EXCELTECH

SITE SAFETY PLAN

FOR

CCB BANKCORP, INC.
LEW DOTY CADILLAC
6301 SCARLETT COURT
DUBLIN, CALIFORNIA

Project No. 3-10058-11
June 1991

CONTENTS

CONTENTS
(Continued)

SITE SAFETY PLAN

CCB BANKCORP, INC.
6301 SCARLETT COURT
DUBLIN, CALIFORNIA

This Site Safety Plan delineates the basic safety requirements for the gasoline tank removal, disposal, and site restoration at 6301 Scarlett Court, Dublin, California.

The provisions set forth in this Plan will apply to the employees of Exceltech, Inc. and their subcontractors working on this project. The subcontractors working on this project may elect to modify these provisions, but only to upgrade or increase the safety requirements, and only with Exceltech's written concurrence.

This Site Safety Plan addresses the expected potential hazards that may be encountered for this project. Field activities for this phase are planned to take place on July 8, 1991 and continue for approximately 3 days. If changes in site or working conditions occur as the activities progress, Exceltech will provide amendments to this Plan.

SECTION 1

SITE HISTORY AND BACKGROUND

The site is located in a commercial section of Dublin. The owner of the property, CCB Bankorp, Inc., has decided to remove the on-site gasoline tank.

One 3,000-gallon gasoline tank is located under the asphalt concrete pavement on the south side of the property's northern most structure.

1.1 Work Plan

Exceltech's work plan consists of the following tasks:

- Notify USA Alert for underground utilities 72 hours prior to start of job pursuant to California State Law.
- Obtain permits from the Alameda County Health Department, the Dublin Fire Department, and the Bay Area Air Quality Management District to remove the tank.
- Peel away the concrete and asphalt from above the tank with a backhoe.
- Load the concrete and asphalt into a dump truck and dispose of it at a Class 3 landfill.
- With a backhoe, remove the soil from above the tank and cut trenches 2 feet wide and as deep as the bottom of the tank along one end and one side of the tank. Stack this soil on visqueen and cover with visqueen.
- Add 30 pounds of dry ice per 1,000-gallons tank capacity and monitor the volatile hydrocarbons within the tank using an LEL Meter.
- Remove the tank and associated piping when the concentration of volatile hydrocarbons within the tanks drop below 10% of the Lower Explosive Limit. Dispose of the tanks and associated piping as hazardous waste.
- Take two soil samples from the native soil below the gasoline tank and have it analyzed for total petroleum hydrocarbon as gasoline (TPHG); benzene, toluene, ethyl benzene, and xylenes (BTEX).
- Immediately backfill the excavation to grade and pave.

- Write a closure report describing work and including pertinent documentation.

1.2 Schedule

The crew will consist of two men (a foreman and a technician). The excavating and tank removal is expected to take 2 days, the backfilling and resurface with asphalt with take 1 day.

SECTION 2

PROJECT SAFETY AUTHORITY

2.1 Personnel

Personnel responsible for project safety are:

Corporate Safety Officer:	Lisa Nelowet
Office Safety Coordinators:	John F. Lynch
Project Supervisor:	Joe Brosnan
Project Foreman:	Jim Williams

Exceltech's commitment to project safety includes the provision of complete in-house training for all field and construction employees. These regularly scheduled training programs comply with Occupational Safety and Health Administration (OSHA) Standard 29CFR 1910.120. Exceltech personnel have extensive experience in the safe conduct of hazardous waste and construction services.

- Corporate Safety Officer, **Lisa Nelowet,** has 5 years of experience in waste minimization, hazardous waste management, and environmental risk assessment. She is skilled in the quantification of environmental contamination, human exposure and health risk, and has participated in research and litigation efforts for major environmental health episodes. Her experience also includes development and presentation of safety training programs. She is responsible for regulatory assistance, waste minimization, community relations, and health risk assessment. Ms. Nelowet holds a M.S. in Statistics from Stanford University, and a Sc.B. in Energy Systems Engineering from Brown University in Rhode Island.

