

APPENDIX M
FRAMEWORK HEALTH AND SAFETY PLAN

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ACRONYMS

AED	automatic external defibrillator
ANSI	American National Standards Institute
Applicant	TransWest Express LLC, also TransWest
Base	Project Base
BMP	Best Management Practice
CFR	Code of Federal Regulations
COM Plan	Construction, Operation, and Maintenance Plan
CPR	cardiopulmonary resuscitation
DEIS	Draft Environmental Impact Statement
DIR	Division of Industrial Relations
EMM	Environmental Mitigation Measure
JSA	Job Safety Analysis
mph	miles per hour
NESC	National Electrical Safety Code
Nevada OSHA	Nevada Occupational Safety and Health Administration
NTP	Notice to Proceed
OHV	off-highway vehicle
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
Plan	Health and Safety Plan
POD	Plan of Development
Project	TransWest Express Transmission Project, also TWE Project
ROD	Record of Decision
ROW	right-of-way
SCATS	Safety Consultation and Training Section
the Act	Occupational Safety and Health Act of 1970
TransWest	TransWest Express LLC, also Applicant
TWE Project	TransWest Express Transmission Project, also Project
USPS	United States Postal Service
WWEC	West-wide Energy Corridor

M1.0 INTRODUCTION

This document provides a framework for a Health and Safety Plan (Plan) which will describe the measures to be taken by TransWest Express LLC (TransWest or Applicant) and its Construction Contractor(s) to address potential health and safety issues and protect both workers and the public during construction, operation, and decommissioning of the TransWest Express Transmission Project (TWE Project or Project).

This framework is prepared in accordance with Environmental Mitigation Measures (EMMs) TWE-51 *"The TWE Project will be designed, constructed, and operated to meet or exceed the requirements of the National Electrical Safety Code (NESC), U.S. Department of Labor, Occupational Safety and Health Administration [OSHA] standards, and the Applicant's requirements for safety and protection of landowners and their property"* and TWE-56 *"As part of the [Construction, Operation and Maintenance] COM Plan, the Applicant will provide a Health and Safety Plan, which will outline measures to protect workers and the general public during construction, operation, and decommissioning of the TWE Project"*.

M2.0 PLAN PURPOSE

The Construction Contractor(s) will be responsible for preparing and implementing a Health and Safety Plan in compliance with all local, state, and federal regulations pertaining to health and safety. The purpose of the Plan is to provide a description of measures that will be implemented in order to minimize safety-related situations that could occur and provide procedures to assist in the protection of workers and the public during the construction phase of the Project.

The Plan will provide specific information for implementing EMMs TWE-51 and TWE-56. Best Management Practices (BMPs) identified in the Draft Environmental Impact Statement (DEIS) which are listed below. The identified BMPs and Mitigation Measures have not been finalized at this time and may be updated, changed, or eliminated in future revisions of the Plan. BMPs which may be implemented include: PHS-4, PHS-5, PHS-6, and PHS-7, obtained from the Record of Decision (ROD) for the West-wide Energy Corridor (WWEC).

The management practices and activities in the Plan are intended to accomplish the following objectives:

- Educate construction workers on the hazards associated with the Project and how to identify them; the safety measures that must be taken to prevent injury; how to identify potentially contaminated soils and/or groundwater; and the procedures for ensuring personnel receive necessary training.
- Identify federal and state occupational standards regarding occupational safety and safe work practices.
- Establish fire safety evacuation procedures.
- Explain the appropriate response actions for each safety hazard and develop and describe the procedures and mechanisms for responding to and reporting serious accidents to appropriate agencies and for notifying the appropriate authorities of safety issues.
- Identify requirements for temporary fencing around staging areas, storage yards, and excavation areas during construction or decommissioning activities, as well as appropriate

measures to be taken during construction of the Project to limit public access to hazardous facilities.

