

CONTRACTOR SAFETY PLAN RESPONSIBILITY & REQUIREMENTS

ALEXANDRIA RENEW ENTERPRISES

Health, Safety, and Environmental Management Plan - December 2015

Drafted By:

JACOBS

1100 N. Glebe Rd., Suite 500 Arlington, Virginia 22201

Modified and Finalized By:

Alexandria Renew Enterprises

Table of Contents

1.0 CONTRACTOR HEALTH, SAFETY AND ENVIRONMENT (HSE) REQUIREMENTS

It is the policy of the Alexandria Renew Enterprises (AlexRenew) to select and contract with Contractors with the same priority and emphasis on Health, Safety and Environment (HSE) protection as we practice for our own employees. It is a contractual requirement that Contractors comply with all applicable local, State, and Federal health, safety, and environmental laws, regulations, and ordinances. AlexRenew may supplement some local, State and Federal laws, regulations and safety standards to incorporate more stringent guidelines. These will be communicated to the Construction Management Company (“CMC”) so that such procedures are subsequently incorporated into the Contractors’ policies and procedures while working on the Site.

This HSE Management Plan specifies requirements that may exceed local, State, and Federal laws, including OSHA standards or the Contractors’ normal HSE procedures. The CMC and Contractors are responsible for reviewing and implementing the HSE requirements set forth in this Management Plan. The CMC and Contractors are also responsible for ensuring that lower tier Contractors review and implement these HSE requirements. When activities and/or the scope of work changes, Contractors shall update their HSE procedures to ensure that the additional activities are covered by their plan.

1.1 Security Requirements

The CMC and all Contractor personnel, agents, representatives, and sub-contractors, will enter the project site thru an AlexRenew established entry gates and sign in at the Security Guards office on a daily basis.

Security Guard shall maintain these sign-in logs for the duration of the project and provide them to the CMC or AlexRenew when requested. Contractor visitors will be required to enter the project site thru an AlexRenew established entry gate and sign in at the Contractor's office. Visitors will be escorted at all times by an AlexRenew official, the CMC and/or a Contractor representative. If visitors tour the site, they must wear protective equipment including, but not limited to, safety shoes, hard hat, safety glasses, and high-visibility vest. The Contractor has the obligation to furnish such safety equipment for all such visitors to the Site.

This policy also applies to the visits by the general public and regulatory agency (e.g., Virginia Occupational Safety and Health Administration (VOSHA) and Department of Environmental Quality (DEQ), etc.) personnel visiting the site. Upon arrival to the site entrance, they will be asked to sign in and remain at the entry gate until CMC officials are notified and arrive to escort them around the site. The Contractor will provide the hard hat safety glasses (non-prescription), and high-visibility vest and any other safety equipment that is necessary on the Site.

Parking for all Contractor vehicles (and personal vehicles) will be parked in a designated parking area. Only construction vehicles (dump trucks, cranes, etc.) will be allowed to enter the work area. A wash bay will be available for construction vehicles to utilize prior to entering public streets.

Based on scheduled activities and Contractors on-site, a mandatory meeting will be held as required by AlexRenew and/or the CMC to discuss and coordinate security responsibilities, construction operations, working hours, number of construction personnel, and any other items of mutual interest.

2.0 DEFINITIONS

3.0 DOCUMENTATION AND REPORTING REQUIREMENTS

3.1 A project-specific HSE Action Plan or, in the case of hazardous waste operations, a site-specific Health and Safety Plan (HASP), must be generated by each Contractor mobilizing on the project. This plan must include a project-specific Emergency Response Action Plan in accordance with AlexRenew, Local, State, and Federal requirements. All HSE Action Plans must include the name, location and direction to the hospital that is the most proximate to the Site.

3.2 If the portion of the project is regulated as a hazardous waste or emergency response operation (HAZWOPER), as defined in 29CFR 1926.65 or 29CFR 1910.120, then the Contractor must develop a HASP, utilizing someone who is qualified in the subject matter, that outlines how hazardous agents (chemical/physical/environmental) will be identified, handled, and controlled. Contractor site personnel working in this area shall be trained on the exposures, as well as the necessary precautions that are to be followed. The Contractor is required to submit

documentation of this training to the CMC prior to commencing work on the Site. In addition,

any Contractor and/or Subcontractor working in adjacent non-HAZWOPER areas will be briefed on work activities and associated hazard(s) in the event of an incident or release if DRI levels exceed established “action levels.” The CMC and AlexRenew officials will be immediately informed by Contractor of any hazardous situations or materials that are discovered.

- 3.3** Contractor shall furnish to CMC the names and qualifications of the Competent Persons and Qualified Persons, who may be required for their scope of work by Federal, State, or local regulations. Examples include, but are not limited to: Competent Persons and/or Qualified Persons for steel erection, excavation, scaffold erection, confined space entry, annual crane inspections, etc.
- 3.4** Contractor is responsible for maintaining a First Aid Register for all employee injuries and illnesses reported on the project. First Aid kits will be provided by all Contractors and at least two persons on Site from each company will be current and trained in First Aid and CPR.
- 3.5** Contractor must immediately inform CMC and AlexRenew of any inspections by VOSH, EPA, or other HSE regulatory agencies or other actions involving the Contractor’s work.
- 3.6** Contractor must promptly report all potentially work-related incidents, injuries, or illnesses to their Supervisor or their Site Safety Officer, the CMC, and AlexRenew EHS Manager.
- 3.7** Injuries, illnesses, or any incident involving a third party or a member of the general public must be promptly reported to the Contractor Site Safety Officer, the CMC, AlexRenew EHS Manager.
- 3.9** Incidents involving potential exposure to hazardous materials and releases or spills of such materials must be promptly reported to Contractor Site Safety Officer, the CMC, AlexRenew, and the necessary Regulatory Agencies.
- 3.10** Accident investigation reports for all Contractor accidents, injuries, and work-related illnesses shall be forwarded to the CMC and AlexRenew EHS Manager within twenty-four hours of the occurrence.
- 3.11** Contractor employees are required to participate in documented, daily task-specific Safe Plans of Action and regular Safety Observation Reports or equivalent. Copies of these documents shall be provided to the CMC weekly.
- 3.12** Contractors will conduct weekly HSE meetings, and meeting reports with attendance sign-in sheets shall be maintained by the Contractor for the duration of the project and provided to CMC upon request.

4.0 HSE TRAINING/COMMUNICATION REQUIREMENTS

- 4.1** Contract employees must complete HSE training required by applicable Local, State, and Federal HSE requirements. All Contractor and sub-tier contractor personnel shall have current OSHA 10hr Construction training at a minimum in addition to any other training required by governing agencies for the scope of work to be performed. Documentation of all HSE training shall be maintained at the project site by the Contractor and provided to the CMC upon request.

4.2 Workers involved with hazardous waste operations, as defined by 29 CFR 1910.120 or equivalent applicable local, State and federal regulations, shall have met, prior to any field work activity or exposure, the training requirements of the standard to include OSHA 40-Hour HAZWOPER Training. Certification of individual worker training shall be provided to the CMC prior to commencing work.

4.3 Contractors must certify that all operators of mobile equipment such as forklifts, cranes, boom lifts, etc. as required by applicable local, state, and federal regulations, have been trained and/or certified on the proper operation of the equipment. Crane operators shall have a current NCCCO certification. Copies of this training and certification shall be maintained on the project site by the Contractor and provided to CMC upon request. Mobile crane operators must be qualified on each specific crane (type & rating) that they are assigned to operate through an OSHA and/or industry recognized testing and qualification procedure. Backup alarms will be functional and tested on a daily basis.

Contractors must establish a prompt and effective method of providing HSE communications such as HSE alerts, advisories, bulletins, regulatory updates, etc., to all Site employees.

5.0 BASIC HSE REQUIREMENTS

The following paragraphs list HSE rules and fundamental requirements for Contractor HSE. When there are multiple rules that may apply, the most stringent of AlexRenew, CMC, Local, State, and/or Federal HSE regulations that govern the work shall be followed.

5.1 Each Contractor shall appoint an on-site Site Safety Officer, who will attend regular CMC HSE meetings and be responsible for implementation of the rules listed below, as well as other HSE rules determined to be necessary for the safe execution of the project. The Contractor Site Safety Officer must possess current 30 hour construction OSHA card.

5.2 Hard hats (ANSI Z89.1 or equivalent) shall be worn at all times (e.g. construction, environmental operations, operations or maintenance environment), regardless of the workers' activities. This includes welders using welding hoods. Hard hats shall be worn in the forward position only.

5.3 Shirts with at least four-inch sleeves and full length pants shall be worn at all times. No tank tops are allowed. Loose or frayed clothing, loose or hanging long hair, ties, rings, body jewelry, etc. shall not be worn around moving machinery or other areas where they may become tangled.

5.4 Hearing protection shall be worn when exposures exceed 85 DBA and/or during work with heavy equipment. Sound level determination is the responsibility of the contractor and/or their lower tier sub-contractors.

5.5 Hard-toe footwear (ANSI Z41.1, or equivalent) shall be worn at all times by all workers when in the construction environment or in areas where there is a danger of foot injuries due to falling, rolling, or piercing objects or when an employee's feet are exposed to electrical hazards.

5.6 Safety glasses with rigid side shields (ANSI Z87.1, or equivalent) shall be worn at all times when in the construction environment and in any area where eye hazards exist. This includes under welding hoods and for workers with prescription eye wear. Safety goggles may be worn over non-safety prescription eyewear.