- Fremont Office Safety Coordinator, **John F. Lynch**, has over 4 years of experience managing remediation projects in the environmental industry and 11 years managing construction projects. Mr. Lynch oversees all aspects of safety training and accident prevention on jobs conducted out of Exceltech's Fremont headquarters. He has been trained according to the OSHA Standard, 29 CFR 1910.120. Mr. Lynch is completing a B.S. in Business at the University of San Francisco.

- Project Supervisor, **Joseph Brosnan,** has over 25 years of experience supervising construction and engineering projects. He has managed several complex asbestos abatement programs emphasizing control, scheduling, and contract administration. Mr. Brosnan specializes in both engineering and business. He holds a B.S. in Engineering Management and Civil Engineering,

from the University of Missouri and a M.B.A. from Breach School of Business in Springfield, Missouri. He has been trained to OSHA Standard 29CFR 1910.120.

- Project Foreman, **James Williams,** has 7 years of experience in the operation and maintenance of a wide variety of equipment used in hazardous waste disposal. He operates front-end loaders, graders, bulldozers, dump trucks, vibrating compactors, rollers, tractors, and asphalt/concrete equipment. Mr. Williams specializes in the excavation and decontamination of hazardous waste.

2.2 On-Site Project Safety

The Project Manager is responsible for the provisions and submittal of this Plan to the Project Supervisor. He has the authority to provide for the auditing of compliance with the provisions of this Plan, suspend or modify work practices, and to administer disciplinary actions for individuals whose conduct does not meet the requirements set forth herein. He will raise any policy issues needing attention to one of the office safety coordinators for discussion with and resolution by the Corporate Safety Officer.

The Project Supervisor is responsible for the dissemination of the information contained in this Plan to all Exceltech personnel assigned to the project, and to the responsible representative of each subcontractor firm working under Exceltech on the project. The Project Supervisor will also act as the Site Safety Officer. In his absence, the Project Foreman will automatically assume the role of Site Safety Officer. Either the Project Supervisor, or the Project Foreman acting as his designee, will be on-site at all times while work is being performed by Exceltech or any Exceltech subcontractor.

2.3 Specific Responsibilities

Company Safety Officer: establishes our Corporate Health and Safety Policy and oversees all company activities related to the following:

- Safety supplies and equipment inventory.
- Medical surveillance program/physical examinations.
- Training programs/hazard communications
- Health surveillance of all Exceltech employees.
- Assuring that safety procedures in effect are in compliance with all appropriate federal, state, and company regulations (following the most stringent of the standards).

- Assuring appropriate personal protective equipment is adequate for actual hazards of on-site conditions.

Office Safety Coordinators:

- Review Site Safety Plan and submit to Corporate Safety Officer as appropriate.
- Oversee office medical surveillance files.
- Oversee office training files and arrange for needed training.
- Review all accident/incident reports filed.

Program Manager:

- Accident/incident reporting procedures.
- Decontamination/contamination reduction procedures.
- Coordination of health emergency plans with local medical clinic.
- Coordination of evacuation plans with local authorities.
- Establishing and coordinating fit testing for all respiratory protective devices to be used on-site.
- Investigate all incidents and accidents and report in writing to Company Safety Officer.

Project Supervisor/Site Safety Officer:

- Ensure that all personnel on-site adhere to the Site Safety Plan.
- Conduct daily tailgate safety meetings.
- Maintenance of personnel exposure monitoring records.
- Assuring appropriate hazard areas are identified and marked.
- Assuring all personnel entering hazard area are in appropriate levels.
- Conducting personnel hazard exposure surveillance through personal air sampling devices.
- Establishment and supervision of first aid station.

- Assuring that adequate supplies of personal protective equipment is maintained.
- Assuring that all supplied-air equipment is functioning properly.
- Establishment of site-specific safety procedures for problems encountered on-site.
- Obtain acknowledgement from all on-site personnel on sign-off page of the Site Safety Plan.

In addition to his Site Safety Officer responsibilities, Project Supervisor will be responsible for all work activities on the site. He will report directly to the Project Manager in all matters concerning this project. The Project Foreman who reports directly to the Project Supervisor, is responsible for all activities on the site in the absence of the Project Supervisor in addition to acting as the Site Safety Officer on the project.