- Designate environmental field representative(s) to be on site to observe, enforce, and document adherence to this Plan.
- Identify where medical kits are located.

M3.0 PLAN UPDATES

The Construction Contractor(s) will be responsible for preparing and implementing a Health and Safety Plan in compliance with all local, state, and federal regulations pertaining to health and safety. This framework for the Plan will be updated for the ROD Plan of Development (POD) and will include relevant mitigation measures to ensure regulation compliance and safety. The framework for the Plan for the Notice to Proceed (NTP) POD will include updates as needed based on final design and engineering.

M4.0 HEALTH AND SAFETY PLAN IMPLEMENTATION

The following subsections describe the Health and Safety Plan to be implemented only during construction of the Project. Similar to this Plan for construction, plans developed for operation would address critical aspects of operations including, but not limited to, hazardous material and waste management, stormwater management, and monitoring for external impacting factors (e.g., seismic activity, landslides). Operating plans would establish detailed procedures, assign responsibilities, and establish self-auditing processes for evaluating overall effectiveness and sufficiency of operations. Mitigation strategies would be developed for both routine and off-normal operating conditions. Under normal operating conditions, health and safety impacts to the public from any of the approved systems would be minimal. Mitigation of impacts under failure modes for the various systems; however, would involve both design considerations and active emergency response measures.

Decommissioning involves activities similar to construction, and thus presents many of the same health and safety hazards. These hazards mainly affect workers, but some, including increased construction traffic and the presence of potentially hazardous work areas, also affect members of the public, albeit at low risk levels. Decommissioning phases are expected to last for shorter periods of time than the construction phase and may involve fewer specific steps. In addition, the majority of activities would occur within the right-of-way (ROW), and their related health and safety impacts would be imposed primarily on the deconstruction workforce. However, impacts to the public would also occur from activities occurring off the ROW such as material storage yards; component dismantlement; salvage recycling operations; and as a result of increased traffic on public roadways. Impacts to the public could also occur from unauthorized access to work sites and storage and recycling facilities.

M4.1 Project Workers and the Public

Workers are protected through the implementation of the Health and Safety Plan. The public is protected by restricting public access to construction work areas; implementing appropriate site security measures, traffic control, dust control, and hazardous material management plans; by coordinating with emergency service providers; and notifying property owners of any hazardous operations to be conducted, such as blasting. Construction sites should be secured at the end of the workday to protect the equipment and the general public. The following subsections provide further details regarding the procedures to be utilized for the protection of workers and the public.

M4.1.1 Site Access and Security

The Construction Contractor(s) will develop Project orientation training which will be part of the NTP POD. Project orientation training will include basic hazard awareness, site-specific hazards, safe working practices, and emergency procedures. Only personnel with a visible hard-hat decal or daily visitor pass, indicating they have completed Project orientation training, will be allowed on any Project work area. Members of the public will not be allowed access to potentially hazardous facilities, including construction work sites and staging yards for materials and equipment. Visitors to any construction site or material yard must have a signed Safety and Environmental Visitor Form indicating that they have been apprised of basic hazards and environmental issues associated with the Project. Visitors must be escorted at all times by Project personnel, who have completed Project orientation training and are familiar with the Project site. In addition, access to material and equipment staged at substation sites and material yards will be restricted by means of fencing, locked gates, and/or posted security guards. Where fencing is used, it will be suitable to restrict transient traffic, off-highway vehicles (OHVs), and the public from accessing potentially hazardous areas. Existing gates on the ROW will be locked, monitored, or left open as determined by the property owner. Personal vehicles must be parked in designated locations, as determined by the Construction Contractor(s). Only approved Project vehicles will be allowed on construction sites, material yards, and transmission ROWs. Security guards will be stationed at major sites as necessary. Cameras and night lighting will be utilized where warranted.