- 5.7** Face shields must be worn in addition to safety glasses when grinding, chipping, jack hammering, and power sawing or when conducting other tasks that involve such face and/or eye hazards.
- 5.8** Gloves, appropriate for the hazard present, shall be worn when hands are exposed to absorption of harmful substances, cuts, abrasions, punctures, biological hazards, chemical burns, thermal burns, or harmful temperature extremes.
- 5.9** Contractor shall comply with AlexRenew's six (6) foot (construction) four (4) foot general industry fall protection requirement. The Contractor is responsible for implementing their own systems to comply with this requirement and other pertinent requirements specified in the VOSH/OSHA standards.
- 5.10** The use of "passive" systems, such as safety nets, monitoring systems, or controlled access zones, as the sole means of fall protection when working above six feet, is prohibited.
- 5.11** Each Contractor who is exposed to a fall hazard shall submit a rescue plan as required by OSHA.
- 5.12** Workers in mechanical lifts, including scissor lifts, boom trucks, suspended or supported personnel baskets, articulating lifts, and other similar devices must use fall protection equipment at all times. Only anchorage points designated by the manufacturer are permitted to be used. Such devices shall not be used as elevators to transport workers to different work locations. All workers operating such lifts shall be trained on the use of the lift and the documentation of this training shall be available upon request by CMC.
- 5.13** All portable ladders must be clearly marked with the ladder owner's name. Ladders shall be inspected by a competent person before use. All damaged ladders shall be removed immediately from the Site.
- 5.14** The safest means of worker access for overhead work (e.g., rolling scaffolds, mechanical lifts, platform ladders, etc.) shall be considered as alternatives to the use of portable ladders. If ladders are used, then the top of all straight and extension ladders shall be tied to a substantial anchor point before use; a second worker must hold the ladder until the tie-off is secure. If a worker's feet are on or above the fifth rung of a stepladder, the top of the ladder must be tied to a substantial anchor or a second worker must hold the ladder throughout the task.
- 5.15** When ascending or descending a portable ladder, three-point contact shall be maintained at all times. When potential fall exposure exceeds 20 feet, personnel on ladders must be protected with a personal fall arrest system.
- 5.16** Decking sections shall be laid tightly and immediately secured upon placement to prevent accidental movement. During initial placement, decking sections shall be placed in such a manner to ensure full support by structural members and each piece shall be individually secured. Pre-installation or shake-out of multiple sections of decking using temporary methods of attachment, such as tack welding, is not allowed. The use of controlled decking zones is not allowed.
- 5.17** Work above or adjacent to water requires a specific written safe work plan, which must be submitted to CMC and or AlexRenew for review before work begins. This includes, but is not limited to,

rivers, lakes, canals, settlement ponds, and open tanks containing liquids. United States Coast

Guard-approved Personal Flotation Devices (PFDs) must be worn when working above or adjacent to water. When working above water or adjacent to water without 100% fall protection, PFDs that will provide floatation to an unconscious user in a face-up position must be used. Personnel shall not work alone above water.

5.18 Equipment and tools shall not be altered in any way to adapt it for a job for which the manufacturer does not intend it. The manufacturer of the equipment must approve any such adaptations or alterations to equipment in writing. Only trained and authorized persons shall operate machinery or equipment.

5.19 All hand-held power tools must be equipped with constant pressure switches that will automatically shut off power when the pressure (worker's hand) is removed. Hand-held power tools with on/off or lock-on switches are not allowed.

5.20 Ground Fault Circuit Interrupters shall be used to protect all temporary electrical wiring and cord sets. The use of an assured grounding conductor program in lieu of GFCIs is not an option.

5.21 Contractor will be provided with a copy of AlexRenew Lock-Out/Tag Out program and procedures through CMC or AlexRenew. Contractor will provide AlexRenew with a copy of their Lock-Out/Tag Out program and procedures through CMC or directly to AlexRenew. This exchange of programs is for informational purposes only. Contractor's lock-out/tag-out procedures shall meet or exceed AlexRenew's program and be followed to minimize the potential exposure of workers to hazardous energy. This exchange is for informational purposes only. Hazardous pipelines or vessels will be isolated by using a double block and bleed system or by blanking. Every effort must be made to de-energize electrical equipment to be worked on and other electrical equipment in the area that may affect the work. If the equipment cannot be isolated or de-energized, a specific written safe work plan must be submitted to CMC and AlexRenew EHS Manager for review before work proceeds. Only "Qualified Electricians" may work on energized or potentially energized circuits. See 29 CFR 1910.332 for qualified electrician requirements. AlexRenew considers equipment rated at 50 volts and above as "high voltage."

5.22 In addition to NEC, and OSHA 1910/1926 Electrical requirements, the Contractor shall comply with the provisions of NFPA 70E, "Standard for Electrical Safety in the Workplace." Contractors shall ensure that their employees are trained in safe work practices, qualified, and provided equipment, tools, and personal protective equipment (PPE) that are specified in NFPA 70E.

5.23 Per 29 CFR 1910.146, confined space entry work must follow a documented hazard assessment and safe work planning process, which must be submitted to the CMC for review prior to entry.

- Contractor who plans to enter a confined space shall submit a written plan to CMC that complies with the above referenced OSHA standard prior to the entry taking place.
- As part of project planning activities, all on-site confined spaces that may be entered shall be identified, evaluated, and classified (permit-required vs. non-permit-required). Likewise, confined spaces discovered during work activities, and which will require entry, will also be evaluated and classified.
- All permit-required confined spaces will be labeled so that employees are adequately warned of

the potential for hazardous atmospheres. Labeling is not required under the following circumstances:

- The spaces are easily recognizable, numerous, and widely spaced (e.g., storm sewer manholes).
- Employees will be instructed that these constitute confined spaces during required training. However, these locations will be included on the inventory.
- A complete inventory has been developed, all personnel have been trained in the use of the inventory, and the workers consult the inventory prior to performance of any work that may require entry into a confined space.
- When non-permit-required confined spaces require the implementation of confined space entry procedures because of specific work operations (e.g., painting, welding), all entry points will be labeled so as to alert all employees of the existence of the hazardous conditions. These signs will be removed only when the hazard no longer exists (e.g., complete curing of the paint).
- Non-permit-required confined spaces can be designated by only a Certified Industrial Hygienist, Certified Safety Professional, Professional Engineer, or a competent person with appropriate confined space training and experience after review of the space(s), historical monitoring data, and other factors (e.g., injuries that have occurred). Therefore, all confined spaces will be considered permit-required, unless the Contractor submits, in writing, an explanation of their justification to re-classify the space. AlexRenew and/or the CMC have the right to refuse the re-classification.

5.24 High-visibility reflective safety vests (ANSI/ISEA 107, Class II, or equivalent) must be worn by all personnel.

5.25 Motor vehicles and mobile equipment shall never be left running without an operator at the controls. Proper use of seatbelts by all occupants is mandatory. Motor vehicle operators are prohibited from using a mobile phone or two-way radio. This applies to both hands-free and non-hands-free devices. If the use of such a device by the motor vehicle operator is necessary, it is only allowed when the motor vehicle is stationary and in a safe location off the roadway. Contractor shall make all efforts to avoid any petroleum spills and leaks from any motor vehicle and equipment.

5.26 Examples of critical lifts include, but are not limited to: lifts of more than 50 tons, those which exceed 85% of the crane's capacity, involve more than one crane, and lifts of a non-rigid object or over active work areas or public property. All "critical lifts" require written prior notification to CMC before proceeding. A lift plan will be required to be submitted by the Contractor two weeks prior to the lift taking place.

5.27 All outriggers on mobile cranes must be fully extended and fully deployed when the crane is used to lift or support a load. All lifts shall be conducted per the manufacturer's requirements and/or recommendations and per the applicable load chart.

5.28 Anti two-block devices that automatically disengage crane hoist/boom functions when the hook or block approaches the jib or boom tip are required on all cranes.

5.29 Multiple lift rigging (Christmas tree lifts) is not allowed without prior written notification to Site/Project Management and development by the Contractor of a written site-specific plan to prevent exposure to overhead loads.

5.30 Field supervisors for the Contractor are responsible for protecting their workers from heat and cold

stress conditions by incorporating protective measures, PPE, and adequate fluid and food intake.

5.31 Eating and drinking will be permitted only in designated areas at AlexRenew project sites. Smoking

will be permitted only in areas designated by Field Supervisors and situated in locations that are not in the immediate vicinity of activities associated with work site activities. Additionally, Field Supervision will designate each smoking area giving primary consideration to those personnel who do not smoke.

- Personnel actively involved in the performance of certain activities will not be permitted to smoke, eat, drink, or use smokeless tobacco, except during breaks (e.g. HAZWOPER Controlled work areas).
- Site personnel will first wash hands and face after completing work activities and prior to eating or drinking.

5.32 Adequate illumination will be provided by Contractors at all times.

6.0 CERTIFICATION, INSPECTIONS, AND REGULATORY AGENCY PERMITS

6.1 Certain operations may require prior written notification to the Site/Project Management and CMC. Such activities may include but are not limited to hot work, confined space/vessel entry, excavations, asbestos abatement, lead abatement, etc. Contractor shall confer with CMC whether any parts of the Contractor's activities require prior written notifications.

6.2 Contractors are responsible for securing and complying with all city, state, and federal permits.

6.3 A third-party certified Qualified Person shall make a thorough annual inspection of all cranes and powered hoisting equipment. Cranes assembled on site shall receive an annual inspection prior to being put into service. Documentation of all crane inspections shall be maintained on site by the Contractor and provided to Site/Project Management upon request.

