Health and Safety Plan Tank Removal Activities 625 Hegenberger Road

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Prepared by:

Environmental Health Consultants, Inc.

November 18, 1991

1.0 Introduction

This Health and Safety Plan covers the activities to be carried out during the excavation and removal of underground fuel storage tanks located at 625 Hegenberger Road in Oakland, California. This plan is intended as a practical approach to the activities in light of the potential occupational and public health hazards. It is expected that site conditions may vary. This plan may be upgraded/downgraded at any time, as appropriate, in light of actual site conditions, at the discretion of the site health and safety officer.

This plan covers all contractors involved in the site activities. It serves as a minimum guideline for protective measures. Individual contractors may elect to implement more stringent measures for their own workers. Each contractor will provide health and safety equipment for its employees. All other personnel are expected to provide equal or greater levels of protection for themselves.

All on-site personnel, regulatory agency personnel, and visitors are expected to be familiar with, and comply with the provisions of this plan.

2.0 Site Background

The underground storage tanks on site were used to store gasoline and possibly diesel fuel. Pipelines carried the fuel to and from the filling islands. In addition, a sump exists on site which contains waste oils and solvents. The current work plan calls for the cleaning, excavation, removal, and disposal of the tanks and sump, and the excavation of surrounding soils where leakage has occurred. The excavated areas will then be backfilled and repaved. 3.0 Key Personnel and Responsibilities

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Contractor Project Supervisor - Mike Garcia, Scrivner Environmental Services, Inc.

The on-site Project Supervisor is responsible for oversight of the site activities, including handling of hazardous materials. He is directly responsible for contractor personnel compliance with the health and safety plan, and will act as response coordinator in case of an emergency.

Site Health and Safety Officer (HSO) - Mr. Jeff Lott or Ms. Irene Fanelli, Environmental Health Consultants, Inc.

The HSO is responsible for the overall management of and decisionmaking regarding the health and safety plan.

Site Geologist - Alan Howard, Brierley & Lyman, Inc.

The Site Geologist is responsible for all soil, water, and product sampling during the removal operations.

4.0 Job Hazard Analysis

4.1 Physical Hazards

The major physical hazards associated with the site are expected to include:

- a. Potential heat stress
- b. Construction equipment
- c. Noise
- d. Manual material handling/demolition
- e. Buried utilities/overhead power lines
- f. Open excavations/uneven terrain
- g. Fire/explosion
- h. Tank removals
- i. Confined space entry

Personnel working most directly with the construction activities, such as the laborers and technicians, will have the greatest chance of encountering these hazards, however all personnel on site will have the possibility of encountering them at one time or another.

4.1.1 Heat Stress

All on-site personnel must be familiar with the symptoms of heat stress, and the conditions during which it may occur. Heat stress symptoms may include nausea, headache, lightheadedness, lack of coordination, or slurred speech. The use of protective clothing greatly enhances the likelihood of heat stress. Where site conditions warrant, the site health and safety officer will monitor for heat stress and implement work/rest regimens, if necessary. Potable water and/or an electrolyte replacement fluid such as Gatorade will be available on-site at all times.

4.1.2 Construction Equipment

Excavation equipment, cranes, and trucks will be used at the site. On-site personnel will be made aware of the presence of this equipment and the hazards of working around such equipment. All personnel operating such equipment will be made aware of the presence of other site personnel. Communication between workers on the ground and operators will be by line-of-sight, utilizing standard construction hand signals. Backup alarms and rollover protection will be utilized, as appropriate.

4.1.3 Noise

Work around heavy equipment always entails the possibility of excessive noise. Where excessive noise may be encountered, employees will be provided with hearing protection, such as E.A.R. earplugs or earmuffs.