M4.2 Safe Work Practices, Training, Documentation, and Reporting

The Construction Contractor(s) will maintain appropriate standards, safe work practices, hazard training, documentation, and reporting in accordance with their respective Plans. As described in Section 4.1 Protect Workers and the Public, these plans will conform to the requirements of the OSHA.

M4.2.1 Safe Work Practices for Each Task

The Construction Contractor(s) will develop a task-specific Job Safety Analysis (JSA) for each construction task. The JSA provides a list of steps, potential hazards, safety procedures, and recommended controls. They specify equipment to be used, as well as inspection and training requirements.

Training on general safe work practices is a requirement for TransWest and its contractors, as specified in their respective Plans. Training topics may also include heat illness prevention, cardiopulmonary resuscitation (CPR)/automatic external defibrillator (AED), first aid, emergency action and fire prevention, and safe driving. No horseplay or fighting will be tolerated. Drugs and alcohol are prohibited, and pets are not permitted on any Project site or ROW. Guns are prohibited on any Project site except for authorized security personnel or law enforcement officers. Unless otherwise posted, vehicles must not exceed 15 miles per hour (mph) along approved access roads, or 5 mph in construction yards. In addition, seatbelts must be worn in all motorized vehicles.

M4.2.2 Worker Training Procedures and Requirements

All Project personnel will participate in worker training and sign a roster verifying their attendance. Information from rosters will be logged into a spreadsheet for ease of verifying Project worker training attendance records. All attendees will be provided with a hard-hat decal, as a visible means of verifying their attendance. Trade personnel will be required to receive essential skills and safety training through an appropriate apprenticeship program, which qualifies them to perform the work of their trade. Non-trade personnel will be required to have received essential skills and safety training

appropriate to their job tasks through their employers' training programs. Records of all training will be available for audit as required.

M4.2.3 Hazard Training Requirements

Construction Contractor(s) shall have an appropriate training program in accordance with its health and safety practices, as well as federal, state, and local laws and regulations. Job-specific construction hazards may be addressed before work begins each day at a tailgate meeting. Typically, the daily tailgate meetings will include a review of the JSA for the work being performed. Other potential safety discussions could include site access, work practices, security, transportation of heavy equipment, traffic management, emergency procedures, wildlife encounters, and fire control and management. If the work plan changes later in the day, an additional tailgate meeting may be held. Anyone arriving at the site after the tailgate meeting will be briefed on the JSA and other tailgate issues discussed prior to entering the construction site, and will sign the tailgate roster.

M4.2.4 Contaminated Soils and/or Groundwater Awareness

Worker training will also address identification of and appropriate response actions for potentially contaminated soils and/or groundwater

M4.2.5 Safety Performance Standards

TransWest will monitor all Project-related workplace injuries and illnesses utilizing OSHA Recordkeeping and Reporting Standards. This includes recordable cases, as well as first aid cases. In addition, TransWest will monitor close calls and motor vehicle incidents reflecting standard OSHA metrics, including recordable cases and cases resulting in lost time.

TransWest and its Construction Contractor(s) will provide the proper tools, equipment, personal protective equipment, and appropriate training for their respective personnel as needed to perform their specific job duties. All safety requirements will be implemented in accordance with OSHA safety standards.

M4.3 Federal and State Occupational Safety Standards

The Project will be constructed in accordance with the NESC and other relevant industry standards (e.g., American National Standards Institute [ANSI]), to insure that adequate safety clearances and provisions are provided. Safety measures including fencing, warning signs, and equipment grounding will be provided per code requirements. All construction personnel will be required to follow OSHA Standards throughout Project construction.

Section 18 of the Occupational Safety and Health Act of 1970 (the Act) encourages States to develop and operate their own job safety and health programs. OSHA approves and monitors such State plans. States must set job safety and health standards that are "at least as effective as" comparable federal standards. Most States adopt standards identical to federal ones. States have the option to promulgate standards covering hazards not addressed by federal standards. A State must conduct inspections to enforce its standards, cover public (State and local government) employees, and operate occupational safety and health training and education programs. States in the Project area with Approved Occupational Safety and Health Plans include Wyoming, Utah, and Nevada.

