



Section 1: Introduction

1. Safety Manual Purpose and Scope

- 1.1 The *Contractor Safety Manual* contains policies and procedures applicable to all contractors and contract employees regarding safety, health, and environmental responsibilities on EQ – The Environmental Quality Company (EQ) premises and for work performed for EQ.
- 1.2 Contractors should review with their employees the sections of this manual that are appropriate to the work to be performed. Sections of this manual will apply to contractors working in all of EQ's premises, whether owned or leased, as well as contractors working on EQ projects at EQ customer sites..
- 1.3 This manual does not replace existing site operational specifications. Approved, site-specific procedures must be followed where applicable.
- 1.4 This manual does not relieve contractors of their responsibility for safety, health, and environmental compliance under law, code, ordinance, or statute.

2. General Information

- 2.1 Throughout this manual, reference to a *contractor* means the contractor's company and the companies of their subcontractors, consultants, vendors, and suppliers. Reference to *contractor's management* means personnel responsible for managing, supervising, or directing contract activities and employees. Reference to an *employee* or *contract employee* means the contractor's employees, and employees of subcontractors, consultants, vendors, and suppliers.
- 2.2 Non-compliance with safety or environmental requirements is treated the same as non-compliance with any contract provision, and may result in work stoppage or employee removal from the premises. Willful or repeated non-compliance may result in contractor dismissal and contract termination.
- 2.3 The *Contractor Safety Manual* is an important part of the EQ safety program and will be issued as part of contract documents. Contractors must ensure that their employees, subcontractors, consultants, vendors, suppliers, and visitors comply with the provisions of this manual while on EQ premises.
- 2.4 Compliance with federal, state, or local codes or regulations is required by law. The *Contractor Safety Manual* is a supplementary document to governmental rules, codes, and regulations having jurisdiction, and does not negate, abrogate, or minimize any provisions of these rules, codes, and regulations. It is intended to supplement and enforce the individual program of the contractor and to coordinate overall safety effort. Contractors are responsible for the safety and health of their employees, subcontractors, consultants, vendors, suppliers, and visitors while on EQ premises.
- 2.5 Safety is considered an integral part of quality control, cost reduction, and job efficiency. Managers and supervisors are accountable for the safety performance demonstrated by their employees.

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Section 2: EQ Management System Requirements

1. EQ Management System (EQMS)

EQ has developed a comprehensive management system. The purpose of the EQMS is to ensure consistent operations in all areas. This framework establishes a more organized, disciplined work environment and is the foundation for continued improvement in EQ's processes. The EQMS is intended to provide the elements needed to achieve all of EQ's quality, environmental, health & safety, and economic goals.

2. Mission Statement and Policy

EQ – Mission Statement

EQ is committed to being recognized as the best provider of environmental management services. To reach this goal, EQ will use innovative technologies and services that minimize waste volumes, reduce costs and protect the environment. EQ will set the standard for customer service, associate satisfaction and financial stability.

EQ – Management System Policy

We are **committed** to:

- Ensuring a safe and healthy environment for EQ Associates, our customers and the public;
- Complying with all applicable laws, regulations and other requirements to which we subscribe;
- Continually improving our integrated Quality, Environmental, and Health & Safety Management Systems;
- Providing a comprehensive line of environmental solutions by utilizing continual innovation and new application of current technologies;
- Minimizing the environmental impacts of our services, operations and products, through application of sustainability principles such as recycling, reuse, pollution prevention, emergency preparedness and conservation of materials and natural resources;
- Exceeding our customer's expectations for quality, service and products.
- Educating, training and motivating our EQ Associates because they are the key to applying the management system into our operations, developing new solutions and satisfying our valued customers.

3. Document Control Program

3.1 The purpose of the Document Control Program is to ensure that all documents incorporated into the EQMS are properly managed (i.e., identified, drafted, reviewed, approved, and maintained.)

3.2 Internal EQ documents are controlled electronically. It is the responsibility of the EQ representative to ensure that any documents issued to contractors are the current

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versions(s). It is the responsibility of the contractor to verify that current documents are in their possession prior to the start of work and to remove all obsolete versions of EQ-provided documents from their crews.

4. Corrective and Preventive Action Program

- 4.1 The purpose of the Corrective and Preventive Action Program is to ensure that quality, environmental, and health & safety non-compliances are identified and investigated in a timely manner.
- 4.2 Corrective actions will be taken to rectify non-compliances.
- 4.3 Preventive actions will be taken to prevent the occurrence of non-compliance.
- 4.4 Contractors will participate in this program by:
 - A. Analyzing their processes and work operations to detect and eliminate causes of actual or potential non-compliance.
 - B. Assisting EQ personnel in Root Cause Analyses or other investigation methods to determine the cause of actual or potential non-compliance.
 - C. Implement and record changes in procedures resulting from corrective action.

5. Management of Change Program

- 5.1 The purpose of the Management of Change (MOC) Program is to ensure that changes to the EQ facility or processes do not introduce an unrecognized or unacceptable hazard, or compromise the safeguards built into the EQMS.
- 5.2 In the course of their work, contractors may discover the need for the following:
 - A. Change to an existing EQ process.
 - B. Change to EQ equipment.
 - C. Use of different chemicals or reagents.
- 5.3 If the modification is a “replacement-in-kind,” it is exempt from the MOC procedure.
- 5.4 Contractors shall initiate the MOC procedures by notifying the EQ representative immediately when the need for a change arises. The EQ representative is responsible for completing a “Management of Change Card” (MOCC) detailing the requested modification. Work may not continue until the EQ representative approves the information from the MOCC.



Section 3: Safety Program Administration

1. General Information

- 1.1 The purpose of the contractor safety program is to establish, implement, and execute a practical and effective method for preventing accidents, illnesses, and injuries and protecting the environment.
- 1.2 The *Contractor Safety Manual* will help contractors and their management to recognize, to evaluate, and to control hazardous activities or conditions within their areas of contract responsibility. EQ will not assume or relieve contractors of the responsibility for employee and public safety or regulatory compliance.
- 1.3 This manual defines how the safety program will be administered, identifies responsibilities, and ensures control of work area safety.
- 1.4 Relevant provisions of this manual apply to all contractors. Contracts signed with contractors and the provisions of this manual are intended to complement each other; however, in the event of a conflict between the provisions of this manual and the terms of a specific contract, notify the EQ project representative immediately.
- 1.5 The provisions of this manual apply to all EQ sites; however, each site may have specific safety rules and regulations that apply when a contractor performs work on that site. The EQ representative will define applicable site rules. Contractors are responsible for following the rules and regulations applicable to the site.
- 1.6 Visitors must be escorted by an EQ employee and must follow the safety directives of the employee.

