RICHARDSON'S BULK SALES LTD.

HEALTH & SAFETY MANUAL (HSM)

ALBERTA

Prepared by:
InUnison™

COVID-19 Response Policy

This policy specifies Richardson's Bulk Sales Ltd's commitment to implement and support the COVID-19 Management Program that has been enacted in response to the pandemic declared by the World Health Organization (WHO) and the emergency measures taken by the federal, provincial, and municipal governments.

The goals of Richardson's Bulk Sales Ltd's COVID-19 response policy are to:

- Support the efforts of government health agencies to control the pandemic;
- Protect the health of staff, the public, and all persons we do business with or come in contact with;
- Provide business continuity planning to ensure that we remain viable and continue to provide needed services and products to our customers; and
- Abide by all requirements established on us by government emergency and health agencies.

Richardson's Bulk Sales Ltd will achieve these goals by:

- Following our comprehensive COVID-19 Management Program;
- Monitoring pandemic developments and implementing the latest instructions and recommendations;
- Providing COVID-19 training to all staff;
- Implementing the COVID-19 screening, isolating, and tracking process for all staff;
- Performing COVID-19 specific hazard assessments for all work processes that involve a moderate or high contact intensity while pandemic protocols are in-place;

- Communicating with our staff and customers on developments, initiatives, changes, and progress related to the COVID-19 pandemic; and
- Encouraging and responding to questions from any customers concerning our program and situation.

Richardson's Bulk Sales Ltd will provide all required support to ensure that the goals of the COVID-19 Management Program are achieved, that our employees, clients, and the public are protected from harm, and that our business remains viable while under pandemic protocols.

Computer and Electronic Use Policy

Computers and electronic devices supplied by Richardson's Bulk Sales Ltd are provided for company business. This policy addresses how these devices are to be used by employees in order to protect the integrity of our electronic systems. If you have any questions you are encouraged to talk to your system administrator or other authorized person before making any changes to your devices.

1. Users are not permitted to alter the configuration of any Richardson's Bulk Sales Ltd network or individual computer software or hardware without prior approval from the System Administrator.

2. No software may be loaded onto Richardson's Bulk Sales Ltd computers and/or electronic devices without the knowledge and prior approval of the System Administrator. Only with the permission of the System Administrator may software be downloaded from the internet or other unapproved sources and be run on Richardson's Bulk Sales Ltd computers or electronic devices.

3. No computer use for recreation or other personal interest will be permitted on Richardson's Bulk Sales Ltd computers or electronic devices. Recreational use includes using personal e-mail, messaging of any type, downloading and uploading personal documents or files, engaging in computer games, and internet use not related to Richardson's Bulk Sales Ltd business.

4. All computer users are reminded that their activities are subject to the civil and criminal laws of the province and/or federal government. Possible illegal activities include but are not limited to sexual or other harassment, threats, obscenity, child pornography, libel, unauthorized access to or attempting to access computers, networks, or Company records, and copyright violations. Copyright violations include the use of unlicensed software.

5. Only currently employed persons of Richardson's Bulk Sales Ltd may use Richardson's Bulk Sales Ltd computers or electronic devices. Only employees may log on to company servers or interconnected systems.

6. All Richardson's Bulk Sales Ltd employees are expected to use good judgment when viewing or sending material that other employees or the public could find offensive.
7. Employees may not copy any company files or documents onto a storage device and remove it unless specifically approved to do so for company business.

Contracting Services Policy

Richardson's Bulk Sales Ltd is a service-orientated company serving Oil and Gas Producers in Western Canada. Our operations are unique to their own circumstances and controls. Because Richardson's Bulk Sales Ltd together with other contracted services are working on contracted worksites in unison it is imperative that all workers are aware of occupational health and safety hazards or possible risks.

In our current business practices, we contract out all of our regular vehicle maintenance and Alberta Government Commercial Vehicle Inspections. This is normally done at the contractor's facility but can, from time to time, be carried out in our shop.

Because of these factors, it is imperative that health, safety and environmental risks on every new and existing worksite are identified and shared with all employees on site. Richardson's Bulk Sales Ltd will achieve this by holding daily morning safety meetings prior to work starting and again whenever new services are required on site. On every new worksite, a Site Hazard Assessment and Pre-job Meeting are held between all workers on site and meeting minutes are recorded and reported using the Site Hazard Assessment and Pre-job Meeting Report.

It is not the current practice of Richardson's Bulk Sales Ltd to use sub-contractors. However, in the event we employ contractors or contract services on our work site, we require all contractors to provide proof of Insurance, WCB validation, and proof that drivers are licensed appropriately. Management will ensure all contractors' employees are aware of all our hazards and control measures, safe work practices and procedures, as well as health and safety expectations.

Our practice is to meet with the contractor to discuss health, safety and environmental expectations, develop a written plan for dealing with health, safety and environmental related exposures, and to discuss any contractor expectations.

These plans are communicated to the contractor and its employees using the Contract Services Orientation and Training Form and the meetings are documented using the Health, Safety, and Environmental Meeting Minutes form.

Emergency Response Plan Policy

Emergency response plans will be developed prior to any work being undertaken by Company personnel. Site-specific emergency response plans will be developed in conjunction with the emergency response plan of our clients or other contractor companies active at non-company work sites.

Emergency response programs will include all elements required by legislation and will identify areas where smoking is prohibited, the use and location of portable fire extinguishing equipment, and how and where to properly store and handle flammable and combustible materials and liquids.

Emergency preparedness plans will be prepared for potential releases of hazardous substances, fires, explosions, severe injuries, natural disasters and any other likely emergencies. Visitors to Richardson's Bulk Sales Ltd sites will be required to be trained in and comply with the on-site emergency response plans that are in place.

Enforcement and Discipline Policy

Workers must carry out their work according to the applicable safety regulations and Richardson's Bulk Sales Ltd's Health and Safety program requirements.

Any worker who has been instructed in Richardson's Bulk Sales Ltd's safety requirements and who wilfully violates any policy, practice, procedure, rule, or reasonable instruction given by a person authorized to do so may be subject to disciplinary measures.

In order to encourage a positive safety culture Richardson's Bulk Sales Ltd:

- Will encourage employees to report all incidents and near misses, without fear of discipline;
- Will document all incidents and near misses in order to learn from them and prevent recurrences; and
- Will emphasize educating rather than disciplining employees for safety infractions, unless it is deemed necessary in order to maintain a safe work environment for all employees.

In an effort to provide supervisors with the guidance they require to administer this policy and enforce safety violation(s), a written disciplinary procedure will be followed (see Rules, section 5.0).

When required, supervisors will be required to carry out the progressive disciplinary procedure in a timely manner. In all instances, disciplinary action will be applied on a fair and consistent basis while maintaining confidentiality as appropriate.

Environmental Policy

Richardson's Bulk Sales Ltd is committed to minimizing the impact of its activities on the environment.

Richardson's Bulk Sales Ltd's environmental commitment will be integrated with corporate decisions and strategies based on the following guiding principles.

Guiding Principles

Richardson's Bulk Sales Ltd is committed to:

- Complying with applicable environmental law, industry standards, and its own environmental policies;
- Making environmental considerations an integral part of its planning process;
- Operating its vehicles and facilities in a manner that protects the environment and the safety and health of its employees and the public;
- Promptly providing relevant information to all stakeholders affected by its operations and being responsive and sensitive to legitimate stakeholder concerns;
- Protecting the land and peoples where we operate;
- Identifying and mitigating any potential adverse effects of its operations on the environment;
- Being prepared for and responding to emergencies in a prompt and efficient manner;
- Ensuring all employees are aware of the requirement to report spills of any quantity; and
- Ensuring that its employees are fully informed of their responsibilities and are trained to protect the environment while performing their duties.

Richardson's Bulk Sales Ltd management, employees, and contractors will be required to adhere to this policy at all times.

Environmental Sustainability

Richardson's Bulk Sales Ltd will establish an environmental sustainability program that:

- Addresses implementing procedures to protect the climate. This includes limiting the amount of greenhouse gases by use of low-emission technologies, driving less or carpooling, and the use of renewable energy sources;
- Takes into consideration the impact a product has on the environment before purchasing. Preference should be given to products that minimally impact the environment. This would include products made of recycled or renewable materials, and products that are more energy-efficient than their alternatives;
- Ensures that vehicles and equipment are kept in good condition with up-to-date preventative maintenance. Motorized vehicles should not be left idling unnecessarily and should use lower environmental impact fuels when possible. The most efficient vehicles and equipment should be used when possible;
- When activities may affect the local animal or plant population or habitat, a plan shall be in place to minimize any environmental impact to them;
- An efficient material management system should be used to reduce the impact on the environment by limiting the amount of materials that are used, left over as waste, or transported;
- Energy conservation measures should be used whenever possible. This can include shutting down equipment when it's not in use, using energy efficient light bulbs, using new energy efficient technology and using equipment with the ENERGY STAR mark; and
- Water conservation measures should be used whenever possible. This can include repair on any equipment leaking water, controlling the use of water for cleaning purposes, upgrading equipment efficiency, educating employees, etc.

Fatigue Management Policy

Richardson's Bulk Sales Ltd will provide a fatigue management framework designed to ensure that employees are fit for duty at all times.

Fatigue Management Framework

The Fatigue Management Framework will be designed to provide:

- Appropriate management of:
  - Risks associated with extended work hours;
  - Information regarding lifestyle management to reduce the risk of fatigue; and
  - Employer and employee responsibilities to ensure regulatory compliance.
- Objective assessment of planned and actual work schedules to identify and manage work-related fatigue issues;
- A risk management approach based on applicable Employment Standards Regulations;
- An auditable system to monitor planned and actual work schedules to ensure that employee fatigue does not give rise to unacceptable risks; and
- Orientation, training, and education designed to assist managers, employees, and their families to address extended hours of work and fatigue-related issues.

Responsibility

Company management, employees, and workers have a shared responsibility to avoid fatigue-related safety performance issues. To this end:

- Richardson's Bulk Sales Ltd will ensure that, in the context of the performance required, employee work schedules allow adequate breaks for recovery between extended work hours or shifts, and

- Individuals have a duty of care to ensure that adequate rest is obtained between shifts and that rest period activities do not cause fatigue or impair performance. When this is not the case, employees have a responsibility to report any impairment in their fitness to work their respective supervisor or manager.

At no time should an employee put themselves or others at risk.

Harassment Prevention Policy

Richardson's Bulk Sales Ltd is committed to providing a work environment in which all employees are treated with respect and dignity. All employees have the right to work in an environment that prohibits discriminatory or abusive actions or remarks.

Harassment occurs when a person is subjected to objectionable or unwelcome conduct, comment, bullying, or action that will or would cause offence or humiliation to a worker or adversely affects the worker's health and safety. Harassment that is based on a protected ground (such as race, religious beliefs, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression, and sexual orientation) is a form of discrimination and is prohibited by the Alberta Human Rights Act. Harassment includes objectionable or unwelcome sexual solicitation or advances. Harassment will not be tolerated by Richardson's Bulk Sales Ltd.

Richardson's Bulk Sales Ltd is committed to eliminating or, if that is not reasonably practicable, controlling the hazard of harassment. Richardson's Bulk Sales Ltd will:

- Investigate any incidents of harassment and take corrective action to address the incidents, and
- Not disclose the circumstances related to an incident of harassment or the names of the complainant, the person alleged to have committed the harassment, and any witnesses, except:
- Where necessary to investigate the incident or to take corrective action, or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident, or
- As required by law.

Richardson's Bulk Sales Ltd is committed to ensuring that no one is subjected to harassment in the workplace.

We are committed to dealing promptly and effectively with harassment incidents and this harassment prevention policy is not intended to discourage a worker from exercising rights pursuant to any other law, including the Alberta Human Rights Act.

The Harassment Prevention policies and procedures will be reviewed when an incident occurs, if recommended by the JHSC and/or HSR or at least every three years.

Hazard Identification, Elimination, and Control Policy

Richardson's Bulk Sales Ltd is committed to providing a healthy and safe work environment for all job tasks that are to be performed. A hazard at the workplace is any condition or thing that may be dangerous to health and safety and has the potential to cause loss. Proper hazard identification, assessment, risk rating, and control will provide all workers with direction in the safe performance of their duties.

For normal operations, a listing of tasks, for every job position or group, which may pose a risk to people, environment, or equipment, will be maintained. A hazard and risk assessment will be performed on these tasks for each job position and will be referred to as a **Risk Analysis by Job Task.** This formal Hazard Assessment will be used to identify Richardson's Bulk Sales Ltd most critical tasks for each job position and to train employees on the safety hazards of their most critical tasks. A further Hazard Assessment, (e.g. **Field Level Hazard Assessment (FLHA) or job specific hazard assessment)**, will be conducted and documented prior to any new work site activity and prior to the introduction of a new process or new piece of equipment. Certain standard tasks which are hazardous, or are carried out repeatedly, may be broken down into their individual elements to properly assess the hazard risk level and establish the controls to be used. This analysis is called a **Job Safety Analysis** or **Job Hazard Analysis** (JSA/JHA).

All potential hazards must be systematically prioritized, and those hazards that may cause imminent danger to workers must be mitigated prior to work commencing.

Formal hazard and risk assessments must be reviewed, created, or revised:

- At least annually;
- At intervals that prevent the development of unsafe and unhealthy working conditions;
- When a work process or operation changes;

- When a new work process or product (e.g., chemical) is introduced;
- When new regulations are implemented that affect a specific written procedure;
- Before work commences at a new work site;
- When Inspection or Incident Reports or Investigations indicate a need;
- When site-specific hazard assessments identify a new hazard;
- When safety statistics indicate a trend; and
- When valid Employee suggestions are received.

All Company workers required to perform hazardous tasks will receive appropriate instruction and training. Written copies of practices and procedures will be accessible and available to all workers.

Workers are expected to follow all applicable practices and procedures and to inform supervisors if they have a concern about the hazards of a work assignment.

Health and Safety Policy

The management of Richardson's is committed to ensuring the protection and maintenance of the health, safety, and physical, psychological, and social welfare of our employees, other employers, self-employed persons, and all others present or in the vicinity of our work locations while at the same time protecting the environment in which we work and conduct our activities. This Health and Safety policy will be communicated to all work site parties including other employers and self-employed persons.

I, Jim Broom, as President of Richardson's Bulk Sales Ltd., give my personal promise to ensure a safe workplace for all parties. I will strive to protect workers from injury and illness related to work and I will provide the resources necessary to keep the workplace healthy and safe. I realize that all workers have the right to work in a safe and healthy work environment.

All Management, Supervisors, Workers, and Contractors at Richardson's are responsible for performing every job in a manner that safeguards themselves and their fellow workers and required to make every effort to provide and maintain a safe and healthy workplace by following our own health and safety standards, industry standards and complying with all relevant government OH&S legislation and regulations. This will be accomplished by working with our Joint Health and Safety Committee (JHSC) or the Health Safety Representative (HSR), as the case may be.

Richardson's will ensure that Workers and Supervisors receive effective training in their specific work tasks and follow our safe work practices and procedures to protect their health and safety.

I invite all employees to co-operate and participate in our goal of preventing all losses and our objectives of achieving a safe and healthy work environment for all.

President

Incident Reporting and Investigation Policy

It is the policy of Richardson's Bulk Sales Ltd to report all incidents involving work refusals, occupational illnesses, workplace violence and harassment, and incidents that result in injury, illness, environmental harm, regulatory non-compliance or property damage, or any occurrences that could have resulted (near misses) in any of the previous incidents. The Incident Reporting and Investigation Program found in this program describes how this policy is implemented.

Serious incidents, as determined by management or as required by legislation, will be formally investigated according to our Incident Reporting and Investigation Program.

The purpose of such investigations shall be to determine the root cause of the incident so appropriate action can be taken to prevent re-occurrence. It is important to remember the main focus of the investigation is not to lay or assess blame. Our policy is to **"Fact Find – Not Fault Find"**.

It is the responsibility of all workers to report all incidents to their immediate supervisor promptly. Supervisors shall be responsible for initiating or conducting investigations, if necessary, and submitting reports and recommendations to management. Management will determine the appropriate corrective actions together with the supervisors and workers. Corrective actions will be tracked and implemented in a timely manner. Employees will be informed of the results of all investigations.

Inspection Policy

It is the policy of Richardson's Bulk Sales Ltd to maintain a program of safety inspections. All places of employment, including buildings, work sites, equipment, tools, machinery and work practices will be included in the inspection program. These inspections will be conducted on a regular basis according to “Safety inspections and Monitoring Worksites” in this program. The maximum interval between inspections is three months or as required by legislation. The purpose of this policy is to control losses of human and material resources by identifying and correcting unsafe acts and conditions.

Supervisors are responsible for directing formal inspections in their area of responsibility and for involving workers in the inspections. Inspections will be recorded on the standard inspection form. Frequency of, and who will perform, inspections will be clearly defined and audited to ensure compliance.

Where unsafe or un-healthy conditions, procedures or practices are found in the course of an inspection, the Supervisor shall take immediate action to have the matter remedied. Corrective actions not completed immediately must be documented and added to the Corrective Action Register. Work cannot resume until appropriate hazard control measures have been taken.

Supervisors are responsible to conduct on-going informal inspections in their areas of responsibility to ensure day-to-day operations maintain the Company standard.