SECTION 3

JOB HAZARD ANALYSIS

3.1 Chemical Hazards

The major contaminants that may be encountered is waste oil and its hazardous components. (See chemicals and characteristics table, page 3-3).

The primary routes of expose for the petroleum hazard are inhalation and ingestion. Levels of contamination are not expected to be high enough to cause significant exposure through either of these routes.

3.2 Physical Hazards

Physical hazards associated with the project include: 1) the hazards associated with heavy equipment, which are primarily physical contact accidents and noise, 2) blowing dust associated with excavating, 3) a fall hazard associated with the excavation pits, and 4) heat stress.

All heavy equipment used on this project will be in good working order and operated in accordance with recognized industry standards and Cal-OSHA Title 8, Subchapter 4, Construction Safety Orders. All backhoes will use side bracing when in operation to secure against lateral movement. Bracing will have secure footing. In addition, an exclusion zone applies to all personnel. The exclusion zone will be 20 feet to the front and either side of the operating heavy equipment. Personnel will not be allowed under an excavated load at any time.

All equipment operators and ground crews working in close proximity of heavy equipment will be supplied with ear protection.

The dust hazard will be mitigated by keeping ground crew from the down wind side of the excavation activity. In addition, water will be applied to control the dust if visible levels of dust reach the property boundary.

The excavation pit will be considered a confined space. Personnel may not enter into the pit.

During transport loading operations, no ground crew will be in the operations area.

Workers may suffer from heat stress.

Some signs and symptoms of heat stress are presented below:

- Heat rash may result from continuous exposure to heat or humid air.

- Heat cramps are caused by heavy sweating with inadequate electrolyte replacement. Signs and symptoms include:

  - muscle spasms
  - heavy sweating
  - dizziness
  - nausea
  - fainting

- Heat exhaustion occurs from increased stress on various body organs including inadequate blood circulation due to cardiovascular insufficiency or dehydration. Signs and symptoms include:

  - pale, cool, moist skin
  - heavy sweating
  - dizziness
  - nausea
  - fainting

- Heat stroke is the most serious form of heat stress. Temperature regulation fails and the body temperature rises to critical levels. Immediate action must be taken to cool the body before serious injury and death occurs. Competent medical help must be obtained. Signs and symptoms are:

  - red, hot, usually dry skin
  - lack of or reduced perspiration
  - nausea
  - dizziness and confusion
  - strong, rapid pulse
  - coma

To avoid heat stress, the Site Safety Officer will keep a supply of drinking water on-site at all times and call frequent work breaks during hot periods.

TABLE 1

CHEMICALS AND CHARACTERISTICS

Chemical	Symptoms	UEL[a] /LEL[b]	PEL[c]	Action Level[d]
Benzene	Irritant to eyes, nose, respiratory system, giddiness, headaches, nausea, staggered gait, fatigue, lassitude, dermatitis, bone marrow depression, abdominal pain; CARCINOGEN	7.1%/1.3%	1 ppm	IC[e]
TPH as Gasoline	Irritant to eyes and lungs, causes cough, conjunctive irritation, hallucinations, dermatitis, blistering, central nervous system depression	7.6%/1.4%	300 ppm	150 ppm
Toluene	Fainting, weakness, confusion, headache, insomnia, dizziness, and dilated pupils	7.1%/1.3%	100 ppm	IC
Ethyl-Benzene	Irritant to eyes, nose, throat, skin and mucous membranes, dizziness, constriction in the chest	6.7%/1.0%	100 ppm	IC
Xylene	Dizziness, excitement, drowsiness, incoherence, irritant to eyes, nose, and throat	6.0%/1.0%	100 ppm	IC

[a] UEL = Upper Explosive Limit
[b] LEL = Lower Explosive Limit
[c] PEL = Permissible Exposure Limit (OSHA)
[d] Action Level = Level above which respiratory protection is needed
[e] IC = Use indicator contaminant - TPHG

SECTION 4

JOB HAZARD SUMMARY

Risk to the environment and the public is forecast to be at a minimum. Dust from heavy equipment usage will be kept to a minimum with misting. Public access will be prohibited by use of barricades and caution tape around the site. Workers will be briefed on all potential signs of danger as outlined in Section 3.0.