2. Safety Program Administration

- 2.1 The effectiveness of the safety program depends on establishing and maintaining a safety culture through the participation and cooperation of employees and coordination of their efforts in carrying out the following basic responsibilities:
 - A. Plan and coordinate work to avoid personal injury, property damage, environmental risk, and the loss of production.
 - B. Establish and maintain a system for early detection and correction of unsafe practices and conditions.
 - C. Provide adequate protection of public and private properties and the environment and ensure the safety of the public.
 - D. Establish and conduct safety education programs.
 - E. Develop an emergency plan for the work

2.2 Safety Program Implementation

- A. Contractors are responsible for establishing and implementing a safety program for their employees. This program will include maintaining and auditing safety performance for compliance with applicable federal, state, local regulations and with established safety and environmental requirements, including but not limited to the contractor's safety and hazard communication programs.
- B. Contractors are to conduct regularly scheduled safety inspections of the work being conducted by the contract and subcontract personnel. The scope or duration of work may regulate the frequency of these inspections.
- C. Contractors must take immediate corrective action when a violation of job safety, fire, or environmental safety hazard is observed.
- D. Contractors are to regularly review their safety performance. Failure to correct a problem may result in work stoppage in the related area, and work will not be permitted to resume until the problem is corrected. Work stoppages need to be communicated within EQ between the project manager and Environmental, Health and Safety (EHS) manager.
- E. If a contractor fails to correct the problem within a reasonable timeframe, EQ will typically provide written notification and then take corrective action. The cost will be the responsibility of the contractor.
- F. Contractors are required to administer their own safety activities and are responsible for the safety of their employees. If requested by EQ, contractors will submit a written copy or description of their company's safety program.
 - 1. The contractor's safety program must meet federal, state, and local regulatory requirements and be equivalent to or more stringent than EQ's program.
 - 2. Where the programs are in conflict or the contractor's program does not address an issue, the EQ safety program as defined in this manual will govern.
 - 3. If required by the project, contractors and their safety manager or designee must attend a pre-work safety conference with EQ prior to beginning work. The conference is to review procedures, forms, record keeping and reporting, and to ensure a clear understanding of the safety program relevant to the work being performed. The "Contractor Pre-Job Checklist" (QES-FM-071-ALL) will be reviewed during this meeting.

3. Contractor Duties and Responsibilities

- 3.1 Contractors are responsible for ensuring that their employees adhere to the directives of the safety program when performing work for EQ. The contractor will submit to the EQ representative a list of individuals and their respective responsibilities.
- 3.2 The contractor's responsibility as it relates to this manual cannot be delegated to subcontractors, suppliers, or others without written approval from EQ.
- 3.3 Contractors are required to designate a qualified safety manager who is knowledgeable in safety, health, environmental protection, and fire prevention. Contractors are also required to designate a competent person for certain tasks, such as scaffolding, fall protection, trenching, hazardous energy control (lockout/tagout).

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- 3.4 If requested by EQ, contractors will submit a history of experience and qualifications for the person who is to manage the contractor's safety functions.
- 3.5 Safety violations by contract employees constitute non-compliance with provisions of the contract and may result in immediate removal from EQ premises.
- 3.6 Contractors are to train their employees on the safety, health, environmental, and fire prevention requirements for the work they are to perform and enforce adherence to safe work practices and procedures.
- 3.7 Contractors are required to maintain a safety training program designed for employees. At minimum, such programs are to provide employees with information on the following topics:
 - A. Hazards present in their work assignment and surrounding area.
 - B. Personal protective equipment requirements.
 - C. Proper procedures for safe work and for reporting unsafe work conditions.
 - D. Waste disposal and environmental release requirements.
- 3.8 Contractors are responsible for planning and executing work according to the stated objectives of the safety program.
- 3.9 Contractors are to arrange for the proper use, maintenance, and repair of work equipment.
- 3.10 The contractor's manager, supervisor, or other person in charge who directs or allows employees to perform unsafe acts or to work in or around unsafe conditions will be immediately removed from EQ premises.
- 3.11 EQ requires that the following functions are assigned. More than one function may be assigned to an individual.
 - A. The **manager** is responsible for implementing and maintaining the safety program.
 - B. The **supervisor** is responsible for implementing and maintaining the safety program for areas under the supervisor's control. Responsibilities include administration and coordination of the following activities:
 - 1. Thoroughly reviewing accident investigations and initiating corrective action.
 - 2. In the event of an accident, preparing and submitting a written report, and assisting in the investigation according to the requirements.
 - 3. Holding safety meetings.
 - 4. Reviewing safety performance and taking action as necessary within the areas of responsibility.
 - 5. Maintaining effective and prompt communication of safety matters.
 - 6. Monitoring compliance with established environmental and pollution control standards and regulations.

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7. Assigning duties to subcontractors, checking work areas, making housekeeping inspections (accompanied by a subcontractor supervisor), and keeping records of conditions found and corrective actions taken.
 8. Requiring employees to use personal protective equipment such as safety glasses, body harnesses, head and eyewear protection, and ventilation equipment.
 9. Maintaining effective communication of safety matters to employees.
 10. Instilling in personnel, by action, example, and training, an attitude toward safety so workers develop a better awareness of accident prevention.
 11. Assisting in the development and communication of safe work procedures for unusual or hazardous operations.
 12. Maintaining compliance with the requirements of federal, state, local, and other agencies, and with the requirements of the general contractor's and EQ's safety manuals.
- C. The ***contractor's safety manager*** serves as a technical advisor to the contractor's management on health and safety planning, training, and problem resolution. The responsibilities associated with this position include the following:
1. Apply policies, procedures, and work practices to promote and administer assigned functions to aid in this responsibility.
 2. Administer and coordinate medical and emergency first aid services and programs.
 3. Monitor compliance and mandatory safety and health laws, regulations, standards, and codes, and audit and document the results in order to eliminate or control hazards which could contribute to or result in an occupational injury or illness.
 4. Investigate work related injuries, illness, and incidents that involve or could involve actual or potential risk to personnel and property, maintain adequate records of pertinent data, and compile the required reports of occupational injuries and illness.
 5. Administer and coordinate the contractor's alcohol and drug abuse program.
 6. Approve the "Safety Procedure Modification Form" (QES-FM-091-ALL) when its use is required.
 7. Respond to EQ site safety and audit findings with written corrective actions to address identified concerns.

4. Subcontractor Duties and Responsibilities

Subcontractor management, supervisors, and safety personnel have the same duties and responsibilities as the contractor as described in Part 3, *Contractor Duties and Responsibilities*, with the exception that the cost will be assumed by the general contractor or contract manager.

5. Employee Duties and Responsibilities

- 5.1 Contract employees must not knowingly work in unsafe surroundings or in an unsafe manner.
- 5.2 Contract employees are responsible for learning, understanding, and following the rules and regulations applicable to the work and for reporting observed or anticipated hazards to their supervisor(s). If such hazards are not addressed, employees must report the conditions to the EQ representative.
- 5.3 Contract employees will be issued a pocket reference handbook entitled "Pocket Environmental, Health and Safety Guidelines for Contract Employees" (QES-CM-003-ALL). This handbook outlines general safety procedures. Employees are required to acknowledge that they have received training on the EQ handbook and that they will comply with the requirements for working at EQ by signing the last page of the handbook, removing it from the handbook, and submitting it to the EQ representative.

