC.

All work will be performed in accordance with:

1. All applicable State and Federal Safety and Health Regulations;
2. IT Corporation's Health and Safety policies and procedures.

1.2 ASSIGNMENT OF RESPONSIBILITIES

1.2.1 Project Manager

The Project Manager will be responsible for field implementation of the Health and Safety Plan. This will include communicating site requirements to all personnel, field supervision, and consultation with the site HSC regarding appropriate changes to the Plan.

1.2.2 Project Industrial Hygienist

Mr. Tim Roberts, C.I.H., Manager of IT Corporation's Western Health and Safety Division, is responsible for the development and preparation of the Plan. He or his designee will also oversee the Plan's implementation.

1.2.3 Health & Safety Coordinator

The site Health & Safety Coordinator (HSC), Mr. Mark Frieberg is responsible for auditing compliance to the Plan and for providing technical support for various Plan program elements, and for authorizing changes to the Plan. The purpose of site audits and Plan coordination is to assist project management in implementing Plan requirements. Additionally, the HSC shall interpret sampling and monitoring results to evaluate the appropriateness of the Plan requirements. The HSC will also handle agency liaison matters regarding Health & Safety.

1.2.4 Field Supervisors

The Field Supervisors will be the first line supervisors responsible for ensuring that all personnel on-site, including sub-contractors, comply with the Plan requirements.

1.2.5. Technicians/Sub-contractors

Technicians, sub-contractors, and other personnel on-site will be responsible for understanding and complying with all site requirements.

1.3 MEDICAL PROGRAM

All IT and sub-contractor site personnel who may be potentially exposed to airborne chemicals from the site shall have successfully completed a preplacement or periodic/update physical examination. This examination has been designed to comply with appropriate regulatory requirements for hazardous waste site operations.

The medical examination consists of:

- Medical and Occupational History Form (detailed questionnaire for new employees, short questionnaire for periodic exams),
- Physical Examination,
- Blood Analysis,
- Urinalysis,
- Chest X-ray,
- Pulmonary Function Test,
- Audiogram,
- Electrocardiogram (if indicated during exam).

1.4 EMERGENCY MEDICAL TREATMENT

- a. Should site personnel suffer an injury or illness, the following resources will be utilized as appropriate:

For emergencies requiring fire, police or ambulance, personnel contact will be arranged prior to job start-up. Appropriate telephone numbers shall be posted. Directions to the site (maps) will be provided to emergency services crews prior to the job.

Hospital locations and telephone numbers shall be identified in the tailgate safety meeting form prior to start-up.

- b. If an injury/illness clearly requires only first aid procedures, treatment can be limited to this level. All incidents not obviously limited to first aid treatment levels require the activation of the appropriate resources to provide more definitive medical care.
- c. Any injury or illness will require the completion of IT form entitled "Supervisors Employee Injury Report." This form, when completed by the job supervisor, shall be forwarded to the IT Health and Safety Division as soon as possible.

- d. In addition to the above requirements, any injury/illness not limited to first aid case will require that the immediate supervisor contact the on-site HSC. This will allow coordination of internal resources to advise the treating physician as to appropriate treatment. It will also permit a timely accident investigation to determine underlying causes so that appropriate corrective steps may be taken to prevent recurrence.

1.5 TRAINING

- a. All IT and sub-contractor site personnel potentially exposed to airborne chemical shall, as a minimum, have successfully completed a Hazards and Protection Limited training class provided by the IT Training Department. This course covers chemical hazards, hazard recognition, hazard assessment, personal protective equipment, and proper handling techniques for hazardous materials. Personnel responsible for testing tank atmospheres prior to tank entry shall also have completed IT's Training Department's confined space class. Additionally, all site personnel shall be briefed as to the requirements of this Plan prior to project start-up.
- b. All personnel operating industrial equipment such as forklifts, cranes, hydroblasters, etc., shall have successfully completed training in the safe operation of such items.
- c. Only personnel trained to render first aid, and certified in cardiopulmonary resuscitation will administer such, as appropriate.
- d. Tailgate safety meetings are a useful training tool and will be conducted at the beginning of each shift and whenever new personnel arrive or when a unique work assignment warrants employee indoctrination and training. Tailgate safety meetings are to be conducted by the supervisor, site HSC, or other qualified persons.