SECTION 5

EXPOSURE MONITORING

Dust hazards will be monitored visually.

When temperatures exceed 85 °F, workers will monitor each other visually for heat stress after every work period. Flushed skin or the lack of sweating will be noted. Fatigue, flushed skin, decreased concentration and movement, lightheadedness, nausea, and loss of manual dexterity are all possible physical reactions to excess heat.

SECTION 6

PROTECTIVE EQUIPMENT REQUIREMENTS

6.1 Introduction

It is important that personal protective equipment and safety requirements be appropriate to protect against the potential hazards at the site. Protective equipment has been selected based on the contaminant type(s), concentration(s), and routes of entry. In situations where the type of materials and possibilities of contact are unknown or the hazards are not clearly indentifiable, a more subjective determination will be made on-site by the Site Safety Officer of the personal protective equipment.

6.2 Level of Protection

The scope and nature of this work qualifies the project to be in Level D based upon the criteria of 29 CFR, "Level D protection should be used when:..." This is based on no airborne hazards and will be confirmed by visual and olfactory monitoring.

Level D personal protective equipment is defined as follows for this project:

Level D
- Hard Hat
- Steel Toed Boots
- Safety Glasses (when an eye hazard is imminent)
- Ear plugs

SECTION 7

WORK ZONE

7.1 General

The site will be controlled to reduce the possibility of exposure to any contaminants present and their transport by personnel or equipment from the site.

The possibility of exposure or translocation of contaminants will be reduced or eliminated in a number of ways, including:

- Setting up security or physical barriers to exclude unnecessary personnel from the general area. This is accomplished by the fencing surrounding the site.
- Establishing work zones within the site.
- Conducting operations in a manner to reduce the exposure of personnel and equipment as noted in Section 3.
- Minimizing the airborne dispersion of contaminants as noted in Section 3.
- Implementing appropriate decontamination procedures.

7.2 Field Operations Work Area

Work areas (zones) will be established based on anticipated contamination. Within these zones prescribed operations will occur utilizing appropriate personal protective equipment. The planned zones are:

1. Exclusion Zone
2. Contamination Reduction Zone; and,
3. Support Zone (non-contaminated).

7.2.1 Exclusion Zone

The Exclusion Zone is the innermost area and is considered dirty or "hot." All areas where contaminated soil is spread.

7.2.2 Contamination Reduction Zone

Between the Exclusion Zone and the Support Zone is the Contamination Reduction Zone. All areas within the fenced property boundaries will be considered the Contamination Reduction Zone.

7.2.3 Support Zone

The Support Zone is considered a non-contaminated or clean area. All areas outside the fenced property boundaries will be considered the Support Zone.

SECTION 8

DECONTAMINATION PROCEDURES

To prevent or reduce the physical transfer of contaminants by equipment, the excavation equipment buckets will be visually inspected at the completion of excavation activities. If any significant petroleum contamination exists in the buckets, the buckets will be washed with a trisodium phosphate solution and the solution placed in 55-gallon drums for appropriate disposal.

SECTION 9

GENERAL PROJECT SAFETY REQUIREMENTS

The project operations shall be conducted with the following minimum safety requirements employed:

9.1 Eating, drinking, chewing gum or tobacco, smoking, or any practice that increases the probability of hand to mouth transfer and ingestion of materials is prohibited during excavation activities.

9.2 Hands must be thoroughly washed before eating, drinking, smoking, or any other activities transpire.

9.3 Legible and understandable precautionary labels shall be prominently affixed to containers containing rinseate from decontamination procedures.

9.4 Removal of dust or other soil materials from clothing or equipment by blowing, shaking, or any other means which may disperse materials into the air is prohibited.

9.5 Daily inspections of excavations shall be made. If there is evidence of possible cave-in or slides that impact safe operations, all work in the excavation shall cease until the necessary safeguards have been taken.

