



**PACIFIC MINE RECLAMATION
STAGE 1 - INITIATE ACTION AT PACIFIC
HEALTH AND SAFETY PLAN**

1. INTRODUCTION

This Health and Safety Action Plan provides guidelines for implementing Stage 1 of Trout Unlimited's (TU) restoration of the Pacific Mine project in American Fork Canyon, Utah. The plan will be reviewed thoroughly with all personnel working on the project including TU's employees, contactors, subcontractors, equipment owner/operators, and other personnel engaged in this work. The plan intends compliance with the statutory requirements of the State of Utah Labor Commission, UOSH, Federal OSHA, Department of Transportation, EPA, and Local Health Department standards and regulations. The Plan is designed and used to achieve a safe and healthy work environment, to prevent damage to equipment, and property and to protect employees and subcontractors.

- i. Trout Unlimited's objective is to implement this project in its entirety with ZERO ACCIDENTS. All personnel working on the project will be thus informed and will be expected to support this objective.
- ii. Trout Unlimited considers this a document subject to changes unexpected site conditions are encountered and as regulations from UOSA, OSHA, DOT, and other regulatory agencies are modified. TU will update the Plan as these changes take place and will modify field operations to reflect those changes.

2. PROJECT ACTION PLAN

Trout Unlimited's Project Manager will review the Health and Safety Plan with all personnel working on the project regardless of their position or company affiliation. Key points in the plan will be reviewed at the daily tailgate safety meetings at the beginning of each day's work. Copies of the plan will be provided to each employee and will be located in the Project Coordinator's vehicle along with a cell phone.

3. TELEPHONE NUMBER FOR PROJECT

Trout Unlimited's primary contact for this project is Ted V. Fitzgerald, Office #801 465-9949, Mobile # 801 319-6932. The project site is in a deep mountain canyon that prevents radio and mobile phone service. The work involved in this project is nothing out of the ordinary tasks common to earthwork construction activities. It is not considered necessary to lease a satellite phone for personnel safety.

The secondary contact for this project is Laura Hewitt located in Madison, Wisconsin. Her office phone is 608 250-3534.

4. LOCATION OF FIELD OFFICE AND EQUIPMENT YARD

Due to the short duration of Stage 1 of this project, the Project Manager will use his truck camper as a field office. The camper will be unloaded from the pickup in a dispersed camping area directly across the river from the Pacific Mine. Normally Mr. Fitzgerald will stay on the project site during working hours and near the field office during non work hours 4 days per week, Monday through Thursday. The camper will have a poster visible to canyon and project visitors identifying it as the field office for the project.

5. SCOPE OF WORK

Stage 1 of this project involves common earthwork, road construction operations. The work will be accomplished using an excavator (trackhoe), a dump truck, operators and two laborers. During the three week period that operations will be conducted, only one day will involve moving material that potentially contains elevated concentrations of heavy metals. The Work Plan for the

project outlines each of the tasks and time frames anticipated to complete Stage 1. The primary work to be completed under Stage 1 is:

- i. Relocate about 500 feet of the Miller Hill Access Road to the base of the future repository at Pacific Mine.
- ii. Open a borrow pit on private land 0.25 miles from the site of the road relocation, stripping and stockpiling topsoil for use in reclaiming the borrow area at the conclusion of Stage 2.
- iii. Excavate and haul approximately 350 cubic yards of borrow for road embankment construction.
- iv. Widen the road into the Blue Rock waste rock pile for access by articulated dump trucks during Stage 2.
- v. Installation of barriers (guardrails and fences) and signs to prevent public use of ATVs, and other vehicles, on previously reclaimed lands at the Pacific mill tailings pond or on the waste rock piles at Pacific mine and the Blue Rock Mine.

6. PERSONNEL

All work will be supervised and directed by Trout Unlimited's Project Manager, Ted V. Fitzgerald. The equipment needed to complete the work will be enlisted from either a contractor or from owner/operators. There will be one equipment operator on the excavator, one driver in the dump truck, and two laborers. The excavator will be used each work day over a three week period. The truck will be used during the second week only. The laborers will be active on-site during the full three week period. Each week will consist of 40 hours of work with either 4-10 hour days or 5-8 hour days.

7. SAFETY MEETINGS

A safety meeting will be conducted each week for all the personnel engaged in the work that week. The safety meeting will be the first order of business on Monday morning each week and will address not only the general health and safety issues of the project but also the specific tasks and associated risks that will be performed that week and during the project implementation.

Tailgate safety meetings will be conducted each morning as work begins to discuss the work to be completed that day. Personnel will be asked to identify and share any health and safety concerns associated with the individual tasks with all present.