Pre-trip or pre-equipment use inspections must be conducted as required.

Contractors/Sub-contractors, if employed, are responsible to conduct inspections in their work areas on a regular basis. Copies of the inspections must be available for review by Richardson's Bulk Sales Ltd.

Maintenance and Preventative Maintenance Policy

All tools, equipment, and machinery shall be properly maintained to reduce the risk of injury to employees or damage to property. Preventative maintenance is an important part of the maintenance program. To ensure that this program is enforced and documented, the following apply:

- On a regular basis, all equipment will be inspected as per the manufacturer's specifications, legislated requirements and the procedures set out in this Manual;
- Preventative maintenance checks will be performed, and scheduled maintenance will be arranged as per individual equipment needs and legislated requirements;
- Employees are to report any damage or unusual equipment operation to their Supervisor immediately; and
- Any tool, equipment, or machinery needing repair will be disabled from use, tagged as "do not use or operate" and immediately taken out of service.

It is the responsibility of the employee assigned to the tools, equipment, or machinery to ensure that these procedures are followed.

It is the policy of Richardson's to maintain all company tools, vehicles, and equipment in a condition that will maximize the health and safety of all personnel.

To accomplish this, a Preventative Maintenance Program shall be maintained and shall include the following components:

- Adherence to applicable legislations, standards, and manufacturers' specifications;
- Services of appropriately qualified maintenance personnel; and
- Scheduling and documentation of all maintenance work.

The supervisor shall be responsible for the application of the program in his/her area of responsibility.

All tools and equipment under Richardson's care, as well as privately owned tools & equipment are to be maintained in accordance with this policy.

Maintenance Policy

All tools, equipment, and machinery shall be properly maintained to reduce the risk of injury to employees, damage to property and/or the environment. Preventative maintenance is an important part of the maintenance program. To ensure that this program is enforced and documented, the following apply:

- On a regular basis, all equipment will be inspected as per the manufacturer's specifications, legislated requirements and the procedures set out in this Manual;
- Preventative maintenance checks will be performed, and scheduled maintenance will be arranged as per individual equipment needs and legislated requirements;
- Employees are to report any damage or unusual equipment operation to their Supervisor immediately; and
- Any tool, equipment, or machinery needing repair will be disabled from use, tagged as "do not use or operate" and immediately taken out of service.

It is the responsibility of all employees responsible for tools, equipment, or machinery to ensure that these procedures are followed.

Personal Protective Equipment Policy

Where engineering, administrative control or safe work procedures may fail to protect an employee, contractor, or visitor from harm; personal protective equipment (PPE) will be worn. Some hazards (e.g., noise and chemical) may take years to have a negative effect on the human body. Strict use of PPE can prevent both short term (acute) and long term (chronic) health effects.

Richardson's Bulk Sales Ltd will determine, based on generic and site-specific hazard assessments, what PPE will be used and will inform employees accordingly. Richardson's Bulk Sales Ltd standards for PPE are the following:

- Approved safety glasses are mandatory when performing work in an industrial location, unless a Hazard Assessment has been performed which determines safety glasses are not required. Safety glasses must have approved side shields.
- Appropriate gloves must be worn as specified for the work. Activities where the wearing of gloves is prohibited will be cited as exceptions.
- Jewelry, such as rings, bracelets and necklaces, shall not be worn when working near moving equipment.
- Appropriate hearing protection must be used when working in areas posted as requiring hearing protection.
- The appropriate respirator must be worn when SDS documentation and/or a hazard assessment requires the same. Training and fit testing must be provided prior to the use of respirators.
- Approved hardhats and steel toed work boots will be worn on all worksites.
- Every employee must wear clothing appropriate for the worksite. No shorts, open toed shoes or sleeveless shirts will be permitted. Approved fire-resistant coveralls must be worn where there exists a flammable or explosion hazard.
- Personal fall protection equipment will be worn when required according to this section and any associated safe work practices.

Richardson's Bulk Sales Ltd will ensure that specialty PPE is available and that employees are trained in the selection, fit, care, use, and cleaning of the equipment. Company supervision is responsible for the enforcement of the PPE policy and procedure. Employees must ensure that worn or damaged PPE is promptly repaired or replaced.

Practice and Procedure Review Policy

Practices and Procedures will be reviewed at a minimum once a year. They may be reviewed in a number of ways, which could be any or all of the following:

- As a topic for safety meetings, by reading one and discussing to see if it still covers all aspects of the task;
- At any time changes are made to equipment;
- If at any time the material is different; and/or
- At any time to see if they cover any and all new hazards that may arise on the job site.

If changes are necessary to any procedure, the changes are to be given to management and a new one will be written. A record of these reviews will be kept on the review form.

This process will help keep them up to-date and current.

Program Administration Policy

To ensure that the Health and Safety Program is coordinated and effective, Richardson's Bulk Sales Ltd will:

- Communicate the program to employees as it is developed and involve them as much as possible;
- Record and file necessary documents, including the following:
    - Hazard identifications, assessments, ratings, and prioritizations;
    - Employee documents, including:
        - New employee orientations;
        - Performance reviews; and
        - Training records;
    - Safety meetings;
    - Safe Work Permits;
    - Corrective action documentation;
    - Work site inspections;
    - First-aid reports;
    - Incident reports and investigations;
    - Maintenance information;
    - Audits;
    - Contractor documents; and

- Follow up on outstanding corrective action items.

Our goal at Richardson's Bulk Sales Ltd is zero losses, and we believe that an effective Program Administration Policy is necessary to achieve this goal.

All general health and safety documentation will be kept on file for at least three (3) years.

Return to Work (RTW) Policy

Richardson's Bulk Sales Ltd is committed to developing and maintaining a safe and healthy work environment. Richardson's Bulk Sales Ltd will make reasonable efforts to provide suitable alternate work duties to any employee unable to perform their duties as a result of a work-related injury or illness.

The purpose of this Return to Work (RTW) policy is:

- To provide for the reinstatement to work of eligible injured employees;
- To accommodate the work or workplace to the needs of an eligible injured employee to the extent that the accommodation does not cause Richardson's Bulk Sales Ltd undue hardship;
- To provide gainful employment for employees who are permanently disabled due to an injury in the workplace; and
- To restore the employee's ability to perform their pre-injury job.

Richardson's Bulk Sales Ltd's RTW program is based on the following principles:

- Compliance with legislated requirements;
- Providing respect and dignity to injured workers;
- Joint responsibility and development of return to work plans with workers and government organizations;
- A focus on rehabilitation and continuing work relationships; and
- Providing safe, meaningful, and productive work to injured employees according to their ability.

Safety Training and Communication Policy

The purpose of this policy is to ensure that all employees have the safety training required for them to work in a manner that protects their own safety and the safety of others. Richardson's Bulk Sales Ltd will ensure that the following safety training standard is maintained and communicated to all workers:

- Orientations for all newly hired, re-assigned, and transferred employees;
- Job specific training (on-the-job) as required according to the hazard assessments;
- PPE training;
- Hazard assessment and control training;
- Approved First Aid training for the appropriate number of workers as required by legislation;
- Emergency response training according to their responsibilities in an emergency;
- WHMIS and TDG training – as required;
- Defensive Driver training – as required;
- Health and Safety Legislation training;
- Refresher training – at appropriate intervals or as required by legislation;
- Inspection training according to their responsibilities; and
- Auditor Training – as required.

Richardson's Bulk Sales Ltd will hold safety meetings monthly and requires all workers to participate.

Social Hosting Substance Abuse Policy

Richardson's Bulk Sales Ltd is committed to maintaining a safe environment for all workers and the public at large. In some cases, alcohol may be served at Company sponsored social functions in accordance with the conditions of this Social Hosting Substance Abuse Policy.

Workers are expected to act reasonably in their alcohol consumption and must behave responsibly at any function hosted by or on behalf of the Company. This will avoid potential health and safety risks or other accidents. Employees must use reasonable judgment and common sense when hosting clients or sponsoring any Company function.

Where an employee or a Company guest is going to return to a safety sensitive work site, after the social function, alcohol must not be purchased or consumed.

All alcohol consumption should be carefully monitored and managed so that there is no inappropriate behaviour at Richardson's Bulk Sales Ltd sponsored social functions. Effective steps must be taken to ensure the safety of all individuals is protected and that no one drives while impaired after social functions. Where impairment may be a concern, appropriate alternate transportation will be considered.

All social events will be managed in a responsible way so as to avoid potential health and safety risks or other accidents.

Substance Abuse Policy

Richardson's Bulk Sales Ltd is committed to maintaining a safe and healthy work environment for all workers and the public at large. Alcohol and drug abuse creates a safety, health, and security hazard. All workers and management are expected to maintain and promote a safe work environment that is free from drugs and alcohol. This policy is endorsed by the President of Richardson's Bulk Sales Ltd or his or her designate.

Richardson's Bulk Sales Ltd supports a rehabilitative approach to assist workers to meet their job requirements if they declare their substance abuse problem, meet the requirements of our substance abuse program, and seek help. Assistance will be provided to employees who declare an addiction that creates a disability as described under prevailing Human Rights legislation without any resulting discipline.

The possession and/or consumption of alcohol, illicit drugs, and drugs regulated by legislation (marijuana/cannabis), or the misuse of prescription or “over the counter” drugs, is prohibited on Company premises, on all work sites, in any company vehicle or vehicle being used for work, or in any circumstance deemed to present a risk to the public or Richardson's Bulk Sales Ltd’s reputation. Richardson's Bulk Sales Ltd will educate its employees on the actual and potential workplace risks related to the consumption or abuse of alcohol or drugs.

Any use or possession of alcohol, illegal or regulated drugs, or unapproved prescription drugs will be treated as a serious violation of Company safety rules, and will result in immediate disciplinary measures including safe removal from the worksite.

Procedures will be developed to support this policy and guide employees, supervisors, and managers in its implementation.

Violence Prevention in the Workplace Policy

Richardson's Bulk Sales Ltd believes in the prevention of violence and promotes an abuse-free environment in which all people respect one another and work together to achieve common goals. Any threatened, attempted, or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm, including domestic or sexual violence, to any worker or member of the public is strictly prohibited and will not be tolerated.

Richardson's Bulk Sales Ltd is committed to eliminating or, if that is not reasonably practicable, controlling the hazard of violence:

- Ensuring that all workers, when engaged in an occupation, refrain from causing or participating in harassment or violence;
- Developing and maintaining a suitable violence control and prevention program and procedure (see Violence Prevention);
- Investigating any incidents of violence in an objective and timely manner and take corrective actions to address the incidents;
- Taking immediate action to stop any violent behaviour and prevent its recurrence; and
- Providing appropriate protection and support for victims of violence.

No action shall be taken against an individual for making a complaint unless the complaint is made maliciously or without reasonable and probable grounds. Complaints will be treated confidentially according to the procedures established in the Violence in the Workplace Procedure and Richardson's Bulk Sales Ltd will not disclose the circumstances related to an incident of violence or the names of the complainant, the person alleged to have committed the violence, and any witnesses, except:

- Where necessary to investigate the incident or to take corrective action, or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident;
- Where necessary to inform workers of a specific or general threat of violence or potential violence and then only the minimum amount of personal information necessary; or
- As required by law.

This violence prevention policy is not intended to discourage a worker from exercising the worker's rights pursuant to any other law.

The Violence Prevention policies and procedures will be reviewed when an incident occurs, if recommended by the JHSC and/or HSR, or at least annually unless the proscribed frequency is longer.

COVID-19 Management Plan

Purpose

This plan is a COVID-19 Safety Plan or Exposure Control Plan and provides the Richardson's Bulk Sales Ltd policies, guidelines, and procedures to be followed at workplaces under the COVID-19 Management Program and will be used for COVID-19 awareness training in order to mitigate the risk of infection while COVID-19 protocols are in-place. Training will include the limitations of infection control measures.

This program will provide guidance on controlling the spread of COVID-19 and other illnesses that spread through liquid droplets and contaminated surfaces and enter through the eyes, nose, and mouth.

Richardson's Bulk Sales Ltd has appointed an infection prevention and control coordinator and provided the coordinator with the training, resources, and support necessary to enable the co-ordinator to implement the plan. Employees have been provided with the name of the coordinator and how he or she can be contacted.

Scope

This procedure will be applied at all Richardson's Bulk Sales Ltd work sites and client work sites. Worksite specific procedures will be developed based on this management plan in consultation with affected workers, health and safety representatives and the worksite health sand safety committee as the case may be. This plan only applies to those jurisdictions where Richardson's Bulk Sales Ltd facilities are permitted to operate or reopen under the prevailing provincial, regional and municipal COVID-19 special measures, laws and orders. Public health measures may be enacted and withdrawn on short notice during the pandemic and these measures may vary regionally, municipally, or by business sector within a province. Richardson's Bulk Sales Ltd will follow all regional and business sector public health and emergency authority requirements and guidance.

There are COVID-19 health measure related restrictions in-place in Alberta. The easing of these restrictions are outlined in Alberta Government "Path Forward" roadmap that includes Steps 1 to 4 based on hospitalization and other criteria. Restrictions vary from most restrictive in Step 1 to least restrictive in Step 4. This process and which step the province is currently on can be found at: https://www.alberta.ca/enhanced-public-health-measures.aspx.

Working from home is mandatory unless Richardson's Bulk Sales Ltd requires the employee's physical presence to operate effectively. Richardson's Bulk Sales Ltd will verify the restrictions that apply to the business and any regional differences that may exist for locations where work occurs.

Richardson's Bulk Sales Ltd will follow all of the Alberta government sector guidance that apply to its operations found at: https://www.alberta.ca/guidance-documents.aspx.

Procedures

Background

Coronavirus

- Coronaviruses are a large family of viruses.
- Some coronaviruses cause respiratory illness in people, ranging from common colds to severe pneumonias. Others cause illness in animals only.
- Rarely, animal coronaviruses can infect people, and more rarely, these can spread from person to person through close contact.
- COVID-19 is the disease caused by a new strain of a coronavirus that had not been previously identified in humans.

Symptoms of COVID-19

- Many symptoms for COVID-19 are similar to those for influenza or other respiratory illnesses. The most common symptoms may include fever, sore throat, new and worsening cough and shortness of breath
- Other symptoms may include: difficulty swallowing, runny nose, nasal congestion, new olfactory or taste disorders, nausea/vomiting, diarrhea, abdominal pain, or difficulty breathing, chills, headache, muscle or joint aches, feeling unwell or fatigue, unexplained loss of appetite and conjunctivitis (pink eye).
- Other atypical symptoms may be found in children, older persons, and people living with a developmental disability.
- As research on this new disease progresses additional symptoms or syndromes are being identified. Consult your public health authority for the latest list of typical and atypical symptoms.
- Some people may have little to no symptoms or the symptoms may be so mild that they go unreported.
- Older persons and persons with pre-existing medical conditions (such as compromised immune systems, high blood pressure, heart disease, lung disease, cancer, or diabetes) appear to develop serious illness more often than others.
- Symptoms may take up to 14 days to appear after exposure to COVID-19.
- It appears that the virus can be transmitted to others from someone who is infected but not showing symptoms. This includes people who:
    - Have not yet developed symptoms (pre-symptomatic), and
    - Never develop symptoms (asymptomatic).

Spread of COVID-19

Human coronaviruses are believed to be most commonly spread from an infected person through:

- Respiratory droplets generated when you talk, cough, or sneeze and in particular when indoors and/or in crowds;
- Close, prolonged personal contact, such as touching or shaking hands; and
- Touching something with the virus on it, then touching your mouth, nose or eyes before washing your hands.

1.0 Hazard Assessment

For all new tasks or changes to work processes Richardson's Bulk Sales Ltd will conduct a systematic hazard and risk assessment to identify the COVID-19 related hazards that exist in the workplace, and how they may put workers, contractors, clients, the public, and any other persons at risk. A COVID-19 Hazard Assessment Tool has been established to determine the COVID-19 risks commonly associated with planned tasks and activities and the controls that are required to mitigate these risks. This hazard assessment will be used to determine the COVID-19 controls that will be established to protect all persons from Richardson's Bulk Sales Ltd work related activities. All hazard assessments and safety planning that are carried out in the course of Richardson's Bulk Sales Ltd's activities will incorporate COVID-19 transmission and prevention as a hazard to be evaluated and controlled.

2.0 Training and Communication Program

Richardson's Bulk Sales Ltd will provide communication to employees on the procedures being taken by the workplace to prevent the risk of transmission of infection, and the importance of their roles in these measures. These procedures will include:

- How to mitigate risks when commuting to and from work;

- How to mitigate risks of transmission in homes and shared living accommodations;
- How to mitigate risks when engaging in other activities outside of work;
- How to mitigate risks when conducting work at work sites and company facilities; and
- How to help prevent the spread of COVID-19.

For hazard and risk assessment and control the Richardson's Bulk Sales Ltd COVID-19 Hazard Assessment Tool will be reviewed and referred to.

Training will include a review of this Plan and the COVID-19 Hazard Assessment.