6.4 All scaffolding must be inspected and tagged by a Competent Person prior to initial use, before each work shift, and after any event that could affect its structural integrity. Suspended scaffolds must receive documented daily pre-use inspections. Untagged scaffolds must not be used.

6.5 Mobile equipment must receive daily pre-use inspections, which will be documented by Contractor and given to CMC upon request. Examples include forklifts, backhoes, personnel lifts/man lifts, etc.

7.0 SITE OPERATIONS

Contractors shall include planning for environmental compliance in the preparation of their HASP or HSE Action Plan. Issues to be considered include but are not limited to release reporting, air permits, water permits, asbestos/lead permits or notifications, hazardous waste generation and related disposal procedures, spill mitigation, clean-up methods, etc.

Contractor shall have a written Hazard Communication Program and comply with the requirements of 29 CFR 1910.1200. A copy of the program shall be forwarded to Site/Project Management and a copy

shall be in the possession of the Contractor onsite.

Any potentially hazardous material or chemical brought onto the site shall be accompanied by a Material Safety Data Sheet (MSDS). Copies of MSDSs shall be forwarded to the Site/Project Management before the product is brought onto the site.

Small quantities (less than 10 gallons) of hazardous liquids, such as gasoline, diesel fuels, and solvents, brought onto the site shall be stored in a properly labeled safety container with a flame arrestor and self-closing lid. Larger quantities will require the construction of a berm to contain a release.

Site/Project Management shall be notified before any chemical or material is used that could create foul smelling, noxious, or toxic vapors or gasses.

All accidents involving exposure to potentially hazardous materials and hazardous material releases (as defined by EPA-RCRA) must be immediately reported to Site/Project Management. It is important to report all releases or exposures even if the incident is considered minor or adverse health effects or symptoms are not apparent at the time.

7.1 Clearing and Grubbing: Chain saws should be used with caution in order to prevent personal injury, as the cutting mechanism is unguarded. Kickback is the single biggest cause of the chain saw injuries. A kickback is the sudden and potentially violent rearward and/or upward movement of the chain saw.

Prior to making the cut, all other workers must be removed and made aware of the fall area.

The operator must be completely familiar with the controls and proper use of the equipment.

- Minimum PPE required includes hardhat, hard-toe safety boots, safety glasses, hearing protection, leather gloves, and debris shield.
- Chainsaw operations require the use of chainsaw chaps (leather leggings are not suitable)
- Employees working aloft in trees will use proper climbing, fall protection, and descending equipment. Fall protection procedures shall be implemented.
- A high visibility reflectorized safety vest will be worn when working around vehicular traffic.

Covering of Holes: Contractors are also responsible for insuring that holes that are two (2) inches or greater in floors, roofs, and other walking/working surfaces are covered. The following is a list of requirements for covering holes:

- Covers for holes shall be capable of supporting, without failure, at least twice the weight of employees, equipment, and materials that may be imposed on the cover at any one time.
- All covers shall be secured when installed to prevent accidental displacement by wind, equipment, or employees.
- Covers shall be marked with the word "Hole" or "Cover" to provide additional warning of the hazard.
- Caution or Danger tape around or over holes four (4) feet or more are not to be used at AlexRenew as protective devices. Tape does not provide any fall protection.

Fire Prevention:

- Fuel should be stored in approved metal safety cans only and labeled as to contents.
- The container should have a metal spout and funnel provided, to allow for electrical bonding during fuel transfer.

- Equipment will be turned off while being refueled.
- Smoking is prohibited during refueling.
- After completing fueling, carefully wipe off any gasoline spilled before starting the engine
- Keep a fire extinguisher available at all times in the work area.
- Keep the equipment clean of gasoline, oil, and sawdust.

Wood Chipping Hazards: Wood chipping equipment should be used with extreme caution in order to prevent personal injury, as the chipping mechanism is open to receive tree branches and other wooden material. The cutting blades begin to rotate when the engine starts and slows down gradually after the engine is shut off.

In addition, the following work safety practices should be observed:

- Care should be taken to avoid foreign objects such as metal, glass or rocks that could damage equipment and become projectiles.
- Personnel will not wear loose clothing, gauntlet gloves, or hand/wrist jewelry when operating a chipper.
- No part of an employee's body will be placed on the chipper table, nor the discharge chute rose while the rotor is turning.
- A chipper will be fed from the side of the centerline, and the employee will immediately turn away when the brush is taken into the rotor chamber.
- Bystanders should be kept at least 25 feet away when in operation.
- Never try to clear blockages by hand and always engage the chipping mechanism gradually using the safety handle.
- Brush chippers will be provided with a locking device on the ignition system that prevents startup when the key is removed.
- Access panels must be closed and secured before chippers are used.
- The infeed hopper or table will be of a design to prevent an employee from reaching the rotor blades or knives during normal operation.
- Trailer-type chippers will be chocked.
- The feed-openings will be protected with flap-type guards to prevent kickback of chips.

7.2 Landfill Operations:

- All ground personnel must wear a high-visibility, reflective safety vest at all times. Safety vests must be visible from all angles.
- All ground personnel will yield to heavy equipment and maintain approximately 100 feet of clearance at all times while maintaining constant eye contact with the operator.
- The site supervisor must notify Site/Project management prior to allowing any worker to enter a high-traffic area. The site supervisor shall instruct Site/Project management to alert all operators when personnel will be entering traffic areas to perform assigned work. When feasible, perform work during periods of low traffic. All work performed in high traffic areas shall be performed

within physical barriers, such as cones, warning tape, concrete jersey barriers, etc. Physical barriers will be set up in such a manner to be visible to all operators.

- Operators and site supervisors shall ensure all reverse warning devices are in working order prior to the operation of equipment. If any person notices an inoperable reverse warning device, that person shall immediately notify the operator and the site supervisor. Any vehicle with an

inoperable reverse warning device shall be tagged and placed out of service until equipped with a working device.

7.3 Drilling:

- Use common sense while maintaining a “safety-first” attitude at all times.
- Know the location of underground and overhead utilities
- Use required PPE; do not wear loose-fitting clothing or jewelry. Keep hair tied back and tucked into hardhat.
- Do not touch or go near moving parts.
- Be aware of the location of “Emergency Shut Off” switches.
- Be aware of potential contaminants. Always wear required PPE and follow appropriate decontamination procedures.
- In the event of an accident, allow properly equipped and protected personnel to respond. Immediately leave the area.
- Do not smoke or use spark-producing equipment around drilling operations.
- No food will be consumed or stored in the work area.
- Do not work around a drill rig during a thunderstorm or rain.
- Maintain orderly housekeeping on and around the drill rig. Store tools, materials, and supplies to allow safe handling by drill crewmembers. Proper storage on racks or sills will prevent spreading, rolling, or sliding. Avoid storage or transportation of tools, materials, or supplies within or on the drill rig derrick.
- Maintain working surfaces free of obstructions or potentially hazardous substances.
- Store gasoline only in containers specifically designed or approved for such use.
- Fire-fighting equipment should not be tampered with and should not be removed for other than the intended fire-fighting purposes or for servicing.
- The departing driller should inform the oncoming driller of any special hazards or ongoing work that may affect the safety of the crew.
- Rigging material equipment for material handling should be checked prior to use on each shift and as often as necessary to ensure it is safe. Defective rigging should be removed from service.
- Work areas and walkways should not be obstructed. The area around the derrick ladder should be kept clear to avoid unimpeded access to the ladder. The rotary table of the rig floor shall be kept free of obstructions and free of undue accumulation of oil, water, ice, or circulating fluids.
- Passengers shall only be allowed in vehicles designed for passenger use. Do not ride on the outside of drill rigs, trailers, or other equipment.

Utility Clearance: Contractors will determine the location of all underground/overhead utilities before drilling operations take place. Project management shall contact Miss Utility to obtain written clearance. For areas that are not covered by Miss Utility or local utility companies, (i.e., client specific utilities), clearance must be obtained from AlexRenew. In addition to obtaining utility clearances, the appropriate party will make a utility survey of each drilling point. The utility survey shall include, but is not limited to; both magnetometer and ground-penetrating radar survey. Documentation that nearby utilities have been marked on the ground and that the drill site has been cleared shall be kept in the project trailer/

support vehicle and communicated to the drilling Contractor. All utilities shall be identified on a job hazard analysis and communicated to all drilling and drill support personnel.

Prior to the start of site work each day, the drilling Contractor will inspect all drilling equipment. The inspections will be documented in the field records, and the records will be maintained at the site. The drilling equipment inspection must be repeated on a daily basis. Defective equipment shall be repaired prior to use.

The following are minimum specifications for performing maintenance on drilling equipment:

- Safety glasses shall be worn, at a minimum, when performing maintenance on a drill rig or on the drilling tools.
- Follow all manufacturers' recommendations for maintenance on drilling equipment.
- The drill rig engine shall be shut down before making repairs or adjustments to a drill rig or lubricating fittings (except repairs or adjustments that can only be made with the engine running). The operator shall remove keys and tag out the ignition. All systems (i.e., drill rotor, engine, pressurized lines, etc.) shall be at a "zero energy state" before performing maintenance.
- The leveling jacks shall be lowered, the wheels chocked, and the hand/parking brakes set before working under a drill rig.