6. EQ Representative's Responsibilities

- 6.1 The EQ representative's primary responsibilities are listed below:
 - A. Be familiar with the *Contractor Safety Manual* and understand the requirements established in it.
 - B. Reference EQ policies and the *Contractor Safety Manual* in contract documents.
 - C. Issue approvals and resolve problems in accordance with EQ policies.
- 6.2 The EQ representative is to emphasize that the manual is:
 - A. Applicable to all contracts.
 - B. Applicable to all EQ sites.
 - C. A consolidated approach to safety.
 - D. An expectation of minimum safety performance by all contractors.
 - E. Intended to increase requirements as risks increase.
- 6.3 The EQ representative is to provide feedback to EQ EHS personnel.
- 6.4 The EQ representative is to monitor the contractor's performance for compliance with the manual.
- 6.5 The EQ representative is to emphasize the following contractor responsibilities, as applicable:
 - A. Ensure safety of all contractor activities and contract employees.
 - B. Establish and implementing a safety program.
 - C. Conduct safety inspections.
 - D. Ensure that contract employees comply with the safety program.
 - E. Designate a qualified safety manager.

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- F. Provide adequate safety training.
- G. Transfer or provide for these same duties and responsibilities to subcontractor management, supervisors, and safety personnel.

7. Reservation of Rights

- 7.1 EQ reserves the right to interpret, to revise, or to depart from safety policies and procedures at any time without notice. EQ also reserves the right to dictate safety standards during the course of a contract as necessary in the interest of safety.
- 7.2 Compliance with this safety manual or EQ's policies, procedures, and standards does not confer or entitle contractors or their employees to any benefits, rights, or privileges that go to EQ employees by virtue of their status as employees of EQ.
- 7.3 Nothing in this safety manual alters contractor or contract employee status or infringes upon the rights of either.

8. Disciplinary Action

- 8.1 The progression of disciplinary action will be determined by the severity of the incident and other mitigating factors. The emphasis is to be on the desire for EQ to promote safety through a cultural shift and not through enforcement activities. However, non-compliance with safety requirements may result in work stoppage if an immediate threat to safety exists.
- 8.2 Although the disciplinary process is written for the individual, the failure of a contractor to take corrective action may lead to the same penalties being placed against the contractor.
- 8.3 There will be no penalty or retaliation for reporting any safety or environmental incident, but the reporting of an incident will not protect the individual from consequences related to the incident.
- 8.4 Disciplinary actions will progress as follows, under ordinary circumstances:

- A. Documented Verbal Warning**
- B. Written Warning with Corrective Action required**
- C. Dismissal from EQ premises for the duration of the project assignment**
- D. Ban from working on EQ premises and contract termination.**

- 8.5 Temporary or permanent removal from EQ premises may occur if the contractor's manager, supervisor, or person in charge of the work being performed requires, requests, allows, or condones employees to work in or around unsafe acts or conditions or violate environmental permits or regulations.
- 8.6 Immediate and permanent removal from EQ premises may occur if a contractor's manager, supervisor, or employee engages in any of the following activities:
 - A. Openly exhibits disregard, defiance, or disrespect for the safety program.
 - B. Knowingly falsifies investigative documents or testimony involving an investigation.

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- C. Participates in fighting, violence, threats of violence, theft, or destruction of property.
- D. Violates established safety rules, regulations, or codes that endanger themselves or others.
- E. Violates established environmental rules, regulations, or procedures that endanger the environment.



Section 4: Reporting an Emergency

1. General Information

- 1.1 This section establishes the requirements, responsibilities, and methods of notification and response to emergency situations.
- 1.2 Where a specific procedure has not been established, use good judgment in determining what actions to take.
- 1.3 In addition to the reporting requirements of this manual, various policies and procedures require that all reports of accidents, incidents, or near misses be submitted to the EQ EHS representative.
- 1.4 The contractor must identify evacuation route(s), assembly areas, and tornado safe areas to all personnel before they begin work.

2. Emergency Reporting Procedures

- 2.1 Immediately report an emergency on EQ property to the EQ representative by telephone, radio, or messenger.
- 2.2 Emergency procedures including telephone numbers for specific sites will be given to contractors prior to the start of work using the "Contractor Safety Orientation Checklist" (QES-FM-093-ALL).
- 2.3 Place emergency phone numbers in conspicuous places throughout the work area.
- 2.4 Photographs of emergency situations are prohibited unless EQ gives written approval.
- 2.5 Do not make comments regarding emergencies to a media representative. Refer media inquires to the EQ Director of Communications or Emergency Coordinator if the Director of Communications is not yet on the scene.
- 2.6 If there is an evacuation, immediately report to the appropriate assembly area. See an EQ representative to confirm the location of the appropriate assembly area(s) and evacuation route(s) relative to the work area. Keep in mind that wind direction may be a factor in determining which assembly area and evacuation route to choose.
- 2.7 Any event from a near miss to a serious injury or fatality must be reported to the EQ project manager as well as to the EQ site EHS manager within 24 hours of the occurrence.

3. Accidents Involving Serious Injury or Death

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- 3.1 In the case of a serious accident, call the EQ emergency telephone numbers for immediate assistance.
- 3.2 If the EQ site has an Emergency Response Team, they may be able to assist in rendering first aid.
- 3.3 Outside medical assistance should be requested by calling 911 unless otherwise directed. (Be aware that it may be necessary to dial a number, such as 9, to get access to an outside line when using site phones.) Notify the EQ contact or Security to escort emergency vehicles to the site.
- 3.4 Clear the area and keep non-essential personnel away.
- 3.5 Provide assistance to rescue personnel if requested.
- 3.6 After proper evacuation of the injured employee, do not disturb or remove anything in the immediate area of an accident scene without EQ permission.
- 3.7 The responsible contractor must make a full investigation and submit an "Accident and Adverse Event Reporting Form" (QES-FM-090-ALL) to the EQ project manager as well as to EQ EHS within 24 hours of the occurrence.

4. Fire or Smoke

- 4.1 In the event of a fire, use the nearest fire alarm pull station, if available, and evacuate the area immediately. If the pull station does not activate (fire alarm is NOT sounding) or if no pull station is available, call the EQ emergency telephone numbers from the nearest phone located in a safe area.

NOTE: EQ personnel will contact the fire department and escort them to the scene.

- 4.2 Contract employees are not required to fight a fire, but are expected to attempt to extinguish the fire after activating the fire alarm system if they are trained and can do so safely.
- 4.3 Any contractors attempting to extinguish a fire should have been trained within the past 12 months in the safe use of fire extinguishers.
- 4.4 Keep non-essential personnel away from the fire.
- 4.5 If explosive materials or compressed gases are involved or other hazards may exist, ensure that affected personnel are immediately evacuated to a safe distance.
- 4.6 Contractor personnel are to evacuate to assigned EQ assembly areas. Once evacuation is complete, contractors must account for everyone for whom they are responsible. If an employee is missing, notify the EQ Emergency Coordinator or fire department personnel immediately.
- 4.7 Responsible or affected contractors must make a full investigation of the incident and submit a written report to the EQ project manager as well as to the EQ EHS manager within 24 hours of the occurrence, using the "Accident and Adverse Event Reporting Form" (QES-FM-090-ALL).