3.0 Prevention

3.1 Screening Process

- Richardson's Bulk Sales Ltd will implement screening of all staff for the symptoms of COVID-19 including fever, sore throat, cough, runny nose, difficulty breathing, and all other symptoms cited in the Richardson's Bulk Sales Ltd COVID-19 Self-Assessment Screening Form.
- All employees will be required to complete the Richardson's Bulk Sales Ltd online COVID-19 Self-Assessment Screening Form.
- Having followed the screening process, employees must confirm that they have not been instructed to take any additional measures after completing the self assessment., Additional measures would include being instructed to be tested, to call the provincial health services number for a consultation, to report for a medical assessment or treatment, to self-isolate, etc.

- Temperature screening of workers prior to their starting a work shift will be undertaken when practicable. Screening may include using a touch-free thermometer to check for fever (temperatures in excess of 38° C). Symptoms will be reviewed with employees, as requested.
- Any person who exhibits any symptoms whether self-declared or observed, or who answers yes to any question on the Richardson's Bulk Sales Ltd COVID-19 Self-Assessment Screening Form must not report to work and must advise their Supervisor and/or the Coordinator. Employees who become symptomatic at work will be safely isolated and sent home according to section 4.0 of this plan.

3.2 Hygiene

Richardson's Bulk Sales Ltd will:

- Instruct employees on how to wash their hands effectively for 20 seconds or more with water, soap, or use sanitizers if water and soap are not available or practical under the circumstances;
- Facilitate frequent and effective hand washing by all persons at the worksite;
- Provide a means to sanitize hands with an approved hand sanitizer (min. 60% alcohol) at points of entry and exit to worksites and facilities and at other high touch locations;
- Instruct and require all workers to exercise proper respiratory etiquette (e.g., coughing or sneezing into a bent elbow, promptly disposing of used tissues in the trash) and ensure that these instructions are followed;
- Instruct and require all workers to make every effort not to touch any part of their face (in particular, eyes, nose, and mouth) as a general rule and to avoid touching any surface or item unless they have washed or sanitized their hands or are wearing fresh or clean gloves;

- Use posters that remind employees and all other persons at worksites to practice respiratory etiquette, proper hygiene, and hand washing/sanitizing. These will be posted in all work areas where they can be easily seen (e.g., entrances, washrooms, and lunchrooms);
- Require workers to wash their hands or use a Health Canada approved hand sanitizer when entering and leaving worksites, lunch rooms, offices, shops, and any other new location;
- Instruct workers on how to safely put on, take off and dispose of PPE that must be presumed to be contaminated; and
- Place additional garbage bins with removable linings at all entrances and exits to workplaces for the disposal of tissues, PPE, and other soiled articles. Garbage bins will be checked and emptied regularly.

3.3 Cleaning and Disinfecting

Surfaces, Tools, and Equipment

- Those responsible for cleaning and disinfecting will be trained in the proper handling and use of cleaning products and they will have appropriate personal protection equipment, such as gloves, for use while cleaning.
- Use a “wipe-twice” method to clean and disinfect. Wipe surfaces with a cleaning agent to clean off soil and wipe again with a disinfectant. Follow the manufacturer's instructions.
- Twice daily cleaning and disinfecting of high traffic areas, common areas, and washrooms will be conducted. The cleaning and disinfecting schedule will be determined based on frequency of exposure and level of risk.
- Hygiene standards to prevent transmission of COVID-19 will be enforced for all vehicles used to transport workers.
-

Cleaning and disinfecting high touch/shared surfaces at worksites and in vehicles will be conducted. High touch/shared surfaces include, but are not limited to:

- Door handles;
- Light switches;
- Shared vehicle and mobile equipment door handles, steering wheels and levers, seat belt buckles, seats, latches and hinges, inspection surfaces, fluid level sticks etc.;
- Clean the cabs of trucks and mobile equipment frequently and remove all garbage and litter and dispose of it immediately;
- Tools, portable ladders, and operating surfaces and controls on equipment and machinery;
- Valve operators, faucets and taps;
- Push buttons, switches and other hand activated controls and relays;
- Handrails and fixed ladder grips;
- Credit card machines and point of sale stations;
- Vending machines, water coolers, etc.;
- All other shared equipment; and
- Surfaces such as chairs, tabletops and countertops in lunchrooms, meeting rooms, and offices.

- Workers will be trained to disinfect their own work areas, high touch/shared surfaces, and shared equipment. This should include but is not limited to:
  - Handheld communication devices such as radios and phones (mobile and stationary);
  - Keyboards and mouse;

- Desks;
- Headsets;
- Test equipment; and
- Shared work accessories and equipment are discouraged (pens, telephones, tablets, mouse etc.) and where required must be cleaned after each.

- Use the event type: COVID-19 Workplace Inspection online checklist to confirm and record that controls have been implemented.

Other Cleaning Requirements

These guidelines will apply where Richardson's Bulk Sales Ltd has high occupancy projects or work activities in a discrete location where access and egress can be controlled. Examples of such work include construction sites and construction or maintenance activities within facilities.

- Plastic or other impervious trash bags will be located inside high occupancy work areas where disposable PPE must be removed and replaced for any reason. These bags will be clearly marked as “Contaminated for Disposal Only”.
- Lined refuse bins will also be located outside of high occupancy work areas where used and contaminated PPE, clothing, and materials must be removed so as not to spread any potentially contaminated items. These bags used as liners will be clearly marked as “Contaminated for Disposal Only” and will be sealed or tied up once used.
- Storage bags or containers must be available for items that must be cleaned after maintenance, repair, or construction activities have been undertaken at a worksite or at the end of a work shift. These items would include tools, reusable PPE, and other items. These containers or bags will be sealed effectively with tape or equivalent and marked “Contaminated, to be Cleaned Before Use”.

- Large contaminated items (e.g. ladders) are to be wiped down with approved disposable wipes or sprayed with an approved cleaner and wiped down before they can be used or re-used and must be segregated and clearly marked as “Contaminated, to be Cleaned Before Use”.
- Workers will be advised to change work clothes in the same location each day when they return home, to avoid contamination with other articles of clothing or furniture, and launder them separately.

3.4 Cleaning and Disinfecting Products

- Regular household cleaning and disinfecting products are effective against the coronavirus that causes COVID-19 when used according to the directions on the label.
- Use a disinfectant that has a Drug Identification Number (DIN) and a virucidal claim (efficacy against viruses).
- Alternatively, use a bleach-water solution with 5 ml of bleach diluted to 250 ml with water (50:1 dilution, based on starting with a 5% sodium hypochlorite bleach solution). Ensure a contact time of one minute and discard leftover solution at the end of the day.
- Mix bleach in a well-ventilated area and follow all special instructions. Do not dispense, dilute or clean with bleach unless you have been trained to do so and have reviewed the SDS.
- Health Canada has approved several hard-surface disinfectants and hand sanitizers at: https://www.canada.ca/en/health-canada/services/drugs-health-products/disinfectants/covid-19/list.html for use against the coronavirus that causes COVID-19. The lists are updated frequently and should be checked regularly. Use these lists to look up the DIN number of the product you are using or to find an approved product.
- Make sure to follow instructions on the product label to disinfect effectively.
- Disposable towels and spray cleaners, or disposable wipes, will be available to workers and others (as necessary) to regularly clean commonly used surfaces.

3.5 Physical Distancing and Related Requirements

Richardson's Bulk Sales Ltd will follow all federal, provincial, territorial and municipal emergency measures related to workplace COVID-19 restrictions and guidelines that are in-place and required by legislation, orders and laws. Richardson's Bulk Sales Ltd will verify when and where it is subject to these orders and will follow the guidelines in section 3.7 of this plan.

The requirements in this section only apply when Richardson's Bulk Sales Ltd is permitted to operate under the prevailing public health measures. These measures may change rapidly from day to day and from region to region. Richardson's Bulk Sales Ltd and employees will abide by all COVID-19 public health orders and laws as outlined in the Scope section of this document.

Richardson's Bulk Sales Ltd will:

- Ensure that workers are instructed to maintain physical distancing, as identified in the risk assessment.
- Where social distancing is not practicable, and is permitted, additional controls should be implemented (e.g. barriers, procedures, PPE) according to the Hazard and Risk Assessment.
- Wherever possible keep work groups together and document the work groups to ensure that contacts can be readily traced in the case of infected workers.
- Identify all common areas and rooms where people gather and there is a risk not maintaining physical distancing;
- Ensure that, where practicable, the number of occupants of rooms and workspaces are restricted to a capacity that will allow for a minimum of 2 metre spacing between workers at all times;
- Remove excess tables, chairs, stools, and workstations or mark them as unavailable for use, in shared spaces;
- Post all physical distancing related rules and controls to be used in common areas and rooms at the entrance to these areas;

- Post external signs visible prior to the entry to workplaces indicating the COVID-19 physical distancing protocols that are being used;
- Post an external COVID-19 screening tool sign at facility entry points to restrict the entry any of symptomatic or exposed persons;
- Ensure that no more than one person is allowed in small areas where 2 metre distancing is not achievable such as:
    - Mechanical or electrical rooms;
    - Tunnels and excavations;
    - Equipment servicing locations;
    - Storage rooms; and
    - Washrooms;

  Unless additional control measures are taken according to a hazard and risk assessment.
- Install signage and ground line spacing markings where practicable to communicate the 2 metres distancing requirements;
- Train staff on the site specific physical distancing protocols to be followed;
- Minimize or eliminate handling high touch items unless sanitized after each use and hands are washed (keys, access cards, documents, etc.); and
- Maintain worker information such as work location, crew assigned to, days at work, so that contact tracing can be performed if required to inform others or requested by a health authority.

3.6 Other Control Measures

To reduce the risk of infection and exposure to workers and any other persons on a Richardson's Bulk Sales Ltd owned or operated site, the following additional controls measures will be taken when

practicable and according to the results of the hazard and risk assessment:

- The virus that causes COVID-19 is known to spread through respiratory droplets and aerosols. Every reasonable effort should be made to control this hazard where employees are working indoors or in close proximity.
- Follow Government of Canada Covid-19:Guidance on indoor ventilation during the pandemic found at: https://www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection/guidance-documents/guide-indoor-ventilation-covid-19-pandemic.html.
- Limiting unnecessary traffic through spaces;
- Ensuring adequate building ventilation airflow rates or increase the rates for makeup, air, supply air, and exhaust systems. Increase the outside air fraction where possible. Higher outside air fractions and higher air exchange rates in buildings may help to dilute the indoor contaminants;
- Maintaining humidity levels that can play a role in the survival of membrane-bound viruses, such as COVID-19. Maintaining a relative humidity between 40-60% indoors may help limit the spread;
- Replacing all air filters frequently that are intended for occupants of vehicles and mobile equipment;
- Leaving all interior offices and doors open, where it is safe to do so and does not introduce additional risk or hazards;
- Placing cleaning and disinfection supply stations at the entrance to offices, shops, and washrooms;
- Controlling traffic movement (e.g. one-way traffic) to allow adequate spacing at worksites where practicable; and
- Providing signage and posters on hygiene, COVID-19 symptoms, safety protocols in-place and emergency medical response procedures.

3.7 Hazard Controls and PPE

When hazards related to COVID-19 cannot be eliminated, Richardson's Bulk Sales Ltd will consider the hierarchy of controls to ensure the risk is reduced to as low are reasonably practicable. This will include elimination and substitution, engineering, administrative, and use of personal protective equipment (PPE). Higher level controls are preferred where appropriate. These controls will be established based on the hazard and risk assessment for each task, refer to the COVID-19 Hazard Assessment Tool. See examples below:

1. First Level Protection- Elimination or Substitution

   Isolate ill or symptomatic workers away from the workplace. Limit the number of people in the workplace at any one time, and implement protocols to keep workers at least 2 metres from other workers and any other person.

2. Second Level Protection - Engineering Controls

   Install barriers such as plexiglass. Ventilation and humidity control.

3. Third Level Protection - Administrative Controls

   Establish rules and guidelines, such as cleaning and disinfecting procedures or organizing traffic flow to prevent close encounters.

4. Fourth Level Protection - PPE

   If the first three levels do not sufficiently reduce the risks in all circumstances then workers should be supplied with personal protective equipment (PPE), such as non-medical masks when the hazard assessment warrants the use of PPE.

   - PPE is necessary when physical distancing of 2 metres or physical barriers cannot be maintained by administrative and engineering controls.

- PPE controls the hazard at the worker level and should not normally be used as the primary control method.
- Types of PPE that may be required, depending upon the nature of the work and the hazard and risk assessment include:
  - Gloves;
  - Eye and face protection (face shields, goggles, safety glasses);
  - Disposable coveralls;
  - NIOSH-N95 disposable respirators or equivalent where the procedure or work may aerosolize large respiratory droplets as determined by a hazard assessment;
  - Half mask reusable respirators with P-100 combination cartridges where chemicals or vapours are present; and
  - Non-medical surgical type masks or cloth masks for general protection as needed.

Refer to the COVID-19 Hazard Assessment Tool for the control measures to use.

Richardson's Bulk Sales Ltd should have a COVID-19 rapid response kit which will include but is not limited to:

- Non-medical face masks;
- Gloves;
- Hand sanitizer;
- Tissues; and
- Plastic garbage bag.

Use, Cleaning, and Storage of PPE

- PPE should be stored, used, and maintained as per the manufacturer's instruction.

- Respirators (e.g. N95 masks) are required when the nature of the work, environment and exposure might cause large droplets containing COVID-19 to be aerosolized into tiny airborne particles.
- Surgical, non-surgical, and other non-NIOSH cloth face masks and eye protection such as goggles and face shields may be required to protect others in larger gatherings indoors where there is a risk of coming within 2 metres of other persons.
- PPE should be discarded in a lined garbage bag after use.
- PPE, such as eye protection, may be reused by the same user, only if the manufacturer allows it.
- Cleaning and disinfecting must be conducted after reusable PPE use as per the manufacturer's instructions.
- If re-using PPE ensure to clearly mark the user's name and store separately from all other PPE, after cleaning and disinfecting.
- All considerations for fitting, use, care, selection, storage, and maintenance of PPE must be followed according to the Richardson's Bulk Sales Ltd Respiratory Protective Equipment Code of Practice, PPE Safe Work Practice, and OEM instructions.

Supply of Worksite PPE and Related Hygiene Materials

1. Richardson's Bulk Sales Ltd procurement manager or equivalent will obtain an estimate of the PPE and materials required from the respective supervisors using the COVID-19 PPE and Related Hygiene Materials Form.
2. PPE and materials will be identified on the form and any specialized material will be noted.
3. Each supervisor will indicate the number of people who will be working under them for the period in question or for the project.

4. The supervisors will add an uncertainty contingency to the quantities depending upon the nature and definition of the work.
5. The procurement manager will establish the inventory level to be maintained as either sufficient for the entire period or for a single work shift plus contingency.
6. The source of the materials will be confirmed as company in-stock or supplier stock.
7. Suppliers and one alternate supplier will be contacted to confirm forecast availability of materials. Where materials are forecast to be out of stock they will be confirmed as pre-purchased prior to the period or beginning the project.
8. The delivery method will be confirmed for the worksite(s) including any potential barriers to delivery such as quarantine or other disruption. Alternative delivery methods will be identified.
9. All of the above information will be included on the COVID-19 PPE and Related Hygiene Materials Form and signed off by the procurement manager prior to beginning the work.

Mask or Face Covering Orders and By-Laws

- These general guidelines are for establishments in municipalities, regions, or provinces that have mandatory mask or face covering requirements for indoor public spaces, public transportation, workplaces, or other indoor places.
- Richardson's Bulk Sales Ltd will ensure that these orders and by-laws are followed in their facilities and while employees are conducting work or travelling in public places or other locations requiring masks while on company business.
- To ensure compliance Richardson's Bulk Sales Ltd will consult the by-law to ensure compliance.
- Where such laws are in-place, Richardson's Bulk Sales Ltd will:
    - Review the by-law to ensure compliance;
    - Create a mask policy for the establishment;

- Communicate this policy to staff, visitors and customers;
- Train staff on the policy and who is exempt; and
- Post signs at all entrances.

- Proper use of a mask or face covering:
  - Do not share your mask with others;
  - Wash your hands before putting on and after taking off a mask;
  - Place the mask over your nose, mouth, and chin;
  - Avoid touching your face and mask while using it;
  - Change your mask as soon as it is moist or dirty;
  - Do not leave your mask tucked under the chin, hanging from your ear, or on your forehead;
  - Remove the mask by the ear loops without touching the front of the mask;
  - Put used mask in a plastic bag or directly in the laundry bin to be washed;
  - Launder cloth masks with other items using the hot cycle and dryer; and
  - Follow all manufacturer recommendations for the use and care of purchased masks including disposable non-medical masks.