Moving Drill Equipment:

- Lower drilling mast before moving rig.
- Secure all loads to rig prior to off-road mobilization.
- Inspect the route of travel prior to moving the drill rig off-road. Be aware of holes, rocks, trees, erosion, and uneven surfaces.
- Remove all passengers from the cab before moving drill rig onto rough or sloped terrain
- Engage multiple drive power trains (when available) on rig vehicle when mobilizing off-road.
- Travel directly up or down grade on slopes when feasible. Avoid off-camber traverse approaches to drill sites.
- Approach changes in grade squarely to avoid shifting loads or unexpected unweighting.
- Use a spotter (person at grade) to provide guidance when vertical and lateral clearance is questionable.
- Use parking brake and chock wheels when grades are steep.

Raising the Derrick (Mast):

- Locate overhead utilities visually prior to raising the mast
- Treat overhead electrical lines as if they were energized and maintain at least a 40-foot clearance.
- Contractors will contact appropriate utilities agency to manipulate and deactivate overhead service in areas that interfere with drilling operations. Do not attempt to handle utilities.
- Stabilize and level each work site prior to drill rig setup. Do not drill on slopes near power lines, including drainage ditches, trenches, excavations, and other holes.
- The derrick must not be raised until the rig has been blocked, leveled (leveling jacks down), and chocked.

- Secure and lock mast according to manufacturer's recommendations prior to drilling.
- If required to perform work on the mast at heights above six feet, a full body safety harness and lanyard shall be work accordingly.
- Note wind speed and direction to prevent overhead utility lines from contacting rig derrick. Allow at least a 40-foot clearance between rig mast and utility lines, unless authorized by the CMC Site

HSE Representative to operate at a shorter clearance distance.

Drilling:

- Follow the manufacturer's operational or field manual's safety guidelines/specifications.
- Only authorized and trained drill rig operators shall operate a drill rig. Drill rigs shall be setup and operated according to manufacturer's specifications.
- Set up and delineate appropriate work zones. This may include an exclusion zone, contamination-reduction zone, and a support zone. When feasible, work zones shall be cleared of obstructions and leveled to provide a safe working area.
- Establish a communication system between driller, helpers, and other field support personnel for responsibilities during drilling operations.
- All personnel shall be instructed to "stand clear" prior to and during startup. Personnel shall stay as far away as possible from operating equipment; especially if a rig is located on unstable terrain (drilling operations shall not proceed on unstable ground).
- Begin auger borings slowly with the drive engine operating at low speed.
- Keep hands and feet clear of rotating augers and direct push equipment.
- Prevent placing hands or feet under auger sections during hoisting over hard surfaces.
- Avoid the removal of spoil cuttings with hands or feet.
- Assure drill rig is in neutral and the augers are not rotating before cleaning augers.
- Wear hearing protection as required.

Fall protection must be maintained around the hole at all times. At no time shall a worker go inside the rails, especially when the equipment is present. Each hole shall be sufficiently protected when work is not taking place.

7.4 Excavation and Trenching:

The following factors are to be evaluated by a competent person and discussed before commencing excavation operations:

- Soil Structure: Excavations in wet soil, sandy soil, or areas that have been backfilled are relatively unstable and must be supported or sloped if employees are to enter the excavation.
- Weather Conditions: Changing weather conditions greatly affect the safety of working in and around excavations. Excess water from rain or snow loosens the soil, increasing the chance of the soil caving in. Excavation should be diked, pumped, or covered, to prevent an excessive amount of water from accumulating.
- Superimposed Loads: Superimposed loads in the vicinity of excavation walls increase the probability of a cave-in. Heavy equipment and materials should be kept back as far as possible. Heavy equipment should be placed on wooden mats or planking to spread the weight more evenly. Considerations must also be taken when buildings, curbs, trees, utility poles, and other structures are around the excavation. Excavated soil must be stored away from the edge of the excavation.

The following safe operating guidelines will apply to excavations exceeding 4 feet in depth.

- Prior to opening an excavation, all efforts shall be made to locate and mark all underground utilities. Miss Utility shall be contacted prior to any digging.
- Trees, boulders, and other surface encumbrances that create a hazard will be removed or made safe before excavation is begun.
- Excavated materials will be stored and retained at least 3 feet from the edge of the excavation. Walkways and sidewalks shall be kept clear of excavated materials.
- Special precautions shall be taken in sloping or shoring the sides of excavations adjacent to a previously backfilled excavation.
- If the excavation may affect the stability/integrity of an adjacent structure, it must be assessed by a qualified person prior to the work taking place.
- Diversion ditches, dikes, or other suitable means will be used to prevent water from entering an excavation and for drainage of the excavation.
- When mobile equipment is used or allowed adjacent to excavations, stop logs or barricades will be installed. The grade will always be away from the excavation.
- Dust conditions during excavation will be kept to a minimum. Wetting agents shall be used upon the direction of the CMC.
- Employees subjected to vehicle traffic in excavating operations shall don reflective clothing. Excavations shall be inspected by a competent person prior to employees entering the space.
- When employees are required to work in an excavation 4 feet or deeper, one or more ladders shall be provided for access/egress. Within the trench, the maximum horizontal travel distance to a ladder shall be no more than 25 feet. The ladder shall extend a minimum of 3 feet above the excavation and be secured. This ladder shall not be removed until all employees have exited the excavation. All ladders will meet the requirements of 29 CFR 1926 Subpart X.
- Excavations equal to or deeper than 5 feet which are entered by employees shall be sloped, shored, or supported by some other protective system prior to entering the space.
- Guardrail or fences shall be placed at all excavations which are close to sidewalks, drives, or other thoroughfares. Adequate protection shall also exist at remote excavations where workers are not present.

Protective Systems: OSHA requires that a competent person inspects all excavations prior to employees entering them. If the competent person determines that a hazard or cave-in exists below 5 feet in depth, that competent person shall determine the necessary precautions to take. Once an excavation reaches 5 feet or more which will be entered by employees it shall be protected by at least one of the following options;

- Sloping or benching in accordance with the following diagram:

	Horizontal to Vertical Ratio (Slope)	Degrees
Stable Rock	Vertical	90
Type A	¾: 1	53
Type B	1:01	45
Type C	1 ½: 1	34

Maximum Allowable Slopes

Notes:

No soil classification is required if a 1 ½:1 slope (34-degree slope) is used. If a 1 ½:1 slope is not used, a soil classification must be made by a competent person. The excavation must then comply with the above minimum slope requirements.

- The second method of support is shoring, sheeting, tightly placed timber shores, bracing, trench jacks, piles, or other materials installed in a manner strong enough to resist the pressures surrounding the excavations.
- The third method is to use a trench box, which is a prefabricated movable trench shield made of steel plates, welded to a steel frame.
- The fourth option is to follow a Registered Professional Engineer's design.

Hazardous Atmospheres: When Contractors perform excavation operations in areas where a hazardous atmosphere could reasonably exist (e.g., landfill, hazardous storage areas, underground/aboveground storage tanks, etc.) personnel will, at a minimum, apply these guidelines:

- Perform atmospheric testing in the anticipated breathing zone of the work area to determine oxygen content, combustible gas, and toxic gases and vapors, at a minimum, if applicable
- Employees will not perform work in areas with less than 19.5% oxygen without the appropriate respiratory protection or adequate ventilation.
- Employees will not perform work in an area with greater than a 10% lower explosive limit (LEL) level.
- Toxic gases will be evaluated on a per-site basis using direct-reading instrumentation (DRI).

Competent Person: The SSO or designated alternate will serve as the site's "competent person" for excavation operations. The designated competent person must meet the following qualifications:

- Has sufficient experience to identify existing and predictable hazards in the excavation surroundings, or working conditions which are unsanitary, hazardous or dangerous to employees, and has the authority to take corrective actions.
- Is a registered Professional Engineer (P.E.) in civil engineering, or
- Has completed a competent person training course in excavation safety which includes at a minimum, the following elements:
 - ★ Soils classification and identification
 - ★ Appropriate sloping/shoring methods
 - ★ Shoring system types and construction
 - ★ Operational safety practices
 - ★ Inspection of excavations

The designated competent person will be responsible for:

- Performing a daily inspection of the excavation (to be documented on an *Excavation Daily Inspection Checklist* form)
- Overseeing excavation operations to ensure that they conform to the requirements of 29 CFR Subpart P.

7.5 Overhead Electrical Lines:

Operation of heavy equipment and cranes in areas with overhead power lines represents a significant hazard to all personnel on the job site. Accidental contact with an energized line or arcing between a high power line and grounded equipment can cause electrocution of equipment operators or nearby ground personnel, and damage to power transmission and operating equipment. While maintaining a safe distance from all energized lines is the preferred means for control of this hazard, site conditions may

not always accommodate this. If work will (or may) occur within 50 feet of any energized lines, the procedures outlined below will be observed.

- Overhead power lines will be identified on each job site before the work commences. For each identified line, the Project Manager must determine whether it is energized (and the operating voltage for energized lines), and whether work operations will require that activities with heavy equipment (excavators, loaders, cranes, etc.) will occur within 50 feet of the line. Unless verified, it will be assumed that all lines will be energized.

Hazard Prevention: Safe working distance is the minimum distance which must be maintained between any energized electrical line and any part of the operating equipment to maintain adequate safety margins, and is based on the line voltage of the power line. The following safe working distance criteria will be applied for all Operations:

0-50	10 feet
>50 – 200	15 feet
>200 – 350	20 feet
>350 – 500	25 feet
>500 – 750	35 feet
>750 – 1000	45 feet

Notes:

Source – American National Standards Institute, Publication B30.5

Where any work task will not allow the minimum safe working distance to be maintained at all times, an alternate means of protection must be identified and approved by the CMC. In order of preference, acceptable procedures are:

- De-energize the power line(s)
- Relocate the lines
- Install insulated sleeves on power lines
- Assign line spotters to assist the equipment operator (this method should only be used in conjunction with one of the methods above to increase safety. It is not allowed to be used in lieu of other means).