1.6 HAZARD EVALUATION AND SAFETY CONSIDERATIONS

1.6.1 Pre-Removal Activities

1.6.1.1 Tank Inspection and Sounding

Prior to clean-out, atmosphere purging, and content disposal, each tank will be inspected and sounded. Visual inspections of interiors shall be made through manholes and inspections ports. No tank entry shall occur at this stage. Tank content shall be sampled by coliwasa or other appropriate means. To minimize skin contamination, protective clothing consisting of polyethylene-coated Tyvek, PVC boots and nitrile gloves and face shields mounted on hardhats shall be worn when prescribed by the on-site HSC. Prior to inspection and sampling, access shall be assessed to ensure that there are no fall, slip or trip hazards. The inspection/sampling supervisor shall document such hazards on the tailgate safety meeting form at the beginning of

each day.

1.6.1.2 Tank Interior Explosive Atmosphere Testing

As required by IT/OSHA confined space requirement, a combustible gas indicator shall be used to test tank interior atmospheres for flammable atmosphere and oxygen deficiency after the tank has been emptied. If the testing reveals any airborne hazard, mechanical ventilation shall be used to abate the hazard. Entry into confined space will not be permitted unless the flammable contents are at less than 10% of the LEL and the oxygen content is greater than 20%. The presence of volatile hydrocarbons shall also be evaluated to determine the level of respiratory protection needed. This includes the posting of an entry permit documenting testing, blinding/locking out of all lines and electrical equipment, appropriate protective clothing, and names of employees entering the vessel. Additionally, a first aid/CPR trained standby person shall be available at the tank entry way for emergency response. Where top entry is necessary, ladders of adequate length and extraction devices shall also be used.

The following protective equipment is anticipated to be necessary for tank entry, since no analytical data is available at this time for more accurate evaluation:

- PVC boots with steel toe and shank (with metatarsal guards if hydroblasting),
- PVC gloves,
- PVC rain gear (heavy duty),
- Airline respirator,
- Lifeline and harness,
- Hardhats,
- Faceshields (for hydroblasting),
- Self-contained breathing apparatus (for standby person).

The air for airline respirators shall be provided from a six-pack arrangement of 300 SCF cylinders containing grade D breathing air.

1.6.1.3 Tank Interior Purging

Where interior tank testing has shown mechanical ventilation to be necessary, the tank interior shall be purged by such means. The fans shall be powered by compressed air, and shall be bonded to the tank to control the build-up of static electricity. Care shall be taken to ensure the tank is ventilated such that personnel in the vicinity are not exposed, and to avoid inefficient ventilation. Ignition sources, such as vehicles and compressors, shall not be stationed within 50 feet of the exhaust area of the tank. The tank interior shall be tested periodically to measure progress, after the fans have been shut off. Compressors used to power the fans shall be evaluated for noise, and if necessary, hearing protection shall be required.

The tank atmosphere inerting will be achieved by introducing solid carbon dioxide into the tank, and allowing it to sublime so it displaces the air. Solid carbon dioxide shall be handled so as to avoid any skin or eye contact to prevent cold burns. After purging the tank interior, no entry will be permitted.

1.6.1.4 Tank Content Disposal

Since tank contents may be pumped off into temporary containers or vacuum trucks, personnel exposure is anticipated to be minimal. Nevertheless, employees handling contaminated hoses shall wear the following protective equipment:

- Polyethylene-coated Tyvex,
- PVC boots with steel toe and shank,
- PVC gloves.

All pumping equipment shall be bonded and grounded to control any static electricity.

1.6.2 Tank Removal and Disposal

After each tank has been cleaned and purged, it shall be removed. The health and safety aspects of such work will depend on the size and nature of the tank. If underground, totally or partially, it will be necessary to excavate. In such event of excavation, all the requirements of OSHA and IT

policy and procedures for excavation safety shall be used. This may include notification of OSHA as per the conditions of IT's annual excavation permit, if employees are required to enter the excavation. Prior to beginning excavation, all neighboring underground utilities shall be located, and locked out of use.

Sloping, shoring or benching will be used if excavation depth exceeds five feet and employees are required to enter the excavation. Excavation spoils shall be kept no closer than three feet from the edge. Exit ladders shall be placed no farther than twenty-five feet apart for appropriate egress. Each day prior to commencing work, the field supervisor shall inspect the excavation for water accumulation or potential hazards associated with moving soil.

All excavation equipment and crane operators shall have successfully completed appropriate training to ensure they can operate such equipment safely.