4.0 COVID-19 Symptomatic, Infected, and Exposed Workers

- Richardson's Bulk Sales Ltd requires all workers to complete the COVID-19 Pre-Screen Self-Assessment tool.
- Any worker who has travelled, had an exposure or has any symptom identified in the COVID-19 Pre-Screen Self-Assessment tool (that is not related to a pre-existing illness or health condition) must not report to work, self-isolate, and contact the Richardson's Bulk Sales Ltd COVID-19 Coordinator or designate. In addition, they should complete the approved provincial on-line self-assessment or equivalent, follow the directions that they receive and call a provincial health advisor who can instruct them accordingly.
- Self-isolation, testing, or medical treatment may be required according to the directions obtained from provincial public health services. The "How to Isolate" requirements in this plan must be followed as a minimum regardless of whether or not the individual has been tested for COVID-19.
- Following a pandemic event, the Richardson's Bulk Sales Ltd person responsible for implementation of the plan should identify learning opportunities and take action to implement any corrective actions.
- If an employee, visitor or patron does come to the workplace with symptoms, or becomes symptomatic while at work, the following response plan requirements apply:
    - Any person who appears to have any of the symptoms cited for COVID-19 upon arrival at the workplace, or becomes symptomatic while at the workplace, will be asked to wash and sanitize their hands, issued a mask and gloves and isolated in a safe location at work. Symptomatic employees or visitors must remove themselves as instructed and begin isolation at home immediately;
    - After being directed to leave the work site, symptomatic employees should consult public health services at 811 and self isolate according to the instructions that they receive;
    - Symptomatic or exposed employees may be directed by the health authority to complete an on-line provincial self-assessment tool (or equivalent) in order to assist in determining next steps;

- Public transportation is not to be used;
- Arrangements will be made by Richardson's Bulk Sales Ltd for safe physically distanced transport of the symptomatic employee or visitor home as needed;
- Once a symptomatic person has left the workplace, clean and disinfect all surfaces and areas with which they may have come into contact with;
- The Alberta Daily Health Checklist may be found at: https://open.alberta.ca/publications/covid-19-information-alberta-health-daily-checklist. All requirements including isolation must be followed according to the directions contained in the self assessment;
- Where using a rapid COVID-19 test Richardson's Bulk Sales Ltd will abide by all of the conditions associated with this testing as outlined in the Alberta guidance document "Industry-initiated COVID-19 testing", found at: https://www.alberta.ca/guidance-documents.aspx;
- Richardson's Bulk Sales Ltd will record the names of employees on shift;
- Records should be kept for 4 weeks. Richardson's Bulk Sales Ltd will make reasonable security arrangements to protect the personal information;
- All symptomatic workers must be reported to the COVID-19 Coordinator or designate. Clear to Work lists will be updated accordingly;
- If a truck or delivery driver or other person from the U.S. or another country is symptomatic at a Richardson's Bulk Sales Ltd worksite, they will be instructed to contact the Canada Border Services Agency (CBSA) at 1-800-461-9999 for where to report to and to receive quarantine instructions; and
- Always call 911 for any medical emergency and instruct the dispatcher if COVID-19 is possible or suspected.

4.1 Isolation

When to Isolate

If required to isolate according to the results of a self assessment, being symptomatic, testing positive for COVID-19, having exposure and/or returning from travel, you should confirm your specific requirements with provincial health services. There are federal, provincial and territorial legal requirements to isolate that are subject to change and could be specific to your location depending upon outbreak circumstances.

You may be directed not to come to work and asked to isolate by the Richardson's Bulk Sales Ltd COVID-19 Coordinator or a designate while your situation is being evaluated, even if you do not seem to strictly fit into an isolation category.

If you determine that you fit the criteria for mandatory isolation, advise your Richardson's Bulk Sales Ltd COVID-19 Coordinator or supervisor immediately and do not report to or stay at work. You will not be permitted to return to work until the coordinator can confirm that it is safe and legal for you to do so.

Mandatory Isolation Guide

Richardson's Bulk Sales Ltd will require employees to follow this isolation procedure as a minimum unless the local, provincial, territorial or federal requirements are stricter. Many of these isolation requirements are legally required under quarantine laws and orders. You can confirm your legal and recommended requirements by calling the appropriate provincial health services number cited below, however you will not be permitted back to work unless Richardson's Bulk Sales Ltd verifies that you meet the required criteria.

1. Employees with Symptoms

   You are required to isolate for a minimum of 10 days if you have a cough, fever, shortness of breath, runny nose, or sore throat that is not related to a pre-existing illness or health condition.

The mandatory isolation period is from the start of symptoms, or until symptoms resolve, whichever takes longer.

2. Tested Positive for COVID-19

   You are required to isolate for a minimum of 5 days for fully vaccinated person and for an unvaccinated person 10 days if you have tested positive for COVID-19.

   The isolation period is from the start of symptoms, or until symptoms resolve, whichever takes longer.

3. Have Symptoms but Tested Negative for COVID-19

   If you tested negative and have known exposure to COVID-19, you are required to isolate for 14 days.

   If you tested negative and have no known exposure to the virus, you are not required to isolate. However, you must stay home until your symptoms resolve so that you do not infect others.

4. Close Contacts of Confirmed Cases

   It is no longer a requirement for close contacts to quarantine for 14 days.

5. Provincial Travellers

   Whether you drive or fly, if you travel within Canada, without having been out of the country, there are no federal travel requirements to isolate or quarantine.

6. International Travellers

Canadian citizens (including dual citizens), people registered under the Indian Act, permanent residents of Canada, or protected persons (refugee status) are allowed to enter Canada however if you are symptomatic or have tested positive to COVID-19 there may be some restrictions. For more information visit the Government of Canada website.

Fully vaccinated foreign nationals may be allowed to enter Canada for discretionary (tourism) travel. Foreign nationals who don't qualify as fully vaccinated will only be allowed to enter in specific circumstances.

As a traveller, you must demonstrate that you have a suitable plan for quarantine. You're expected to make these plans, within your own means, before travelling to Canada.

Foreign nationals who do not have a suitable plan may be denied entry into Canada.

As part of your quarantine plan travellers will need to confirm you have a suitable place to quarantine where you:

1.
   - Stay for 14 days or possibly longer;
   - Have access to the necessities of life, including water, food, medication and heat without leaving quarantine;
   - Can avoid contact with others who did not travel with you; and
   - Have no visits from family or guests.

International exemptions from quarantine

Exemption from the mandatory quarantine requirements under certain conditions, including if you:

1.
   - Qualify as a fully vaccinated traveller;
   - Provide essential services;
   - Maintain the flow of essential goods or people;
   - Are receiving medical care within 36 hours of entering Canada (non-related to COVID-19);
   - Regularly cross the border to work (pattern of travel which is generally defined as daily or weekly); and
   - Live in an integrated trans-border community.

Find out if your travel is exempt

How to Isolate

Follow all Provincial health orders pertaining to isolation requirements. If you are in mandatory isolation under Federal guidelines such as after international travel:

- Stay home – do not leave your home or attend work, school, social events, or any other public gatherings;
- Avoid close contact with people in your household, especially seniors and people with chronic conditions or compromised immune systems;
- You are prohibited from taking public transportation like buses, taxis, or ride-sharing;
- Do not go outside for a walk through your neighbourhood or park. This includes children in mandatory isolation;
- You can get fresh air in your backyard, if you have one, but you must remain on private property not accessible by others;
- If you live in an apartment building or high-rise, you should stay inside. If your balcony is private and at least 2 metres away from your closest neighbors, you may go outside on the balcony; and
- These instructions are consistent with new federal requirements under the Quarantine Act.

4.2 Tracking Procedure

- Employees who have received a positive test result must provide it to the coordinator to establish start dates for isolation.
- Employees must provide an update to the coordinator of their status during isolation.
- Existing procedures will be used to ensure that the locations of workers and visitors, who they worked with, and who they were in contact with are retained to assist public health authorities should they need to perform contact tracing.

References

- Government of Canada, Coronovirus disease (COVID-19). https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19.html
- Centers for Disease Control and Prevention, Coronovirus (COVID-19). https://www.cdc.gov/coronavirus/2019-nCoV/index.html
- Government of Alberta – COVID-19 info for Albertans.https://www.alberta.ca/coronavirus-info-for-albertans.aspx
- Alberta Biz Connect (workplace guidance). https://www.alberta.ca/biz-connect.aspx

Worker Responsibilities to Reducing COVID-19 Risks

The **Managers and Supervisors** of Richardson's Bulk Sales Ltd are responsible for preventing the risk of transmission of infection amongst workers, volunteers, or (as applicable) patrons in the following ways:

- Knowledge:
  - Developing and implementing a COVID-19 Management Plan;
  - Encouraging workers and volunteers to remain up to date with developments related to COVID-19; and
  - Posting COVID-19 information in areas where workers, volunteers, and patrons can refer to them.
- Actions:
  - Ensuring that the hazard assessment to reduce the spread of COVID-19 is completed and communicated to all workers;
  - Implementing a COVID-19 pre-screening process to eliminate potential of symptomatic or exposed worker coming to work;
  - Ensuring 2 metre social distancing requirements are in place; and
  - Provide for rapid response if a worker, volunteer, or member of the public develops symptoms of illness while at the place of business.
- Communication:
  - Communicating and training staff on the risk of COVID-19 and the controls to reduce the risk implemented by the Company.

- Supervising:
  - Ensuring that controls to reduce risk of COVID-19 are implemented by all staff;
  - Maintaining high levels of hygiene (e.g. increased cleaning and sanitation of all areas, especially high touch areas); and
  - Preparing for increases in absenteeism due to illness among worker, volunteers, and their families.

Workers/Staff employed by Richardson's Bulk Sales Ltd are responsible for preventing the risk of transmission of infection in the following ways:

- Knowledge:
  - Reviewing Richardson's Bulk Sales Ltd hazard assessment to minimize COVID-19, and
  - Reading and acknowledging all COVID-19 policy and procedures.
- Actions:
  - Completing the online pre-screening self-assessment to declare that they are fit for duty;
  - Ensuring that required COVID-19 training is completed, as per Richardson's Bulk Sales Ltd requirements;
  - Sanitizing hands prior to entering the workplace;
  - Wearing appropriate PPE, as specified by Richardson's Bulk Sales Ltd;
  - Following Richardson's Bulk Sales Ltd procedures and controls as per the hazard assessment to minimize COVID-19 risks;
  - Ensuring that hand hygiene and sanitization occurs on a regular basis, before and after contact with patrons or visitors;

- Cleaning and sanitizing work areas and other high touch areas on a regular basis;
- Maintaining 2 metre social distancing, as per Richardson's Bulk Sales Ltd procedure; and
- Use the event type: COVID-19 Workplace Inspection online checklist to confirm and record that controls have been implemented.

- Communication:
  - Notifying your Manager or Supervisor immediately, self-isolate, and do not come into work, if symptomatic or exposed to COVID-19, and
  - Correct (if safe to do so) and report unsafe acts or unsafe work areas to the Supervisor or Manager immediately.

Communication – Safety Meetings

1.0 Continuous Improvement

Continuous improvement and communication are key components of an effective health and safety management system.

Richardson's Bulk Sales Ltd safety meetings are one of the most effective means of keeping safety in the forefront of everyone's minds. Effective, open, regular, two-way communication about health and safety issues is a critical component in preventing injuries and illnesses in the workplace. Contractors and all other work site parties should be included in safety meetings and all other two-way communication opportunities.

Continuous improvement of our health and safety system requires establishing health and safety goals, measuring our performance in achieving these goals using safety statistics and to determine how we can improve upon our results. We must communicate our goals and objectives, the results obtained and the actions that we will take in order to allow all employees to contribute to the continuous improvement process.

All safety meetings will be documented, signed, and filed.

Richardson's Bulk Sales Ltd will employ the following types of safety meetings in the health and safety program.

2.0 Conducting Safety Meetings

The following are some suggestions to ensure an effective meeting:

- Meetings must not be open-ended complaint sessions. The person running the meeting must keep on topic and maintain the standard structure;
- The presenter must be well prepared. Preparation for the meeting should begin prior to the morning of the meeting;

- Use Company health and safety committee members or representatives to assist in researching the topic, if necessary;
- Allow for a few minutes of discussion on the topic and the review of safety incidents and any other safety issues or concerns. Take note of any unanswered questions or action items. Get back promptly to the attendees with answers and proposed corrective actions; and
- Have everyone sign an attendance sheet, which documents the date, presenter, and subject of the meeting. A generic safety meeting form has been supplied in this manual.

3.0 Pre-Job Safety Meetings

At active worksites it may be appropriate to start every day or work shift with a meeting to discuss the day's activities and the hazards that might be encountered. Richardson's Bulk Sales Ltd will hold pre-job safety meetings where Safe Work Permits are a requirement or when work conditions or locations have changed.

Site contractors and all other work site parties should be included in the pre-job safety meetings. Depending on the scope of the contractor duties, they may also be required to conduct regular safety meetings separate from Company safety meetings.

All pre-job meetings will be recorded, signed by all attendees, and filed.

4.0 Other Safety Meetings

4.1 Monthly or Periodic Safety Meetings

Monthly or other periodic safety meetings are generally held with all employees and contractors for a department, project, or work site location to discuss overall safety concerns, changing conditions, policy changes, new procedures, and training needs.

These meetings will typically include one or more of the following features:

- Previous meeting minutes, key decisions, and follow-up actions;
- Continuing concerns;
- Recent incidents, incident investigations, and near misses;
- Upcoming training and suggestions for new training;
- New equipment, practices, procedures, or processes;
- Guest speakers, often senior management;
- Training videos or handouts; and
- Open discussion and suggestions.

Meeting minutes will be documented, filed, and posted.

Critical action items resulting from safety meetings will be prioritized for implementation and added to the Corrective Action Register for future action.

4.2 Joint Health and Safety Committee (JHSC) Meetings

The requirements for committee safety meetings are discussed in the Joint Health and Safety Committees procedure. The JHSC will review the minutes of all other safety meetings that have been conducted and will also follow the general requirements of Richardson's Bulk Sales Ltd monthly safety meeting. Minutes of JHSC minutes must be posted or provided electronically within seven days after the meeting was held.

4.3 Health and Safety Representative (HSR) Safety Meetings

Where a HSR exists or is required, Richardson's Bulk Sales Ltd will meet regularly with the HSR to discuss health and safety matters. The HSR will review the minutes of all other safety meetings that

have been conducted at his or her work location. A HSR may call a special meeting with Richardson's Bulk Sales Ltd to deal with urgent concerns at the work site.

4.4 Reporting of Concerns to the JHSC or HSR

- Employees may report a health and safety concern directly to a JHSC member or the HSR as the case may be.
- The employee's concern will be kept confidential if they so desire unless prevented by law or if doing so may cause more harm to any other person than maintaining confidentiality.
- The employee's concern will be addressed at the next scheduled meeting or will be investigated immediately with an area supervisor if the concern poses an immediate hazard to any person.
- The employee will be informed of the resolution process to be used and will receive a report of the investigation and the reason for any actions taken or not taken.
- The employee may present their concern to the JHSC or HSR if they chose to do so.
- Richardson's Bulk Sales Ltd will not retaliate or discriminate against any employee to raises a concern in good faith.

5.0 Corrective Action

Safety meetings may generate safety items for immediate action, work orders, and/or Corrective Action Register items. In order to ensure timely completion of these action items, Richardson's Bulk Sales Ltd in consultation with the JHSC or HSR will appoint a key person to oversee follow-up activities.

All safety items requiring attention should be entered and tracked on the Corrective Action Register. Richardson's Bulk Sales Ltd and the JHSC or HSR as applicable will review the corrective action items when they meet and at a minimum quarterly. Corrective Actions undertaken as part of a provincially required reportable incident investigation will need to be reported according to the Incident Reporting and Investigation section of this Manual.

6.0 Safety Reporting

6.1 Safety Statistics

Richardson's Bulk Sales Ltd believes in measuring and analyzing safety performance results in order to evaluate performance against goals and objectives and as part of a continuous improvement program.

On a quarterly basis, the following items will be reported for that quarter and compiled on a year-to-date basis. Statistics may be broken out by operating areas and summarized for the overall company. These include:

- Average number of people in the workforce;
- Hours worked;
- Number of First Aids (FA) reported;
- Number of Medical Aids (MA) reported (defined as a worker having to report to a medical centre – clinic or hospital);
- Number of modified work cases (restricted duty) reported;
- Total days of modified work performed in the month;
- Number of Lost Time Accidents (LTA) reported;
- Total number of days lost due to lost time accidents, including days lost by individuals injured in previous months;
- Frequencies, calculated on the basis of events per 200,000 hours worked, will be calculated for FAs, MAs, and LTAs, as well as the total FA + MA + LTA; and
- Severity, calculated on the basis of days lost per 200,000 hours worked.

6.2 Safety Activity Summaries

The safety activities undertaken by Richardson's Bulk Sales Ltd will be tracked to determine overall safety program performance.

By measuring the frequency and type of safety activities each month and on a year-to-date basis, Richardson's Bulk Sales Ltd working with the JHSC or HSR as applicable can determine where the Health and Safety Program is in need of improvement, and the relative performance of locations, departments, and work activities.

The activities to be measured are the following:

- Safety Meetings and JHSC Meetings held;
- Inspections conducted;
- Safe Work Permits or Hazard Assessments completed; and
- Incident Reports filed (subdivided into the following categories):
- Injuries (LTA/MA/FA);
- Environmental;
- Equipment Damage;
- Property Damage;
- Vehicle; and
- Near Misses (Incident Reporting objective is 50% Near Misses).

Frequent safety reporting contributes to positive safety awareness within the Company.

6.3 Quarterly Incident Summary

For every serious incident, there may have been numerous prior near misses and at risk behaviours or unsafe conditions.

By encouraging the reporting of all incidents, hazards, and near misses, Richardson's Bulk Sales Ltd can obtain sufficient information to record the occurrences and determine any emerging trends or required action items.