Elimination of electrical power provides the most acceptable means of ensuring safety of personnel. While temporary site power lines are under the control of the site manager; (and can be de-energized locally) electrical distribution and transmission lines can be de-energized only by the owner of the line,

(generally the local electrical utility). Therefore, de-energizing of a line requires the advance coordination with the line owner – generally at least one week advance notice should be provided.

Insulating sleeves can be placed over power lines to provide a contact and arcing barrier if work must occur closer to the power lines than the accepted safe work distance. Although not as desirable as line de-energizing, the use of these sleeves can provide an acceptable alternative where electrical lines are required to remain in service.

As with de-energizing of distribution and transmission lines, placement of insulating sleeves can be performed only by the line owner. This requires advance coordination with the line owner. To install the

sleeves, representatives of the line owner will require access to the job site.

A line spotter is a person located at ground level who is assigned to observe equipment operations with the specific duty of assisting the equipment operator to ensure that no part of the equipment gets too close to an energized, unprotected electrical line. This method alone cannot be used if the required distances cannot be maintained.

Persons assigned to act as line spotters must meet the following requirements:

- While acting as a spotter, no other duties may be performed (e.g., the line spotter cannot also act as the load spotter during a lifting operation)
- The spotter will have a radio or other direct means of communicating with the equipment operator at all times.
- The spotter will be positioned at a right angle to the equipment operator's line of sight to maximize the sight angles between the personnel.

Under no circumstances will any portion of a piece of equipment pass closer than the required minimum distance to an energized, un-insulated electrical line.

The following additional safety measures can be implemented as needed when working around energized power lines:

- Provide equipment with proximity warning devices – these provide an audible alarm if any part of the equipment gets too close to a line.
- Install ground safety stops – these prevent vehicles from accidentally entering hazardous areas.
- Equip cranes with a boom-cage guard – this prevents the boom from becoming energized if an electrical line is contacted.
- Utilize insulated links and polypropylene tag lines – these prevent transmission of electricity to loads or tag line handlers if an electrical line is contacted.

NOTE: These additional safeguards are intended as supplemental protection. Use of these measures is not permissible as a substitute for maintaining the safe working distance or implementation of the safety procedures.

7.6 Welding, Cutting, and Other Hot Work:

- AlexRenew must be notified of any cutting or welding activities within any structure including Access Galleries (Tunnels) on the plant prior to the work being started. This notification is to allow AlexRenew to contact their Fire Alarm monitoring company and the City Fire Department to have them disregard fire alarms triggered by the heat or smoke of the welding operations.
- Equipment will be used only for operations for which it is approved, and as recommended by the manufacturer.
- Workers assigned to operate or maintain oxygen/fuel-gas supply equipment and resistance welding equipment will be thoroughly instructed in the safe use of such equipment by a qualified person.
- Engineering controls will be implemented to control hot work hazards to the extent feasible.
- Before cutting or welding is performed, the area will be inspected by the supervisor responsible

for authorizing hot work. When appropriate, a written Hot Work Permit will also be completed to designate specific approvals needed and precautions to be taken.

- Hot Work Permitting procedures will be followed whenever Hot Work is to be performed in or within 100 feet of any Class I Div. I area. This includes but is not limited to Hot Work in:
 - ★ Building A
 - ★ Building C
 - ★ Building K
 - ★ Building L
 - ★ Building M
 - ★ Building 20
 - ★ Building 55

Storage and Handling of Compressed Gas Cylinders:

- Compressed gas cylinders will be legibly marked with either the chemical or trade name of the gas. Such markings will be stenciled, stamped, or labeled and will not be easily removable.
- The marking will be located on the shoulder of the cylinder.
- Compressed gas cylinders will be equipped with approved connections.
- Acetylene cylinders will be stored and used valve end up.
- Cylinders will not be stored near highly combustible/flammable materials, especially oil or grease.
- Cylinders will be stored in an upright and secure position with caps installed and separated from fuel-gas cylinders or combustible materials (especially oil or grease), by a minimum distance of 20 feet, or by a noncombustible barrier of at least 5 feet high and having a fire resistance rating of at least one half hour.
- Cylinders will not be dropped, struck by objects, or permitted to strike each other violently.
- Cylinder valves will be closed and gauges removed before moving cylinders.
- Cylinder valves will be closed and gauges removed at the end of the shift or when work is finished.
- Valves of empty cylinders will be closed.
- Cylinders will be kept far enough away from the actual welding/cutting operation so that sparks, hot slag, or flames will not reach them.
- Cylinder valves will always be opened slowly.
- An acetylene cylinder valve will not be opened more than one and one-half turns of the valve stem and preferable no more than three-fourths of a turn.
- Where a special wrench is required to operate a cylinder valve, it will be left in position on the stem of the valve when the cylinder is in use. In the case of manifold or coupled cylinders, at least

- one such wrench will be available for immediate use.
- Regulators will be removed, valve caps in place, and valves closed when cylinders are transported by vehicles. All vehicles used to transport cylinders will have a proper support rack installed.
- A suitable cylinder truck, chain, or other steadying device will be used to prevent cylinders from being knocked over while in use or storage.
- Cylinders will not be placed where they may become part of an electrical circuit.
- Tapping of an electrode against a cylinder to strike an arc will be prohibited.

Eye and Face Protection Eye and face protection will comply with the following:

- 29 CFR 1926.102
- Welding helmets and hand shields will be used during all arc welding/cutting operations, excluding submerged arc welding. Cutting/welding goggles will also be worn during arc welding/cutting operations. The goggles or glasses may be either clear or colored glass, depending on the type of exposure in welding operations. Helpers or attendants will wear proper eye protection.
- Safety goggles or other approved eye/face protection are for use during gas welding operations in light work, torch brazing, or inspection.
- All operators and attendance on resistance welding or brazing equipment will use face shields or goggles, depending on the particular job.

Protective Clothing Hot work will require the following protective clothing:

- Except when engaged in light work, all welders will wear flameproof gauntlet gloves.
- Flameproof aprons made of leather, or other suitable material, may also be desirable for protection against radiated heat and sparks.
- Woolen clothing will be worn in preference to cotton because it is not so readily ignited. Nylon clothing is not permitted for welding/cutting operations. All outer clothing, such as jumpers or overalls, will be reasonable free from oil or grease.

Fire Watch:

- When required, a fire watch will be maintained for at least 30 minutes after completion of welding/cutting operations so that possible smoldering fire can be detected and extinguished. This includes breaks and lunches. Firewatchers will have fire-extinguishing equipment readily available and be trained in its use.
- Firewatchers will be familiar with facilities and procedures in the event of a fire. They will watch for fires in all exposed areas and attempt to extinguish them only when obviously within the capacity of the equipment available. The City Fire Department will be immediately notified of all fires.

7.7 Heavy Equipment:

Field operators that involve heavy equipment represent a significant hazard to ground workers as well as heavy equipment operators. Heavy equipment may cause serious injury or death as a result of a rollover, contact with ground personnel, and pinch points. All personnel working at or visiting a site

where heavy equipment operations occur shall read and abide by the requirements of this procedure.

Communications between site supervisors/managers, heavy equipment operators, and other site personnel is a key method of preventing serious injury or death during heavy equipment operations. The following outline the communication requirements during heavy equipment operations:

- Contractor Site supervisors/managers shall ensure that all operators are notified/informed of when, where, and how many ground personnel will be working on the site.
- Contractor Site supervisors/managers shall inform ground personnel before changes are made in the locations of designated areas.

- If required to work near heavy equipment, ground personnel shall use industry standard hand signals to communicate with operators.
- Always maintain eye contact with operators to the greatest extent possible (always face equipment). Never approach equipment from a blind spot or angle.
- All heavy equipment shall be equipped with reverse warning devices (i.e., backup alarms) that can be significantly heard over equipment and other background noise. Reverse signaling lights shall be in working order.
- When feasible, two-way radios shall be used to verify the location of nearby ground personnel.
- When an operator cannot adequately survey the working or traveling zone, a guide shall use a standard set of hand signals to provide directions. Flags or other high visibility devices may be used to highlight these signals.

Clearance Ground clearance around heavy equipment may significantly reduce hazards posed during heavy equipment operations. The following outline the clearance requirements during heavy equipment operations:

- Ground personnel shall always yield to heavy equipment.
- Ground personnel shall maintain approximately 100 feet of clearance from all active heavy equipment, unless an approved, job-specific hazard analysis that identifies any special precautions is completed and communicated to the appropriate operators and ground personnel.
- Contractor Site supervisors/managers shall designate areas of heavy equipment operation and ensure that all ground personnel are aware of designated areas. Designated areas shall include boundaries and travel routes for heavy equipment. Travel routes shall be set up to reduce crossing of heavy equipment paths and to keep heavy equipment away from ground personnel.
- When feasible, site supervisors/managers shall set up physical barriers (e.g., caution tape, orange cones, and concrete jersey barriers) around designated areas and ensure that unauthorized ground personnel do not enter such areas.
- Operators shall stop work whenever unauthorized personnel or equipment enter the designated area and only resume when the area has been cleared.
- Operators shall only move equipment when aware of the location of all workers and when the travel path is clear.
- Ground personnel shall never stand between two pieces of heavy equipment or other objects (i.e., steel support beams, trees, buildings, etc.).
- Ground personnel shall never stand directly below heavy equipment located on higher ground.
- If working near heavy equipment, ground personnel shall stay out of the travel and swing areas (excavators, all-terrain forklifts, hoists, etc.) of all heavy equipment.
- Ground personnel shall never work near heavy equipment during times of inadequate lighting.
- Personnel shall keep all extremities, hair, tools, and loose clothing away from pinch points and other moving parts on heavy equipment.