5. Chemical or Hazardous Material Spill

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- 5.1 In case of a spill, call the EQ emergency telephone numbers immediately. Isolate and contain the spill if it is safe to do so, as determined by a competent person.
- 5.2 Comply with the requirements of Section 12, Environmental Issues.
- 5.3 Responsible or affected contractors must make a full investigation and submit an "Accident and Adverse Event Reporting Form" (QES-FM-090-ALL) to the EQ project manager as well as to the EQ EHS manager within 24 hours of the occurrence.

6. Property Damage

- 6.1 If property under EQ control is damaged, notify the EQ representative immediately.
- 6.2 Protect against further damage where possible.
- 6.3 Keep non-essential personnel away from the area.
- 6.4 The responsible contractor must make a full investigation and submit an "Accident and Adverse Event Reporting Form" (QES-FM-090-ALL) to the EQ project manager as well as to the EQ EHS manager within 24 hours of the occurrence.

7. Severe Weather

- 7.1 Upon notification of a severe weather affecting an EQ site, EQ personnel will immediately issue an alert (e.g., by public address announcement and/or building sweep.)
- 7.2 Instructions will be given to personnel to take appropriate actions.
- 7.3 Take the following actions during warning conditions.
 - A. Secure loose materials that can become displaced.
 - B. Seek shelter in designated safe areas if possible. If not, seek shelter in the center of a building or near the strongest supported section of the lower levels of a building.

8. Bomb Threat

- 8.1 If a bomb threat is received, EQ personnel will determine if an evacuation of the site or buildings is required. Once evacuation is complete, each contractor will account for their employees.

9. Evacuation

- 9.1 The EQ Emergency Coordinator will determine if evacuation of buildings and site structures is required. An individual can initiate a building evacuation by pulling a fire alarm pull station or contacting an EQ Emergency Coordinator.
- 9.2 An EQ evacuation also requires that contract employees evacuate.
- 9.3 The evacuation routes and assembly areas are pre-determined at each EQ site and will be communicated to contractors prior to beginning work using the "Contractor Safety Orientation Checklist" (QES-FM-093-ALL).

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- 9.4 Leave the affected location by the designated route and proceed calmly to the designated assembly location.
- 9.5 EQ managers, EHS managers, and/or EQ Emergency Coordinators will remain in the affected area as long as it is safe to ensure that all personnel have evacuated.
- 9.6 After arriving at the assembly area, contractors should relay any problems relating to the emergency to EQ EHS personnel.
- 9.7 When evacuation is complete, contractors must account for their personnel.

10. Transportation

- 10.1 It is the policy of EQ that first aid, medical, and emergency transportation is to be provided by the contractor for employees who sustain occupational injuries or illnesses.
- 10.2 Contact Security or the EQ representative to request and escort an emergency vehicle onto the site.
- 10.3 Contractors must provide non-emergency transportation for their employees from the job site to the specified doctor's office or clinic.

11. Reporting of Non-Referred Medical Treatment

- 11.1 Contractors must notify EQ of employees who have obtained outside medical treatment for an alleged EQ-site related injury or illness. The responsible contractor must submit an "Accident and Adverse Event Report Form" (QES-FM-090-ALL) to the EQ project manager as well as to the EQ EHS manager within 24 hours of the occurrence.



Section 5: Investigation and Reporting of Accidents and Incidents

1. General Information

- 1.1 Accident and incident investigation and reporting promote accident prevention by detecting the causes of accidents. This allows steps to be taken to remove the causes and eliminate future accidents, thus reducing the number and severity of occupational illnesses and injuries.
- 1.2 Accident investigation and reporting also helps to reduce worker compensation, public liability, and property damage insurance premiums.

2. Accident and Incident Investigation

- 2.1 An accident or incident resulting in an injury or illness, fatality, environmental release, damage to property or equipment, or a “near miss” must be reported and investigated. The following categories are recognized by EQ:
 - A. **Near Miss** – An event or occurrence that had or has a high probability of compromising the safety or health of employees.
 - B. **Incident** – An event that interrupts operations or damages property or equipment.
 - C. **First Aid Case (FAC)** - Any employee that is injured on the job and is treated, seen, or administered to by a physician in a clinic, hospital, infirmary, or medical facility because of the on-the-job injury, but is not restricted or given professional care past the first visit is considered to be an OSHA First Aid Case.
 - D. **Recordable Injury or Illness** – An occupational injury or illness that requires medical treatment more than simple first aid and must be reported on the OSHA form 300.
 - E. **Lost Workday Case (LWC)** - those injuries and illnesses that cause the employee to experience days away from work, days of restricted work activity, or both.
- 2.2 The EQ EHS manager and the EQ project manager must be notified immediately of any fatalities, serious injuries or illnesses, and significant property damage occurring on EQ property. The EQ EHS manager will lead the investigation of any of these events.
- 2.3 The contractor or designee responsible for the area or trade involved in the accident or injury will conduct investigations of events not deemed serious and significant. An EQ representative will participate if deemed appropriate by EQ.
- 2.4 Investigation will begin promptly after the accident or incident. The contractor must report accidents that result in fatalities and/or 3 or more injuries requiring overnight hospitalization within 8 hours of occurrence to the State’s Department of Labor.

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- 2.5 All accidents or incidents will be documented on an "Accident and Adverse Event Reporting Form" (QES-FM-090-ALL). The report must be submitted within 24 hours of the occurrence of the accident or incident to the EQ project manager as well as the EQ EHS manager.
- 2.6 All accidents or incidents will be considered non-compliances subject to the Corrective Action Program. (See Section 2: EQ Management System Requirements.)
- 2.7 The investigation and report must be made immediately; however, distribution of the report will not be made until similar investigations and reports required by the applicable agencies are complete.
- 2.8 EQ may take photographs in conjunction with investigations of accidents involving serious personal injury, non-project personnel injuries, substantial property damage, and equipment or material failure.
- 2.9 Information provided to the media is the responsibility of the EQ Director of Communications. Do not give information to the media without written approval from EQ.

3. Reporting Safety Performance

- 3.1 If requested by EQ, contractors who work on EQ premises will submit a "Contractor Pre-Job Checklist" (QES-FM-071-ALL) to the EQ representative.
- 3.2 The checklist will request the following information or verification of the following information as attachments, including but not limited to:
 - A. The contractor's written Environmental Health and Safety Program(s).
 - B. The total number of recordable injuries or illnesses (as recorded on the OSHA 300 Log) that occurred on the job during the last 3 years.
 - C. Accident rates (Total Recordable Incident Rate - TRIR and Days Away Restricted and Transfer - DART) for the last 3 years.
 - D. Lists of personnel expected to be on site during the project and verification of training.