A one-page quarterly summary report can be shared with all employees. The report will state and categorize the events, and any action items or lessons learned will be included beside it.

The intent of this report is to educate all workers on the hazards of the workplace and to raise their Level of Safety Awareness so that they are on the lookout for hazards prior to those hazards resulting in incidents.

6.4 Record Retention

All safety documentation (e.g. Training records, inspections, first aid records, incident reports and investigations, safety meeting minutes) will be filed in a manner that allows for prompt retrieval. Safety documentation will be kept for at least 3 years, unless required by legislation to be kept for a longer term.

6.5 Trending

Health and safety performance as tracked and measured through the Statistics and Records described in this section will be used to compare quarter over quarter and year over year trends. These trends will be communicated to employees and will be used to generate action plans as appropriate to prevent incidents from occurring.

7.0 Audit Process

An audit is a comprehensive and objective evaluation of Richardson's Bulk Sales Ltd's health and safety management system. It allows the organization to:

- Obtain valuable input from employees, and others at the work sites, on the usability and practicality of the safety program;
- Evaluate each individual element of the program to determine how well each element has been implemented; and
- Evaluate individual departments within the business to compare their respective progress in the program.
- Audits are performed by either Richardson's Bulk Sales Ltd employees in cooperation with the JHSC or HSR as applicable or external auditors trained and certified to perform audits. The auditor will refer to a number of documents during an audit, including:
- Company Health and Safety Manual, policies, and safe work practices;
- Any training and maintenance records relating to safety;
- Emergency Response Plans;
- Files containing records of inspections, investigations, audits, safety meeting minutes, and safety performance reviews; and
- Relevant safety legislation.

The auditor will also conduct interviews with employees and make observations in the workplace.

Audits are normally required to be performed annually in order to maintain Certificates of Recognition (COR) or other Provincial Safety Designations. Normally the initial audit, and a re-certification audit, must be done by an approved external auditor for companies with more than a stated number of employees.

Independent audits may also be required from time to time, for example, when requested by a Company client.

All audits will generate action items for improved performance. These action items must either be implemented immediately or transferred to the Corrective Action Register for timely attention. An Action Plan for the upcoming year will be established based on the audit results.

Senior managers will review the results of the previous year's audit to initiate improvements where applicable and to set the strategic direction. The results of each audit will be communicated to all employees in a timely manner as will the action plan resulting from the audit and the new goals and objectives set by senior management.

8.0 Annual Review

The Health and Safety management system will be reviewed by the senior manager annually. The review will be based on the safety meetings, communication, corrective actions, statistics, goals and objectives and audits as discussed in this section of the manual. Required improvements or initiatives will be communicated as discussed in this section. The signature of the senior manager on the Health and Safety Policy will attest that the review has been conducted.

Forms

- Safety Meeting Minutes
- Safety Statistics Form

Emergency Response

1.0 Introduction and Administration

1.1 Emergency Response Plan (ERP) Policy

Richardson's Bulk Sales Ltd will maintain a written emergency plan that is appropriate for the hazards of the workplace. Richardson's Bulk Sales Ltd's ERP will adhere to all the standards and requirements of the specific OHS and regulatory bodies. The plan will address emergency conditions that may arise from within the workplace and from adjacent workplaces. The Emergency Plan will employ site-specific emergency response plans when required. The plan will be developed and implemented in consultation with Richardson's Bulk Sales Ltd workers.

The plan will be kept up-to-date to reflect current circumstances at the workplace. It will identify which ERP process is to be used by employees and may be used in conjunction with a client or third-party ERP plans on whose site Richardson's Bulk Sales Ltd may be working.

The program will identify the areas where smoking is prohibited, the use and accessibility to portable fire extinguishing equipment, and proper storage and handling of flammable and combustible liquids.

Richardson's Bulk Sales Ltd Emergency response planning will take into account such factors as operational, organizational, personnel, and regulatory changes, and lessons learned from real-life events or exercises. All Richardson's Bulk Sales Ltd emergency response plans will be regularly maintained to reflect any new information concerning hazards, response procedures, operations, equipment and personnel. When changes to the ER Plan occur, employees will be re-trained.

Richardson's Bulk Sales Ltd's worksite-specific emergency response plan will be in-place prior to employees being assigned to a particular worksite and will include the following:

1. The identification of potential emergencies;

2. Procedures for dealing with the identified emergencies;

3. The identification of, location of, and operational procedures for emergency equipment;
4. The emergency response training requirements;
5. The location and use of emergency facilities;
6. The fire protection requirements;
7. The alarm and emergency communication requirements, including the names and contact phone numbers of key personnel. A list of telephone numbers will be kept up-to-date for use in emergencies and located in a conspicuous place accessible to every employee;
8. The first-aid services required;
9. Procedures for responding to an emergency that may require rescue and evacuation; and the designated rescue and evacuation workers; and
10. A means of quickly summoning an ambulance service or other suitable means of transportation.

Employees will be trained in first aid as required by legislation and outlined in the Medical Emergency Response Plan (First Aid) procedure.

Employees, contractors, and all other work site parties of Richardson's Bulk Sales Ltd will be involved in, and review, the emergency response process and plans. The emergency preparedness and response plan may be used for routine and non-routine emergencies, as well as changes in operation, and products or services that create new emergency situations.

For oil and gas operations regulated by the Alberta Energy Regulator, site-specific Emergency Planning and Response Zones (EPZ) will be established for wells, pipelines and facilities, containing a hazardous product requiring a specific emergency response by the licensee according to AER Directive 071. Where applicable Richardson's Bulk Sales Ltd will follow all of the requirements for ER planning and public notifications for EPZs, including having all ERP documents filed and or available as required by the AER and Directive 071.

If required by the AER and enabling legislation, for any of its operations Richardson's Bulk Sales Ltd will complete an ERP Application and make all electronic filings required under Directive 071. The

ERP must be distributed to government agencies as required by Appendix 5 of Directive 071.

2.0 Emergency Scenarios and Hazard Assessments

Richardson's Bulk Sales Ltd Emergency Response Plans shall identify all potential emergencies that the employees of Richardson's Bulk Sales Ltd might encounter. Fire and medical emergencies are common to all work sites, and will be included in all ERPs. Other potential emergencies might include, threatening persons, severe weather, earthquakes, vehicle accidents, equipment rollovers, and chemical spills. Written response procedures will be included for each type of likely emergency.

This listing of potential emergency scenarios, and the required control plans, will be documented and will be updated annually, or more frequently as conditions change.

For each emergency scenario, non-medical emergency supplies (e.g. fire extinguishers, flashlights, spill kits, SCBA's) meeting legislated requirements, if applicable, will be identified. Two forms have been supplied to assist in ensuring these emergency supplies are adequate and inspected regularly. The Emergency Equipment Inventory and Emergency Preparedness Inspection forms can be found in the Forms Section of this manual.

Richardson's Bulk Sales Ltd will conduct a risk assessment in any workplace in which a need to rescue or evacuate workers may arise Richardson's Bulk Sales Ltd will ensure that an assessment is conducted of the risks posed by hazardous substances from accidental release, fire, or other such emergency.

Prior to working at a new site, a senior Richardson's Bulk Sales Ltd worker located on site will conduct a site-specific hazard assessment. When the risk assessment shows a need for evacuation or rescue, appropriate written procedures will be developed and implemented.

Site-specific emergency procedures will be reviewed with workers before work begins at the site. This is typically completed during the pre-job safety meeting/ toolbox talk.

3.0 Training and Exercise (Drills)

All workers shall be educated on the Company's Emergency Response Plan. This will include a review of the written procedures, and an annual emergency drills. Workers with designated responsibilities

within the Plan (such as performing a headcount) will be trained on their responsibilities. Written records will be kept for all training. Training may be recorded on the Master Training Schedule.

3.1 Emergency Drills

An emergency drill will be conducted annually to review the effectiveness of the emergency procedures such as, communication, chain of command, roles and responsibilities, and evacuation procedures. Where identified, based on risk level and preparedness, more frequent drills or exercises may be required. All workers will be given adequate emergency response instruction and training prior to work commencing. The criteria of the training will include:

- Procedures;
- Roles and responsibilities;
- Location of and operational procedures for emergency equipment;
- Equipment;
- Hazards;
- Regulatory requirements; and
- Lessons learned from previous response activities (real and simulated).

At least once every year and after any change is made in the emergency evacuation plan or the emergency procedures, an evacuation or emergency drill shall be conducted for the employees in a building.

3.2 Fire Emergencies and Firefighting

Where workers are placed in operations with the potential for fire, appropriate and adequate training in prevention and firefighting will be provided to those workers. Where workers or members of the public are placed in positions of having to escape from a fire, prior orientation and evacuations procedures will be made known.

- All Richardson's Bulk Sales Ltd workers will be given adequate instruction in the fire prevention and emergency evacuation procedures applicable to their workplace;
- Workers assigned to firefighting duties in their workplace will be given adequate training, by a qualified instructor, in fire suppression methods, fire prevention, emergency procedures, organization, and chain of command, firefighting crew safety, and communications applicable to their workplace;
- Retraining for firefighting duties must be provided periodically, but not less than once a year;
- A Richardson's Bulk Sales Ltd worker who is assigned to firefighting duties will be physically capable of performing the assigned duties safely and effectively before being permitted to do them; and
- Every employee shall be instructed and trained in:
- The procedures to be followed by him or her in the event of an emergency, and
- The location, use, and operation of fire protection equipment and emergency equipment provided by Richardson's Bulk Sales Ltd.

3.3 Emergency Equipment

The Emergency Response Plan shall list the emergency equipment available to employees. This may include, fire extinguishers, first aid kits, AED, respiratory protective equipment, radio, spill kits, eyewash, emergency shower, and vehicle emergency kits. Emergency equipment availability at off-site locations will be identified during the pre-job safety meeting/toolbox talks.

Emergency equipment availability at company locations will be identified on the posted site muster and evacuation diagrams. New or transferred employees will be trained in the location of emergency equipment as described in Training program and an annual review of the location of this equipment will be conducted as part of the annual emergency response drill.

Emergency response equipment – whether owned, contracted, or leased shall be regularly inspected and maintained in a state of readiness. Inspection and maintenance records shall be retained.

Richardson's Bulk Sales Ltd shall verify that the emergency response contractors listed in the ERP meet these requirements.

Richardson's Bulk Sales Ltd will provide workers who are subject to the ERP or who have responsibilities to respond to emergencies under the ERP with personal protective clothing and equipment appropriate to the work site and the potential emergencies identified in the emergency response plan. Workers who respond to an emergency must wear and use personal protective clothing and equipment appropriate to the work site and the emergency.

3.4 Training and Records

All records of training, meetings, and exercises shall be maintained for a period of three years and shall be reported to the requesting regulatory agency if requested for assessment. These records shall include:

- Type of exercise held;
- Scope and objectives;
- Invitations to participants;
- Sign-in sheets and persons involved;
- Minutes;
- Outcomes;
- Lessons learned; and
- Action plan, including timelines.

New hazards or personnel will be inducted into the emergency response management program at the earliest opportunity and prior to conducting those duties.

Where possible, employees given specific responsibilities in a particular emergency, will be evaluated through in-house or third-party training programs with practical assessment, documented on-the-

job training, staged competency evaluations, drills with documented assessments or actual emergency events.

Richardson's Bulk Sales Ltd will designate the workers who will provide rescue and evacuation services and supervise evacuation procedures in an emergency. Richardson's Bulk Sales Ltd will ensure that designated rescue and emergency workers are trained in emergency response appropriate to the work site and the potential emergencies identified in the emergency response plan. This training will include exercises appropriate to the work site that simulate the potential emergencies identified in the emergency response plan (as described above). These training exercises must be repeated at intervals required to ensure that the designated rescue and evacuation workers are competent to carry out their duties.

4.0 ERP Review

The ERP will be formally reviewed:

- Annually;
- After an ER Exercise; and
- After an actual Emergency.

The formal review will include an evaluation of the response to actual and simulated emergencies and will identify any critical deficiencies in the components of the overall response.

5.0 Emergency Definitions and Classifications

5.1 Emergency Definition and Response Criteria

The definition of an emergency is an incident that results in (or has the potential to result in) injury or loss of life, that poses a threat to the safety of personnel or the general public, or a situation that may cause environmental damage or significant loss or damage to Company or personal property.

Potential emergencies may be:

- A fatality or life-threatening injuries;
- Transportation accidents;
- Property or asset fires and explosions;
- Major damage to Company property or equipment;
- Significant hazardous product releases or other chemical spills, which may be harmful to personnel or the environment;
- Security-related incidents involving issues such as theft, extortion, bomb threats, or acts of vandalism;
- Hostage taking or ransom situations;
- Natural occurrences such as severe weather conditions, including earthquakes, floods, forest/wild fires, and tornadoes;
- Business interruptions involving loss of process, product, or communication tools as a result of utility failures, workplace violence, civil unrest, or labour disruption, etc.;
- Multi-hazard emergencies (e.g., a natural gas line rupture causes fire/fire explosion/injury);
- Terrorism (e.g., cyber-terrorism and chemical, biological, radiological, and nuclear terrorism); or
- Third-party or public involvement having an immediate impact on the Company's image.

5.2 Emergency Level Definition

Where necessary Richardson's Bulk Sales Ltd will determine an emergency level according to its classification system.

Using Table 1 – Emergency Preparedness Assessment, the potential hazards can be rated for Likelihood (L) and Consequence (C) on a scale of 1 to 3. Based on Table 2, the Emergency Level is determined by the product of L X C.

Recognized emergency levels are:

- **Alert:** A minor situation where the incident may be readily resolved using available personnel and equipment.
- **Level 1 Emergency:** A low level emergency where risks to on-site personnel, off-site public, and the environment are low or non-existent. It may be resolved through standard operating procedures and contained within the immediate vicinity of the incident site. Non-disruptive to normal operations.
- **Level 2 Emergency:** A medium level emergency where risk to on-site personnel exists and risk to off-site public and the environment is possible. It may require outside assistance from mutual aid partners, industrial service providers, or local authorities in order to be resolved, and it may spread beyond the immediate vicinity of the incident site. Disruptive to normal operations.
- **Level 3 Emergency:** A high level emergency where risk to on-site personnel, off-site public, and the environment exists. It cannot be resolved with personnel and equipment at hand, and it requires assistance from outside agencies/service providers/authorities. Risk to on-site personnel, off-site public, and the environment exists and is spreading beyond the immediate vicinity of the incident site. Causes shutdown of normal operations for duration of incident.

See Table 3 for a graphic description of this level of classification process and Table 4 for additional instructions. These emergency levels are a guideline and may be upgraded or downgraded depending upon the circumstances of the emergency.

Table 1 – Emergency Preparedness Assessment

Emergency Preparedness						
Potentially Hazardous Activity, Condition, or Exposure	Activity Description	Description of Potential Hazards Identified	Likelihood (Level 1 – 4)	Severity (Level 1 – 4)	Hazard Controls	Competencies; Authorized Personnel
Life-Threatening Injuries/Fatality						
Transportation Accidents						
Property/Asset Fires						
Explosions						
Natural Causes						
Lightning						
Power Outage						
Tornado						
Floods						
Ice Storms/Severe Cold						
Grass Fires						
Earthquakes						
Biological Pandemic						
Hazardous Product Release						
Evacuations						
Security: Theft/Bomb Threats, Etc.						
Security: Hostage/Ransom, Etc.						
Security: Terrorism						
Business Interruption: Loss of Communication; Labor Disruptions						
Multi-Hazard Emergencies: Natural Gas Line Rupture Causing Fire and Explosion and/or Causing Evacuation						
Third-Party Involvement Having Immediate Impact on Company Image						

Table 2 – Emergency Level Classification

RISK LEVEL	ASSESSMENT RESULTS
Alert 2-3	**Alert**
Low 4-5	**Level-1 Emergency**
Medium 6	**Level-2 Emergency**
High 7-8	**Level-3 Emergency**

All incidents are classified as either an Alert or an Emergency (Level 1, 2, or 3). An Alert is defined as an incident that can be handled on-site through normal operating procedures. A situation involving a more complex resolution is defined as an Emergency.