Personal Protective Equipment: At a minimum, all ground personnel and operators outside of heavy equipment shall wear the following:

- High visibility, reflective safety vest that is visible from all angles and made of fluorescent material and orange, white, or yellow reflective material (ensure that vest is not faded or covered with outer garments, dirt, etc.)
- ANSI-approved hard hat

- ANSI-approved safety glasses with side shields
- ANSI-approved hard toe safety boots
- Hearing protection as needed
- Appropriate work uniform (i.e., full length jeans/trousers and a sleeved shirt; no tank, crew tops or loose clothing permitted).

Utilities: When contacted by heavy equipment, aboveground and underground utilities may cause severe injuries or death as a result of electrocution, explosion, etc. The following outline the requirements while performing heavy equipment operations that may lead to contact with aboveground or underground utilities:

- Always be aware of surrounding utilities
- Ensure all equipment (i.e., dump trailers, loaders, excavators, etc.) is lowered prior to moving underneath of aboveground utilities.
- Ensure utilities are cleared and identified prior to beginning any earthwork moving operation. Contact the local utility service providers for clearance prior to performing work.

Training, Inspection, and Maintenance:

- Only designated, qualified personnel shall operate heavy equipment.
- Operators shall have all appropriate local, state, or federal licenses or training to operate a designated piece of heavy equipment.
- Operators shall be evaluated through documented experience (resume) and a practical evaluation of skills (field tests). Operators shall be knowledgeable and competent in the operation of a designated piece of heavy equipment.
- All heavy equipment shall be inspected and, if necessary, repaired prior to use. Operators shall not operate heavy equipment that has not been cleared for use. All machinery and mechanized equipment will be certified to be in safe operating condition by a competent individual seven days prior to on-site operation, and is valid for one year.

Operation:

- All heavy equipment shall be operated in a safe manner that will not endanger persons or property.
- All heavy equipment shall be operated at safe speeds.
- Always move heavy equipment up and down the face of a slope. Never move equipment across the face of a slope.
- Slow down and stay as far away as possible while operating near steep slopes, shoulders, ditches, cuts, or excavations.
- When feasible, operators shall travel with the “load trailing,” if the load obstructs the forward

view of the operator.

- Slow down and sound horn when approaching a blind curve or intersection. Flagmen equipped with 2-way radio communications may be required to adequately control traffic.
- Operators shall remain in cab while heavy equipment is being loaded.
- Always keep heavy equipment in gear while in operation. Do not place in neutral.
- All heavy equipment shall be shut down prior to and during fueling. Do not smoke or use electrical devices while fueling. Fuel shall not be carried in or on heavy equipment, except in

permanent fuel tanks or approved safety cans.

- Turn off heavy equipment, place gear in neutral and set parking brake prior to leaving vehicle unattended. Also, place buckets and blades on the ground and place hydraulic gear in neutral. Heavy equipment parked on slopes shall have the wheels chocked.
- Never jump on to or off a piece of heavy equipment.
- Never exit heavy equipment while it is in motion.
- Passengers shall only ride in heavy equipment designed for occupancy of passengers.
- Never ride on the outside of a piece of heavy equipment (e.g., tailgates, buckets, steps, etc.).
- Site vehicles must be parked in a safe place away from heavy equipment.
- Operators shall never push/pull “stuck” or “broken-down” equipment unless a spotter determines that the area is cleared of all personnel around and underneath the equipment.
- Operators shall wear seatbelts at all times while operating heavy equipment.
- If designated for work in contaminated areas/zones, equipment shall be kept in the exclusion zone until work or the shift has been completed. Equipment will be decontaminated within designated decontamination areas.
- Equipment left unattended at night adjacent to traveled roadways shall have appropriate lights or reflectors, or barricades equipped with appropriate lights or reflectors, to identify the location of that equipment, and shall not be closer than 6 feet (or the regulatory requirement for the work location) to the active roadway.
- Pneumatic-tired earthmoving haulage equipment, with a maximum speed exceeding 15 miles per hour, shall be equipped with fenders on all wheels.
- Lift trucks shall have the rated capacity clearly posted on the vehicle, and the ratings are not exceeded.
- Steering or spinner knobs shall not be attached to steering wheels. ?High lift rider industrial trucks shall be equipped with overhead guards. ?When ascending or descending grades in excess of 5%, loaded trucks shall be driven with the load upgrade.
- All belts, gears, shafts, pulleys, sprockets, spindles, drums, flywheels, chains, or other reciprocating, rotating or moving parts of equipment shall be guarded when exposed to contact by persons or when they otherwise create a hazard.
- All hot surfaces of equipment, including exhaust pipes or other lines, shall be guarded or insulated to prevent injury and fire.
- All equipment having a charging skip shall be provided with guards on both sides and open end of the skip area to prevent persons from walking under the skip while it is elevated.
- Platforms, foot walks, steps, handholds, guardrails, and toe boards shall be designed, constructed, and installed on machinery and equipment to provide safe footing and access ways.
- Substantial overhead protection shall be provided for the operators of fork lifts and similar equipment.

7.8 Traffic/Pedestrian Safety:

The following requirements can be implemented for simple work operations occurring on or

near roadways. The Contractor will utilize flagmen during activities that require work in local streets and/or schools/pedestrian crossings.

- Work activities by Contractors will not restrict emergency vehicle access
- Follow the Virginia Work Area Protection Manual on Standards of Traffic Control when necessary
- Use of Signs and Cones to Direct Traffic: Traffic signs and cones are used to direct traffic away from and around personnel. Cones and signs are effective only if they give oncoming drivers enough time to react *and* make it clear how traffic should react.
- Signs and Traffic Control Devices: Signs are required in addition to cones in almost all traffic control situations.
- “Road Work Ahead” or “Men Working” is the basic warning signs. They are orange, a minimum of 48" x 48" square, and equipped with a self-supporting base. In general, advanced signs should be placed well ahead of the cone taper to warn traffic of the upcoming controls. If required by law, they can be placed on the roadside in advance of the cone taper.
- Directional Arrow signs should be placed ahead of the cone taper to clearly indicate which direction traffic should flow.
- Warning Flags are often put in cones at the leading edge of a taper to make the taper more prominent. They have no legal status and are not to be used on AlexRenew projects. Use a “Road Work Ahead” sign instead.
- Additional protection will be provided by City of Richmond Police in high-traffic areas to include residential areas and pedestrian crossings.

7.9 Flammable and Combustible Materials:

- Storage containers in storage racks are to be stored a minimum of 50 feet from the nearest structure. All containers are to be electrically grounded. Drip trays are to be provided under container spigots.
- When transferring a flammable/combustible liquid an electrical bond (metal-to-metal) is to be established between the two transfer containers prior to transfer. Storage containers are to be equipped with an approved safety faucet and flexible metal hose. A pressure-vacuum relief vent is required for containers of flammable liquids. Metal-to-metal contact may also be established by using a grounding strap.
- Spill containment is required for all solvent dispensing areas. The secondary containment dike will be designed for 110 percent of the maximum stored solvent volume, with the capacity for 24-hour holding time.
- The maximum amount of flammable solvent (used for cleaning purposes) at any workstation is limited to one quart. Variance from this requirement requires the prior approval of the City of Alexandria Fire Marshal.
- Maximum use must be made of fireproof metal cabinets to store flammable liquids inside any structure.
- Rags, kimwipes, etc., that are contaminated with flammable liquids are to be placed in a safety container equipped with a fusible link lid.
- All containers of flammable liquids must be properly identified as to contents.
- All manually handled flammable liquids shall be handled in approved safety containers. The exception is pint-sized squirt bottles.
- Where flammable solvents must be used in wash containers, such as for paint sprayer cleaning, the container must be provided with a self-closing or fusible lid.

- Flammable liquid in portable containers in excess of the amount required for one day of use must be stored in approved flammable liquid storage cabinets.
- Flammable storage cabinets will be kept closed, and will be latched each time after use.
- “NO SMOKING” signs are to be posted in areas where flammable liquids are stored, dispensed, or used.
- An adequate supply of fire extinguishers will be located to support each area where flammable or combustible liquids are handled or stored.

Additional information and requirements for handling and storage of specific flammable liquids are detailed in Material Safety Data Sheets (MSDS), which must be obtained and maintained on site for each solvent in use.

7.10 Compressed Gases:

Compressed air or other compressed gases in operating pressures exceeding 10 pounds per square inch gauge (psig) are not to be used to blow dirt, chips, or dust from clothing while it is being worn. Compressed air for other types of cleaning (other than clothing/personnel) is limited to 30 psig.

The use of blown compressed air is to be controlled, and proper personal protection equipment or safeguards utilized, to protect against the possibility of eye injury to the operator or other persons.

Compressed air or gases are not to be used to empty containers of liquids in cases where the operating pressure can exceed the safe working pressure of the container.

Compressed gases are not to be used to elevate or otherwise transfer any hazardous substance from one container to another unless the containers are designed to withstand the operating gas pressure with a safety factor of at least four.