Section 6: Safety Orientation and Training

1. General Information

- 1.1 This section establishes basic training and instruction activities to ensure that employees are trained in hazard recognition and are informed of their responsibilities in carrying out their assignments in an efficient and accident-free manner.
- 1.2 The provisions in this section will also help employees comply with specific OSHA, state, and local safety requirements, as well as the requirements of this safety manual.
- 1.3 It is the contractor's responsibility to provide training in a language that their employees can understand.
- 1.4 The contractor's supervisor must instruct employees on the safest way to perform each task of the work assignment before beginning work.

2. Orientation and Refresher Training

- 2.1 Contractors must instruct newly employed, promoted, or transferred personnel in the safety practices required by their assignments. Employees must receive an EQ EHS orientation prior to starting work.
- 2.2 Initial safety orientation for new employees must include a discussion of the basic safety and environmental regulations at the site. The initial orientation must be performed by EQ or certain pre-approved contractors, and must be documented.
- 2.3 Employees are required to attend safety orientation before going unescorted into the work area.
- 2.4 Other specific, identified training requirements (e.g., Confined Space Entry, Respiratory Protection, Forklift certification, etc.) must be met in addition to this safety orientation before employees are permitted to perform work at an EQ site.
- 2.5 The safety orientation is site-specific, therefore attendance at a separate orientation is required for work performed at each EQ site.
- 2.6 Contractors are required to understand and comply with each safety requirement. Refresher training is required every 2 years for construction/operations/maintenance contractors.

3. Safety Sticker Requirement

- 3.1 Safety stickers will be issued to contractors after they have attended contractor safety orientation. Each sticker indicates the site for which it is valid.
- 3.2 Contractors must have a valid, site-specific safety sticker in their possession when on a work site. The sticker must be readily visible or available.

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- 3.3 Training is required every 2 years. The sticker indicates the calendar year during which the safety orientation was attended.
- 3.4 Contractors must attend a safety orientation course as refresher training before a new sticker is issued.

4. Documentation Requirements

- 4.1 At the conclusion of the orientation, contractors will receive the “Environmental, Health and Safety Pocket Guide for Contract Employees” (QES-CM-003-ALL) handbook.
- 4.2 The last section of the handbook has a tear-out sheet. Contractors are required to complete the form on this sheet and give it to their instructor to be forwarded to the site EHS files.

5. Contractor Self-Certification

- 5.1 Contractors may orient their employees and issue safety stickers on behalf of EQ if they comply with the following requirements:
 - A. The contractor has an instructor authorized by the EQ EHS manager who is a member of the contractor’s staff assigned to work at that site.
 - B. The contractor submits their safety record to the site safety organization for consideration.
 - C. The orientation program is evaluated and approved in writing annually by the EQ EHS manager.
- 5.2 Upon approval by the EQ EHS manager, the EQ representative will provide copies of the “Environmental, Health and Safety Pocket Guide for Contract Employees” (QES-CM-003-ALL) handbook and site-specific stickers for the contractor’s use.
- 5.3 Contractors must document training and provide records to EQ as requested.
- 5.4 A current list of orientation attendees will be maintained by EQ, and the list will be the authority for answering questions regarding employee training.



Section 7: Inspection and Auditing

1. Inspection and Audit Program

- 1.1 If requested by EQ, contractors will establish an inspection and audit program to help eliminate unsafe practices by their employees, establish a hazard-free workplace, and protect the environment.
- 1.2 The inspection and audit program reaffirms the contractor's responsibility for the actions of their employees as originally assigned under the General Duty Clause Provision of the Occupational Safety and Health Act of 1970 (revised). The exercise of these responsibilities by contractors is an effective deterrent to accidents arising from unsafe acts or conditions.

2. Inspection and Auditing Procedures

- 2.1 Control of workplace safety is achieved only when each contractor fulfills contractual and statutory responsibilities by implementing practical steps to maintain safe, healthy, and environmentally sound work practices and conditions.
- 2.2 Contractors are responsible for conducting continual monitoring of their operations to ensure that they are aware of the probable sources of potential injury, illness, or loss due to unsafe acts or conditions.
- 2.3 Contractors must continually monitor and audit the performance of subcontractors and their supervisors. Contractors must notify subcontractors if unsafe practices are observed.
- 2.4 Contractors must appropriately plan the procedures to be followed for each operation. Personnel chosen to perform a planned operation must be trained in all aspects of the procedure, including emergency actions to be taken in the event of a mishap.
- 2.5 In addition to inspections conducted by the contractor, EQ representatives such as insurers or EHS personnel may conduct inspections and audits. Contract activities could also be subject to periodic inspection by OSHA compliance officers. Contractors shall respond in writing to EQ on actions taken on all safety audit findings.
- 2.6 If OSHA compliance officers visit an EQ site, they will be escorted by the EQ EHS manager. The appropriate contractors will then be notified so that an opening conference may be conducted. If the inspection is to occur on EQ property, EQ will organize the inspection in accordance with OSHA regulations. Contractors must forward copies of OSHA inspection reports and citations received by the contractor to EQ. The contractor must post citations as required by OSHA.
- 2.7 Contractors must notify EQ in writing of the existence of hazardous conditions, property, or equipment in work areas that are not under the contractor's control. It is the contractor's responsibility to take necessary precautions against injury until such hazards are removed.
- 2.8 The contractor's equipment must be used, inspected, and maintained as directed by this manual, the manufacturer's instructions, and by applicable federal and state safety,

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health, and environmental regulations. If a conflict exists, the more stringent requirement takes precedence.

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Section 8: Alcohol and Drug Abuse

1. Alcohol and Drug Abuse Policy

- 1.1 Contractors must develop and enforce a policy that prohibits the possession, distribution, promotion, manufacture, sale, use, and abuse of illegal drugs, drug paraphernalia, controlled substances, and alcoholic beverages by employees on EQ premises. Contractors must comply with the Drug Free Workplace Act of 1988.
- 1.2 Contractors must require and fund drug testing and alcohol screening as outlined in paragraphs 2 and 3. Contract employees are prohibited from reporting to the premises under the influence of alcohol or drugs which affect their working ability or safety, including but not limited to their alertness and coordination.
- 1.3 The policy applies to all contractors, contractor's management, and employees. EQ may take legally permissible steps as necessary or appropriate to enforce compliance with this policy.
- 1.4 Employees may possess a prescription medication in its original container to be administered only to the person for whom it is prescribed.