Table 3 – Emergency Responses for Each Level of Emergency

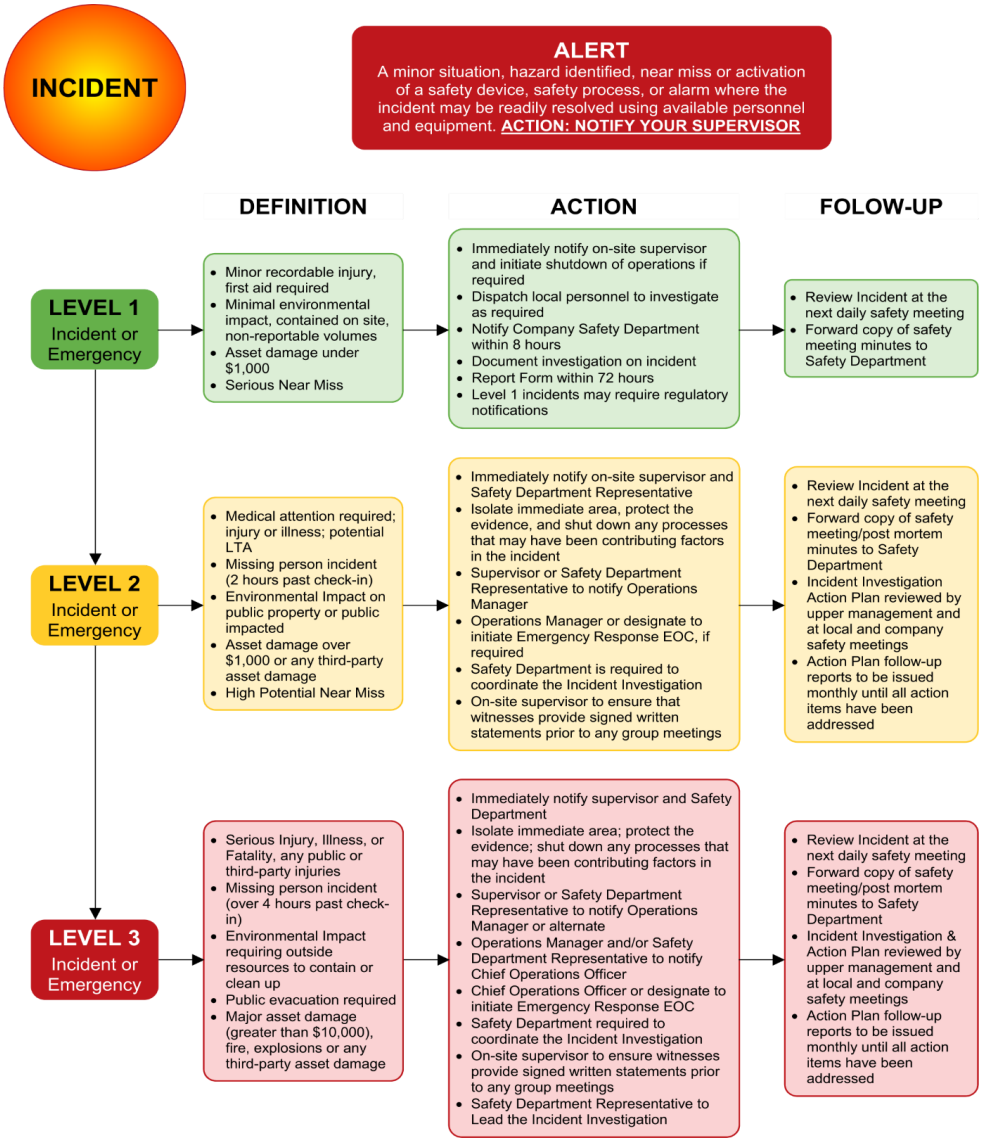


Table 4 – Emergency Response Guidelines: Criteria Matrix for Classifying Incidents

Risk	Alert: Minimal	Level 1: Low	Level 2: Medium	Level 3: High
Control	Immediate control of hazards, with progressive resolution of the situation.	Immediate control of hazard is becoming progressively more complex because of deteriorating conditions.	Imminent and/or intermittent control of the hazard is possible.	Imminent control of the hazard is not possible.
Containment	Control and relief systems functioning correctly.	Control and relief systems function correctly.	Some control and/or relief systems are not operational.	Key control and relief systems are not operational.
Impact on public/ worker safety	On site only.	On site, with possible impact off site.	On site, possible impact off site.	Potential for public safety to be jeopardized.
Environment	On site only.	On site, with some potential off site. Minor or short-term.	On site, with some potential off site. Minor or short-term.	On site, with significant off site. Long-term.
Possible Responses for Specified Incidents				
Responses	**Alert**	**Level 1**	**Level 2**	**Level 3**
Communication 1. Internal	Discretionary, depending on company policy.	Discretionary, depending on Company policy.	Immediate notification of off-site management.	Immediate notification of off-site management.
2. External public	Courtesy, at Company discretion.	Mandatory for any individuals within the Emergency Planning Zone requiring notification (if applicable)	Planned and instructive as per the specific ERP.	Planned and instructive as per the specific ERP.
Media	Reactive, as required.	Reactive, as required.	Proactive –media management to local or regional interest.	Proactive-media management to national interest.
Government	Notify regulatory agency if public has been contacted.	Notify regulatory agency and local authority, if required for initial response.	Notify regulatory agency and local authority.	Notify regulatory agency and local authority.
Actions 1. Internal	On site, as required by company.	On site, as required by Company. Initial response undertaken in accordance with the specific or corporate level ERP.	Pre-determined public safety actions are underway. Corporate management team alerted and may be appropriately engaged to support on-scene response.	Potential for public safety to be jeopardized.
2. External	On site, as required by company.	On site, as required by Company.	Potential for multi-agency (operator, municipal, provincial, or federal) response.	Immediate multi-agency (operator, municipal, provincial, or federal) response.
Resources 1. Internal	Immediate and local. No additional personnel required.	Establish what would be required.	Limited supplemental resources or personnel required.	Significant incremental resources required.
2. External	None.	Begin to establish resources that may be required.	Possible assistance from government agencies and external support services, as required.	Assistance from government agencies and external support services, as required.

5.3 Incident Command System (ICS)

The first person to arrive at the site of an incident (or the most qualified person present in the event of an incident occurring at an occupied site) becomes the Incident Commander (IC). Directly under the IC are the Safety Officer, Liaison Officer, and Information Officer. Next in line are the Operations Chief, and Logistics Chief. These positions may be combined depending on the particular circumstances and the resources available. Each of these positions reports directly to the Incident Commander.

The Incident Commander:

- Sets objectives and priorities, and
- Maintains overall responsibility for the incident response.

The Safety Officer:

- Is responsible for worker safety;
- Brings on additional resources as required; and
- Has specialized skills to match specific disasters.

The Liaison Officer:

- Coordinates efforts with other agencies and services.

The Information Officer:

- Deals with the media and the public, and
- Facilitates communication between the Incident Command Post (field) and Emergency Operation Centre (headquarters).

The Operations Chief:

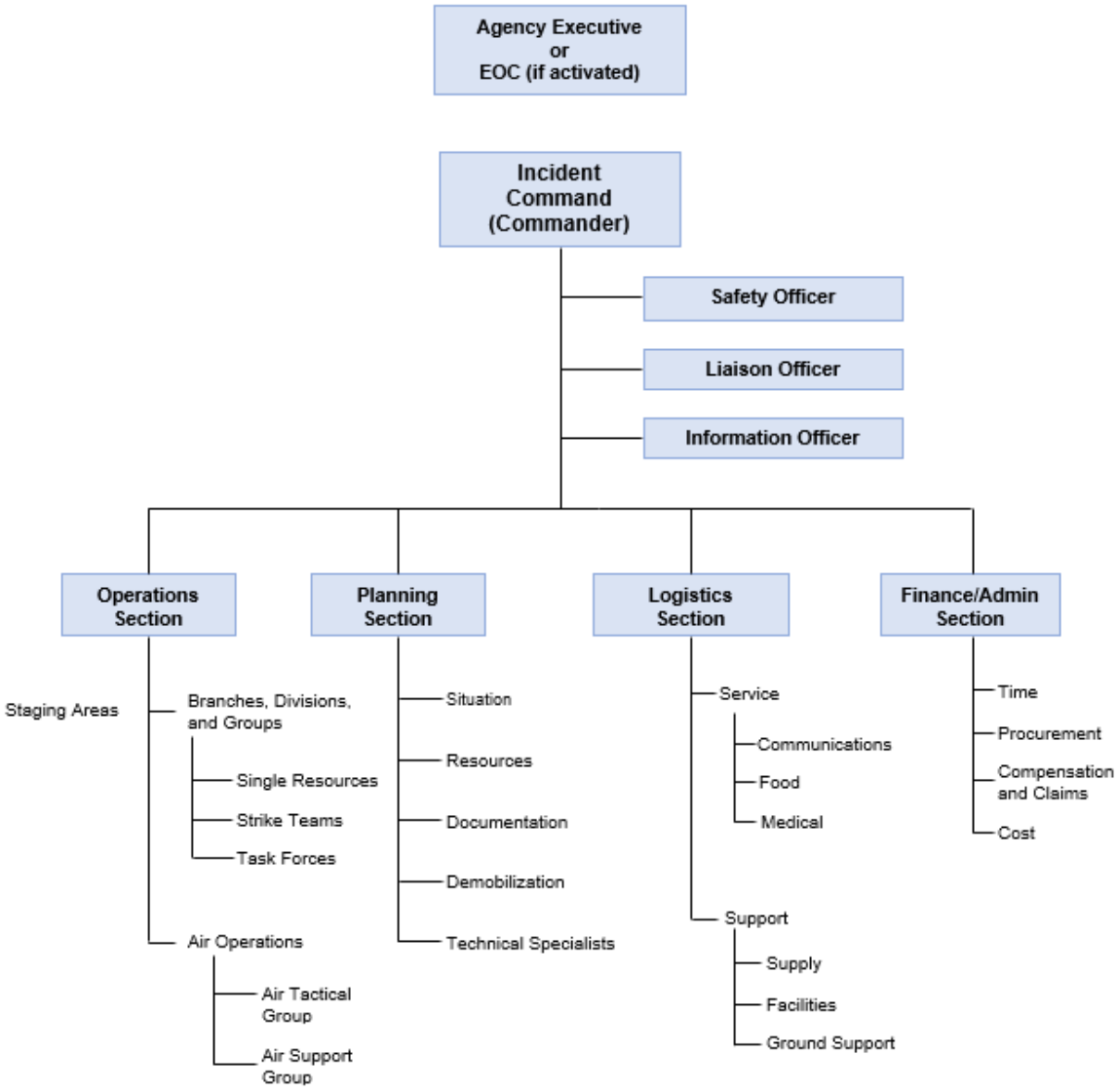
- Is the head of the operations section;
- Conducts operations to carry out the organizational plan;
- Directs resources; and
- Oversees decontamination and waste control.

The Logistics Chief:

- Is the head of the logistics section, and

- Provides resources and support to meet incident requirements.

ICS ORGANIZATION CHART



5.4 Emergency Response Procedure (ERPs)

An emergency is a situation that arises suddenly and requires a prompt response. An emergency may be an incident with injuries, a fire or explosion, an escape of toxic or combustible materials,

and/or hydrocarbon, chemical, or other spill or release. This section provides a generalized Richardson's Bulk Sales Ltd ERP as well as ERPs for likely emergencies. These can be used to develop site-specific ERPs.

A. General Emergency Response Procedure

Declare the Emergency

If you feel that an emergency exists, do not hesitate to declare it. You must begin the emergency response process immediately. The degree or level of emergency is not always easily determined.

Always sound the alarm when an emergency exists. Ensure that all individuals at the workplace are familiar with it and will recognize what it means when they hear it. Occupational Health and Safety Regulations require an emergency response plan to include the alarm and emergency communication requirements.

Immediate Notifications, Assignments and Actions

Always do the following:

- Notify your immediate supervisor or company management. You will be assisted with further notifications;
- Get help. Get help as soon as possible, and if required, enlist the aid of others working in your area;
- Ensure the safety of emergency response teams and do not allow them to enter into hazardous situation without adequate preparation; and
- Give help. If there are injured persons on site, administer first aid and arrange for transport to a medical facility as soon as possible.

In some emergencies, there may be specific responsibilities for individuals. Follow the emergency response plan's assignment of responsibilities.

Minimize Damage on Site

If the potential for more injury or damage exists, assess the nature of the threat and, if possible, immediately obtain assistance to minimize those dangers.

- Stop ALL work;
- Assess the situation. Consider the following:
- Is there an injury, a fire, a spill, or a leak?
- What are the weather conditions?
- What is the terrain like?
- Who/what is at risk: people, property, or the environment?
- What actions should be taken: Is an evacuation necessary?
- Is diking necessary? What resources (human and equipment) are required and readily available?
- What can be done immediately?
- Extinguish ALL possible sources of ignition;
- Shut down ALL gas, diesel, or electrical equipment being used;
- Close any water, gas, or air valves that supply equipment; and
- Review and follow the appropriate emergency procedures.

B. Responses to Likely Emergencies

Remote Worksite or Field Emergency Procedures

- In the case of a field emergency, the person in charge will be the senior Richardson's Bulk Sales Ltd employee on site.
- If an evacuation is called for, all Richardson's Bulk Sales Ltd personnel must report to the designated muster station. At the muster station, a head count must be conducted to determine if anyone may have been left behind.
- A list of emergency phone numbers will be kept in Company vehicles and offices. The cell phone will be the primary method of communication. After the emergency has been assessed and emergency services have been called for and/or administered, Richardson's Bulk Sales Ltd management is to be notified.
- If rescue efforts are required, they should be conducted by local authorities or site designated ER teams. Richardson's Bulk Sales Ltd employees on site will conduct rescue only if they are trained and are competent to perform the rescue. Ensuring the safety of rescue personnel is paramount.

Rescue Plans

- Where remote work may impact rescue of workers this will be assessed on the “Site Specific Emergency Response Plan”.
- A site-specific rescue plan will identify the resources to be used on site to mount a rescue and the persons who can assist in a rescue. This will include mobile equipment and man lifts as well as stretchers and emergency transport immobilizing boards and cages.
- The fall protection plan will include a rescue plan for a suspended worker. This will include designating cranes or aerial platforms to access suspended workers or any designated high angle rescue teams available on-site. The rescue plan will be communicated to all workers (see the Fall Protection and Fall Protection Plans SWP).
- The emergency plan will include instructions on how to summon emergency assistance or medical transportation to remote worksites including air evacuation, if required.

- The rescue plan will include the use of site designated ER teams if available.
- Richardson's Bulk Sales Ltd employees on site will conduct rescue only if they are trained and are competent to perform the rescue.

Serious Injury

(Refer to Medical Emergency Response Plan for detailed medical emergency requirements.)

- The person discovering the injury must call for certified medical personnel to attend to the accident.
- Assess the accident. Ensure that immediate hazards are dealt with prior to dealing with the injured worker. The safety of the rescue team is a priority.
- Determine the severity of the injury and call for emergency help if it is determined to be necessary.
- Perform or obtain certified first aid.
- If required and appropriate, arrange to have the patient driven to local medical facilities.
- If transport is not possible or there is a concern that the injury may be worsened, emergency transport must be arranged.
- Designate someone to direct EMS personnel at the entrance to the accident scene. Accompany the injured worker, keep them warm, minimize any bleeding, regularly check the level of victim consciousness, and re-assure the victim while en-route to medical facilities.
- Verify that a Richardson's Bulk Sales Ltd Manager or his designate has informed the regulatory authorities, as required.

Fatality

- Notify the police force and the OHS office.
- Follow directions from the police and investigating OHS officer in charge.
- Protect the accident scene and do not disturb anything according to the requirements of Incident Reporting and Investigation section 2.2. Do not allow any witnesses to leave the worksite until directed to do so by the police and/or the OHS officer in charge.
- Direct all those involved or aware of the incident at the worksite not to release any details until such time as they are public knowledge and then only as directed by the company.
- Under all circumstances refer all inquiries, except those of the police or OHS, to the designated company emergency communications person for the accident. Do not release any information to any other person unless it is requested as part of an external or internal investigation.
- The emergency communications person will first advise next-of-kin and only when next-of-kin have been informed will any statements or releases be made to the press and then only by the designated communications person.
- The emergency commander will arrange for counseling services. All those affected are to be informed of how and when such counseling will be made available.

Fire and Explosion

All employees will participate in the fire, escape, and/or other emergency programs that are put in place. The fire and explosion escape plan, which outlines designated exits and meeting areas, will be posted prominently in buildings and facilities.

Once outside, a head count will be done to ensure that everyone is accounted for. This information must be passed on to emergency responders.

All employees will be made aware of the fire and explosion escape plan and meeting locations during site-specific or new employee orientations.

- The person discovering a fire must inform nearby workers, ensure that they are safely evacuated and declare the emergency. Ask for 911 to be called or arrange for appropriate designated fire personnel to respond. If external fire fighters are called for, a person must be designated to meet them and lead them to the fire.
- If employees are trained and it is safe to do so, they should attempt to control a fire using hand-held fire extinguishers and fire hose, as necessary.
- If a fire is deemed "out of control", there is a danger of explosion, or is too dangerous to fight in its vicinity the safety of the fire crew must be assessed and an evacuation to a muster station may be required.
- If an evacuation is called for, no employee will re-enter the area until an all clear is declared.

Spills and Releases

ER Training

If employees are required to control a release of a hazardous substance, to perform cleanup of a spill, or to carry out testing before re-entry into a contaminated area, Richardson's Bulk Sales Ltd will provide:

- Adequate written safe work procedures;
- Appropriate personal protective equipment, which is readily available to workers and is adequately maintained; and
- Materials or equipment necessary for the control and disposal of the hazardous substance.

Spill ERP

1. In the event of a spill or release which is sizeable, uncontrolled and/or may harm the public or the environment, call:

- 911;
- Richardson's Bulk Sales Ltd's 24-hr phone number;
- The owner of the vehicle or equipment, if other than Richardson's Bulk Sales Ltd;
- The shipper or owner of any Dangerous Goods involved;
- AER OneStop electronic reporting for flaring and venting contraventions;
- Alberta Energy/Environmental Emergency Response Line 1-800-222-6514 (if release has impact on Alberta's land/air/water); and
- Canutec at 1-613-996-6666 if:
  - Any amount of infectious substance (Class 6.2) is involved;
  - Any gas leaks from a cylinder that has suffered a catastrophic failure; and
  - A railway vehicle is involved.