Compressed Gases (Cylinders):

- Cylinders are not to be used unless they bear Department of Transportation (DOT) markings showing that they have been tested as required by DOT regulations.
- Cylinders must never be dropped, struck, or permitted to strike each other violently. Cylinders may be moved by tilting and rolling them on their bottom edges.
- Valve protection caps must always be kept on cylinders when they are being moved or stored, and until ready for use.
- Cylinder valves are to be kept closed except when gas is being used or when connected to a permanent manifold. Valves of empty cylinders must be closed.
- Cylinders must never be used as rollers or supports, or for any purpose other than carrying gas.
- Cylinders of compressed gas shall be stored in areas where they are protected from external heat sources such as flame impingement, intense radiant heat, electrical arc, or high-temperature steam lines.
- Cylinders are to be stored in an assigned area, with full and empty cylinders stored separately. Stored fuel gases and oxygen cylinders are to be separated by at least 20 feet, or by a fire wall of at least 5 feet high that has a fire-resistance rating of at least ½ hour.
- Oxygen, Nitrogen, Helium, or Freon cylinders may be stored or transported either in an upright or horizontal position. Acetylene cylinders must always be kept in an upright position. All

- horizontally placed cylinders are to be secured by chocks or ties to prevent rolling.
- Cylinders are to be secured to a fixed object by chain or equivalent fastening device whenever they are placed in an upright position. The protective cap is not to be removed or the cylinder valve opened until the cylinder is secured.
- Repair of leaks must never be attempted on a pressurized system. System pressure should be reduced to atmospheric pressure as rapidly as possible, and the supervisor notified immediately.
- Compressed gas cylinders must be legible marked for the purpose of identifying the gas content with either the chemical or trade name of the gas. Such marking is to be by means of stenciling, stamping, or labeling, and must not be readily removable. Whenever practical, the marking is to be located on the shoulder of the cylinder. Positive identification of the gas in any cylinder is required before connecting cylinders for use.
- Compressed gas cylinders in portable service are to be conveyed by suitable trucks, to which they are securely fastened. All gas cylinders in service must be securely held in substantial racks or secured to other rigid structures so that they will not fall or be knocked over.
- Gas cylinders moved by hoist must be handled in suitable cradles or skip boxes. Any slings used for this purpose must be specifically designed for that cylinder handling.
- Cylinders must not be placed where they might form part of an electrical circuit.
- Transfer of acetylene from one cylinder to another or mixing of gases in a cylinder is prohibited.
- Oxygen cylinders are never to be stored near:
 - ★ Highly combustible materials, especially oil and grease;
 - ★ reserve stocks of acetylene or other fuel gas cylinders; or
 - ★ any other substance likely to cause or accelerate fire.
- Compressed oxygen is never to be used: as
 - ★ breathing air;
 - ★ to purge pipelines, tanks, or any confined area;
 - ★ to supply a head-pressure tank;
 - ★ in pneumatic tools;
 - ★ in oil preheating burners;
 - ★ to start internal combustion engines;
 - ★ for ventilation;
 - ★ for cleaning clothing; or
 - ★ in any other way as a substitute for compressed air.

7.11 Underground Work:

A mandated pre-job meeting will be held prior to the start of the underground work. Participants include all interested parties such as state representatives if needed, CMC, Contractors, and fire and law enforcement representatives.

- The pre-job meeting subject items will include all of the following facets of the work:
- Personnel requirements
- Ventilation
- Excavation
- Ground support
- Diesel engine operation
- Emergency plans
- Codes of safe practices
- Rescue crew and first aid procedures

- Protective equipment requirements
 - Underground communication systems
 - Fire prevention and control
 - Explosives safety (if used)
 - Dust control
-
- Transportation and haulage
 - Electrical equipment
 - Lighting requirements
 - Laser safety
 - Occupational exposure sampling

General Safety:

- The Contractor Site Supervisor will ensure that every reasonable effort is taken for the safety and health of employees, whether or not specified in this procedure.
- Fence, cover, over or otherwise safeguard to control unauthorized entry underground.
- At least one designated employee must be on outside duty when anyone is working underground.
- A check-in/check-out procedure will be provided at the surface that will ensure those aboveground can accurately determine and identify those underground.
- Unnecessary accumulations of water, muck, timber rails, and similar materials will be avoided underground.
- Gunite, shotcrete, and pumpcrete lines will be secured to prevent uncoupling of sections under pressure.
- Air hose ($\frac{3}{4}$ inch or larger) requires a safety device (whip check) to prevent the hose or line from whipping if disconnected under pressure.
- Inform oncoming shift of any hazardous occurrences or conditions.
- Any buried air, fuel, or utility line requires a “buried line” caution sign. Overhead utility lines should be marked also to prevent accidental contact.

All employees involved with underground work will be instructed in hazard recognition and measures to take to eliminate the hazards including:

- Air monitoring and ventilation
- Illumination
- Communications
- Flood control
- Personal protective equipment
- Emergency procedures, including evacuation plans
- Check-in/Check-out procedures
- Explosives
- Fire prevention and protection
- Mechanical equipment

7.12 Poisonous Plants, Insects and Animals Indigenous to Virginia Plants:

- *Giant Hogweed* can be identified by its height, the size of the leaves and its flower clusters. It grows to be approximately 15 feet tall with leaves spanning 2-5 feet. It has a thick green stem with purple areas and hairy flower stalks. A combination of contact with the sap from this plant and exposure to the sun can cause painful burning blisters within 24 to 48 hours. It can also cause

- purple and black painful sores.
- *Blue-Green Algae* technically known as cyanobacteria are naturally occurring and found in lakes

and streams. The algae become very abundant in warm undisturbed waters. Exposure to the algae in small quantities over a long period of time or large quantities of a short period for time can cause liver damage and/or damage to the nervous systems.

- *Poison Ivy or Poison oak* grows in a vine or a shrub formation. The tissues of these plants contain poisonous oil which is irritating to the skin. The leaf formation is two leaves on the side and one down in the middle. The edge of the leaf have varying amounts of notches. In the spring the poison ivy is a red color. Later in the spring they become a shiny green. In autumn the leaves turn yellow, red, and orange. Small greenish flowers grow in bunches close to the leaf joints, later in the season berries form that are whitish and waxy looking. Wash the area several times with soap water if exposure is confirmed. If blisters, redness, and/or itchiness develop, treat with calamine lotion, Epsom salts, or bicarbonate of soda.

Poisonous Insects and Animals:

- *Fleas, mites, and chiggers* are not poisonous but can cause skin irritation. Symptoms of a bite may include small, raised lesions, pain or itching, inflammation of the skin, allergic-type reactions in people that are hypersensitive. Clean the affected area with soap and water. Call a physician if the pain or itching persistent or there are signs of infection, and/or if you have a fever.
- *Tick* bites can have similar skin irritations as the fleas, mites and chigger bite but can also carry Lyme disease. The following are symptoms of Lyme disease: a rash at the site of the bite, flu like symptoms, fever, headache, nausea, jaw pain, sensitivity to light, red eyes, muscle aches and/or a stiff neck. See your doctor immediately.
- *Black and Yellow Argiope female spider* spins its web in a circle. The male will spin a smaller web with a zigzag pattern. The female grows to be inch and a half long. The male grows to be $\frac{3}{4}$ inch long. The spider has a small front body section with silver hairs on it. The abdomen (large back section) is egg shaped with black and yellow coloring. The spider lives in fields and gardens in shrubs, tall plants and flowers.
- *Black Widow Spiders* are a venomous spider. It injects a small amount of poison when it bites. Reports indicate the human mortality rate is less 1%. The female Black Widow is shiny black, usually with a reddish hourglass shape on the underside of her spherical abdomen. Her body is about .5 inches long, 1.5 inches when the legs are spread. Adult males are harmless to humans, about half the female's size, with smaller bodies, and longer legs and usually have yellow and red bands and spots over the back as do the immature stages. Their webs are erratic in appearance, and the silk is stronger than almost all other spiders.
- *Brown Widow Spider* is not as dangerous as some other widow spiders because the Brown Widow Spider is less likely to bite someone and injects less poison.
- *Fire Ants* can inflict painful stings. The ant mounds are found in warm, sunny locations such as landscape beds, lawns, around trees and shrubs, along sidewalk cracks and against buildings. If disturbed, these ants are generally aggressive and can inflict painful stings.
- *Timber Rattlesnakes* are venomous snakes. They measure from 3-3.5 feet or more in length. Two color patterns are commonly found: a yellow phase, which has black or dark brown cross bands on a lighter background color of yellow, brown or gray, and a black phase, which has dark cross bands on a dark background. Scales are ridged, giving this rattlesnake a rough-skinned appearance. The timber rattler has a broadly triangular head with many small scales on the crown

- of the head bordered by a few large scales.
- *Northern Copperheads* are venomous snakes. Northern Copperheads are medium-sized snakes. Adults typically range in length from 26 to 42 inches. The distinctive feature is the copper or

bronze-colored top and sides of the head. This species also uses camouflage, in the form of tan, brown and rust-colored bands that allow the copperhead to disappear easily into dried up, fallen leaves, sticks and limbs.

- *Eastern Cottonmouths* are venomous snakes. Cottonmouths or water moccasins are common residents of southeastern swamps; however, they can be found in almost any wetland within their range. This species is highly variable in coloration, but is usually plain brown or olive with darker blotches or bands. These snakes average 3 to 3 1/2 feet long and are very stout-bodied. Cottonmouths have a reputation for being vicious and aggressive. When confronted cottonmouths will often stand their ground and not retreat.