9.6 All trenching and excavation work will comply with regulatory agency rules.

9.7 The walls and spaces of all excavations and trenches more than 5 feet deep and into which employees will enter shall be guarded by shoring, sloping of the ground (2:1), or some other equivalent means.

9.8 If workers are required to enter excavations greater than 5 feet deep they will be subject to the provisions of the Exceltech Confined Space Entry Procedures.

9.9 All trenches shall be backfilled as soon as practical after work is completed and all associated equipment removed following receipt of analytical results.

9.10 Field operations personnel shall be cautioned to inform each other of non-visual symptoms of the presence of toxics, such as:

- Headaches
- Dizziness
- Nausea

- Blurred Vision
- Cramps
- Irritation of eyes, skin, or respiratory tract
- Changes in complexion or skin discoloration
- Changes in apparent motor coordination
- Changes in personality or demeanor
- Excessive salivation or changes in pupillary response
- Changes in speech ability or pattern

9.11 Exceltech personnel on-site are to be thoroughly briefed on the anticipated hazards, equipment requirements, safety practices, emergency procedures and communications methods, standard operating procedures for all equipment, initially and in daily briefings.

9.12 Any skin contact with excavated soil or groundwater shall be avoided.

9.13 A multi-purpose portable fire extinguisher shall be located on each piece of heavy equipment and in on-site Exceltech pick-up trucks.

9.14 The Site Safety Officer will be responsible to take necessary steps to ensure that employees are protected from physical hazards, which could include,

- Falling objects such as tools or equipment
- Falls from elevations
- Tripping over hoses, pipes, tools, or equipment
- Slipping on wet or oily surfaces
- Insufficient or faulty protective equipment
- Insufficient or faulty operations, equipment, or tools

SECTION 10

SANITATION

Restrooms and potable water are located in the building on-site.

SECTION 11

STANDARD OPERATING PROCEDURES

All personnel on-site will implement and comply with the heavy equipment operating procedures, heavy equipment operator check list, and truck operating procedures that follow.

11.1 Heavy Equipment Operating Procedures

a. All employees shall be clear of equipment before starting. Equipment operators shall perform a complete walk-around inspection before starting equipment.

b. All engines shall be shut down prior to refueling.

c. No adjustments, cleaning, or repairs shall be made to equipment while the equipment is running. All exposed gears, sprockets, chain drives, and belt and pulley drives shall have guards replaced directly following repairs, lubrication, cleaning, or similar operations.

d. Only trained employees are permitted to operate equipment.

e. No equipment shall be left with the engine running on an inclined surface.

f. All four wheels will be kept on the ground during loading.

g. Material piles shall only be approached at a speed necessary to fill the bucket.

h. The bucket or blade shall be grounded when equipment is to be left unattended, even if for a short time.

i. No eating, reading, or daydreaming while engaged in the operation of heavy equipment. Equipment shall not be operated if the operator is physically unfit to do so.

j. Hand signals shall only be recognized by the operator from the person supervising the lift or the unloading. Operating signals must follow the approved standard.

k. Clearances and other environmental conditions shall be checked when working near electrical wires, guy lines, or structures. Avoid contact of boom or cables with lines, electrical wires, and structures. At no time will equipment booms operate within 10 feet of high voltage overhead power lines.

l. Operators will inspect equipment daily to ensure that it is in good working order, and all safety equipment is operational. This includes brakes, horn, alarms, etc.

m. Gasoline shall not be stored on the equipment.

n. All equipment shall be kept clean and orderly. Cabs shall be routinely inspected for cleanliness by the operator and the supervisor.

o. Load limits of the equipment shall be strictly observed.

p. The operator will be the only person allowed on the equipment. NO PASSENGERS.