The need for protective clothing and equipment will depend on the extent of contamination external to the tank. The HSC shall determine the appropriate level of protection needed, with the guidance of the project industrial hygienist overseeing the plan. To assist in determining appropriate respiratory protection, air shall be sampled using direct reading methods such as PID, CGI, or colorimetric indicator tubes. EPA level C protection is anticipated to be the highest level needed, although field circumstances may require a higher degree of protection.

At the start of each day a tailgate safety meeting will be held to discuss the use of personal protective equipment use, chemical and physical hazards present.

After the tank has been removed, it may be necessary to perform hot work on it, such as cutting it into manageable sizes. Where such work is needed, appropriate fire control precautions such as outlined in IT Hotwork policy and procedure.

1.6.3 Soil/Water Sampling

Prior to initiating such activities, the site HSC shall determine the potential chemical and physical hazards to prescribe the appropriate measures. Level C protection is the highest anticipated need, but this will depend on the nature of the site to be sampled, and extent of contamination therein.

Prior to sampling, the sampling supervisor, with the assistance of the site HSC, shall review health and safety hazards and appropriate personal protective equipment with the sampling crew during the tailgate safety meeting at the beginning of each day.

1.7 SITE AIR MONITORING

Site air monitoring may be required to ensure adequate protection of site personnel and the environment. This information shall be used to establish the degree of respiratory protection. Significant excursions above permissible exposure limits (PEL's) may require adjustments in protection levels.

Level 1: Real-time monitoring techniques will be used for area monitoring on a periodic basis to ensure adequate protection of personnel.

Level 2: Industrial hygiene techniques utilizing solid collection media may be performed outside of the respirator and will be used for personnel (breathing zone) monitoring.

All monitoring data is to be entered in a job log book. Personnel who have been monitored will also be notified in writing of the results and their significance. A copy of this report will also be maintained in the employee's medical surveillance file.

Monitoring results will be used to verify the adequacy of protective equipment and determine if changes are appropriate. The HSC may conduct periodic field audits to assess health and safety conditions which shall be documented in safety inspection reports. Such reports will address appropriate corrective measures where necessary. Follow-up inspections will be conducted if appropriate.

1.8 GENERAL SAFETY REQUIREMENTS

All work will be conducted to comply with all applicable OSHA General Industry Safety Orders and Construction Safety Orders. The following points outlined are not all inclusive. They illustrate some of the more pertinent concerns.

- a. If appropriate, each work site shall be divided into three well delineated zones, as follows:

Contamination Zone - This zone includes the actual areas of contamination. This zone has the highest inhalation exposure potential and/or presents a high probability of skin contact with chemicals.

Contamination Reduction Zone - This zone covers all areas immediately surrounding the contamination zone. This zone has the next highest inhalation hazard but does not have a high probability of skin contact with chemicals.

Clean Zone - This zone covers all areas outside of the contamination reduction zone. Adverse exposure to chemicals is unlikely.

- b. The decontamination station shall be positioned at the entrance to the contamination reduction zone with a step-off area just inside the contamination reduction zone. All personnel entering or leaving the site shall pass through these areas to don or doff the appropriate protective equipment. Disposable booties, if required, will be provided for those personnel exiting through the station into the clean zone from the contaminated reduction zone.
- c. At least one emergency shower/eyewash station shall be established where there exist the potential for splashes of corrosive liquids. This unit shall be placed near the decontamination station.
- d. All excavation work must comply with the following rules:

No employee shall work adjacent to any excavation until a reasonable examination of same has been made to determine that no conditions exist exposing them to injury from moving ground.

Trees, boulders, and other surface encumbrances, located so as to create a hazard to employees involved in excavation or in the vicinity thereof at any time during operations, shall be removed or made safe before excavating is begun.

Excavations shall be inspected by an IT qualified person after every rainstorm or other hazard-increasing occurrence, and the protection against slides and cave-ins shall be increased if necessary.

- e. As appropriate, equipment on site shall be bonded and grounded, spark proof, and chemically compatible.
- f. A tailgate safety meeting shall be conducted at the beginning of each shift and whenever new personnel arrive, or when a unique work assignment warrants employee indoctrination and training. Tailgate safety meetings are to be conducted by the supervisor, a safety representative, or other qualified persons.

- g. A qualified person shall take positive steps to ensure that employees are protected from physical hazards, which would include, but are not limited to, the following:

Insufficient or faulty personal protective equipment,

Insufficient or faulty operations equipment and tools,

Noise in excess of acceptable levels,

Tripping over hoses, pipes, tools, or equipment,

Slipping on wet or oily surfaces,

Appropriate action to provide secure footing shall be taken at all locations where personnel will be working.