8.0 RESPIRATORY PROTECTION

Contractors, who plan to use respirators as a part of their work operations, are required to forward to the CMC copy of their written Respiratory Protection Program.

Refer to 29 CFR 1910.134 for requirements of this OSHA standard.

9.0 HSE SURVEYS

The CMC and the AlexRenew EHS Manager may conduct periodic HSE surveys of the site. There will be an interval of self-inspections conducted every two weeks with documentation of results sent to the Site/Project management. Any HSE discrepancy observed shall be reported to the appropriate Contractor representative for immediate correction.

These HSE surveys do not relieve Contractors of their responsibility to self-inspect their work on a regular basis and document audit results with appropriate corrective action(s) with copies and communication sent to CMC and to conduct their work in a safe and environmentally compliant manner.

10.0 PLANNING AND OBSERVATION PROCEDURES

In order to achieve the AlexRenew's goal of Zero Incidents, the following shall be implemented by the Contractor. The SPA, the TSA, and the SOR process require each worker to receive on-the-job training from their direct Supervisor. Contractor employees shall also be trained and educated on their individual responsibilities contained in these tools by the Contractor after mobilization.

10.1 Safe Plan of Action: The Safe Plan of Action (SPA) is developed by the crew assigned to perform the work with guidance from their Supervisor. The Supervisor identifies the work area and task to be performed and then leads the crew in developing a Safe Plan of Action.

Creating the SPA requires the Supervisor to solicit crew participation in identifying hazards and hazard control measures such as PPE, training requirement, permits, procedures, etc.

Members of the team are required to review and sign the SPA document on a daily basis to indicate their participation, their understanding of the plan, and their agreement to follow the

plan.

10.2 Task Safety Awareness: The Task Safety Awareness (TSA) meeting is a daily HSE briefing associated with the task(s) that are scheduled for the crew during the work shift.

These meetings generally take from two to ten minutes and address the HSE measures specific to the tasks.

TSA meetings shall be conducted at least daily and whenever a task presents a change of hazards from the previous tasks.

10.3 Safety Observation Reports: The Safety Observation Report (SOR), is a proactive process designed to identify and document HSE-related acts and conditions in the work environment. All Contractor's supervisors are required to participate in the SOR process by generating written SORs and turning them in to the CMC Site/Project Management at least weekly.

The SOR allows any site worker to record observed proper or improper HSE practices and identifies the cause of any deficiencies so that corrective action can be taken.

11.0 ACCIDENT/INCIDENT INVESTIGATION

A formal accident investigation must be conducted when an accident occurs, including non-injury incidents, most first-aid type accidents, and environmental releases or spills.

11.1 In the event of a workplace accident, injury, or illness, the most important immediate actions are to provide medical assistance to those who may need it and to ensure the safety of others that may be affected or acting as emergency responders.

11.2 Securing the accident scene is essential to ensure an effective accident investigation. No materials or equipment shall be moved made until a review of the accident is completed, except when securing equipment or materials that could result in further injury.

11.3 Obtain witnesses' names, permanent addresses, and signed statements of their complete factual observations.

11.4 All accident investigations must be documented using the Accident Investigation Report. All required reports should be completed and copies provided within 24 hours to the CMC Site/Project Manager.

12.0 DRUGS, ALCOHOL, AND CONTRABAND

AlexRenew strictly prohibits the use, sale, attempted sale, manufacture, possession, distribution, cultivation, transfer, or dispensing of any illicit substance. This includes the use or possession of prescription medications without a valid prescription.

CMC and all Contractors shall implement a Drug, Alcohol, and Contraband Policy, including post

incident testing, which meets the requirements of the CMC's policy. Key elements of the CMC's policy, except where prohibited by law, are:

- Pre-access/Pre-assignment testing current to within six months prior to initial assignment to work on the AlexRenew project.
- Post-incident testing of any worker involved in a project-related workplace incident that results, or could have resulted, in injury to any person requiring medical treatment beyond first aid, any

type of medical attention given by a third-party medical services provider (hospital, clinic, doctor, etc.), a motor vehicle incident, or property damage. Post-incident testing must be conducted as soon as possible after the incident occurs.

- Reasonable suspicion testing upon reasonable suspicion by CMC or Contractor management that a worker is under the influence of a prohibited substance. In such cases, worker(s) shall be immediately removed from the project and surrender their project credentials. Personnel so removed may only be allowed to return with a negative test result and written permission of the CMC.
- Periodic random or unannounced testing for workers randomly selected or chosen by job classification or worksite. The percentage of the workforce or the number of workers, selected for testing shall be specified on a project specific basis and stated in the project's Hazard Assessment Safety Action Plan.
- Possession or use of alcohol in a CMC-, AlexRenew -, or Contractor-provided vehicle is prohibited.
- Any worker whose drug or alcohol test is positive will be removed from the project and required to surrender their project credentials.
- Refusal to submit to drug or alcohol testing, or attempts to tamper with, adulterate, dilute, or otherwise tamper with a test sample will be treated the same as a positive test result.
- Contractor shall adopt collection, chain-of-custody, and other related procedures consistent with sound industry practice.
- The AlexRenew drug and alcohol testing requirements may be more stringent than the CMC minimums. If so, AlexRenew's requirements shall be enforced.
- If the CMC suspects that a worker is in possession of illegal drugs, alcohol, or contraband, the CMC may request that the individual voluntarily submit to a search of his or her person, personal effects, vehicles, lockers, and baggage. The CMC may also conduct random searches of individuals entering or leaving the work site. All searches will be performed by local law enforcement.
- Any suspected contraband will be confiscated and may be turned over to law enforcement, as appropriate. If an individual is asked to submit to a search and refuses, that individual will be considered insubordinate, will surrender their project credentials, will be escorted off the job, and will not be allowed to return.
- CMC shall have the right to review the Contractor's Drug, Alcohol, and Contraband Policy and to audit the Contractor's implementation of their program at the jobsite.
- Contractors shall comply with all applicable federal, state, and local alcohol and drug-related laws and regulations.

13.0 MEDICAL AND EXPOSURE MONITORING

Contractors involved with operations, such as those involving hazardous waste, asbestos or lead abatement, certain carcinogenic compounds, etc., shall describe their medical and exposure monitoring

procedures and their proposed compliance methods in their HSE Action Plan or HASP.

Employees involved in these operations shall have met, prior to any fieldwork activity or exposure, the medical requirements of applicable regulations or standards, including, but not limited to, a baseline medical exam and periodic update exams, as required.

Employee medical requirements and limitations shall be considered prior to the use of certain types of PPE, such as respirators.

14.0 IMMINENT DANGER SITUATIONS

Upon discovery of any situation that may, in the opinion of the AlexRenew or CMC, reasonably be expected to cause serious physical harm, illness, death, or significant environmental damage, the Contractor Site/Project Management or HSE representative shall suspend the related work immediately. Work may resume only after the HSE concern(s) have been corrected, to the satisfaction of AlexRenew and CMC.

- Examples of “imminent danger” situations may include, but are not limited to the following:
- Visual observations of contamination, waste, etc. in a non-HAZWOPER work area
- Falls from elevations
- Excavations not properly sloped or shored
- Electrocution hazards
- Work activities posing injury hazards to the general public
- Operation of vehicles, machinery or heavy equipment in an unsafe manner
- Improper Lock Out/Tag Out procedures

In addition to the immediate suspension of work, the procedure for correction of imminent danger situations follows the “HSE Adherence Policy” set forth below. If site personnel are required to evacuate the area, personnel will exit through designated emergency routes and gather in a designated area for a head count, etc.

15.0 HSE ADHERENCE POLICY

Contractors are required to comply with the applicable HSE requirements and regulations. The procedures below outline a three-step, progressively administered system to correct compliance problems. However, if in the opinion of the AlexRenew non-compliance issues are considered to be severe, Contractors’ contracts may be terminated at any time.

15.1 Action Level One: If a Contractor fails to comply with an applicable HSE standard, Site/Project Management will issue a written “Notice of HSE Non-Compliance” to the Contractor’s site representative. Site/Project Management will also forward a “Warning Letter for HSE Non-Compliance” and a copy of the Notice of HSE Non-Compliance to the Contractor’s President or Operations Manager.

15.2 Action Level Two: If item(s) of HSE non-compliance are not corrected by Action Level One, or if the Contractor repeatedly fails to comply with the applicable HSE regulations, the AlexRenew EHS Manager will issue a “Written Notice of Temporary Job Suspension” to the Contractor.

The Contractor's work may not resume until the AlexRenew EHS Manager, Site Project Management and the Contractor's Division Manager or equivalent have met and the Contractor has proposed corrective actions that are acceptable to the AlexRenew EHS Manager and CMC.

Actions that may be considered include, but are not limited to:

- Removal of certain Contractor personnel from the project,
- Alteration of the Contractor's job procedures, or
- Implementation of corrective action by AlexRenew with back charges to the Contractor.

The Contractor shall not resume work until the CMC accepts the proposed corrective actions. CMC will document and keep on file the meeting results in the form of meeting minutes.

15.3 Action Level Three: If Action Levels One and Two do not result in the Contractor's HSE performance being brought into compliance, contract termination may result. AlexRenew may terminate the contract after verifying with the AlexRenew EHS Manager that the HSE adherence procedure has not been followed and after giving the Contractor applicable notice. Contractors that have a contract terminated in accordance with this procedure are ineligible to participate in future AlexRenew projects until they have implemented and demonstrated corrective actions to improve their deficiencies. Only written approval from the AlexRenew's Engineer - Director can reinstate a Contractor's eligibility.