

The Sydney Steel Site Contractor Health and Safety Program

**Site Decommissioning
2001-2005**

***Contact: Sheldon Andrews
Site Health & Safety Officer
902-564-7937***

***Site Representatives: Joel Mac Lean
Yvonne Williams
Malcolm Morrison
George Hennick***

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Contractor Health and Safety Program

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Introduction

Sydney Steel Health and Safety Policy

At the Sydney Steel site (the Site), there is nothing more important than the health and safety of our employees and the people working on site.

We are committed to:

- Integrating health and safety practices into all aspects of our work on this site.
- Providing innovative and preventive health and safety programs. We will continually optimize the effectiveness and integrity of our programs through open communications, comprehensive training and education, audits and workplace assessments;
- Developing understanding among those in leadership of their personal responsibilities and their accountability to provide a safe and healthful workplace;
- Developing understanding among all employees, contractors and their employees of their personal responsibility to work safely, their accountability for individual performance and the assignment of appropriate authority to implement these responsibilities, and;
- Meeting or exceeding the requirements of applicable legislation and regulations for performance in health and safety matters.

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Introduction

Sydney Steel Health and Safety Policy

Background

The Site of the former Sydney Steel Works is to be demolished over the three to four year period to 2001-2005. The equipment is to be sold and removed. This procedure manual is designed to provide the practices and procedures to ensure the safety of all employees, contractors, subcontractors, suppliers and their employees who will be working at the Site during this period.

Sydney Steel is committed to the Health and Safety of all of its employees, and expects the same commitment by each contractor to its own employees. This program was developed for use by all contractors who perform work or provide services on the Site. Contractors include all on site service providers, construction contractors, outside carriers and all subcontractors.

The conservation and protection of our natural environment is a fundamental consideration and the responsibility of every employee on the Site. In addition to Health and Safety commitments, environmental assurances are expected by each contractor to its employees.

This program does not cover all of the Site-specific or even project-specific health and safety issues that may arise. This manual is by no means meant to be all inclusive of the requirements of the Occupational Health and Safety Act & Regulations for the province of Nova Scotia or any other applicable regulations.

Contractor Health and Safety Program Elements

The Contractor Health and Safety Program has six elements. These include:

1. Contractor Pre-Qualification

All new contractors must complete the Site Contractor Pre-Qualification form (to be obtained from Commercial Services) and provide all the information and documentation as outlined on the form. Prior to doing work at the Site, all Contractors must provide their Contractor's W.C.B. experience rating and be members in good standing.

2. Requirements of Contractor

This element of our program is a compilation of the specific information that the Contractor needs to know before and be aware of during the performance of work at The Site in order to ensure compliance with our program. Not all information in this section applies to all contractors. It is up to the individual contractors to review this element and understand the applicable sections based on the work or service that

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they will be providing on this Site.

3. Commitment and Registration

This element of our program includes two (2) copies of the "The Site Contractors Health and Safety Program Commitment Agreement". This Commitment Agreement is to be signed and dated (after reviewing the "Requirements of Contractors") by a representative of the Contractor who has the authority to commit the Contractor Company to comply with Sydney Steel Contractor Health and Safety Program. One copy is to be returned to the Site Health and Safety Officer and one copy is to be retained by the Contractor.

4. Contractor Employee Orientation

In this program element, the Contractor is responsible to issue and review the provided orientation with each contractor employee working at the Site at the beginning of work, and review monthly as conditions change. After review of the orientation, the contractor employee will complete and sign the acknowledgment section.

Contractor employees will not be allowed to work at The Site unless they have had the provided orientation reviewed with them within the last year. The review of the orientation is the responsibility of the Contractor and must be done by competent persons.

Copies of this Program are available from the Site H & S Officer.

Contractor employees must have the orientation review prior to arriving on site, but in no circumstances will they be allowed to commence work without a review.

5. Safe Work Permit Meeting and Site Specific Information

Prior to doing any work at the Site, the Contractor and all Sub Contractors must attend a Safe Work Permit Meeting with Site Management to review the Site specific hazards and requirements necessary to ensure the work will be done in a safe manner. This information must be reviewed prior to starting the job with all contractor employees who will be at the Site.

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In addition, there is to be a review of the Safe Work Permit each day by the Contractor Site Supervisor with his or her employees before commencing work. Where there is an established sector of work, location, conditions, and hazards and they will not change during a month, then a monthly safe work permit meeting can be held.

Outside Carriers, Delivery, Pickup, personnel are generally not required to have a safe work permit and site specific meeting unless the scope of the service that they provide will go beyond the routine delivery / pickup of commodities at approved points within the Site .

6. Audit for Compliance

This element of the Sydney Steel Contractor Health and Safety Program outlines the specific information that the Contractor needs to know before and be aware of during the performance of work at the Site in order to ensure compliance with our program.

The Site H&S Officer will be conducting audits on a regular basis to assess the level of program compliance. The audit will be based upon the rules, responsibilities and safe work practices contained in this Sydney Steel Contractor Health and Safety Program.