11.2 Heavy Equipment Operator Check List

1. Check for oil or water drippings on machine or onto ground.

2. Check engine oil and water level.

3. Check fan belts, tire pressure, and loose lug nuts.

4. Look for sabotage or damage done to machine the previous day.

5. Start engine and check oil pressure.

6. Inspect all gauges.

7. Inspect all controls.

8. Inspect cutting edge for wear and loose bolts.

9. Inspect all safety equipment - seat belts, back-up alarm, brakes, canopy and windshield.

10. Contact foreman or Exceltech shop if any adjustments or repairs are needed to be done to the piece of equipment.

11.3 Truck Operating Procedures

a. Oil, water, and the brakes shall be checked before starting the engine.

b. Before moving any truck, a check for clearance around the vehicle from any obstructions or personnel shall be performed. Walk around the truck.

c. Drivers shall, unless specifically instructed, exit the cab when the truck is being loaded.

d. Overloading of trailers shall be prohibited.

e. Passengers are not to ride on the running boards.

f. Always set the hand brakes and lock ignition before leaving the truck at the end of the shift.

g. All regulations and traffic laws shall be strictly obeyed.

SECTION 12

CONTINGENCY PLAN AND EMERGENCY RESPONSE PROCEDURES

12.1 Site Emergency Warning System

The warning systems that will be utilized depending on the work site conditions or emergency involved:

- Verbal communications
- Radio communications
- Vehicle horns

Verbal instructions with or without assistance are used to deal with specific incidents.

Radio communications are used between the site and the Fremont office.

Vehicle horn signals are used to signify an emergency warning. One long blast is used on-site to signify emergency evacuation of the immediate work area to a predetermined location upwind, where a head count will be taken and further instructions given.

12.2 Emergency Equipment

The following equipment comprises the basic emergency equipment list, of which all shall be available at the work site:

- Fire extinguishers - dry chemical
- First kits (including chemical burn kit)

12.3 General Emergency Procedures

In case of an emergency or hazardous situation, the team member that observes this condition shall immediately sound the alarm.

Upon hearing an alarm, all non-emergency communications will cease and the member giving the alarm will proceed to give the Site Safety Officer all pertinent information. This information will also be provided the Project Supervisor as soon as feasibility.

Actions to be taken will be dictated by the emergency condition as directed by the Site Safety Officer.

Power equipment will be shut down and operators will stand by for instruction.

Injured personnel will be transported to the appropriate medical facility.

The Exceltech Fremont office will be notified immediately.

In case of a fire, explosion, or hazard alarm, personnel will immediately proceed to assigned pre-arranged safe locations: along the site perimeter.

Upon arrival at the safe locations, a complete head count will be given to the Site Safety Officer and personnel will stay at the safe locations until the area is secured.

12.4 Personal Injury

If an injury occurs due to an accident or exposure to a hazardous substance, the Exceltech Fremont office will be notified. The Site Safety Officer will be given all appropriate information concerning the nature and cause of the injury so that treatment preparations can be initiated. The injured person will be transported to the Contamination Reduction Zone where appropriate first aid and treatment can begin. The Project Supervisor will be informed and will investigate the cause of the injury and make any necessary changes in work procedures.

12.5 Ambient Monitoring Contingencies

If olfactory monitoring on the downwind edge of the Contamination Reduction Zone indicates significant levels of any contaminants, the Site Safety Officer will warn unprotected personnel to evacuate.

12.6 Emergency Contact Listing

In the event of an accident resulting in physical injury, first aid will be administered, and the injured worker will be transported to Washington Hospital for emergency treatment. A physician's attention is required regardless of the severity of the injury.