2. Drug Testing

- 2.1 EQ requires the following regarding drug testing:
 - A. Contractors must have a program that includes pre-employment drug testing.
 - B. The EQ representative may request additional drug testing for work with exposure to high risk.
- 2.2 When drug testing is conducted, contractors must require that each employee produce a urine sample to be tested at a minimum for marijuana metabolites (cannabinoids), cocaine metabolites, opiate metabolites, phencyclidine, and amphetamines.
- 2.3 At a minimum, contractors must comply with the DOT Procedures for Transportation Workplace Drug Testing Programs as specified in 49 CFR Part 40. Contractors may assign more stringent screening or confirmation values at their discretion except when regulated by applicable state or federal laws.
- 2.4 Testing methods must conform to applicable state laws, and results must be reviewed by a licensed physician with knowledge of substance abuse disorders.
- 2.5 Certification in the form of the test results or a letter from the laboratory performing the testing must be available to EQ upon request prior to the employee's orientation. Contractors will retain the certification in their files. The EQ project manager may request the certification for archiving with the contract files.
- 2.6 EQ has the right to request that the contractor perform additional testing under the following circumstances:

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A. Accidents or Safety Violations

Following an occupational injury requiring treatment by a physician, an accident or incident involving safety rule violation, damage to equipment or property, careless acts, or in instances where the accident or incident was due to a failure to wear prescribed protective equipment while working on EQ premises.

B. Reasonable Suspicion of Illegal Drug Use

When reasonable suspicion exists that an employee exhibits signs of intoxication, drug influence, or other behavior causing a prudent and reasonable person to have concern for the safety of the employee, other employees, or the public.

C. Suspicious Incidents and Occurrences

When there is suspicion (based on demonstrable information such as an unusual number of post-accident positive test results, incidents of theft, lost productivity, unexplained personal behavior or other facts) that specific employees or other designated work groups (including but not limited to entire crews, work sites, shifts, or sensitive job classifications) are under the influence of drugs.

D. Discovery of Illegal Drugs or Drug Paraphernalia

When an employee is found to be in possession of illegal drugs or drug paraphernalia, or when these items are found in an area controlled or used exclusively by employees.

E. Random Testing

Includes employees in positions where unsafe work behavior, performance, or error in judgment caused by drug abuse may affect the safety of operations or the well being of the employee, other employees, or the public.

2.7 Clarification of Drug Testing Requirements

A. If an employee has been tested previously and the results were confirmed to be negative, he/she will be allowed to return to another EQ project by submitting a copy of the previous test. The test must have been performed within the last year and a copy of the test must be submitted with each project. The test results pertain to the individual and are acceptable if an individual changes companies.

B. Individuals who may be on site for a limited time may be allowed to work without drug testing if they are escorted by an EQ employee or approved contractor.

3. Alcohol Screening

3.1 If the contractor has just cause to believe an employee is abusing alcohol, the employee must be evaluated and a urine or blood screening test must be performed if necessary.

3.2 An employee is considered "under the influence" by meeting the legal definition based on blood alcohol content, or if he/she is unable to perform his/her job in an acceptable manner because of impaired judgment or physical abilities following the use of alcohol.

4. Consequences

- 4.1 An employee who produces a confirmed positive drug test after medical review or is determined to be under the influence of alcohol will be prohibited from working at or entering EQ facilities.
- 4.2 Employees may be barred from EQ premises for the following:
 - A. Refusing to submit to a search or inspection, urine, drug, or blood test when requested by the contractor.
 - B. Degrading, diluting, switching, altering, or tampering with a test sample.
 - C. Using, manufacturing, distributing, or dispensing illegal drugs while on the premises.
- 4.3 Security or other appropriate EQ personnel will be immediately informed of the name of any person that is barred or removed from EQ premises for violation of the alcohol and drug abuse policy.

5. Enforcement

- 5.1 Contractors will remove employees from the premises if they appear on the premises while under the influence of alcohol or drugs.
- 5.2 Contractors must obtain appropriate permission so that employees entering, departing, or on the premises will, upon the contractor's request, undergo a search of their person, locker, desk, or any property under their control for illegal drugs. This includes the employee's personal effects and automobile if it is located on the premises. Such searches may be conducted when there is a reasonable basis to suspect that the employee's work performance or on-the-job behavior may have been affected by drug use or that the employee has sold, purchased, used, or possessed illegal drugs on the premises.



Section 9: Security Program

1. General Information

- 1.1 Contractors must establish a security program and coordinate their security actions with the EQ representative or EQ site security.
- 1.2 EQ is not responsible for lost or stolen property at its facilities.

2. Use of EQ Facilities

- 2.1 EQ facilities are not to be used by contractors, contract employees, subcontractors, vendors, or suppliers without prior authorization. Violation of this policy may result in immediate removal from EQ premises.
- 2.2 Use only designated roads, gates, and doors for entry or exit.
- 2.3 Park in designated areas only.
 - A. EQ reserves the right to tow vehicles that are parked in areas other than those assigned. Vehicle damage, towing, and storage charges are the vehicle owner's responsibility.
 - B. Vehicles parked or operated on site are subject to search without prior notice. Failure to allow a search may result in the vehicle and employee being barred from EQ premises.
- 2.4 Reckless or irresponsible vehicle or machinery operations may result in immediate removal from EQ premises.
- 2.5 The EQ representative determines normal working hours for the contract.
- 2.6 Visitors must be escorted while on EQ premises.

3. Harassment

Harassment, including sexual harassment, will not be tolerated. Violation of this policy may result in immediate removal from EQ premises.

4. Contractor Security

- 4.1 Do not enter or attempt to enter EQ facilities without proper authorization and identification.
- 4.2 Visitors to EQ facilities will be admitted through a security post, where they will sign in. The contractor is to provide visitors with any required personal protective equipment (PPE) before they enter a work area. Visitors must follow the same procedure as other personnel when entering or exiting the work area through a designated security post.

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- 4.3 Visitors must be escorted at all times.
- 4.4 Dismissal of an employee from the premises requires that the contractor's supervisor escort the employee to the designated exit; and as appropriate, obtain the dismissed person's documents, keys, and equipment; ensure that the person immediately leave EQ premises; and notify the EQ representative.

5. Deliveries

- 5.1 Unless waived by the EQ representative, delivery drivers for contractors, subcontractors, vendors, and suppliers must report to a designated security post upon arrival at the work area. The EQ representative will clear entry to the work area.
- 5.2 The driver will sign in or be logged in by the security officer and directed to the appropriate area for receiving and unloading. Upon completion of the delivery, the driver must return to the same gate entered and sign or be logged out. Drivers must remain in the delivery or receiving dock area until they are ready to leave the site.

6. Site Security

EQ provides varying levels of security depending on the facility or jobsite. When security is provided for the site by EQ, this service does not relieve contractors of their contractual duties, obligations, and responsibilities to ensure that their trailers, vans, vehicles, equipment, tools, and storage areas are properly secured at the end of each workday.