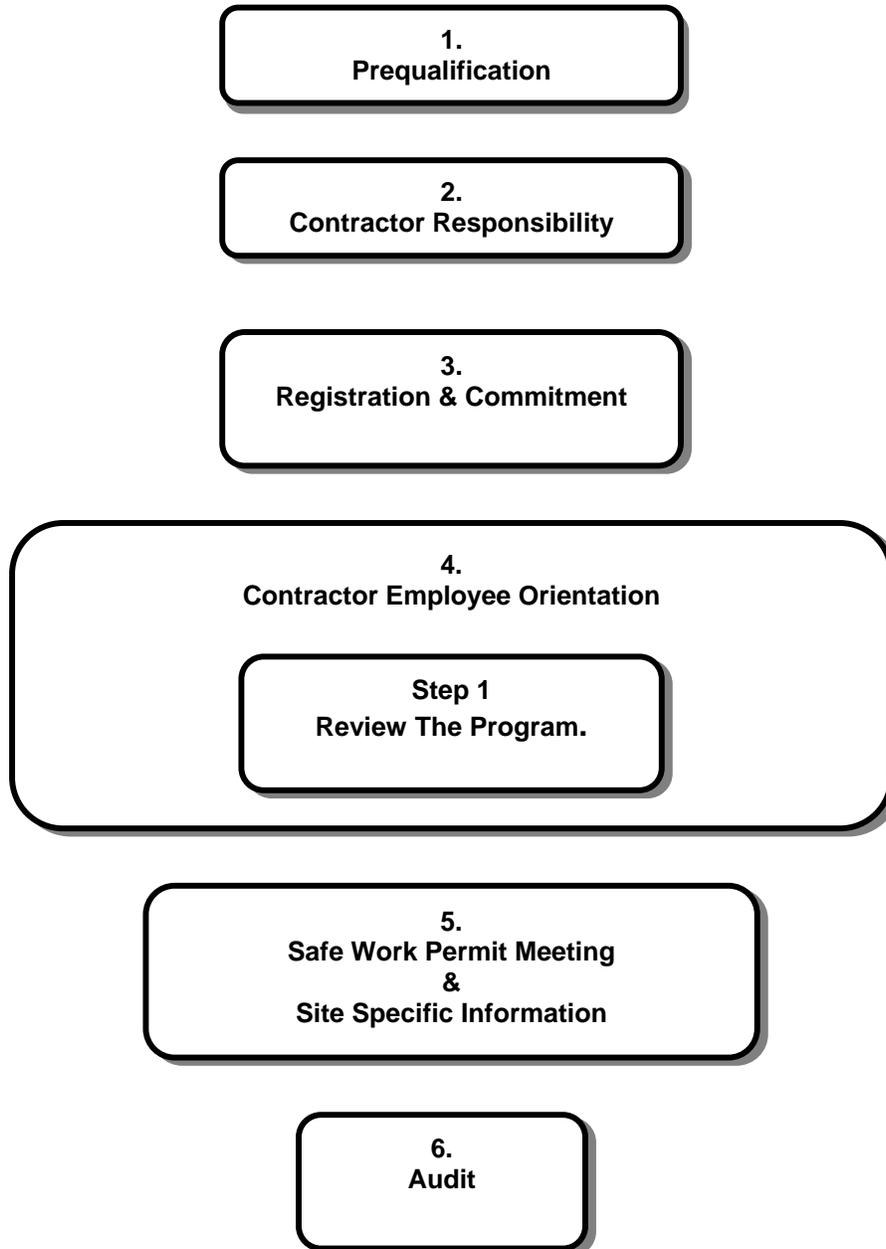
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The Sydney Steel Health and Safety Policy

Figure 1-02(a) Contractor Health and Safety Program Elements



Contractor Health and Safety Program

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Requirements of Contractors

Purpose and Description

This element of the Sydney Steel Contractor Health and Safety Program outlines the specific information that the Contractor needs to know before and be aware of during the performance of work at The Site in order to ensure compliance with our program.

It is a clear expectation that all Contractors must comply with all current Federal and Provincial Health and Safety and Environmental Legislation. It is also a clear expectation that Contractors provide competent employees and supervision that are knowledgeable and considered experts at the work they are performing. It should be specifically noted that if at any time while working at the Site a contractor employee is unsure if the work they are doing is safe, they must stop what they are doing and contact their supervisor immediately.

In addition The Site has specific requirements of Contractors working at our site that must be adhered to.

This section of the manual outlines these requirements. As you review these requirements it is imperative to keep in mind that the next section of the manual will require that you formally acknowledge that you are prepared to commit your company to adhere to these requirements when performing work or providing services at the Site.

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Requirements of Contractors

Governing Authorities

Various governing authorities have the authority to inspect or audit the work at the Site. Inspections / investigations may be random or may be prompted by direct complaints received from employees, unions, contractors, or a neighbouring community.

Cooperation with government inspectors and immediate compliance with any directives or orders of these authorities is essential in order to limit the potential for downtime resulting from work stoppages or the assessment of penalties.

The Site H&S Officer must be immediately advised of any inspection / investigation by a governing authority on the worksite and be copied on all reports.

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Requirements of Contractors

Record Keeping

There are specific requirements for record keeping in various sections contained within this manual that must be kept on file for a period of two years. These records must reflect the appropriate training for the work that the contractor will be performing. The following lists the minimum requirements:

- Date of Training
- Material Covered
- Name of Employee
- Trade and Certificates
- Signature of trainer
- Signature of trainee

Sydney Steel also expects that all tradesmen carry all current and valid trade certificates deemed necessary by governing legislation and trade regulation for the nature of work that they perform.

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Requirements of Contractors

Fitness to Work

Background

Every contractor has a responsibility for the health and safety and well being of each person under their direction, including employees, sub-contractors, visitors and other authorized guests.

Impairment

Impairment impacting a person's health and safety on the job site is the issue; such impairment may be due to injury, medical condition, alcohol, drugs, medication or other possible conditions affecting behaviour including stress, fatigue, anger, depression, anxiety, etc.

Persons Found in a Suspected Impaired Condition

Where persons are found in a suspected impaired condition, (eg., behaving in an abnormal or inappropriate manner):

1. The person must not be allowed to work or remain on the job site.
2. If an employee is suspected of being impaired when entering the premises (e.g., reporting for work, returning from lunch), the Security Department will refuse entry and request the employee's Supervisor to come to the gate. Police will be called if necessary and further followup action will be taken with the employee's employer.
3. The person in question should be offered medical assistance to be arranged through Site H&S Officer. If the offer for assistance is refused the Supervisor must then send the person home. A taxi ride home must be offered by the Supervisor. When necessary, Security will notify the police if the person refuses transportation home.
4. All employees sent home because of suspected impairment must be reassessed prior to the next working shift. If requested, the Site H&S Officer will assist in determining fitness for work and any need for further assessment. The Contractor Employee must be accompanied by his / her Supervisor.

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Requirements of Contractors

Security and Gate Access

Access through the Site Gates will not be permitted without prior authorization. All appropriate personal protective equipment and general safety precautions must be adhered to.

Security personnel at our Gates are required to verify authorization upon gate entry and exit. Security personnel will provide directions and general precautions, and will arrange for an escort to the worksite where warranted.

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Requirements of Contractors

Traffic / Parking Regulations

Traffic Regulations

Posted speed limits on all Site roadways and traffic signs (e.g., stop signs) must be adhered to. Maximum speed is 30 km/hr unless otherwise posted. Passing is not permitted with the exception of slow moving equipment where extreme caution must be taken to ensure it can be done safely and the maximum posted speed limit is not exceeded. Large mobile equipment is not considered to be a slow moving vehicle. Parking violations that are safety related will be treated as a violation of traffic rules.

Driveways, laneways, or emergency vehicle routes must not be blocked or restricted at any time.

Violation of the Site Traffic Rules are considered to be a Major Safety Infraction and progressive discipline will be followed. The first offence results in a written warning; a second offence within a one-year period will result in a one-day suspension or suspension of driving privileges on the property for one (1) month. Depending on the severity of the first offence a written warning may be omitted and an automatic suspension given.

Construction Access and Parking

All construction personnel must use designated routes to access construction-parking areas.