The Project Manager will document the safety meetings and the items discussed. Those documents will be included in the permanent project records and retained as mandated by EPA or TU's operating procedures, whichever is longer.

8. PERSONAL PROTECTIVE EQUIPMENT

- i. Hard hats will be worn at all times personnel are on duty, whether in or out of equipment.
- ii. Personnel will wear hard-toed up boots when handling materials, working around heavy equipment, or any time there is a hazard to the feet.
- iii. All personnel will wear long pants and shirts with sleeves. Soiled clothing potentially contaminated by heavy metals will be cleaned or replaced before the next shift.
- iv. Personnel will be encouraged to use sun block to prevent overexposure from the sun.
- v. Goggles, dust masks, or safety glasses will be available to personnel whenever hazards exist to the eyes or lungs from flying particles or dust. The work does not involve the use of chemicals, paint, electrical arc, etc.
- vi. Laborers will be required to have and use protective gloves during all manual labor activities.
- vii. Seat belts will be worn in all vehicles and equipment.

9. MEDICAL SURVEILLANCE

Stage 1 of the construction work at Pacific, which this Plan addresses, involves one day of work that disturbs waste rock that has been scattered below the actual waste rock pile in the corridor where the road relocation will occur. The work of collecting that "float" rock will be done by an excavator which will scrape the 3 inches to 2 feet of rock into an area adjacent to the waste rock pile. The work will be directed and supervised by Trout Unlimited's Project Coordinator who has been trained and certified in Hazwopper. While this work is being performed the operator of the equipment will be required to keep the cab of the excavator closed and the air conditioner operating. This will effectively prevent the operator from encountering the heavy metals potentially present in the material that will be moved and piled that day. Other personnel working on the project on this day of mine waste disturbance will be assigned tasks far removed from this operation.

For Stage 1 none of the personnel working on the project will be required to undergo blood-letting screening because there is very limited disturbance of mine waste. The Project Coordinator will constantly be alert to potential exposure of personnel to potentially hazardous materials and will ensure that personnel are not placed in danger. Furthermore, none of the construction personnel, except for the Project Coordinator will be required to have Hazwopper training.

10. AIR MONITORING

Stage 1 of the construction at Pacific Mine will involve only one day of disturbance of material potentially containing elevated levels of heavy metals. It is not considered prudent to perform air monitoring during this phase of work because of the very limited exposure personnel may have to dust potentially containing heavy metals. Air monitoring will be employed during Stage 2 of the project when mine waste materials will be moved in large quantities over 1 month of work.

11. RESPIRATORY PROTECTION

The type and amount of work to be performed under Stage 1 does not warrant special respiratory protection. The excavator operator and truck driver will have protection from air bourn particles by their enclosed cabs and air conditioners. The laborers will not be working along side the equipment during earth moving operations so their exposure to dust, etc. will be minimal.

12. SANITATION

With only 5 people working on the project at one time sanitation will be taken care of by 1 port-a-potti located at either the borrow area or at Pacific Mine in areas of vegetative cover for privacy. The unit will be furnished and maintained by Trout Unlimited.

13. DRINKING WATER

Drinking water will be available to construction personnel. They will be encouraged to carry water with them along with their lunches but a supply of bottled water will be maintained in the Project Coordinator's vehicle which will be on site during all construction activities. Garbage (water bottles and other debris) will be collected and disposed of by the Project Coordinator though personnel will be instructed to not discard trash but to retain it until it can be properly disposed of.

14. FIRST AID AND MEDICAL FACILITIES

The Project Coordinator will have a cell phone on-site during all construction operations. The project site does not have cell phone reception. In the event of a serious accident, personnel will be knowledgeable of the cell phone location and operation in the Project Coordinator's vehicle. The vehicle will have the keys in it at all times. Personnel will know of a location where cell phone reception is available about 1 ½ miles from the project site at the top of Pole line Pass. Any

of the project personnel will be capable of taking the vehicle and phone to that location to dial 911 to get help for the injured party(s). A suitable location for helicopter transport exists at Pacific Mine. Ambulance service takes about 1 ½ hours to reach the site after notification of an accident. If the injured party can be transported by personal vehicle, they will be taken from the canyon to get medical attention in the Project Coordinator's vehicle or other project personnel. There will be a first aid kit in the Project Coordinator's vehicle in a location that all personnel are aware of. All non life threatening injuries will be treated at the emergency room of the:

American Fork Hospital
170 North, 1100 East, American Fork, Utah – Telephone 801-763-3300

All illnesses or accidents involving project personnel will be documented by the Project Coordinator and retained as part of the Project Documentation.