7. Contractor Responsibilities

- 7.1 Contractors will provide or direct the following as appropriate:
 - A. Designated parking areas for employees
 - B. A method of identification, such as hard hat decals or a company uniform
 - C. Security personnel for construction entrance roads and non-work periods
 - D. Perimeter security fencing for sites not maintained by EQ
 - E. Site lighting for night security if needed
 - F. A site access plan for approval by EQ
- 7.2 Contractors are responsible for any additional field office security beyond that provided by EQ.
 - A. If additional security measures are instituted, advise EQ of installed audible or visible alarm devices.
 - B. Provide a list of supervisory personnel (name, address, and telephone number) who will be available during non-work periods to assist in the event of a security breach or other problem.
 - C. Advise employees, subcontractors, and suppliers of site speed limits and security measures.
 - D. Provide identification of equipment and machinery by paint scheme, ID tag, or contractor name painted in a prominent location.

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- E. Disable and store motorized machinery during non-work hours to prevent unauthorized operation.
- F. Provide proof of required insurance for vehicles to be used on site upon request, prior to vehicle use.

7.3 Employees are responsible for:

- A. Safe operation of vehicles while on site and when leaving the site.
- B. Locking or securing personal vehicles against theft.

NOTE: EQ does not assume responsibility for damage, fire, or theft to a contractor's vehicle.

- C. Parking in designated areas only.
- D. Ensuring the security of personal tools and equipment.
- E. Reporting accidents or incidents to the contractor's management and to the EQ representative.

8. Firearms

Firearms, including concealed handguns and other weapons, are prohibited on EQ premises regardless of permit. This includes firearms stored in vehicles while parked on EQ premises.



Section 10: Hazard Communication Program

1. General Information

- 1.1 Contractors must establish and maintain a written, comprehensive hazard communication program that complies with applicable federal and state law and includes:
 - A. A list of hazardous materials in the workplace
 - B. Material safety data sheets
 - C. Provisions for container labeling
 - D. An employee training program
- 1.2 Contact the EQ representative or the site EHS manager for specific hazard communication concerns relevant to the location and department where work is being performed.
- 1.3 Refer to the DOT *Emergency Response Guidebook* for information about hazardous material spills.

2. Hazardous Materials List

- 2.1 Contractors must prepare a hazardous materials list before the materials arrive on site.
- 2.2 The hazardous materials lists must contain:
 - A. The chemical name and common name used on the MSDS or container label.
 - B. The quantity of the chemical that will be stored on site.
 - C. The area where the hazardous material is stored.
 - D. The expected length of time the chemical will be stored on site.
- 2.3 The hazardous materials list must be prepared for each work area and updated within 30 days of the addition or removal of a hazardous material, or when the quantity stored changes significantly. The entire hazardous materials list must be updated annually.
- 2.4 Contractors may be requested to submit hard copies of the hazardous materials list and material safety data sheets to the EQ representative before the hazardous materials are brought on site.
- 2.5 The EQ representative will forward a copy of the list to the site EHS manager who will retain the copy for their files.
- 2.6 By receiving and forwarding this information, EQ does not imply acceptance of responsibility or guarantee completeness or accuracy of contractor submittals.
- 2.7 The use of hazardous materials at an EQ facility requires consultation with the site EHS manager.

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- 2.8 Hazardous materials may not be stored on site without consent from the site EHS manager.

3. Material Safety Data Sheets

- 3.1 Contractors must maintain the most current material safety data sheets provided by the manufacturers and distributors of the material. If the contractor does not receive an MSDS from the manufacturer or distributor, the contractor should request one. As a general guideline, an MSDS dated 3 years earlier than the submission date should not be submitted to EQ without verification that it is the latest version of the document.
- 3.2 Beyond the identity information, the MSDS must provide information in the areas required by OSHA in 29 CFR 1910.1200(g) (2).
- 3.3 A copy of each MSDS must be maintained at the work site. The copy must be easily accessible to contractors, employees, and EQ personnel.

4. Container Labels

- 4.1 Contractors must ensure that labels on incoming containers are not removed or defaced, and that containers are easily marked.
- 4.2 Each container must be labeled, logged, or marked with the identity of the hazardous chemical it contains, and it must show appropriate hazard warnings for employee protection. The hazard warning can be messages, words, pictures, or symbols used to convey the hazard. Labels must be legible, in English (plus any other language required), prominently displayed, and meet OSHA and DOT requirements.

5. Hazard Communications

- 5.1 Contractors must have a means of informing employees of the hazardous materials associated with the work they perform, and communicating information on hazards in the EQ facilities at which they are working.
- 5.2 Contractors must train employees to recognize and avoid hazards and train them in the use of personal protective equipment to be used when working with hazardous materials.
- 5.3 Employee Information and Training
- A. Contractors must establish a training and information program for employees potentially exposed to hazardous materials in their work area at the time of initial assignment, and whenever a new hazard is introduced to their work area. The discussion topics must include at a minimum:
1. Existence of the hazard communication standard and its requirements.
 2. Operations in the work area where hazardous materials are present.
 3. Where the contractor will keep the written hazard evaluation procedures, communications program, hazardous materials list, and the required MSDSs.
- B. Training must comply with OSHA standards and, at a minimum, focus on the following:

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1. How the hazard communication program is implemented on site, how to read and interpret information on labels and MSDSs, and how employees can obtain and use the available hazard information.
 2. Hazards of the materials in the workplace.
 3. Measures employees can take to protect themselves from hazards.
 4. Specific procedures put into effect by the contractor to provide protection, such as work practices and using personal protective equipment.
 5. Methods and observations, such as appearance or smell, workers can use to detect the presence of a hazardous material to which they may be exposed.
- C. Where necessary, EQ will provide training on the unique hazards that contractors may encounter at EQ facilities.
- D. For further information, contractors not familiar with the applicable State's hazard communication program are encouraged to contact the Department of Labor in the State where the site is located.
- E. Contractors must report any illness or injury known or suspected to be associated with hazardous material use or potential exposure while in EQ premises to the EQ representative.

5.4 Hazardous Materials

- A. Contractors are responsible for the safe use, storage, transportation, and disposal, in accordance with applicable laws, of chemicals or hazardous material used in the performance of their work.
- B. Contractors must have available for EQ a list of chemicals or materials used in the performance of their work and a copy of the MSDS for each material. The receipt of the list or MSDS by EQ does not relieve the contractor from requiring employees and other persons performing work to assume responsibility for the safe use, storage, and disposal of hazardous materials.
- C. Contractors must require their suppliers, agents, and employees of other persons performing work to use an approved substitute chemical or material in the place of a chemical or material that EQ requests not be used for the work.
- D. Chemicals or materials brought on site by employees and other persons performing work must bear a label stating the identity of the chemical or material, hazards associated with it, and the name of the responsible party bringing the chemical or material onto the site.
- E. Waste resulting from the work must be properly disposed of by the responsible contractor in accordance with local, State, and Federal regulations. If uncertain about proper waste disposal, contact the EQ EHS manager. Do not dispose of waste in site dumpsters.
- F. Hazardous materials, pollutants, and contaminants encountered or generated from soils or facilities in place prior to commencement of work, or from portions of the contract already completed by other contractors, are the responsibility of EQ. These will be disposed of as directed by the site EHS manager in accordance with applicable laws. The contractor must immediately notify EQ if unexpected

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hazardous substances, pollutants, and contaminants are encountered at the work site.