All contractors will park their personal vehicles in the area designated by the Site Representative.

Driveways, laneways, walkways, or emergency vehicle routes must not be blocked or restricted at any time by construction vehicles, machinery, equipment or materials except in the course of demolition or other business activity.

Overnight parking of equipment or vehicles must occur only with the permission of Security. The security of equipment or vehicles is the responsibility of the contractor. No vehicle is to be left without appropriate brakes / blocking.

Vehicles must not be left unlocked overnight or with keys in place.

Construction equipment such as zoom booms, scissors lifts, bulldozers, forklifts, etc., must have all moveable parts in their stowed positions when left unattended.

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Requirements of Contractors

Mobile Equipment / Crane(s) and Certification

Background

This section discusses the requirements related to Mobile Equipment and Cranes that may be required to perform the work that you are contracted to do.

All contractors must ensure that all personnel required to operate mobile equipment, e.g., backhoes, trucks, excavators, etc. during the course of their work, are properly trained, possess a current drivers licence as well as all other necessary licences and / or certificates and are competent.

All mobile equipment must be in good operating condition with current maintenance and inspection records available on request. (See current legislation and regulations for mobile equipment.)

Mobile Cranes

- Ensure that you have discussed all necessary arrangements, e.g., crane placement, road restrictions, medical, security, and fire department notification, lockouts, safety watch, etc. with the appropriate Site Representative co-ordinating your work prior to the Safe Work Permit meeting.
- Discuss the procedure for operation of a mobile crane within the buildings of the facility.

Pendant / Overhead Cranes

- All Contractor personnel who will be operating a pendant / overhead travelling crane during the course of their work at the Site must be in possession of a current certified licence for overhead travelling crane operation.

Elevating Work Platforms

- Personnel shall be given verbal, visual and hands-on instruction on the safe operation and requirements to operate that specific class of elevating work platform, prior to start of job.
- Review current legislation and regulations for Elevating Work Platforms.

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Requirements of Contractors

Embedded Services Locate Request

An Embedded Services Locate Request is a written approval that must be obtained from Site Representatives prior to any excavation, digging, drilling, grading, piling, boring, or concrete removal.

The Locate Request identifies all embedded services (e.g., electrical conduits, pipelines, telephone lines) located in the area.

The Site Representative will acquire this written approval prior to the safe work permit meeting. Any other specific instructions or procedures will be issued prior to starting work.

Note: Never disturb or remove red concrete without a Locate Request.

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Requirements of Contractors

Equipment and/ or Work Area Isolation

Purpose

To prevent uncontrolled movement or flows, accidental starts of process, electrical and mechanical equipment as well as programmable logical controllers (PLC's) and other computerized devices. This also includes isolating the flow of gas, air, hydraulics, steam and hazardous areas.

Isolations may be in the form of lock-outs, blocking, pinning, chaining, flagging off or barricading. At the Site, most isolations performed are lockouts.

Everyone has the right to lock-out for themselves, or to work under the protection of their supervision (i.e., supervisors can lock-out for their employee's).

How Do We Isolate?

Before any work is performed, we isolate by:

- a) Identifying the energy sources;
- b) Requiring the hazard(s) to be identified;
- c) Defining the isolations to be taken, and;
- d) Checking for isolation effectiveness.

Note: Isolation of an area should include a sign identifying who is responsible for the isolation and how they can be reached.

- The Site Representative will arrange for Qualified Electrical Personnel to isolate areas as required by contractors.
- The decision on how an isolation is to be performed must be developed by a competent person with knowledge of the equipment, area and process. This can be accomplished as part of a written procedure.
- For simple equipment isolation - The Site Representative will arrange for Electrical Contractor to isolate area, and assist Contractors by isolating equipment / services so that the contractor can affix their locks.
- **Sydney Steel Representative will also arrange to isolate high voltage breakers / switches (greater than 750 volts)** as per switching procedure. The Contractor to affix locks as per isolation requirements.
- Key points of isolation to be discussed at the Safety Work Permit Meeting:
 - How many locks required?
 - Where to place locks?
 - Who will show contractor where to put locks?
 - Ensure locks are adequately identified (Name / Company or Department / phone#)
 - **Safety Locks must have only one key**

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Requirements of Contractors

Equipment and/ or Work Area Isolation

- For permanent shutdowns - Isolation to be performed with an approved written Isolation Procedure and place Isolation Procedure and / or Isolation Checklist along with key in "Lock-out Box". All areas and electrical equipment must be so tagged.
- Ensure copy of the "permanent" Shutdown Isolation Procedure is attached to Safe Work Permit.
- For major shutdowns, Qualified Personnel to place lock on "Lock-out Box or Bar" (in most areas). Some areas may require
- "All" on- site Contractor Personnel to place lock on "Lockout Box/Bar". Please discuss this issue to assure all persons included.
- If the scope of work changes and requires that the isolation be changed, another isolation procedure meeting to be held to document changes. A new Safe Work Permit Meeting is to be held using the new isolation procedure to ensure all personnel on job-site are aware of the changes.
- All safety locks used for isolation purposes are long shanked. Personal Safety Locks must be:
 - individually keyed or keyed alike in multiple sets;
 - b) Supplied with ONE key;
 - c) Identified with name and company of user, on the lock or on a suitable tag, and;
 - d) Used ONLY by person identified on tag.

Written Isolation Procedure

The Supervisor of the person(s) performing the work is responsible for determining when a written isolation procedure is needed to make a job safe.

1. All written isolation procedures must be developed by a competent person with knowledge of the equipment, area and process and must include:
 - the equipment, devices or things requiring isolation
 - the method of isolation required
 - blocking, pressure release, purging, physical / electrical disconnects, barricades and testing of equipment
 - to make certain isolations are effective
 - switches, valves or isolating devices required to be locked out
 - the initial approval and subsequent revisions to be approved by the Site Representative using the procedure.
2. When no written procedure is required for a job, the job supervisor for the work must determine what is required for isolation at the time.

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Requirements of Contractors

Equipment and/ or Work Area Isolation

3. When the written isolation procedure is used, the procedure must be:
 - dated and approved by the supervisor/leader making the job safe, and;
 - where lock boxes / bars are used the procedure or listing is to be posted on the job site or lock box and
 - Visible to anyone to review, prior to start of work.

Made Safe

4. The person making the job site safe must check that the isolation is effective.
5. Prior to the start of work, each person working on a job must check with the job supervisor that the isolation is effective. An additional check is required if there is a return to the job later in the shift.