4.1.4 Manual Material Handling/Demolition

Wherever possible, material handling will be done mechanically. Where manual handling is absolutely necessary, personnel will be instructed in safe handling techniques, and will be instructed to use the appropriate protective gear to prevent abrasions, cuts, and struck-by accidents. Personnel working from a manlift, such as during the demolition/removal of awnings, will be instructed in work practices for manlifts. Lifelines and safety safe belts/harnesses will be utilized as appropriate. Areas where overhead hazards may exist from falling debris will be demarcated as such, and unauthorized persons will be kept out of such areas.

4.1.5 Buried Utilities/Overhead Power Lines

Excavation areas will be examined by a locator, and utilities will be protected during excavation activities. Protection from

overhead power lines will be accomplished by maintenance of safe distances of at least 10 feet at all times.

4.1.6 Open Excavations/Uneven Terrain

All open excavations and ground openings will be protected from inadvertent entry. Any openings left open will be barricaded and/or covered to prevent entry by unauthorized personnel. Although most work in excavations deeper than four and one-half feet is expected to be accomplished mechanically, from outside the excavation, any excavations deeper than four and one-half feet into which personnel will be entering will be appropriately sloped, shored, and/or benched, and the appropriate OSHA permitting and notifications will be made. All excavations will be maintained with adequate means of egress for personnel working within.

Any obviously uneven terrain which poses a tripping hazard will be filled in or otherwise protected to prevent injury. Likewise, cleared walkways will be established around any debris and equipment on the ground, in order to minimize any tripping/contact hazard.

4.1.7 Fire/Explosion

The potential for fire/explosion exists while working with flammable chemicals such as gasoline. Appropriate measures will be taken to reduce this risk through proper monitoring of the tanks before excavation, washing and inerting of tanks and pipelines, bonding of equipment to the tank, and through the maintenance onsite of adequate fire-fighting equipment, including a supply of ABC fire extinguishers.

4.1.8 Tank Removals

The actual tank removal presents a combination of physical hazards,

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such as entry into excavations, close work with heavy equipment such as backhoes or cranes to excavate and remove the tank, and the fire/explosion hazard from the potential combustion of materials remaining inside the tank. Protective measures for excavation work, work with heavy equipment, and proper tank monitoring and purging will be implemented. All tanks will be thoroughly tested for airborne combustibles and oxygen prior to and during the removal process.

4.1.9 Confined Space Entry

Entry into confined spaces is not expected to take place during the on-site activities. <u>IF CONFINED SPACE ENTRY IS REQUIRED,</u> <u>APPROPRIATE CONFINED SPACE ENTRY PROCEDURES, INCLUDING MONITORING</u> <u>PROCEDURES, MUST BE IMPLEMENTED PRIOR TO ENTRY</u>. Entry into any excavation must be evaluated for confined space conditions, i.e., oxygen deficiency, limited egress, etc. In addition, confined space entry must only be conducted with continuous on-site supervision by the HSO.

4.2 Chemical Hazards

A summary of the characteristics of the chemicals known to be found in the tanks and soils at the site is presented in Table 1. Chemical hazards may be encountered during any of the tank excavation and removal activities. During these operations, site personnel may be exposed to any or all of the chemicals noted in the table, with the exception of 1,1,1 TCA, which is found only in Exposure to these chemicals may occur through the sump. inhalation, ingestion, or direct skin absorption/contact. Such exposure is expected to be minimized through proper work practices, personal protective equipment in accordance with ambient air monitoring, and proper personal hygiene. The primary vehicle for these materials is transport on dust and volatilization. Dust and vapor control measures will be utilized as appropriate. The

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potential for exposure to the public exists during the activities, however control measures taken will minimize any such exposure.

5.0 Air Monitoring Plan

Ambient airborne organic vapor levels will be measured using a photo-ionizing detector (PID) such as the Photovac MicroTIP, or a flame-ionizing detector (FID) such as the Foxboro OVA. Organic vapor levels will be monitored regularly during all intrusive activities such as excavation and sump and tank removal.