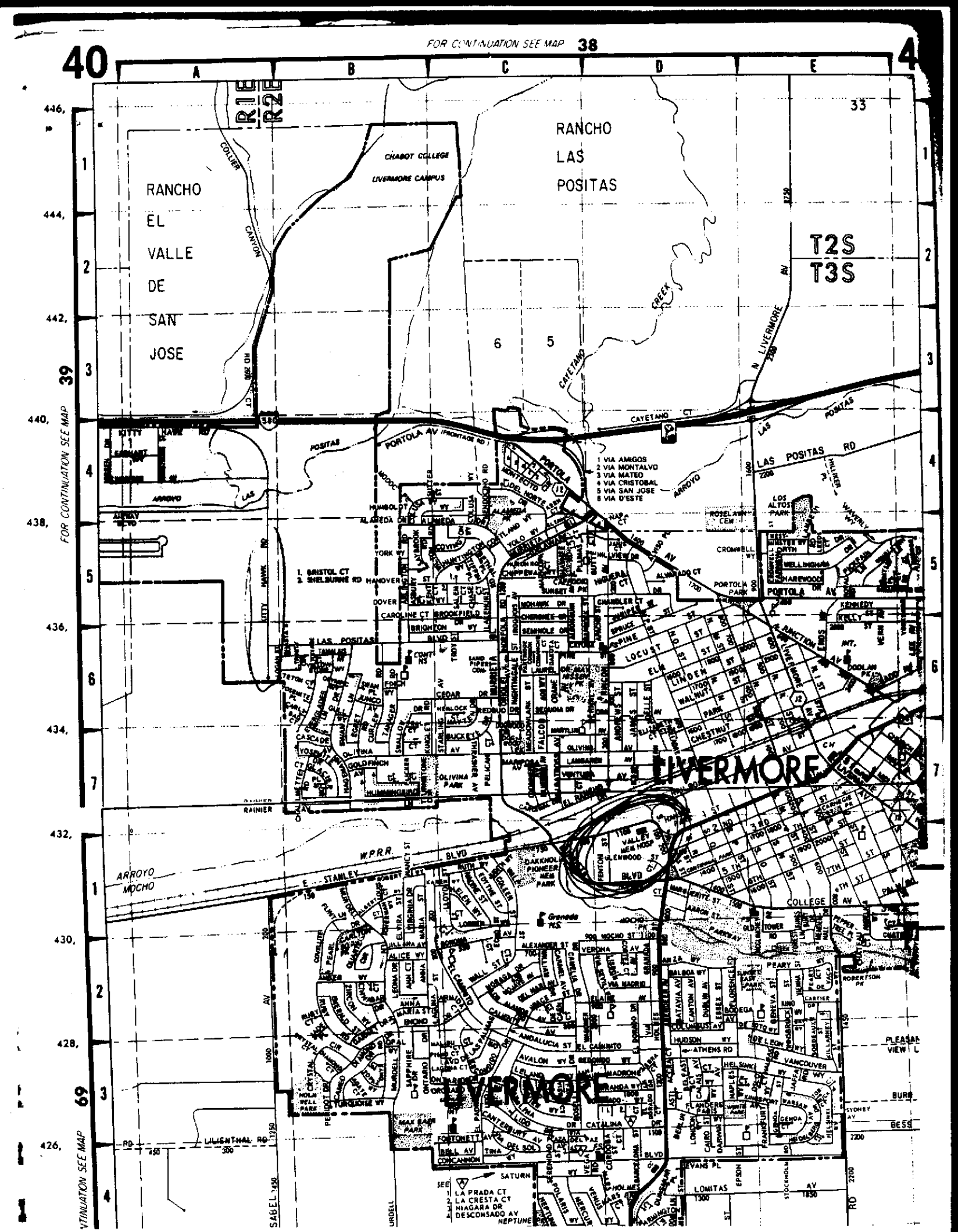
In the event of fire, explosion, or property damage at the site, Mr. Bob Heasman (714-979-4600) will be immediately notified. If necessary, local fire or response agencies will be called.

Emergency Telephone Numbers:

Fire and Police 911

Valley Memorial ..... (415) 447-7000
1111 E. Stanley Boulevard
Livermore, California

Directions to Hospital: Get on Highway 580 Eastbound to Portola Avenue Exit. Turn right off Portola onto Murrieta Boulevard. Continue on Murrieta past railroad tracks to E. Stanley Boulevard. Turn left onto E. Stanley Hospital is two blocks on the right.