Locking Out

6. Lock(s) are to be placed as to prevent the physical movement of the isolating device(s) - switch, valve, lever, etc.
7. A supervisor, or person having responsibility over others, may lock-out for those they have responsibility for, providing there is an approved written isolation procedure.
8. When personal locks are used, the user either affixes them or is present to witness their use.

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Requirements of Contractors

Equipment and/ or Work Area Isolation

Inspecting

Inspecting is defined as the act of viewing and / or checking only on the work and does not entail working on the equipment.

A supervisor or staff/technician may inspect only with the approval and accompaniment of the person who has the area locked out.

Lock Removal

NO PERSONAL OR DEPARTMENTAL LOCK SHALL BE REMOVED OTHER THAN BY THE PERSON WHO AFFIXED IT UNLESS THAT PERSON IS PRESENT TO WITNESS THE REMOVAL.

All persons must be clear before any lock protecting them is removed. If necessary, isolation of the area is to be maintained during the removal process to prevent entry of any person(s) into the affected area.

When a person leaves a job and their lock(s) are still affixed, that person must be satisfied that the equipment or area they are working in is still properly isolated prior to resuming work.

Periodically, circumstances arise when equipment or a process must be taken out of service for maintenance reasons and the job cannot be immediately completed. Examples of this would be the removal of electrical motors for repair or the removal of a valve for repairs when the valve or motor must be sent out of the plant for the repair work to be done. In these circumstances, no locks shall be removed unless the equipment or process is completely safe or the responsibility for the isolation is transferred to another person who will replace the original locks with their locks. The responsibility for this belongs to the person performing the work.

Where safety lock(s) are left on and it is **ABSOLUTELY IMPERATIVE** that the equipment be used, the person responsible for the lock(s) must be contacted to come in for removal. This applies to all applications - personal, supervisor, and departmental locks. If the above is not possible, the lock(s) may be removed, after determining that it is safe to do so, by the Site Supervision, Electrical and Mechanical Maintenance personnel.

This includes the department(s) locking out.

- Form 749 "Lock Removal" must be completed to document the lock removal. Copies are to be sent to the Health and Safety Officer.

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Requirements of Contractors

Barriers and Barrier Tape

Background

Barriers are used to stop the passage of people or vehicles in a restricted area.

A barrier must be installed to warn people of hazards created by demolition, asbestos removal, construction and/or maintenance activities in the area and to direct persons past such hazards.

Guarding (Barricade) is a requirement of the Occupational Health and Safety Act and the Regulations.

All barriers at The Site must be installed in accordance with the requirements outlined in the Occupational Health and Safety Act & Regulations.

All openings, sumps, vessels, bins, hoppers, elevated platforms or pits, other than grease pits, which constitute a hazard, shall be fenced or otherwise guarded. (Occupational Health and Safety Act and Regulations).

Types of Barriers Approved For Use at The Site

There are two types of Barriers approved for use at the Site:

Fixed Barricades

Fixed barricades are used to physically prevent entry into a restricted area because a hazard exists. Access may be restricted by using:

- Wooden Barricades
- Concrete Barricades
- Fabricated structures made from steel or wood
- Fencing

Fixed Barriers should be used to prevent entry of unauthorized people or equipment into areas where a hazard exists. Examples of situations when fixed barricades should be used include:

- Excavations;
- Openings in floor, walls, platforms and handrails;
- Tripping hazards such as: Uneven floor or surfaces under repair;
- Fall prevention;
- Road closures

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Requirements of Contractors

Barriers and Barrier Tape

Barrier Tape

Barrier Tape is used to warn people of a potential hazard and deter entry into a restricted area. This method does not physically prevent entry, but people must not enter the area restricted without authorization from the Site supervisor. It will be considered a major safety infraction for any unauthorized person(s) entering into a barricaded area.

Barrier Tape should be used to warn people of a potential hazard and / or prevent entry into a restricted area. Examples of when barrier tape should be used include:

- Demolition
- Asbestos removal
- Commissioning / Decommissioning of live equipment;
- Restricting access because of a fire line;
- Identifying a confined space (work in progress);
- Cordoning off and accident investigation site, and;
- Flagging off floor area because of overhead work in progress.

Note: The use of barrier tape as an alternative means to stop/halt physical entry into an area where there is an open pit or missing handrail etc., is strictly prohibited. A fixed barrier must be used in this situation.

The standard barrier tape that is to be used in all applications at the Site is **(Yellow) "Danger, Authorized Entry Only"**.

All barrier tape must be removed from the Site at the time the work is complete or at the time the hazard no longer exists.

Barrier Tape Identification Tag

When Barrier Tape is used it is the responsibility of the Site supervisor to ensure that identifying tags are affixed around the perimeter of the barrier tape. As a minimum, an identification tag must be affixed to each point of entry to the barricaded area.

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Requirements of Contractors

Barriers and Barrier Tape

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Requirements of Contractors

Personal Protective Equipment

Personal Protective Equipment provides a secondary method of protection for an employee where it is not possible to eliminate or control the hazard.

The personal protective equipment necessary for the business unit, will be discussed at, and stated on the Safe Work Permit Form. Specific protection for the work being performed must be evaluated by the contractor.

All Personal Protective Equipment deemed necessary by the Contractor to protect the health and safety of the contractor employee(s) is to be provided by the contractor.

As a minimum the following Personal Protective Equipment is generally required in all plant areas:

- CSA Approved Hard Hat
- CSA Approved High Impact Safety Glasses (with permanently attached side shields) - Prescription or Non-Prescription
- Safety Boots
- Arms and Legs completely covered as required

All personal protective equipment must be inspected as required regularly and be in a condition that provides the protection it was designed for.

Foot protection, as a minimum must be safety footwear with a Canadian Standards Association (CSA) approval with Grade 1 (i.e., Green Patch) designation may be worn on Site.

Clothing requirements are long-sleeved shirts and long pants as required. This also applies to getting to and from the job site.

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Requirements of Contractors

Confined Space Entry

Definition

A confined space means a space in which, because of its construction, location, contents or work activity therein, the accumulation of a hazardous gas, vapour, dust or fume or the creation of an oxygen-deficient or oxygen enriched atmosphere may occur.

Physical Characteristics of a Confined Space

The physical characteristics of a confined space are:

- A space that is large enough and so configured that an employee can enter and perform assigned work,
- An enclosure that, by design, has limited openings for entry and exit.
- An area or space that has the potential to accumulate a hazardous gas, vapour, dust or fume or become
- An oxygen-deficient or oxygen enriched atmosphere, either from an external source or an internal source.

Confined spaces may include, but are not limited to, sewers, tunnels, manholes, utility vaults, piping, storage tanks, process vessels, pits, excavations, and other similar types of enclosures with limited access and / or without adequate ventilation to eliminate the potential for the accumulation of a contaminant or oxygen depletion or enrichment.