2. Inform nearby workers of the situation and secure the area.
3. Assess the nature of the spill if safe to do so:
   - Assess the spilled material. An SDS may need to be consulted, and
   - If the spill is an airborne flammable vapor or a toxic liquid, initiate an emergency evacuation to a safe perimeter location.
4. Contact emergency personnel.
5. When safe to do so, contain the spill and commence cleanup.
6. Only Richardson's Bulk Sales Ltd senior management or appropriate regulatory authorities can approve a return to work after an emergency of this nature.

Building/Site Evacuation

An emergency response plan must include procedures for rescue and evacuation. For off-site locations, evacuation procedures and methods of rescue should be identified and reviewed with workers prior to commencing work activities.

Two Emergency Assembly Areas will be identified in advance for buildings or areas that might require evacuation. These Emergency Assembly Areas will be upwind and beyond the area of any likely hazards. Changes in wind direction and other weather conditions must be taken into account while determining the Emergency Assembly Areas. Prior to beginning any work, the Emergency Assembly Areas will be made known to those on site.

- When evacuation is deemed necessary, employees (including the first-aid attendant) will be notified of the nature and location of the emergency.
- Workers will safely evacuate and will leave the building or work site by the nearest exit or as advised. When evacuating work areas, employees should close doors behind them. Employees working with electrically operated machines or equipment should switch the equipment off or unplug it prior to leaving the work area.
- Once out of a building, do not smoke – combustible gases might be present.
- Regardless of the exit used, employees will gather at the pre-designated Emergency Assembly Area, which is upwind and safe from smoke and gases. A head count must be conducted to ensure that everyone is accounted for.
- The appropriate designated employee must notify the fire department or other emergency responders and adjacent workplaces or residences that may be affected if the risk of exposure to a substance extends beyond the workplace.
- After the evacuation is complete, no one will re-enter the building until advised by a senior Company manager or the on-site emergency services personnel.

Rescue Plan

- Building Site Specific Emergency Response Plans will include emergency rescue provisions from local emergency service providers (911).
- In non-remote areas the person responsible for performing headcounts will also ensure that emergency services are summoned for any missing persons so that a search and rescue can be performed.
- Employees who require assistance in the event of an evacuation will be identified and assigned a co-worker who will provide evacuation assistance.
- The building evacuation in will include the location of stretchers and immobilizing boards and cages to be used to transport injured persons in an emergency evacuation, if safe to do so prior to the arrival of emergency services.

Mobile Equipment or Vehicle Accident

- Render first aid to those injured if it can be done safely.
- Keep away from the accident scene and keep others away. Do not make contact with hazardous materials unless properly trained to do so.
- Secure the area to the best of your ability.

- The person in charge should immediately notify:
  - The local police;
  - Their supervisor;
  - The owner of the vehicle, if not Richardson's Bulk Sales Ltd; and
  - The shipper or owner of the affected goods, if applicable.
- If the accident involves a victim exposed to a hazardous substance and a rescue must be performed, rescuers shall always put on life saving PPE before attempting any rescue.
- If victims are not breathing, start artificial respiration.
- If there is no pulse, start full cardiopulmonary resuscitation.
- Keep the patient warm.
- If the eyes are irritated, wash with clean water for several minutes.
- Ensure that the victim seeks medical assistance even if there are no signs of symptoms.
- In the case of serious accidents or injuries, until permission has been granted by an Occupational Health and Safety Inspector or a Peace Officer, no one is to disturb the scene of an accident except to:
  - Attend to persons injured and prevent further injury if this can be done safely, and
  - Protect the public, the environment, or further damage to property.

Natural Disasters

Alert Ready is Canada's emergency alerting system. Alert Ready delivers critical and potentially life-saving alerts to Canadians through television, radio, and LTE-connected and compatible wireless devices. The Alert Ready system includes federal, provincial, and territorial emergency management officials, Environment and Climate Change Canada, the broadcasting industry, and wireless service

providers. Alert Ready works to ensure Canadians receive alerts immediately and know when to take action to stay safe.

In addition to television and radio, Alert Ready sends life-threatening emergency alerts to cell phones and wireless devices that are compatible with Wireless Public Alerting (WPA). For emergency alerts to be received on a wireless device, three conditions must be met. The wireless device must be:

1. A wireless public alerting (WPA) compatible device, like a smartphone, capable of connecting to an LTE network (LTE is commonly referred to as “4G LTE”); and
2. Equipped with the latest version of its operating software; and
3. Connected to an LTE cellular network at the time the emergency alert is issued or joins the network while the alert is still active.

Alberta Emergency Alert (AEA) is a provincial government program that distributes alerts (critical and informational) throughout Alberta via radio and television networks, an RSS feed, the internet (through the AEA and other websites), amateur radio network, social media (Facebook and Twitter), road signage, outdoor digital signs and the AEA application for iOS and Android smartphones.

Authorized Users, including emergency managers, local government officials, police officials, First Nation representatives, as well as provincial and federal department representatives, may post alerts that are distributed throughout the province as required.

Richardson's Bulk Sales Ltd will install the Alberta Emergency Alert application on smartphones to provide alerts directly.

Links to the smartphone application can be found at:
http://www.emergencyalert.alberta.ca/content/about/signup.html

1. Floods

Floods are the most likely natural disasters in Canada.

a) Flood Notifications:

- A High Streamflow Advisory means that stream levels are rising or expected to rise rapidly and no major flooding is expected. Minor flooding in low-lying areas is possible. Anyone situated close to the streams affected (campers, fishermen, boaters, and the public) is advised to be cautious of the rising levels.
- A Flood Watch means that stream levels are rising and will approach or may exceed bank full. Flooding of areas adjacent to these streams may occur. Anyone situated close to the river is advised to take appropriate precautionary measures.
- A Flood Warning means that rising stream levels will result in flooding of areas adjacent to the streams affected. Anyone situated close to the river should take appropriate measures to avoid flood damage.
- Hurricanes and storm surges can cause the water level to rise quickly along ocean coastlines and waterways connected to the ocean. Weather advisories by environment Canada will provide information on areas likely to be affected and on-going flooding conditions.

In order to receive important updates on Alberta's rivers, Richardson's Bulk Sales Ltd will download the Alberta Rivers Mobile Application from:

https://play.google.com/store/apps/details?id=ca.ab.gov.abrivers&hl=en&gl=US

Municipal governments are responsible for informing their residents about possible flooding and providing detailed information about what to do to protect their families and property.

b) During Flooding – Emergency Instructions

- Listen to your local media, as well as government broadcasts. Important instructions for your safety and information on the situation will be broadcast on local stations.
- If you are requested to leave the area, do so immediately and follow instructions issued by your municipal officials.
- Follow the site-specific evacuation plan for Richardson's Bulk Sales Ltd location. Shut off all utilities as directed in the ERP for building or site evacuation.

- Stay out of the flooded area until the municipal authority gives permission to return.
- Barricades are placed on roads for your protection. If you encounter a barricade, go another way.
- Avoid standing water, as it may be electrically charged from ground or downed power lines.
- Do not attempt to drive over a flooded road. Floodwaters can conceal debris or areas where the road has eroded. The ground underneath will probably be slippery.
- Watch for damaged roads, loose or downed wires and fallen objects on the road.
- Do not drive through water unless you are certain the road is safe and the water is no higher than the wheels of your vehicle. Proceed slowly to avoid splashing water on the engine and stalling it. When emerging from water, drive carefully because wet brakes do not work well.
- If your car stalls in rising waters, get out immediately and make your way to higher ground.
- Do not attempt to cross a flowing stream. You can be swept off your feet by only 15 centimeters (6 inches) of moving water.
- Do not attempt to drive through floodwaters or underpasses. The water may be deeper than it appears.
- Avoid areas prone to flash flooding.
- Do not phone the municipal government, police, or fire department unless you or others are in need of assistance.
- Do not attempt search and rescue activities on your own.

2. Severe Storms and Tornados

Thunderstorms, hail, blizzards, ice storms, high winds and heavy rain can develop quickly and threaten life and property. Severe storms occur in all regions of Canada and in all seasons.

When a severe storm is on the horizon, the Meteorological Service of Canada issues Watches, Warnings and Advisories through radio and television stations, the Weather Office Website,

automated telephone information lines and Environment Canada's Weatheradio. Richardson's Bulk Sales Ltd will provide a means to monitor severe weather alerts and communicate these to employees.

a) Types of severe storms:

- Blizzards;
- Hail;
- Heavy rain;
- Ice storms;
- Lightning;
- Thunderstorms; and
- Wind.

b) Severe Storm Preparedness:

- If a severe storm is forecast, secure everything that might be blown around or torn loose - indoors and outdoors. Flying objects can injure people and damage property.
- Trim dead branches and cut down dead trees to reduce the danger of these falling during a storm.
- If you are indoors, stay away from windows and doors.
- Richardson's Bulk Sales Ltd will advise you of the sheltered area according to the site-specific emergency plan.
- If you are advised to evacuate, do so according to the site-specific evacuation plan. Take emergency kits with you as required according to the circumstances.
- You can use a cellular telephone during a severe storm, but it's not safe to use a land-line telephone.

c) Lightning

- Always take shelter during a lightning storm.
- There is no safe place outside during a thunderstorm. Safe shelter can be found either in an enclosed building or a hard-topped vehicle.
- If you can see lightning or hear thunder, you are in danger of being hit. Seek shelter immediately.
- Wait 30 minutes after the last lightning strike in a severe storm before venturing outside again.
- Do not ride ATVs or open topped vehicles. These will not protect you from a lightning strike.

d) Tornadoes

- Tornado Communication
    - Richardson's Bulk Sales Ltd will communicate weather office issued watches and warnings. Richardson's Bulk Sales Ltd worksites will stay tuned to your local TV and radio stations for updated storm information especially when weather conditions exist for generating a tornado.
    - A tornado watch is an advisory only. It means that all the conditions that make a tornado are present. Nothing may happen, but a watch could develop into a warning. Stay alert. Listen to your radio.
    - A tornado warning means that the event is imminent, or a tornado has touched down. Take immediate precautions and listen to your radio.
    - When Environment Canada has reliable evidence that a tornado has been detected or is imminent, a tornado warning is issued for a specific area through the media or through Alberta Emergency Alert.
-

Tornado Planning

- Richardson's Bulk Sales Ltd will select and designate a tornado a shelter area in the basement that offers protection. The shelter area will be easily accessible and able to offer protection from flying glass, debris and furniture.
- If forced to take shelter away from your worksite, avoid large halls, auditorium, cafeterias, arenas and or any large building with large span roofs. Seek out an inner hallway, washroom, closet, etc.
- When a severe storm (tornado) strikes, Richardson's Bulk Sales Ltd will use the emergency communication procedures to determine in advance how your employees will stay in contact with Richardson's Bulk Sales Ltd.
- Richardson's Bulk Sales Ltd will follow and communicate the local municipality Registration and Inquiry services to be used following a major emergency or disaster event, and will publicize telephone numbers for citizens to call to register, and to inquire about missing family members.

- When a severe tornado storm threatens
  - During heavy storm activity, check and verify access to the designated shelter area and your emergency kits.
  - Stay away from windows.
  - Avoid traveling so that you will not be caught out in the open.
  - If the storm is severe, be prepared to shut-off utilities according to the Richardson's Bulk Sales Ltd evacuation plan and go to your designated shelter area.

- If caught outdoors and you cannot reach your designated shelter, lie flat in a ditch, excavation or culvert. If possible, lie flat holding onto the base of a small tree, bush or shrubbery to avoid being lifted or blown away.
- If caught while driving, drive away from the funnel at a right angle or to its direction of travel. If you cannot escape the path of the funnel, get out of your vehicle immediately and seek shelter in a ditch or ravine, keeping its slope between you and the funnel.
- If caught away from work in a built-up area, seek shelter in a sturdy building. Go to an interior hallway or washroom on the lower floor. Avoid buildings with large span roofs such as malls or supermarkets.

3. Wildfires

In certain areas of the province wildfires are common between May and September.

a) In case of Approaching Fire

- Report it immediately by dialling your provincial forestry office, local fire department emergency number, or 911.
- Dress properly to reduce risk of burn injuries. Wear long pants, shirts made of cotton or wool and sturdy footwear.
- Have firefighting tools and ladders propped against the house in a visible place.

b) Evacuation Alerts

- Cover all openings with metal coverings or fire-resistant material such as 12-millimetre plywood. This helps keep sparks and embers out.
- Move any combustibles well away from structures.

- Attach all water hoses and place them so they can reach any exterior surface of the buildings (including the roof).
- Verify that your sprinkler system is operational and charged as required.
- If you have an outdoor pool or hot tub, make is as accessible as possible for firefighters. Fill garbage cans and buckets with water and leave them where firefighters can find them.
- Block downspouts and fill rain gutters with water.
- Turn off propane or natural gas valves.
- Close all windows and doors (closing interior doors will slow fire spread inside structures).
- Move combustibles away from windows and doors.
- Fill sinks, bathtubs and buckets for use as extra water reservoirs. Attach inside hoses.

c) Evacuation Orders

- If Richardson's Bulk Sales Ltd receives an evacuation order, use the ERP pre-planned evacuation route or the route singled out by authorities on site.
- Move away from the wildland fire, never toward it. If in doubt, use the principal evacuation route.
- Drive carefully with headlights on making way for pedestrians and emergency vehicles.
- Stop at the pre-determined marshaling point(s). Report in to authorities and wait for further instructions.
- Do not leave again without informing officials. Do not return to the worksite until permitted to do so by Richardson's Bulk Sales Ltd authorities.

Biological Hazard Emergency Plan

1. Natural Biological Substances

The following may be encountered in buildings, vehicles, public areas, sheds, food, and waste and material storage areas when cleaning or storing materials:

- Moulds;
- Fungus;
- Rodent droppings;
- Human waste from collection systems and/or leaks in collection systems; and
- Dust.

Spills and Clean-Up

All of these substances may be harmful if inhaled or in some cases contacted. The hantavirus is found in deer mice droppings in North America and can cause serious or fatal disease. Hantavirus is more prevalent in Western and Southwestern regions but has been encountered elsewhere. Rodents can also transmit other diseases directly. All rodents and animal droppings and urine should be treated as a biohazard.

- Do not touch or enter areas where you suspect a potential biohazards;
- Follow the Chemical and Biological Hazards SWP;
- Wear approved respiratory protection according to the Respiratory Protection SWP;
- Do not attempt to clean without approval and training;
- Wet down suspected biohazard dust and droppings with a spray of dilute bleach if trained to do so;
- Wet clean dusts using respiratory protection; and
- Consult a medical treatment facility if you become ill.

2. Bloodborne Disease

You may become exposed to blood or bodily fluids at the scene of an injury or while attending to injured or sick employees as a first aider.

Bloodborne diseases include:

- Hepatitis B/C;
- HIV AIDS; and
- Other viral diseases.

Spills and Clean-up (refer to the Blood-Borne Air-Borne Pathogens SWP)

You should assume that all blood and bodily fluids are infected, follow universal precautions and only contact or clean up such fluids if you have been trained and are wearing the appropriate PPE according to the First Aid SWP.

- Only contact patients and bodily fluids according to accepted protocols for infection according to the First Aid SWP.
- Obtain competent help for any clean-up if you have not received training.
- You may be required to obtain a HPC/HPA immunization before you can be a first aider.
- You will be provided with medical testing for infectious agents if you have come in contact with a suspected bio-hazard.

3. Epidemic and Pandemic Levels of Disease Plan

To be used in conjunction with the Chemical and Biological Hazards and Blood Borne Disease SWPs.

a) Definitions

The definitions used for the levels of disease vary however the Centers for Disease Control (CDC) uses the following terminology:

- **Endemic**: The baseline level of disease that is observed. This level can be sporadic or at a persistently high level.
- **Epidemic**: Refers to an increase, often sudden, in the number of cases of a disease above what is normally expected in that area.
- **Outbreak**: Similar to epidemic but used for a more limited geographic area.
- **Pandemic**: Refers to an epidemic that has spread over several countries or continents with a large number of people affected.

Recent examples of epidemic/pandemic disease includes HIV/AIDS, the influenza virus H1N1, and the coronavirus COVID-19.

b) Public Health Agencies

Any unexpected increase in disease can affect Richardson's Bulk Sales Ltd directly by infecting the workforce or employee family members, and indirectly by the disruption to operations resulting from any measures taken to control an epidemic.

The Public Health Agency of Canada maintains a Canadian Pandemic Planning Influenza Preparedness document that contains guidance for the health sector. The provinces have prepared influenza pandemic plans. The provincial health authorities with emergency management services have issued pandemic influenza plans.