- h. Legible and understandable precautionary labels shall be prominently affixed to containers of raw materials, intermediates, products, by products, mixtures, scrap, waste, debris, and contaminated clothing.

- i. Employees shall not be permitted to exit the regulated area until contaminated clothing and equipment have been removed.

- j. Contaminated protective clothing and equipment shall not be removed from the regulated area until it has been cleaned or properly packaged (double plastic bagged) and labeled.

- k. Removal of materials from protective clothing or equipment by blowing, shaking, or any other means which may disperse materials into the air is prohibited.

- l. Eating, drinking, and smoking shall be restricted to areas within the clean zone.

- m. All employees shall be required to wash their face, hands, and forearms with soap and water before eating, drinking, smoking, or applying cosmetics.

- n. Field personnel must observe themselves and each other for signs of toxic exposure. Indications of adverse effects include, but are not limited to:

Changes in complexion and skin color,

Changes in coordination,

Changes in demeanor,

Excessive salivation,

Abnormal pupillary response,

Changes in speech pattern.

- o. Field personnel shall be instructed to inform their supervisor of any non-visual effects of toxic exposure such as:

Headaches,

Dizziness,

Nausea,

Blurred vision,

Cramps,

Irritation of eyes, skin, or respiratory tract,

And any other abnormal physiological functions.

- p. Eating, drinking and smoking will be restricted to the rest area.
- q. Fall protection shall be required for any work surface higher than six feet. This may be either fall barriers with toe guard, or safety belts with lanyard.
- r. All construction equipment shall have automatic back up alarms, seat belts and Roll Over Protective Structures.
- s. No cranes shall be operated within ten feet of live electrical conductors. Rated load capacities shall not be exceeded.
- t. All portable supplies shall be fitted with over-current protective devices such as ground fault circuit interrupters. Unless double insulated, all electric tools shall be properly grounded.
- u. Safety glasses are mandatory for all personnel using tools which may eject flying particles or fragments. Examples of such tools are grinders, sanders, saws, etc.

1.9 PROTECTIVE EQUIPMENT REQUIREMENTS

- a. Personal protective equipment requirements will be established via task assignment and location.

The protective clothing requirements for tank inspection and sounding, tank atmosphere testing, tank entry and tank interior purging have been outlined in Section 1.6. During project activity the site industrial hygienist, in conjunction with the project oversight industrial hygienist, shall determine whether the outlined requires are adequate.

All construction equipment operators shall be required to wear hard hats, steel-toe boots, and hearing protection, if noise monitoring indicates noise levels in excess of current permissible levels.

Where there exists a significant potential for skin contact with toxic substances, operators may be required to wear neoprene boots and gloves and protective clothing. In unusual circumstances, respiratory protection may also be needed. The industrial hygienist shall make these field determinations and will also decide on the need for hearing protection.

b. Respiratory Protection

All respirators shall be utilized and maintained in accordance with established procedures. These procedures include written operating procedures governing the selection and use of respirators and, procedures for selection, instruction and training, cleaning and sanitizing, inspection and maintenance of these respirators.

Properly cleaned, maintained, NIOSH approved respirators shall be used.

Selection of respirators shall be reviewed with the IT Health and Safety Division.

As a minimum, air-purifying cartridges shall be replaced at the end of each shift.

Employees wearing air-purifying respirators shall be required to change filter elements whenever an increase in breathing resistance or breakthrough is detected.

- c. Personal protective equipment for entry into any excavation or trench shall be established according to tests and inspections performed by a qualified individual.

1.10 HEAT STRESS

- a. Adverse climatic conditions - heat and cold - are important considerations in planning and conducting site operations. Ambient temperature effects can include physical discomfort, reduced efficiency, personal injury, and increased accident probability. Heat stress is of particular concern while wearing impermeable protective garments, since these garments prevent evaporative body cooling.
- b. The wearing of protective clothing in warm environments creates a heat stress potential. One or more of the following control measures can be used to help control heat stress:

Provision of adequate liquids to replace lost body fluids. Employees must replace water and salt lost from sweating. Employees must be encouraged to drink more than the amount required to satisfy thirst. Thirst satisfaction is not an accurate indicator of adequate salt and fluid replacement. Electrolyte replacement fluids such as Gatorade or Quick--Kick, or a combination of these with fresh water will be

available for use. Employees will be encouraged to increase their sodium intake.