CSE Procedure

A procedure, listing the requirements for safe entry and safe work within a confined space must be written and approved by a competent supervisor before any entry is made. All hazards must be identified, and eliminated or controlled according to the procedure. This procedure must be reviewed with all of the entrants of the confined space.

Legal Requirement

The Occupational Health and Safety Act (OHSA) & Regulations, outline the minimum requirements that must be met before entering a confined space. The Site' Confined Space Entry Standard is designed to meet or exceed the legislative requirements of this regulation.

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Requirements of Contractors

Purging Procedures

Definition

Purge is the act of replacing the atmosphere within a closed system or vessel (container) by an inert substance in such a manner as to prevent the formation of an explosive mixture with air, prevent a dangerous concentration of an asphyxiant or toxic gas, or in the case of oxygen, to lower the oxygen content to prevent damage to the vessel or to personnel from extremely rapid combustion.

Preparation and Execution of the Purge Procedures

All purge procedures will be prepared and executed by authorized personnel only.

Having completed the purge out procedure, the contractor will lockout isolation points with own locks and proceed to perform the necessary work.

All Purge Procedure related details (e.g., lockouts, special instructions), must be discussed at the Safe Work Permit Meetings.

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Requirements of Contractors

Emergency Response Plan (ERP)

The Site Emergency Response Plan (ERP) outlines responsibilities, sources and communication relating to the activities on Site. The plan enables coordination of contractor Emergency Response Plan (ERP), as well as providing a ready reference for communications and simple checklists for effective emergency response.

The contractor must ensure that the Site H&S Officer reviews the Contractor ERP plan prior to start of work. This is normally done at the Safe Work Permit Meeting.

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Requirements of Contractors

Communication

Safe Work Permit Meetings / Site Specifics

It is of the utmost importance that all information received by the Contractor Supervision at the "Safe Work Permit Meeting" and through "Site Specific Information Packages" is communicated to all contractor employees, sub contractors and their employees. All communication must be documented and kept on file.

Contractors Toolbox Safety Talks

It is the responsibility of the Contractor to ensure that toolbox safety talks are delivered daily (prior to starting work) to all employees working on the project, as a means of providing regular Health and Safety awareness, and encouraging employees to actively participate in Health and Safety matters.

Documenting the delivery of these safety talks is the responsibility of the contractor. The documentation must include a record of the names (with signatures) of all employees in attendance, date, time, and discussion topics.

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Requirements of Contractors

Workplace Inspections

The contractor is responsible for maintaining a safe work area and must ensure that regular workplace inspections take place. Formal documented workplace inspections must be done weekly by the contractor supervisor accompanied by an employee.

Individual work must be checked daily for:

- Health, safety and ergonomic hazards
- All tools and equipment are safe to use
- Signs and labels are legible

Typically, the types of things to review would include but not be limited to, the condition of:

- Personal Protective Equipment
- Access Stairs and Platforms
- Ladders
- Scaffolds
- Equipment and Tools
- Vehicle
- Housekeeping
- Emergency Eyewash and Showers
- Material Storage
- Material Safety Data Sheets

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Requirements of Contractors

Accident Investigation

Background

The Site requires each contractor to have an effective accident reporting system which is understood and implemented by all contractor and subcontractor employees prior to commencing work on the Site premises.

When an Accident Occurs

It is the responsibility of the contractor to ensure that all employees are trained to report all accidents, with or without injuries. When an accident occurs, the contractors supervisor must:

- Investigate all accidents with or without injury and provide a full report to the Site H&S Officer.
- If there is an injury, arrange transportation to the Cape Breton Regional Hospital by calling Main Security Gate: Cell-- **578-5806**
Office 564-7901 or 564-7900

When serious injuries are incurred, emergency communications are required.

- In the case of a critical injury or death, secure the scene of the accident and do not disturb unless disturbance is necessary in order to eliminate danger to other persons. Immediately inform the Site H&S Officer.
- Take all necessary actions to prevent a recurrence of the accident and document the actions taken.

Emergency Communications

Security / Ambulance / Fire – Cell--**578-5806**

Office—564-7901 or 564-7900

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Requirements of Contractors

Regulated Substances

Material Safety Data Sheets outline and will be used to discuss substance hazards and safety requirements, more specifically safety equipment, make, model, filter types, gloves, etc. The locations of Safety Showers and Eyewash Stations must also be reviewed and communicated to all contractors.

In the event of the removal of designated substances such as asbestos, all contractors on the job site must review a written removal procedure at the Safe Work Permit Meeting.

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Requirements of Contractors

Chemical Management and Transportation of Dangerous Goods (TDG)

The contractor shall comply with all applicable regulations including The Transportation of Dangerous Goods Act.

Unless otherwise specified in writing by the Contractors and the Site Representatives, the Contractor will:

1. Have a list or inventory of all chemicals being brought by the Contractor to the job site, with up-to-date Material Safety Data Sheets (MSDS). The chemical inventory should contain:
 - the name of the material
 - the amount used and stored (e.g., per month, per year or whatever is convenient, and;
 - where the material is used and stored
2. Have an up-to-date written emergency response plan, which outlines actions to be taken by the contracting employees in the event of a leak, spill, fire or explosion. Contracting employees must have been properly trained in spill response and control procedures and if expected to respond to a "dangerous goods occurrence", receive Transportation of Dangerous Goods (TDG) training once every three (3) years.
3. Ensure that chemical containers (drums/totes) are labelled as to content and in good condition and impermeable to the chemicals they contain. Non-compatible chemicals are to be segregated. All applicable safety marks, labeling, placarding and documentation are used.
4. Be in constant attendance when loading / unloading a storage tank.
5. Ensure that valves and nozzles are locked in the closed position when not engaged.
6. Have all required licences to purchase, store or use a chemical and comply with all chemical storage and chemical waste regulations.

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Requirements of Contractors

Reporting Environmental Incidents

It is The Site policy to report environmental incidents (or "spills") to the Department of Environment and other authorities.

Under the Environmental Protection Act, a "spill" is defined as a discharge into the natural environment which includes air, a natural watercourse (like the Harbour), groundwater and the ground and may happen out of a structure or container (e.g., tank, piping, valves, vehicle, building, stack vents).

The Contractor must take immediate action to safely stop the emission or contain the discharge and notify the Site H&S Officer of the situation.

The Site Environmental Officer will report the environmental incident as per "Emergency Response Plan", Schedule A.