Monitoring for combustible levels of vapors and for oxygen level will be performed <u>prior to and during</u> all activities involving contact with the tanks and sump. These levels will be monitored using an instrument such as the Gastech combustible gas meter. The instruments must be calibrated daily to ensure accurate readings. Calibration procedures will be in accordance with the manufacturers' recommendations.

Employee exposure monitoring will be accomplished during intrusive work activities for the constituents listed in the Table. This monitoring will include time weighted average breathing zone samples. All sampling and analytical procedures will be in accordance with NIOSH standardized methods, or an equivalent. Analysis of all air samples will be performed by an American Industrial Hygiene Association (AIHA) accredited laboratory. Site personnel will be advised of the results of the monitoring. Additional sampling and monitoring will be performed at the discretion of the HSO.

6.0 Personnel Protection

6.1 Protective Equipment

The minimum level of protection for exclusion area personnel includes:

Hardhat Steel-toed boots Safety glasses

During excavation and any other activities where skin contact is a potential exposure mechanism, Tyvek coveralls and neoprene or nitrile gloves and boots will be utilized.

Chemical goggles/safety glasses will be worn to prevent eye contact via splash or dust, as necessary. Spray or steam-cleaning operations may warrant the use of full-face faceshields.

Hearing protection will consist of the worker's choice of earplugs or earmuffs.

Half-mask and full-face respirators will be maintained in good condition on-site. Organic vapor cartridges will be provided for use with the respirators. All respiratory protection will be NIOSH/MSHA approved equipment.

The use of all protective equipment will be at the direction of the HSO, or upon the request of on-site personnel.

6.2 Action Levels

Use of respiratory protection will be at the direction of the HSO according to ambient monitoring readings taken in the breathing zone of the workers, or upon the request of on-site personnel.

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Action levels that signal an upgrade in protection are 10 parts per million (ppm) for a duration of five minutes for half-mask respirators and 50 ppm for five minutes for full-face respirators.

If ambient readings reach 100 ppm for five minutes, work will be suspended until the ambient levels can be brought down by the use of vapor suppressant. Such means may include backfill with clean soil or the use of water spray.

Eyewash bottles will be maintained in the support area, along with the site first aid kit. ABC fire extinguishers will be maintained in the support area and on each piece of heavy equipment.

7.0 Work Zones and Site Security

7.1 Exclusion Area

The active work areas during excavation and sump and tank removal activities will be considered exclusion zones. Such areas will be demarcated by barricades and warning tape, temporary construction fence, or other such measures. Access to these zones will be limited to authorized personnel with the appropriate protective equipment, who have met the training and medical requirements.

7.2 Decontamination Area

All personnel working on site must pass through the decon area before proceeding to the support area. A temporary wash pad will be constructed for equipment decontamination, as necessary, in order to collect the wash water for disposal. Facilities for personnel decon will be located adjacent to the active work area. Personal protective equipment cleaning and storage areas will be included in the decontamination area.

7.3 Support Area

The support zone will be located adjacent to, and upwind (if possible) of the decontamination zone. Toilet facilities for site workers will be located in this area.

7.4 Site Security

The perimeter of the site will be surrounded by fencing at least six feet tall. The site will be secured in this manner for the duration of the project, and while soils are stockpiled on the site. All stockpiled soils will be covered with plastic sheeting and secured before the end of each work day.

8.0 Decontamination Procedures

8.1 Personal Decontamination

All disposable clothing will be deposited in containers on-site for off-site disposal. Wash tubs with soap and water and rinse tubs will be provided for decontamination of boots and gloves to be reused. Respirators will be cleaned with sanitizing wipes unless gross contamination requires heavier cleaning in separate wash and rinse tubs.

Soap and water will be available for personnel to wash up after work or if any skin contact occurs during the work day.