Establishment of a work regime that will provide adequate rest periods for cooling down. This may require additional shifts of workers. Heat stress measurements shall be compared to the ACGIH Heat Exposure TLV's for work regimens, with special consideration given to the WBGT modification factors.

- c. All breaks are to be taken in a cool rest area (77°F is best).
- d. Employees shall remove impermeable protective garments during rest periods.
- e. Employees shall not be assigned other tasks during rest periods.
- f. All employees shall be informed of the importance of adequate rest and proper diet in the prevention of heat stress.

PRELIMINARY HEALTH AND SAFETY PLAN

FOR

CONTAMINATED SOIL ASSESSMENT

AT

FABCO AUTOMOTIVE CORPORATION

PREPARED BY

IT CORPORATION

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1.0 PRELIMINARY HEALTH AND SAFETY PLAN

1.1 INTRODUCTION

It is the policy of IT Corporation (IT) to provide a healthful work environment for all of its employees. IT considers no phase of operation or administration to be of greater importance than injury and illness prevention. All project activities will be conducted in a manner that minimizes the probability of injury, illness, or accident occurrence. The potential for occupational exposures to airborne chemicals as well as the numerous physical and contact chemical hazards of the project can be effectively controlled through strict adherence to the Health and Safety (H&S) Plan.

The purpose of the H&S Plan is to protect all personnel while successfully completing the project. In order to accomplish this, the plan requires that IT site personnel be assigned specific health and safety responsibilities. IT also prescribes mandatory operating procedures, establishes personal protective equipment requirements for specific activities or work zones, and develops contingency plans for unanticipated conditions and emergency response.

The provisions of this Plan are mandatory for all IT personnel and subcontractors and supplement any FABCO contractor safety requirements. All visitors to the site will be required to abide by these procedures. Work conditions can be expected to change as the project progresses. As appropriate, addenda to the Plan will be provided by the H&S representative. No changes to the Plan will be implemented without prior approval of the H&S representative.

2.0 ASSIGNMENT OF RESPONSIBILITIES

Assignment of responsibilities for development, coordination and implementation of the site safety plan is necessary for proper administration of the plan.

- Safety Director - The Safety Director is responsible for the development and coordination of the site safety plan. This includes medical programs, training requirements, hazard assessment, personal protective equipment, field implementation and audits. Liaison with officers or representatives of government agencies on matters relating to safety and health should be handled by the Safety Director or the Site Safety Officer.
- Site Safety Officer - The Site Safety Officer (SSO) is responsible for ensuring day-to-day compliance of the site safety plan in addition to the Safety Director. The SSO will have:
 - Authority to enforce adherence to the Final Safety Plan,
 - Responsibility for determining the existence of any unsafe conditions and the authority to stop work until the unsafe conditions are corrected, and
 - Responsibility for reviewing planned site activities and reviewing specific safety procedures for ensuring adherence to the Final Safety Plan.
- Site Manager - The Site Manager is responsible for field implementation of the site safety plan. This includes communicating the specific requirements to all personnel, auditing, and consulting with the SSO regarding appropriate changes in safety and health requirements.
- Site Personnel - All site personnel are responsible for understanding and complying with all site safety and health requirements.

3.0 AIR MONITORING

Air monitoring for flammable and explosive atmospheres will be performed with a portable direct reading combustible gas meter with a ppm concentration sensitivity.

Air monitoring for benzene and other contaminants may be performed with detector tubes, or passive dosimeters as appropriate. The sensitivity of these air monitoring methods will be sufficient to allow comparison with PELs.

The initial Health and Safety evaluation of the site information has concluded that is the likelihood of employee exposure to significant airborne chemicals, e.g., benzene, is low.

4.0 PERSONAL PROTECTIVE EQUIPMENT

Personal protective equipment (PPE) will be required during the site remediation. Selection has been based on preliminary job hazard analysis and work task requirements.

Equipment to protect the body against contact with known or anticipated chemical hazards can be divided into four categories according to the degree of protection afforded:

- Level A: - Should be worn when the highest level of respiratory, skin, and eye protection is needed.
- Level B: - Should be selected when the highest level of respiratory protection is needed, but a lesser level of skin protection. Level B protection is the minimum level recommended on initial site entries until the hazards have been further defined by onsite studies and appropriate personnel protection utilized.
- Level C: - Should be selected when the type(s) of airborne substance(s) is known, the concentration(s) is measured, and the criteria for using air purifying respirators are met.
- Level D: - Should not be worn on any site with respiratory or skin hazards. Is primarily a work uniform providing minimal protection.