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Requirements of Contractors

Electrical Equipment Areas

Access to areas that contain "Live" electrical equipment are **restricted** to authorized personnel only. Authorized Personnel are defined as:

- Qualified electrical contractors and personnel;
- Persons accompanied by Qualified electrical personnel, and / or;
- Contractors who have been given "short term" access per their Safe Work Permit

Contractors that require short term "unaccompanied" access into electrical equipment areas must be under the direction of electrical personnel. The Site-specific health and safety information and tour must detail the specific location, the hazards for the area and any other relative information. This must be given to the contractor as part of the Safe Work Permit Meeting.

While in an electrical equipment area persons who come within one (1) metre or three (3) feet (or more depending on the voltage level) of **live** exposed electrical equipment must wear the required personal protective equipment or the **live** exposed electrical equipment must be guarded.

For additional details refer to Contractor Requirement 2-22 "Working on or Near Live Electrical Equipment" on the following pages.

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Requirements of Contractors

Working On or Near Live Electrical Equipment (750 Volts AC or DC and Below)

Background

At the Site, the method for working on any electrical equipment is to isolate and lock out all sources of energy. However, in certain circumstances it is necessary to test and troubleshoot electrically energized equipment.

At the Site, we do not "repair" or "replace" live equipment. There is only one exception to this statement and that is the changing of or racking in and out of low voltage substation breakers, on a live bus, with the cell door open.

Definitions Near

Near has been defined with respect to live exposed electrical equipment at 750 volts and below as within one meter.

The following list of questions will assist an individual in determining whether they are near and likely to become endangered at distances greater than one meter from the live exposed parts. A qualified electrical person must make this evaluation.

- Are you or the equipment or materials used to perform the job likely to come in physical contact with the energized electrical circuits?
- Are there tripping hazards in the work area?
- Could you lose your balance because the work requires you to reach an excessive distance?
- Do you have adequate lighting to see clearly what you are doing?
- Do you have conductive materials or equipment on your person?
- Is there any possibility of equipment movement?
- Do you think protective barriers should be used?
- Has all your equipment been checked and in good working order?
- Do you have a sense of nervousness about your proximity to live exposed electrics on a specific job?
- Has the voltage and amperage level been considered?
- Have you considered any environmental conditions like water, dust, congestion etc.?
- Any other hazards in the workplace?

Trouble-Shooting And Testing

The action performed on an electrically energized system to determine the existence or cause of a problem.

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Requirements of Contractors

Working On or Near Live Electrical Equipment (750 Volts AC or DC and Below)

Working On

To repair, replace, test or trouble-shoot electrical equipment.

Hazard Assessment

Each job will be assessed and the hazards identified by a competent electrical person (i.e., a person, who is, through training and experience, able to recognize electrical hazards and trained in CPR).

Based on the assessment the appropriate procedures and required personal protective equipment will be used.

Personal Protective Equipment

All Personal Protective Equipment deemed necessary by either the Site H&S Officer and / or the Contractor to protect the health and safety of the contractor employee(s) is to be provided by the contractor.

If a person approaches within one meter of live exposed electrical equipment at 750 volts or below, the necessary Personal Protective Equipment must be worn.

When working on or near live exposed electrical equipment a 230 volts AC or DC and above or approaching within one meter, the following personal protective equipment **must** be properly worn:

Personal Protective Equipment:

- Hard hat
- Safety glasses with permanent side shields
- Shock Resistant (Omega) Work Boots
- Flame Resistant Clothing System
- Class '0' Rubber Gloves with leather outers for 230 volts (AC/DC) or above
- Face Shield (if arc hazard exists)
- Any other personal protective equipment as determined by the area in which the work is being done (e.g., hearing protection, harness, respirator, etc.,)

Other:

- A second suitably equipped competent person when working with voltage levels at or over 300 Volts, except for testing or trouble-shooting (i.e. changing of or racking in and out of a low voltage substation breaker on a live bus, with the cell door open)
- Testing equipment must be certified by the manufacturer for its intended use

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Requirements of Contractors

Working On or Near Live Electrical Equipment (750 Volts AC or DC and Below)

When working on or near live electrical equipment below 230 volts, the following requirements are optional per hazard assessment.

Personal Protective Equipment:

- Class '0' Rubber Gloves with leather outers for below 230 volts (AC/DC)
- Flame resistant clothing for below 230 volts (AC/DC)

Other:

- A second suitably equipped competent person when working with voltage levels below 300 Volts AC or DC.
- Mats (e.g., insulated rubber)

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Requirements of Contractors

Scaffolds

What is a Scaffold?

A scaffold is an elevated working platform for supporting both people and materials. It is a temporary structure used mainly for construction and / or maintenance work. Scaffolds must be designed to support at least four (4) times the anticipated weight of people and materials that will use them.

Legal Requirement

Proper components, training in erection and use, and disassembly of scaffolds are a requirement of the Occupational Health and Safety Act and Regulations.

Construction / Erection

Operating Services - Carpenters Responsibilities

All types of scaffolding (may or may not include frame scaffolding) shall be constructed, erected or assembled by a competent person. During construction and upon completion of the scaffolding, the competent person is responsible to attach the appropriate identification tag.

Overhead Protection

Whenever work is being done on a scaffold over people working below, overhead protection must be provided on the scaffold. This protection should be not more than nine (9) feet above the working platform and should be planking or other strong suitable material.

Means of Access

A safe and convenient means must be provided to gain access to the working platform level. Means of access may be by a portable ladder, fixed ladder, ramp or runway, or stairway.

Identification of Scaffolds

"DO NOT USE" Scaffold Identification Tag (WHITE Plastic Holder RED Lettering)

- During construction, erection or assembly of any scaffold, a **"DO NOT USE"**

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Requirements of Contractors

Scaffolds

Scaffold Identification Tag must be affixed by the erectors in a prominent location on the scaffold and / or at each point of potential access to the scaffolds.

"USE WITH CAUTION" Scaffold Identification Tag (YELLOW Plastic Insert)

- If the scaffold cannot be built strictly to specifications, the erectors must affix a **"USE WITH CAUTION" Scaffold Identification Tag** with special instructions at each point of access. For example, if a guardrail cannot be installed, the Yellow Tag will indicate this restriction and provide instructions that a safety harness shall also be worn.

"OK TO USE" Scaffold Identification Tag (GREEN Plastic Insert)

- Once construction, erection or assembly of the scaffold has been completed and has been approved for use by the erectors, they must affix an **"OK TO USE" Scaffold Identification Tag** at each point of access.

Inspection and Maintenance

Contractors Responsibilities

Contractors, who are using scaffolding, shall inspect the scaffolding frequently.