M4.3.1 Nevada

The Nevada State Plan is administered by the Division of Industrial Relations (DIR), Department of Business and Industry. Within the DIR, an enforcement section and consultation section have been established. Enforcement is provided by the Nevada Occupational Safety and Health Administration (Nevada OSHA), and Consultation is provided by the Nevada Safety Consultation and Training Section (SCATS). The Nevada State Plan applies to all public and private sector employers in the State, with the exception of federal employees, the United State Postal Service (USPS), private sector maritime, employment on Indian Lands, and areas of exclusive federal jurisdiction.

Nevada adopts federal OSHA standards by reference and enforces OSHA standards contained within 29 Code of Federal Regulations (CFR), Parts 1910 (General Industry), 1926 (Construction) and 1928 (Agriculture). In addition, Nevada has adopted additional requirements to include: safety programs, cranes, steel erection, construction projects, asbestos, explosives, ammonium perchlorate, and photovoltaic system projects.

M4.3.2 Utah

The Utah Occupational Safety and Health Division is part of Utah's Labor Commission. The Utah State Plan applies to all public and private sector places of employment in the State, with the exception of federal employees, the USPS, private sector maritime, Hill Air Force Base, Tooele Army Depot which includes the Tooele Chemical Demilitarization Facility, and certain agricultural related operations (field sanitation and temporary labor camps), which are subject to federal OSHA jurisdiction. While Utah adopts most federal standards identically, the State periodically supplements federal standards with additional requirements.

M4.3.3 Wyoming

The Wyoming State Plan applies to all public and private sector places of employment in the State, with the exception of federal employees (including those employed at Yellowstone and Grand Teton National Parks), the USPS, private sector maritime, employment at Warren Air Force Base and at the Naval Petroleum and Oil Shale Reserve in Casper, and certain agricultural related operations (field sanitation and temporary labor camps), which are subject to federal OSHA jurisdiction.

The Wyoming State Plan adopts all federal standards identically except for 29 CFR Part 1910 Subparts A, B, and C, and Part 1926 Subparts A and B, which have been reworded to reflect the Wyoming's Safety Act. New standards are promulgated by the state of Wyoming within six months of promulgation by the Secretary of Labor. Wyoming cannot adopt standards that are more stringent than corresponding federal standards, but can adopt standards for industries not covered by federal OSHA. Wyoming has adopted the federal recordkeeping and reporting requirements identical to the federal rule, 29 CFR Part 1904.

M4.4 Potential Health and Safety Issues

Most occupational health and safety issues during the construction, operation, and decommissioning of electric power projects include, among others, exposure to physical hazards from use of heavy equipment and cranes; trip and fall hazards; exposure to dust and noise; falling objects; work in confined spaces; exposure to hazardous materials; and exposure to electrical hazards from the use of tools and machinery. Occupational health and safety hazards specific to electric power transmission projects primarily include:

- Live power lines

- Working at height on poles and structures
- Exposure to chemicals (primarily handling of pesticides (herbicides) used for ROW maintenance and exposure to polychlorinated biphenyls (PCBs) in transformers and other electrical components).

Additional health and safety issues include, but are not limited to the following:

- Working in or near traffic;
- Driving and hiking in rugged terrain;
- Working in inclement weather and in extremes of heat and cold;
- Coming into contact with poisonous snakes, spiders, and plants;
- Falling into excavation areas;
- Falling from structures or from ladders;
- Working with or around blasting materials;
- Working near energized electric facilities;
- Working in isolated areas prone to wildland fire;
- Working in areas located far from emergency medical services;
- Encountering buried utilities;
- Working around noisy equipment and/or helicopters; and
- Working near abandoned mines.

M4.4.1 Fire Control and Evacuation Procedures

Refer to Appendix H – Fire Protection Plan.