The Level of Protection selected should be based primarily on:

- Type(s) and measured concentration(s) of the chemical substance(s) in the ambient atmosphere and its toxicity, and
- Potential or measured exposure to substances in air, splashes of liquids, or other direct contact with material due to work being performed.

Level D Protection will include:

- Hard hat,
- Safety glasses,
- Safety toed work boots,
- Cotton coveralls or similar work clothing,
- Nitrile gloves when handling contaminated soil.

5.0 WORK ZONES

The minimum level of protection required to work in the Work Zones will be Level D protection. The chemical hazard associated with the site do not warrant rigorous work zone establishment or decontamination procedures.

6.0 MEDICAL PROGRAM

Establishment of a medical screening, health surveillance and emergency medical assistance program is essential for worker protection during the site cleanup.

10.1 MEDICAL SCREENING AND HEALTH SURVEILLANCE

All IT and subcontractor personnel assigned to this project will complete pre-employment and periodic update physical examinations prior to and during the course of the job. This examination consists of a medical history, work history, physical exam, liver function study, urinalysis, chest x-ray, complete blood count, pulmonary function study, audiometry and additional medical tests and examinations as required. This examination has been designed by a physician specializing in occupational medicine. The physical examination protocol has been reviewed by the Safety Director and complies with all appropriate health and safety regulations.

10.2 EMERGENCY MEDICAL ASSISTANCE

Prior to work start-up, an emergency medical assistance network will be established. The local fire department rescue squad, ambulance service, hospital emergency room and sheriff's office will be identified. Telephone numbers, locations and routes for these services will be posted at the site. All services involved in the network will be advised to the potential hazards that may be present.

Selected members of site personnel will be qualified to render first-aid and/or CPR as appropriate. A first-aid kit will be available at the site for use by trained personnel.

In the event of injuries or illnesses, supervisors are required to complete the IT Corporation form entitled "Supervisors Employee Injury Report." This form, when completed by the supervisor will be forwarded to the SSO for review. Any injury or illness not limited to a first-aid case will be immediately reported to the SSO. This will allow the coordination of internal resources to assist the treating physician in rendering appropriate care.

7.0 PERSONNEL TRAINING PROGRAM

All personnel will be provided formal health and safety training prior to the commencement of work. The Safety Director will be responsible for developing and administering the training program. A suggested Course outline is provided below:

<u>SUBJECT</u>	<u>DURATION</u>
1. Introduction	30 minutes
2. Chemical hazards	60 minutes
3. Protective clothing	60 minutes
4. Respiratory Protection Devices	90 minutes
5. Hazard Communication	60 minutes
6. Hearing Conservation	30 minutes
7. Work zones and protection levels	30 minutes
8. Decontamination	30 minutes
9. Emergency response evacuation procedures	30 minutes
10. Medical examinations	30 minutes
11. General site safety requirements	60 minutes

Follow up training will be provided as appropriate prior to each change in operations. Employees who are not in attendance during the initial training course(s) will be provided this training using the original training course outline. Selected site personnel will have completed training in first-aid and CPR. Tailgate safety meetings to discuss pertinent site safety topics will be conducted at the beginning of the work shift.

8.0 DOCUMENTATION AND RECORD KEEPING

The documentation and recording of all employee medical exams, training attendance, exposure monitoring, etc., is an integral part of the health and safety program. Documentation and records on all site employees and incidents will be performed as follows:

- Medical records - all medical records become a permanent part of each employees confidential medical file and must be maintained for duration of employment plus thirty (30) years.
- Personnel exposure monitoring record - each employee exposure record shall be preserved and maintained for at least thirty (30) years.
- Training records - all training provided will become part of a permanent record. Items recorded will include: attendance, agenda, exam scores and respirator fit test results.
- Health and safety meeting reports - attendees and topics discussed during health and safety meetings will be documented on Tailgate Safety Meeting forms. Minutes of more involved meetings will be kept and all will become part of a permanent record. Safety inspections will be documented on a Safety Inspection Report.
- Accident Investigation Reports - different types of accident/incidents involving both employees and equipment exist. Each accident/incident will be thoroughly investigated, reported and documented.
- Emergency Reports - all emergencies, their nature, cause, response actions taken and remedial actions taken will be documented in memo form to all appropriate officials.