Removal, Component Inspection and Storage

Any scaffolding that is no longer being used (i.e., the job is completed), is to be removed by a competent person. Once removed, the competent person is also responsible for inspecting the scaffolding components for any damaged parts or components, discarding or repairing these components and proper storage of all components prepared for future use.

Scaffold Pre-Use Checklist

The following are some items to consider prior to using scaffolding:

- Are scaffold components in safe condition for use?
- Are planks in safe condition for use? For wood planking, the following applies:

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Requirements of Contractors

Scaffolds

- Planks must be at least two (2) inches thick by ten (10) inches wide and must meet or exceed the requirements for Number 1 Grade Spruce or better planking.
- Shall be free of wormholes, cracks, checks, splits, excessive knots, waness, warps and twists.
- The weight of the plank must be checked. A lightweight plank indicates that it is dry and possibly brittle.
- The surface of the plank must be checked for the possible penetration of potentially damaging substances (e.g., acidic solutions)
- Immediately discard any planks showing these or other defects.
- Do planks overhang their supports by no less than six (6) inches and no more than twelve (12) inches.
- Planks are secured from slipping (e.g., Planks have cleats where required and are properly fastened to the planks)
- Is the frame spacing and sill size capable of carrying the intended load?
- Have competent persons been in charge of erecting the scaffold?
- Are sills properly placed and of adequate size?
- Have screw jacks been used to level and plumb scaffold versus unstable objects such as concrete blocks, loose bricks, etc.?
- Are base plates and / or screw jacks in firm contact with sills and frames?
- Is scaffold level and plumb?
- Is guard railing (complete with top and mid rail and toe board) in place on all open sides?
- Has proper access been provided?
- Has overhead protection or wire screening been provided where necessary?
- Has the ratio of height to least lateral dimension not exceeded three (3) to one (1) (*i.e., Three to One Rule*). For example, if the base measurements of the scaffold provide a width of five (5) feet and the length of the selected crossbraces provide a bay length of ten (10) feet, the maximum height of the scaffold shall not exceed fifteen (15) feet (*i.e., 3 x 5 feet = 15 feet*).
- Exceptions may include circumstances where:
 - The scaffold is tied into the structure:
 - The scaffold is properly stabilized by guy wires, and / or;
 - The scaffold is secured by outrigger stabilizers sufficient to maintain the ratio.
- Have brackets and accessories been properly placed:
 - Brackets?
 - Putlogs?
 - Tube and Clamp?
- All nuts and bolts tightened?

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Requirements of Contractors

Scaffolds

- Is scaffold free of makeshift devices or ladders to increase height?
- Are working platforms fully planked between guardrails?
- Are toeboards installed properly?
- Have precautions been taken to prevent against hazardous conditions such as:
 - Power lines?
 - Wind loading?
 - Possible washout of footings?
 - Uplift and overturning moments due to placement of brackets, putlogs, or other causes?

General Safety Rules

The following are some general safety rules for the use of scaffolding:

BEFORE Using Scaffolding, **Check** to ensure that:

- Scaffolding is approved for use (e.g., Review "Identification Tag")
- Base is sound, level and adjusted
- Legs are plumb and all braces are in place
- Locking devices and ties are secured
- Cross members are level
- Planks, Decks and Guardrails are in good condition, installed and secure

DO:

- Follow all instructions / notes on Scaffold Tag (e.g., use harness)
- Remove snow and ice from scaffold platforms, ladders and access areas.
- Use an access ladder to climb on or off a scaffold, not scaffold frame, unless it is specially designed to be climbed.
- Ensure that the scaffold is securely attached to the building structure. The effects from winds increase when scaffolds are covered.
- Protect all planked or working levels with proper guardrails, mid-rails and toe boards along all open sides and at the ends of scaffold platforms.
- Guardrails may be removed for the purpose of lowering or hoisting materials but must be replaced immediately. Fall Protection (i.e., safety harness) must be worn when guardrails are removed.

DO NOT:

- Do not use scaffolding that have a "DO NOT USE" Scaffold Identification Tag affixed anywhere on the scaffolding.
- Do not jump onto planks or platforms.

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Requirements of Contractors

Scaffolds

- Do not climb or stand on cross braces or guardrails.
- Do not work on scaffolds during storms or high winds.
- Do not use ladders or makeshift devices on top of scaffolds to increase height.
- Do not overload (i.e., exceed tagged capacity) scaffold frames or platforms.
- Do not rest materials or equipment on guardrails.
- Do not try to repair bent or kinked frames. Immediately discard them.
- Do not use scaffolds near electrical wires.

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Requirements of Contractors

Controlling Air Emissions

Background

Minimizing air emissions from the Site sources is an environmental priority.

Dust, or particulate, from storage piles and open areas is caused by high winds and vehicle traffic.

Minimizing Air Emissions

Contractors must minimize air emissions by following:

Loading Practices

Trucks must not be overloaded with material. Overfilling causes spillage from trucks. The spilled material creates "trackout". Trackout is carried along the road by the vehicle's tires. It dries on the road and when driven over, is crushed, creating dry dust, or air emissions.

Speed Limits

All speed limits must be obeyed. Following posted traffic speed limits minimizes the amount of dust created on roadways.

Turn off Engines

Drivers shall turn off engines while stationary unless the engine is required for a specific reason (e.g., vacuuming in or pumping off load).

Sandblasting

To minimize airborne sandblasting particulate, the contractor shall use the lowest dust abrasive available. Where sandblasting of paints may be leadbased, the debris generated during the removal of the existing paint shall be collected and disposed of properly – the debris cannot be diluted to render it non-hazardous.

Construction and Demolition

Trackout from job sites must be controlled and waste / debris from any demolition must be properly disposed.

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Requirements of Contractors

Spill Control and Response

Spill Control and Response

Spill Control The preferred method of controlling spills is to prevent them from happening in the first place.

To prevent spills, a Contractor must use the following individually, or in combination:

1. Store oils or chemicals away from sewer grates or where a spill could reach a sewer.
2. Inspect the condition of the oil or chemical container, drum, tote etc., transferring the material to a new container if necessary.
3. Ensure level controls, alarms and / or standby backup pumps are in working condition.
4. Develop and maintain procedures to respond to a spill and instruct their employees in these procedures.

Spill Response **The Contractor responds to a spill by:**

1. If possible, stop the spill, taking into account employee safety first.
2. Prevent the spill from entering sewers by stopping the flow, dyking, sealing manhole covers and sewer grates and spreading absorbents.
3. Report the spill to the Site Representative immediately, who will follow the "Emergency Response Plan" reporting procedure.
4. In the event of a chemical spill, the Material Safety Data Sheet (MSDS) should be consulted. Safe handling procedures, instructions in case of fire, health hazard ratings and summarized spill response procedures are listed on all MSDS sheets. The MSDS sheet should be made available by the Site Representative.