- G. Contractors are required to keep accurate records of the types and quantities of waste, including hazardous waste, and the facilities in which the wastes are treated, incinerated, or disposed. The contractor must provide EQ with copies of these records. Liquids (including muddy water) or chemicals should not be pumped or allowed to flow into a sewer. Do not clean equipment or change lubrication or pneumatic fluids in areas that are not equipped with spill containment and control facilities.



Section 11: Housekeeping

1. General Information

- 1.1 Good housekeeping is mandatory. Contractors must keep their work area neat, clean, and orderly.
- 1.2 If a contractor's work area is not kept clean, EQ may have the area cleaned and charge the cost to the contractor. EQ may also stop work until the area has been cleaned.

2. Housekeeping Procedures

- 2.1 Keep work areas, passageways, fire exits, fire lanes, and stairs in and around the buildings and structures clear at all times.
- 2.2 Store materials, equipment, and tools in an orderly manner.
- 2.3 Keep storage areas and walkways free of dangerous depressions, obstructions, and debris.
- 2.4 Clean the work area daily and dispose of debris in dumpsters, or off site in accordance with the environmental requirements of EQ, the EPA, and other regulatory agencies. The contractor shall contact the EQ representative to confirm the proper location for each type and volume of waste to be disposed of on site. (See Section 12: Environmental Issues.)



Section 12: Environmental Issues

1. Hazardous Waste Management

- 1.1 Contractors are responsible for the safe use and disposal of chemicals and hazardous materials brought onto EQ property in compliance with applicable laws and regulations, and for complying with applicable requirements for generators of hazardous waste.
- 1.2 Contractors that generate hazardous waste must comply with local, State and Federal regulations. No hazardous waste may be disposed in EQ waste containers. If there are questions, consult the EQ EHS manager for disposal directives.
- 1.3 Do not store more than 55 gallons of hazardous waste or one quart of acutely hazardous waste as defined in Part 261, Title 40, Code of Federal Regulations (40 CFR 261) without approval from the EQ EHS manager. Waste containers must be clearly labeled as to their contents. Waste must not be transferred between EQ facilities when it involves crossing or traveling on a public roadway without approval from EQ. Do not dispose of hazardous and chemical waste in company dumpsters.
- 1.4 Contractors that meet the qualifications of a conditionally exempt small quantity generator of hazardous waste as defined in 40 CFR 261.5, must coordinate the transfer of potentially hazardous waste to EQ for disposal. Contractors that do not meet the qualifications of a conditionally exempt small quantity generator are responsible for obtaining an EPA Identification Number and managing hazardous waste generated in accordance with applicable state and federal regulations. Contractors are subject to periodic inspections by the EQ EHS manager to ensure proper management, storage, and documentation practices are being followed.
- 1.5 The disposal of waste materials such as asbestos, lead paint, construction debris, or contaminated soil resulting from demolition, excavation, or maintenance activities that are not the result of hazardous materials or petroleum products brought on site by a contractor must be approved by EQ. These waste streams must be transferred or disposed of in accordance with written procedures approved by the EQ EHS manager.

2. Spill Prevention and Control

- 2.1 To minimize the risk of spills or releases to the environment, contractors must employ appropriate protective procedures such as double containment, overflow protection, employee training, and other measures as part of activities involving the use, storage, or handling of petroleum products or hazardous materials on EQ property.
- 2.2 Containers of hazardous materials and petroleum products should be stored in order to prevent releases to the environment. This requires selecting locations and methods to minimize exposure to rainfall, surface water, and the ground. Enclosures, shelters, and secondary containment should be used where appropriate. Containment pans should be placed under equipment where there is the potential for a leak or discharge. In the event that secondary containment is used in an area that is exposed to rainfall, the following requirements apply:

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- A. Prior to discharge of a containment system to the storm water system, inspect the primary container for signs of leakage and inspect the containment system by visual observation for color, foam, outfall staining, visible sheens, and dry weather flow. The discharge of a containment system that has evidence of contamination is prohibited.
- B. The responsible contractor must maintain a log indicating the individual making the observations, description of accumulated storm water, and the date and time of release.
- C. Submit a copy of the log to the EQ EHS manager.

3. Notification of a Spill or Release to the Environment

- 3.1 Most EQ sites are subject to government notification and reporting requirements when a petroleum product or hazardous material is spilled or released to the environment, including releases to the ground, surface water, sanitary sewer system, or air that are not specifically authorized by the company's environmental permits. A spill or release of a hazardous chemical or petroleum product must be cleaned up immediately.
- 3.2 The responsible contractor must notify EQ immediately, followed by a written incident report within 24 hours that includes the following information:
 - A. Description of the spill or release event.
 - B. Names of individuals involved.
 - C. Date and time of spill or release.
 - D. Copy of the MSDS for the material spilled or released.
 - E. Estimated quantity and type of material spilled or released.
 - F. Duration of the release.
 - G. Steps taken or planned to reduce, eliminate, and prevent recurrence of the spill or release.

4. Discharges to Storm water Conveyance Systems

- 4.1 A discharge to a storm water conveyance system refers to any discharge to a storm water drain, parking lot, ditch, loading dock, or ground that is not connected to a sanitary sewer. The following types of non-storm water discharges may be discharged to the facility's storm water conveyance systems:
 - A. Uncontaminated groundwater
 - B. Water from foundation drains and footing drains.
 - C. Air conditioner condensate without added chemicals.
 - D. Springs.
 - E. Uncontaminated potable water.
 - F. Waterline, sprinkler system, and fire hydrant flushings.
- 4.2 No other non-storm water discharges are permitted unless approved by the EQ EHS manager. Examples of prohibited activities include:
 - A. Discharging of rinse water from vehicle or equipment washing.
 - B. Discharging of treated water systems such as water fountains, cooling tower water, and water used to passivate piping.

- 4.3 An unauthorized or unpermitted non-storm water discharge is considered a release and must be reported and documented in accordance with the notification procedures described in Part 3, preceding.

5. Erosion Control

- 5.1 Settling basins and/or straw barricading around storm sewers is required for ground breaking or any condition that could cause silt to enter a storm sewer.
- 5.2 A city, county, or state soil erosion permit may be required depending on the size and location of the area to be disturbed. The contractor shall confirm requirements and obtain any necessary permits prior to the start of work.

6. Open Burning

Open burning of debris on EQ property is prohibited.

7. Disposal of Waste in Sanitary Sewers

No hazardous materials, chemicals, or petroleum products may be disposed in sanitary sewers.

8. Asbestos

If material that contains asbestos is suspected or encountered, stop work immediately, notify the EQ representative, and proceed only after an asbestos plan has been approved.

9. Training

Contractors are responsible for training their employees on these procedures, and for maintaining training documentation.

10. Recycling

EQ encourages and supports recycling of materials when possible. At the start of work, contractors should prepare a recycling plan and submit it to the EQ representative.