M4.4.2 Heavy Equipment Transportation and Traffic Management

Refer to Appendix U – Traffic and Transportation Management Plan.

M4.5 Response Actions for Safety Hazards

At least two personnel on each construction crew will have first aid, CPR, AED, and bloodborne pathogen training. Fire safety personnel will periodically inspect work along the ROW and will be certified emergency responders. Crews will also be familiar with evacuation routes should emergency evacuation be needed. Additional emergency support will be available by contacting the Project Base (Base), which provides direct lines to emergency medical services, life flight, fire protection, County Sheriff's Departments, and State Highway Patrols. Base will be staffed by personnel that are trained to monitor construction field activities, both in the air and on the ground. Base will provide and/or coordinate necessary emergency responses, notifications, and formally document events. When

appropriate, Base will trigger a call to emergency services. Crews will have direct contact with Base by means of radios, cell phones, and satellite phones if necessary. While working through the appropriate procedures, Base will provide the following support:

- Dispatching field security agents and field safety advisors to the scene of an incident/event.
- Beginning an incident/event timeline as an event unfolds, documenting times when actions or events occur.
- Launching a wide variety of notifications to Project and TransWest leadership. These notifications will be made to different distribution lists based on the level and type of incident/event. Notifications will be made within minutes of an event and contain information regarding who, what, when, where, any action taken, and the status of the incident/event.
- Staying in communication with the field personnel reporting an incident/event and the procedure will ensure expeditious response and accurate information.

M4.5.1 Authority Notification

Construction crews will immediately alert the on-site TransWest representative of all incidents. The TransWest representative will provide appropriate notification to Base. If a TransWest representative is not on-site, Construction Contractor personnel will be provided with a radio to make notification themselves.

Base will then be responsible for notifications to appropriate Project personnel and TransWest management. These notifications will be made to different distribution lists based on the level and type of incident/events. Notifications will be made within minutes of an event and provide information regarding who, what, when, where, any action taken, and the status of the incident/event.

M4.5.2 Fire Safety Evacuation

The Health and Safety Plan will also include fire safety evacuation procedures and incorporates the Fire Protection Plan. As previously described, TransWest will also maintain a Base operation, which will be available during all work hours, to assist with effective communications with crews, emergency agencies, and Project management. Base will facilitate evacuation/rescue efforts if required. An evacuation route map showing safe exit routes and assembly locations will be shared as part of the worker training orientation. In the event of fire or other site emergency, the following evacuation procedures will be followed to track personnel leaving the work site:

- At each work site the designated point of contact will verify the current head count and notify Base.
- Base will notify fire dispatch and emergency responders of personnel locations, headcount, rally points, and headings to assist in evacuation operations.
- Radios and global positioning system tracking units will be monitored at Base. Updated information will be relayed to Base as needed.
- Upon arrival at the rallying points, all personnel to be evacuated will be required to checkout with Base before leaving.

M4.5.3 Medical Aid Kit Locations

Facilities/areas such as substations and construction yards will contain first aid kits that are appropriate for the number of personnel working at the respective sites. First aid kits and fire extinguishers will also be stored in Project vehicles. An AED will be maintained at each terminal site.

M4.5.4 Reporting Serious Accidents

As previously described, Base will monitor field personnel and maintain radio communications with a designated point of contact at each work site. All incidents will be reported immediately to Base, which will initiate notifications as described previously. In addition, TransWest will have environmental monitors, field safety advisors, fire marshals, and security agents in the field to monitor, respond to, and report any incidents.

M4.6 Environmental Field Representative(s)

An environmental field representative will be designated as TransWest's field, fire, safety, and security team lead. In this role, the environmental field representative will be responsible for safety, fire preparedness, security, and Project Base operations and will provide management oversight for Project personnel fulfilling these roles. The environmental field representative will work closely with these individuals to implement the Health and Safety Plan during construction.