15. AUTOMOBILE ACCIDENTS

All vehicle and equipment accidents which take place within the construction zone will be reported immediately to the Project Coordinator and to proper authorities. It is the Project Coordinator's responsibility to secure the accident scene and to begin an investigation immediately and provide collected information to the authorities when they arrive

The Utah County Sheriff dispatch phone number is 801-343-4100.

16. FATAL ACCIDENTS

In the event of a fatal personal injury accident, the accident scene will be secured and the body protected from disturbance from humans or animals. The Utah County Sheriff's office will be notified immediately by calling the number directly above.

17. TRAFFIC CONTROL

Construction operations will utilize roads open to public use as equipment is being mobilized. The equipment and truck owners will be responsible for safe transport of their equipment to Tibble Fork Reservoir. As the equipment is moving up the canyon on Forest Service roads, the Project Coordinator will lead in his vehicle and serve as a Guide Car. He will alert all oncoming traffic to the construction traffic and direct those public vehicles to be pulled off the road at the nearest turnout where the equipment/truck can pass. The same procedure will be followed as the equipment demobilizes and leaves the canyon.

During the first week of operations there will be a few minutes when the excavator is moving along roads open to the public. The Project Coordinator and laborers will stop any oncoming traffic until the equipment leaves the road. During the second week the dump truck will use about 1000 feet of road open to public use in two road segments. Both segments are low speed sections with good visibility. The driver will ensure no oncoming traffic is approaching before he occupies the road. A construction warning sign will be erected at the down-canyon road approaching the work site warning the public of heavy truck traffic.

Safe vehicle and equipment use will be stressed at the opening safety meeting and all tailgate sessions.

18. HOUSEKEEPING

The work area will be cleaned up on an ongoing basis. All waste and debris will be hauled away by the Project Coordinator weekly.

19. TOOLS AND EQUIPMENT

Tools and equipment will be inspected daily before use to assure that they are in good working condition and that all safety guards are in place.

20. FIRE PROTECTION AND PREVENTION

Fuel for the equipment and truck will be the responsibility of the owner of the equipment. It is anticipated that fuel will be carried in tanks mounted in the bed of service vehicles. No storage of fuel in surface tanks on the ground will be used. The service vehicle will be required to contain a fire extinguisher as will the Project Coordinator's vehicle.

In the event a fire occurs, all personnel and equipment will be directed to take action to contain or extinguish the fire under the direction of the Project Coordinator.

21. OPERATION OF MOTOR VEHICLES/MOVING EQUIPMENT

All equipment will be maintained in safe working condition and will be appropriate and adequate for the intended use. The Project Coordinator will give directions of the work that is to be performed but it will be the operator/driver's responsibility to perform that work in a safe manner. Any unsafe practices will be immediately stopped and a tailgate session held to correct those actions.

Only qualified, authorized personnel will operate equipment. Equipment maintenance and service will be the responsibility of the owner of that equipment. Equipment operators and truck drivers will make a pre-shift walk around safety inspection of their equipment and any conditions that affect safety will be corrected before use. Backup alarms will be operational at all times. Seat belts will be used during all operations. Equipment, pickups, and passenger vehicles not necessary for performing the work will be parked in a designated area well away from the work area.

22. EXCAVATIONS AND TRENCHING

All excavation and trenching will be performed in accordance with proper operating conditions. Operators will look around the equipment to ensure no personnel are within their operating perimeter before they begin operations in each area, each time they move into the area or have been idle for a period of time. The rear of the equipment/truck will be checked each time the vehicle is backed up. Rear view mirrors will be operational and free from dust obscuring the operators vision.

Personnel on the ground will be instructed on the proper techniques for working around equipment. They will be alerted to the dangers of moving equipment and to listen for back up alarms at all times. Care will be taken by operators, drivers, and laborers to eliminate hazardous conditions due to their operations.

23. POWER LINES

There are no power lines at the work site, at the unloading area for the equipment at Tibble Fork, or along the road to the work site.

IT IS TROUT UNLIMITED'S INTENTION TO CREATE AND MAINTAIN A SAFE WORK ENVIRONMENT THROUGHOUT THE CONSTRUCTION PHASE OF THIS PROJECT. UNSAFE ACTIONS WILL NOT BE TOLERATED AND WILL BE IMMEDIATELY CORRECTED.

Prepared By _____
Ted V. Fitzgerald, Trout Unlimited's Project Coordinator

Approved By _____
Peter Stevenson, EPA On-Scene Coordinator

TABBED PAGE

APPENDIX 4