8.2 Equipment Decontamination

Any equipment that comes in contact with contaminated materials will be properly cleaned before leaving the site. Heavy construction equipment will be steam cleaned as necessary on a temporary decon pad. Smaller pieces of equipment will either be steam cleaned or washed in the same manner as contaminated personal protective equipment, i.e., with a brush and soapy water and rinse water.

8.3 Decontamination Materials

All decon water will be collected for disposal to a proper disposal site. Contaminated Tyvek suits and other contaminated disposable equipment will be collected and disposed of at an appropriate site.

9.0 General Site Safety Provisions

- 9.1 General Site Health and Safety and Work Rules
- No drinking, gambling, or illegal drugs will be allowed onsite. Anyone reporting to work under the influence of alcohol and/or illegal drugs will be subject to disciplinary action. Any employee under a physician's care and/or taking prescribed narcotics must notify the HSO.
- 2. Personal protective equipment is required in designated areas. Such equipment may include, but is not limited to, respiratory protection, earplugs/earmuffs, hardhat, Tyvek coveralls, boots, gloves, chemical goggles, safety glasses, and protective faceshields.
- 3. Eating, drinking, smoking, and chewing gum or tobacco are allowed only in designated areas in the support zone. Smoking is strictly prohibited in the exclusion zones due to the potential flammability hazard.
- Changes in work practices or work rules will be implemented only after approval by the project manager and the HSO.
- Construction equipment always have the right-of-way over regular vehicles.
- 6. All employees entering the Exclusion Area must complete the required decontamination procedure before leaving the site.
- 7 All protective clothing to be worn inside the Exclusion Area will be supplied. None of this equipment will be permitted to leave the site with any employee for personal use. Also, any equipment to be used elsewhere for another project will be fully decontaminated before leaving the site.

- 8. Employees shall listen for warning signals on construction equipment and shall yield to construction equipment.
- 9. All equipment operators shall pay deliberate attention to watching for workers on the ground who may be in their path and provide these people with warning before moving.
- 10. All workers shall follow emergency procedures explicitly.
- 11. Kneeling and/or sitting directly on the ground in the exclusion area or decontamination area is prohibited.
- 12. All employees will utilize a buddy system while working on site.
- 9.2 Conditions of Site Access

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- All personnel must meet the medical monitoring requirements of 29 CFR 1910.120. Failure to submit to, or pass, any exam will be grounds for excluding the employee from the site.
- 2. All employees must participate in the air quality exposure monitoring program by wearing the personal monitors or sampling devices designated by the HSO. Any employee refusing to participate in the program, or tampering with a sample, will be subject to disciplinary action.
- 3. No beards or long sideburns will be allowed since they interfere with the seal of the respirator to the face. Trimmed sideburns and mustaches are acceptable. All employees must report to work clean shaven because of the potential need for the use of respiratory protection.
- 4. All employees must complete the required training program prior to starting work at the site.



5. All on-site personnel must wear the prescribed health and safety equipment, and go through the decontamination procedures prior to exiting the site.

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10.0 Emergency Procedures

The local response units for fire and paramedics will be notified of site activities, and will be provided with this Site Health and Safety Plan.

The medical center will be notified of the site activities and the potential for contaminated materials being present on the clothing or body of personnel brought to the facility. Directions for the emergency route to the medical center is included in Table 2. This Table will be posted at various conspicuous locations around the site and in site vehicles that may be used to transport injured personnel. A list of the emergency telephone numbers is also included in Table 2, and will also be posted near the telephones and around the site.

Whenever possible, injured personnel will be decontaminated and/or moved to the support area as long as such procedures do not further compromise the health and safety of the individual.

On-site emergencies are expected to be restricted to potential fires and minor spills, and possible minor injuries to site personnel. On-site conditions are expected to be within the limits of measures which can be taken by on-site personnel. Any emergency which poses a potential threat to the public will be considered a situation requiring outside assistance from emergency response agencies. During any on-site emergency, work activities will cease until the emergency is brought under control.