FOR CONTINUATION SEE MAP 38
40
A
B
C
D
E
R1E
R2E
T2S
T3S
RANCHO EL VALLE DE SAN JOSE
RANCHO LAS POSITAS
CHABOT COLLEGE
LIVERMORE CAMPUS
COLLIER CANYON RD
CAYETANO CREEK
N LIVERMORE AV
CAYETANO CT
LAS POSITAS RD
PORTOLA AV (FRONTAGE RD)
1 VIA AMIGOS
2 VIA MONTALVO
3 VIA MATEO
4 VIA CRISTOBAL
5 VIA SAN JOSE
6 VIA D'ESTE
1. BRISTOL CT
2. SHELBURNE RD
LIVERMORE
ARROYO MOCHO
W.P.R.R.
E. STANLEY BLVD
COLLEGE AV
PEARY RD
LILIENTHAL RD
SATURN
SEE
1 LA PRADA CT
2 LA CRESTA CT
3 NIAGARA DR
4 DESCONSADO AV
NEPTUNE
FOR CONTINUATION SEE MAP 39
FOR CONTINUATION SEE MAP 69

SECTION 13

SAFETY/ORIENTATION TRAINING

Field personnel from Exceltech will attend a project-specific training program for safety issues and project work task review before beginning work. The meeting will be conducted by the Project Supervisor.

13.1 Formal Training

All Exceltech field personnel are trained in accordance with all applicable OSHA regulations pertaining to personal safety and hazardous materials handling and decontamination. Exceltech's health and safety program is in full compliance with 29 CFR, Part 1910, including the OSHA interim ruling which amends CERCLA and sets specific standards for medical surveillance and training. Copies of training documentation are available on request by notifying Mr. John Lynch in our Fremont office at (415) 659-0404.

Exceltech field personnel have extensive knowledge of various construction work and the tools in which to do their work. Personnel are trained in the hazards of heavy equipment, open excavation, and various other earth moving hazards.

This formal training is supplemented by daily tail-gate safety briefings and additional site-specific training as required.

SECTION 14

MEDICAL SURVEILLANCE

Exceltech personnel and subcontractors engaged in project operations shall be participants in the Medical Surveillance program, and must be cleared by the examining physician(s) to wear respiratory protection devices and protective clothing for working with hazardous materials. The applicable requirements under CAC Title 8, Section 5216 are available in the Fremont office and will be observed.

14.1 Examination Requirements

All Exceltech personnel on-site shall have successfully completed a pre-placement or periodic medical examination in accordance with established Exceltech policies and procedures, and consistent with the provisions of the OSHA carcinogen standards. This examination includes a complete medical and occupational history, physical examination, and selected biological sampling. Laboratory studies include a complete blood count (CBC), urinalysis, chemistry panel (SMAC), pulmonary function (FEV and FVC), chest X-ray, audiometer, and vision screening. Additional testing is conducted as deemed appropriate by the occupational physician. Ongoing medical consultation and post-project testing is also provided. Exceltech Medical Surveillance Program records are available in the Fremont office for review.

14.2 Emergency Medical Treatment

Emergency facilities and contact agencies (which include local hospital facilities, state highway patrol, local fire/paramedics, and local law enforcement agencies) have been established in Section 12, and arrangements have been made with those organization as appropriate. These facilities and agencies will be utilized in the event of an employee injury or illness requiring emergency medical care beyond the capabilities of on-site first aid trained personnel.

SECTION 15

RECORDKEEPING

15.1 General

Recordkeeping shall be consistent with OSHA regulations in all respects. The following permanent records will be maintained in the Exceltech offices and at the site:

- Safety Inspection Reports
- Personnel Exposure Monitoring Records (spiral or bound permanent log books will be used)
- OSHA 200 - Current to within 5 days
- Accident reports consistent with the established Exceltech procedures
- Tailgate safety meetings (held daily before start of work)

15.2 Medical Records

Permanent medical records are maintained in confidential files as part of Exceltech's Medical Surveillance Program.

SECTION 16

SIGNOFF PAGE

I have read the Site Safety Plan and fully understand the hazards associated with the tank removal project at 6301 Scarlett Court, Dublin, California.

I will comply with the minimum safety requirements set forth in the Site Safety Plan. I will implement the Site Safety Plan requirements and agree to notify the Site Safety Officer or the Project Supervisor should any unsafe acts be witnessed by me while I am on this site.

Print Name	Signature	Date

Project Safety Plan approved by:

Office Safety Officer

Project Supervisor