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Requirements of Contractors

Waste Management

Waste Management

The Contractor shall comply with Nova Scotia Waste Regulations of The Environmental Protection Act.

Unless otherwise specified in writing by the Contractor and the Site Representative, the Contractor will:

- Restore the job site and any lands affected by it, to an acceptable condition, free of all waste, debris and hazardous materials. The Contractor is responsible for removing any refuse, including empty containers (e.g., drums, cans), left over construction material and packaging.
- No residuals or contaminated water is to be allowed into the Site water treatment plants or sewer systems. Liquid industrial waste cannot be dumped down a sink or sewer.
- Segregate any waste generated from a job and identify as either hazardous, liquid industrial or non-hazardous.
- Waste containers shall be dated and labelled as to content. The containers shall be in good condition and impermeable to the waste it's receiving. The lid shall be kept closed unless adding more of the same waste.
- Prior to shipping off wastes, the Contractor shall ensure that shipping documents, labelling and placarding requirements are complied with according to legislation.

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Requirements of Contractors

Commitment Agreement

Commitment Agreement

This program has been prepared to assist you in your business dealings with Sydney Steel Corporation. The regulations and procedures set out in this manual ARE NOT INTENDED TO REPLACE OR SUPERSEDE ANY LAWS, REGULATIONS OR LIABILITY APPLICABLE TO THE WORK UNDERTAKEN BY YOU. In the event of a conflict, you must act in accordance with the governing law or regulation and report the conflict to the appropriate Site H&S Officer. This manual has been registered to:

Company Name:

Contact Name:

Address: Street:

City: Province:

Postal Code:

Telephone Number:

Fax Number:

Email Address:

I, _____, representing the above named company, fully understand and have complied with and will continue to comply with, the requirements outlined in the Site Contractor Health and Safety Program and confirm that all our employees assigned and / or sub-contractors retained to work on the Site are in compliance with the requirements as outlined in the program.

Signed: _____ Date: _____

Copy "Commitment Agreement" for your records and return signed and dated original via mail to:

The Site Corp.
1 Inglis St.,
P.O. Box 1450,
Sydney, Nova Scotia, Canada,
B1P 6K5

Or via facsimile to:

• (902) 564-7903

Attention: Site H&S Officer

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Requirements of Contractors

Contractor Employee Orientation

Contractor Employee Orientation

This section outlines the training and orientation to the Site Contractor Health and Safety Program that the contractor must give their employees, prior to the start of any work.

Contractors must ensure that all supervisors are trained in the Requirements of the Contractor sections of the Site Contractor Health and Safety program.

Contractors must ensure that all employees and its sub-contractors are trained in the provided orientation. The purpose of the orientation is to provide basic information on the employee's personal responsibilities for Health and Safety.

It is the contractors' responsibility to issue and review the contents of the provided Manual. (Additional copies are available on request). The contractor employee will complete and sign the acknowledgment section and the contractor will record that an employee orientation has taken place. The orientation is valid for one year from the orientation date.

This orientation must be redone on an annual basis. The contractor company must keep a record of all orientations on file.

The following items must also be reviewed:

- Your rights and the Nova Scotia Occupational Health and Safety Act.
- A review of your company's safety policy and program by the Site H&S Officer.
- Generic WHMIS awareness training, including labels and interpretation.
- A review and training in any "Trade Specific" High Hazard concerns, including Occupational Health and Safety Act and Regulations requirements.

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Requirements of Contractors

Safe Work Permit Meeting & Site Specific Information

Safe Work Permit Meeting

Prior to any "work" being done by a contractor, a Safe Work Permit Meeting must be held to establish and document safe procedures. These meetings are conducted by the Site Representative or the Site H&S Officer. Work must never begin before the Safe Work Permit Meeting has taken place and information conveyed to all employees.

An employee must review the instructions of the safe work permit meeting and sign the acknowledgment form. Where there is an established scope of work, location, conditions, hazards, and they will not change during a month, then a monthly safe work permit can be held.

A Safe Work Permit Meeting is scheduled to:

- Inform the Contractor of the Health and Safety hazards or requirements of the area in which they will be working. The Contractor site supervisor (or appropriate designate) is responsible to convey this information to all contract personnel working on the project.
- Ensure the contractor conforms and complies with any local rules for the area in which they will be working, The Site's Health and Safety Program and the Occupational Health and Safety Act and Regulations.
- Inform appropriate Site employees of the scope and schedule of the work being performed. Further specific information requirements are outlined on Form 124 "Safety Work Permit".

The contractor should visit the job site with a Site representative prior to the safe work permit meeting.

Appendix

- Safe Work Permit
- Acknowledgement of Training
- Site Map
- Your Rights, Responsibilities and the Occupational Health and Safety Act

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Requirements of Contractors

Safe Work Permit

SAFE WORK PERMIT (Form 124 B)

Date Held: _____ P.O.: _____ Reqn.: _____ File No.: _____

Contractor: _____ Sub Contractor: _____

Dept. _____ Scope of Work: _____

Sysco Coordinator/ ext: _____ Start Date & Time: _____ Est. Comp. Date: _____

1. **Crane(s) Mobile Equipment Required:** Yes No Type of Equipment _____

2. **Embedded Services Locate Request discussed:** Yes No
Clearance No. _____

3. **Equipment and/or work area to be isolated:** Yes No If Yes Specify: _____

4. **Personal Protective Equipment to be worn, Specify:** Hard hats Safety Boots Safety Glasses
Fall Arrest Harness Hearing Protection Respiratory Protection Chemical Goggles
Other Specify: _____

5. **Confined Space Entry:** Yes No (a confined space means a space in which, because of its construction, location, contents or work activity therein, the accumulation of a hazardous gas, vapour, dust or fume or the creation of an oxygen-deficient or oxygen-enriched atmosphere may occur.)
Contractor to follow Confined Space Entry Procedure: Issued Procedure No. _____

6. **Area Gas Check Required** Specify Type _____ Contact: _____

7. **Purging of Pipelines:** Yes No If Yes, procedure must be attached, Procedure No. _____

8. **Additional Protection:** Safety Watch Fire Watch Other _____

9. **Road / Rail Restrictions:** Yes No If Yes, Contact _____

10. **ERP Procedures** discussed/issued

NOTES: _____

This permit is no longer valid if the contractor/sub contractor does not start within 8 days of permit meeting or leaves the job site for more than 8 days. Any deviation from this permit must be confirmed with the Sysco Coordinator.