11.0 Training

All on-site personnel working in the exclusion zone will have the appropriate prior experience and training, in compliance with 29 CFR 1910.120. Such training includes the 40-hour basic training, three days of supervised field experience, 8-hour update training, and 8-hour supervisory training as appropriate.

Project-specific training will be provided prior to startup of onsite activities. This training will include:

- a. Site health and safety plan
- b. Decontamination
- c. Personal protection levels
- d. Chemical hazards
- e. Physical hazards
- f. Medical monitoring
- g. Air monitoring
- h. Use and maintenance of personal protective equipment
- i. Work zones
- j. Site safety rules and conditions of employment
- k. Emergency provisions
- 1. Buddy system

On-site tailgate meetings will be held before each work day to reinforce pertinent topics from the above list and to anticipate problems that may arise during the day. The HSO and Project Supervisor will conduct these meetings. This training will be documented as part of the daily documentation for the site.

Table 1 Chemicals of Concern

Material	Route of Entry ¹	PEL/TLV ² , (ppm ³)	Target Organs
Benzene	I,S,C,G ⁴	0.1	Blood, CNS ⁵ , skin, bone marrow, eyes, respiratory system
Ethylbenzene	I,C,G	100	Eyes, upper respiratory system, skin, CNS
Gasoline	I,S,C,G	300	Skin, CNS, liver, kidneys, spleen, respiratory system
Inorganic Lead	I,C,G	0.05 mg/m ³	GI tract ⁶ , CNS, kidneys, blood, gingival tissue
Tetraethyl Lead	I,S,C,G (skin) ⁷	0.075 mg/m ³	Skin, upper respiratory tract, eyes, CNS
Toluene	I,S,C,G	100	CNS, liver, kidneys, skin
1,1,1 TCA ⁸	I,C,G	350	Skin, CNS, cardiovascular system, eyes
Xylenes	I,S,C,G	100	CNS, eyes, GI tract ⁹ , blood, liver, kidneys, skin

Notes:

1.	Data	taken	from	the	NIOSH	Pocket	Guide	to	Chemical	<u>Hazards</u> ,
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- PEL/TLV = The lowest of either the Federal OSHA Permissible Exposure Limit, CAL-OSHA Permissible Exposure Limit, or the Threshold Limit Value for exposure assigned by the American Conference of Governmental Hygienists (ACGIH).
- 3. All values are in units of parts per million (ppm) unless otherwise denoted.

4. I = Inhalation

- S = Skin contact
 - C = Eye/Skin absorption
- G = Ingestion
- 5. CNS = central nervous system.
- 6. GI tract = Gastrointestinal tract.
- 7. (Skin) denotes that this chemical is absorbed directly through intact skin, as noted by the ACGIH.
- 8. 1,1,1 Trichloroethane, or Methyl Chloroform
- 9. GI tract = gastrointestinal tract.



Contact	Phone Number
Ambulance	911
Fire	911
Police	911
Hospital Eden Hospital, Castro Valley	(510) 537-1234
Scrivner Environmental Services Chris Hess	(209) 935-0815
Environmental Health Consultants, Inc.	(415) 347-9205
Irene Fanelli home	(415) 375-0477

Directions to Eden Hospital

From the site, head westbound on Hegenberger Road. Enter Highway 880, and proceed southbound to Highway 238. Proceed eastbound on Highway 238 to the Castro Valley Blvd. exit. Proceed eastbound on Castro Valley Blvd. and make a left turn onto Lake Cabot Road. Eden Hospital will be on the left.

Table 3 Employee Records Verification Matrix

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Environmental Health Consultants

Project No._____

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				EACH OCCURRENCE	\$		
				FIRE DAMAGE (Any one fire)	\$		
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HIRED AUTOS							
NON-OWNED AUTOS				BODILY INJURY (Per accident)	\$		
SARAGE LIABILITY				PROPERTY DAMAGE	\$		
EXCESSLIABILITY				EACH OCCURRENCE	\$		
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