The provincial health authorities and the Public Health Agency of Canada should be consulted for all planning and updates on epidemics and disease outbreaks.

c) Epidemic/Pandemic ER Plan

Epidemic/Pandemic Coordinator

- Richardson's Bulk Sales Ltd will designate a coordinator who will monitor public health services for information concerning outbreak/epidemic occurrence and potential. The coordinator will be responsible for dealing with all issues related to epidemic/pandemic disease as they might affect the workplace. This may include staying in up-to-date or in communication with local health departments and health care providers; and developing and implementing protocols for response to ill individuals depending upon the nature of the disease and the recommendations of public health authorities.
- Where an epidemic or outbreak is considered likely, all employees should be advised of the potential for an outbreak or epidemic using approved government sources of information.
- The coordinator will be responsible for establishing and maintaining hand washing facilities, hand cleansers, and other hygiene items required to assist in the spread of any disease. Use of these measures will be encouraged by all supervisors at all times and any specific requirements relative to a disease outbreak will be implemented by the supervisors under the care of the coordinator. Emphasis will be placed on items that sanitize, are disposable, do not require touching to operate, and do not otherwise spread disease.
- The coordinator will communicate this program to all employees and this review will include the symptoms, how to prevent spreading, when not to report to work, and the containment plans according to known or likely disease types that could result in an epidemic/pandemic.

Employee Preventative Measures and Training

- All employees will be informed of the methods by which any identified epidemic/pandemic disease is transmitted, and the immediate steps being taken to reduce the potential for contact and transmission.

- Employees who are at higher risk of contracting the disease, should self-identify by their physiology, health conditions, through travel, by working closely with others or the public, or being exposed to items and surfaces that may harbour the disease.
- These employees at higher risk will be advised of the symptoms, hazards and the control measures that are to be taken at the workplace.

Control Measures

- When faced with an epidemic/pandemic and based on public health information specific control measures will be implemented and communicated to all employees and will include:
    - The universal precautions to be used (assume that all persons in close contact are infected);
    - Clear instructions that employees who are ill, who have been in contact with those who are ill, who are caring for those who are ill or at high risk of infection are not to report to work and are to inform the HR coordinator of their status and how they can be followed up on;
    - Physical barriers that will be used to prevent contact and the social distancing requirements of 2m or more unless other hazard controls are in-place;
    - Ventilation and air filtering changes;
    - Monitoring of employee health status at work;
    - Immunizations and other preventative medical treatments;
    - New or increased first aid supplies and infection control supplies;
    - Location and contact of new or changed emergency health services;
    - Additional first aid training that is required according to the health authorities;
    - Self-quarantine requirements for individuals experiencing any symptoms or exposed to the disease;

- Immediate reporting of any disease symptoms or contact with individuals who have contracted the disease;
- Social distancing and avoiding or participating in large gatherings according to the latest recommendations;
- Working from home and/or telecommuting in lieu of travel;
- PPE requirements such as gloves, respirators, goggles, etc.; and
- Specific hygiene requirements, increased hand washing, sneezing protocol, disposal of infected items, increased surface cleaning of frequent hand contact surfaces, increased cleaning of work surfaces, food handling precautions, etc.

Business Continuity Planning and Emergency Communication

- Richardson's Bulk Sales Ltd will include epidemic planning in its business continuity program that will address:
  - High levels of absenteeism from illness or caregiving in an epidemic/outbreak;
  - Business disruption from travel restrictions and changes in logistics resulting from public measures to control disease;
- The Richardson's Bulk Sales Ltd emergency communication procedures includes an external and customer communications procedure based on the following:
  - The pandemic-epidemic coordinator will inform the President that an outbreak or epidemic is likely (or has occurred) and the business disruption that can result in likely and worst-case scenarios;

- The coordinator and the President, in consultation with managers, will determine the external stakeholders including community, government, client, financial and suppliers who are to be advised and updated according to the nature of the outbreak or epidemic;
- The coordinator will draft the initial communication to be sent to outside stakeholders. The president will review and approve the communication. The communication will include when regular updates will be issued and under what (changing) circumstances special updates will be issued;
- The communication will be issued by the President;
- Status reports will be compiled by the coordinator in consultation with the managers and forwarded to the President for regular updates or if circumstances change; and
- External inquiries will be routed to the coordinator who will respond if the inquiry is within the current action plan. If the inquiry is outside of the current action plan it will be forwarded to the president for joint consideration prior to issuing a response.
- The pandemic-epidemic emergency communication phone list will be used in conjunction with the Emergency Phone List for outside agencies from 5.5 of the Emergency Response section of your manual;
- The pandemic-epidemic phone list will identify all persons who have a role in response and business continuity planning. Alternates will be included in the list;

- The pandemic-epidemic emergency communication phone list will be used by employees to contact key company persons, for information or instructions concerning any aspect relating to the epidemic-pandemic;
- The HR coordinator will maintain a list of employees whose status is to be verified because they are sick, quarantined, or caring for others who are sick, or being cleared for work. The HR coordinator will maintain a list of businesses affected by the an epidemic/pandemic. No employees will be dispatched to related or unrelated businesses without prior verification of the safeguards required according to the HR coordinators' updated list. The HR coordinator will verify status of related and unrelated businesses;
- The pandemic-epidemic coordinator will maintain a list of community, government, and industry organization external contacts to be contacted in the event an outbreak of disease will impact these external parties or where disease reporting and business status reporting may be required under special circumstances.
- The emergency communication program will include a list of clients and suppliers to contact in the event that an outbreak of disease has impacted the company's operations in any manner;
- The sales/marketing coordinator (or alternate) will maintain the key client contact list. The procurement/purchasing coordinator (or alternate) will maintain the key supplier contact list. Their contact information will be contained in the Emergency Communication Phone List;
- The procurement/purchasing coordinator key supplier contact list will include alternatives to critical services, supplies, or raw materials; and
- Alternate key persons.

Review

- The epidemic/pandemic plan will be reviewed annually or when conditions change. The coordinator will initiate a review of the plan after any epidemic/pandemic incident in order to determine what went well and provide improvements as well as any deficiencies that must be corrected.

6.0 Emergency Phone List

An emergency response plan must include the location and use of emergency facilities. For off-site locations, outside services that can provide assistance in the event of an emergency should be identified and reviewed with workers prior to commencing work activities.

EMERGENCY CONTACTS	
Emergency Assistance (this will also alert necessary hospital, ambulance, fire, police, etc. as required)	911
Agency Response Readiness Centre (ARRC)	1-866-618-2362
Alberta EDGE (TDG Emergencies)	1-800-272-9600
AB One Call	1-800-242-3447
STARS	911
Driver Check (A&D Testing)	1-800-463-4310 (option #1) Emergency Bookings

AB Workplace Health & Safety – OHS Contact Centre	1-866-415-8690
Workers' Compensation Board (WCB)	1-866-922-9221
Alberta Environmental Hotline (ASERT)	1-800-222-6514

The Richardson's Bulk Sales Ltd communication protocol will establish the emergency notification protocol, command structure, emergency assembly areas, and evacuation procedures.

7.0 Serious Incident Notification and News Media

Notification decisions will only be made by the most senior Richardson's Bulk Sales Ltd employee available. Richardson's Bulk Sales Ltd will check with the local police or RCMP before notification is attempted. Under no circumstances will the name of any accident victim be released to the public or to any non-essential organization or person.

Richardson's Bulk Sales Ltd employees should not make any statement of any kind. Only Senior Company officials can issue statements to the press or media.

Until the facts are clear, answer the media queries by saying: "A statement will be issued by the Company as soon as possible". Provide media with the name and number of the senior company representative. Beyond this statement, employees are prohibited from speaking with the media. As information becomes known, a senior Company employee will prepare a statement that will be released to the news media.

8.0 Communication Policy and Incidents

All company information that is not in the public domain is "company confidential" and no employee may release it unless required to do so to properly perform their duties or as required by law. All company incidents, occurrences, events, and actions taken by Richardson's Bulk Sales Ltd that an employee becomes aware of in any manner is "company confidential" information and may not be

released publicly in any manner. Company “confidential information” may be contained in written materials, photographs, sketches, video and audio recordings, computer hardware and software, disks, documents, files, drawings, and product specifications.

“Confidential information” may include, but is not limited to:

- Details of any Richardson's Bulk Sales Ltd or Richardson's Bulk Sales Ltd related party (individuals, employees, shareholders, directors, suppliers, contractors, customers, companies, organizations and governments) occurrence, incident, event or action witnessed, observed or described by others;
- Plans, drawings, schematics, flow diagrams;
- Photographs, and video and audio recordings;
- Information technology, software and electronic files of any type;
- Intellectual property and know how;
- Manufacturing, repair, or maintenance methods or processes;
- Equipment or process performance, efficiency, and operating cost information;
- Financial information of any type;
- Business plans or projections of any type;
- Contracts, purchase orders, tenders, bids, and related information;
- Travel plans;
- Staffing levels and projections;
- Personal or private information about any individuals; and/or
- Company communications with any other party.

Publicly releasing, sharing, revealing, distributing, or discussing “confidential information” is prohibited. For clarity this includes releases of “confidential information” through discussions with

private individuals, releases of any type to the media and postings of any type to on-line forums, blogs or social media (Facebook, Instagram, Twitter, etc.) that can be accessed by others in any manner.

Making disparaging comments about Richardson's Bulk Sales Ltd, or any Richardson's Bulk Sales Ltd party in a public forum of any kind is prohibited, as is engaging in any conduct that may damage the reputation of Richardson's Bulk Sales Ltd.

9.0 Supporting Documents

For further information on Emergency Response, refer to the following Safe Work Practices:

- Blood-Borne/Air-Borne Pathogens Exposure;
- Environmental Reporting (Spills and Releases);
- Fires and Explosions Hazards;
- Fire Prevention and Fire Safety;
- Fires and Explosions – Welding, Cutting, and Allied Processes; and
- Medical Emergency Response Plan.

10.0 Company Specific Emergency Preparedness Procedure

10.1 Introduction

Every Company task has potential hazards that may, under uncontrolled circumstances, develop into emergency situations. Being prepared for an emergency in addition to comprehensive prevention programs may reduce the loss potential substantially. The programs outlined in this Section rely completely on the confidence of the employee to supervisor relationship to be successfully implemented.

Management and every employee in the company should be aware of the emergency procedures and the location of equipment and resources such as telephones, fire suppression equipment, first aid equipment and assembly point within their operating area. During an emergency, all cellular phone traffic will be dedicated to the emergency. All personnel working within the organization are directed to the following nine-step procedure should they need emergency help.

10.2 Procedures to Following in an Emergency

1. Protect Yourself

   Assess area for hazards and take necessary precautions.

2. Take Command

   Designate a person to report the occurrence to supervisory personnel

3. Provide Protection

   Protect the incident scene from further hazards for example: traffic, operating machinery, fires, live wires, etc.

4. Give First Aid (If Safe To Do So)

   Give first aid to the injured as soon as possible.

5. Call For Emergency Assistance:

   Call an ambulance and any other emergency services required. In most locations dialling 911 does not ensure contact with emergency services.

6. Isolate Incident Scene

   Barricade, rope off or post a guard at the scene to make sure that nothing is moved or changed until authorities have completed their investigation.

7. Advise Management

   Inform management. If required, they can begin to notify the next-of-kin, government authorities and start procedures for reporting and investigating the incident.

8. Guide Emergency Responders

   Meet and direct the response crews to the incident site.

9. Get Name of Hospital

   For follow-up and next-of-kin notification, find out which hospital the injured are being transported to.

10.3 Emergency Phone List

The emergency list has been developed to assist each Company employee with a list of essential phone numbers. The list should be posted by all office telephones or near communication sources always.

10.4 Emergency Evacuation

Personnel may be informed of an evacuation by means of.

- Word of Mouth;
- Klaxon Horn;
- Bull Horn; and/or
- Fire Alarm.

10.5 Emergency Equipment

1. First Aid Kit

   All vehicles and offices are equipped with a No. 1 First Aid Kit.

   All employees receive First Aid training when starting. Taken every 3 years thereafter.

2. Fire Extinguishers

   All vehicles and offices are equipped with ABC fire extinguisher.

   All employees receive basic instructions on how to use a fire extinguisher.

3. Eye Wash Bottles

   All vehicles and offices have. When vehicle not being used, eye wash bottles will be stored in office. Eye wash bottles will be taken with employee when going to job site and returned to office after job is done. This will keep the bottles from freezing in the winter.

4. Survival Kit

   All vehicles are equipped with a Survival Kit. Survival kit will contain matches, candles, socks, toque, long sleeve shirt, flashlight, blanket, granola bars, gloves, extra batteries, bottles of water and hot packs.

5. Flares

   All vehicles are equipped with reflective triangular flare kits. Flares should be 30 m (100 ft) in front and behind vehicle and 150 m (500 ft) in front and behind your vehicle if you are on the crest of a hill.

   All personnel working on Company projects will be required to observe the following procedures in the event of an evacuation of the project or structure:

- All work is to be stopped;
- Equipment and energy sources to be shut down;
- All employees to proceed to the nearest designated emergency assembly point;
- Employees to report to Supervisor for a name check-off;
- Security measures to be established in the area as necessary to keep non-essential people well back (for obvious safety reasons); and
- Work to be resumed only under the direction of the Area Supervisor.

POST ALL BUILDING SPECIFIC EVACUATION PROCEDURES ON EMPLOYEE BULLETIN BOARDS.

Prime Contractor may have an Emergency Plan in place and in that case they shall supply all necessary information to be followed including all required documentation.

10.6 Emergency Preparedness

Potential Emergencies

This is a list of potential emergencies that have been identified by Management and employees.

- Medical
- Extreme Weather/Storms
- Hazardous Chemical Release or spill
- Fire
- Motor Vehicle

1. Medical

   All injury accidents shall be reported immediately and necessary medical attention shall be acquired. If medical aid is necessary, a medical aid form shall be sent with the injured employee to be completed by the physician and sent back to the Company Safety Co-coordinator indicating extent of injury (e.g. notification of local governmental agencies) and physician summary report.

2. Extreme Weather/Storms

   When a project/facility or task is in the vicinity of these storms, the following procedures should be observed:

   - Severe Lighting:
     - Lakes, sloughs or any open body of water is to be avoided.
     - Tops of buildings, high lines, vessels or crane operation to be avoided, Construction equipment to be avoided.
     - Vehicles to be pulled off the road and the 4-way flashers activated until the storm has passed.
   - Tornado:
     - Below grade shelter to be found. Staying inside structures is recommended but exterior doors and windows are to be avoided.
     - Operation of pumping fluids to be suspended. Turn vehicle off, disconnect hose from tank and take refuge in a shelter.
     - Should shelter not be available, employees should proceed to low ground or a ditch and lie down with the head protected.

3. Hazardous Chemical Release or Spill

   Immediately upon a release or a spill, steps should to be taken be implement the spill plan. The plan is comprised of the following basic Steps

   The Safety Data Sheets (SDS Manual) are to be referred to for detail procedures.

   The area is to be secured and isolated and/or contained if possible.

   If the release is a large uncontrollable spill of liquid, the local police are to be notified immediately. The police will mobilize assistance and commence public evacuation in the immediate vicinity.

   Report to management immediately. Management will then contact the Fire Department and all other applicable government agencies and Prime Contractor.

   In most cases, clean-up procedures should start as soon as possible to prevent further spread of the chemical into storm drains, floor drains, flowing water or ground water

4. Fire

   Richardson's will ensure that signs will be posted in conspicuous places at all entrances to a fire hazard area, identifying the area as a fire hazard area, prohibiting the use of an open flame or other source of ignition in the area. For off-site locations, fire hazard areas will be identified and communicated to the employees prior to commencing work activities at these sites. This will be done at the pre job safety meeting with management and employees.

   In case of a small fire, use the following steps to deal with the fire. ONLY USE THESE STEPS IF IT IS SAFE TO DO SO. DO NOT ATTEMPT TO PUT OUT ANY FIRES LARGER THAN THE EXTINGUISHER BEING USED CAN HANDLE. REMEMBER LIFE BEFORE LIMB.

   - When a fire is discovered, first call, or have someone call, the fire department.
   - Stay back 6 to 10 feet (2 to 3 m) from fire.
   - Keep a clear path of retreat.
   - Stay low to avoid smoke and fumes.

- Get fire extinguisher; break seal (or pull pin). Hold firmly upright.
- Aim at base of flame (not at flames or smoke).
- Press on the lever to discharge.
- If possible, keep the wind behind you.
- Spray the extinguisher agent at the base of the entire burning area in quick, side to side, sweeping motion.
- Avoid inhaling the extinguishing agent.
- After the fire is out, keep a careful watch for reflash.
- Take extinguisher out of service and have it recharged.

Classification of Fires

- Class A Fire: Ordinary combustible (paper, wood, upholstery).
- Class B Fire: Flammable liquids (gas, oil, grease).
- Class C Fire: Electrical fires.
- Class D Fire: Combustible metals (magnesium, titanium, sodium).

Firefighting Techniques (METHANOL FIRES)

- Methanol has an almost invisible flame in daylight and produces no smoke. Fires can only be detected by observing rising heat waves. When other materials ignite, flames and smoke become more visible.
- In winter, the vapour explosive hazard is reduced (ambient temperature is less than the Methanol flash point) and to some degree the overall fire risk is also reduced. However, local hot spots can exceed the flash point and may ignite with a spark and start a fire, e.g., hot welding slag or a bearing overheating on a methanol pump. Summer conditions intensify the overall fire hazard.

- Uses of Aqueous Film Forming Foam (AFFF) alcohol-resistant type, with 6% foam proportioning (with water) equipment is recommended for large scale fires.
- Permanent sprinkler/drench systems are very effective in controlling potential large fires at an early stage. Additionally, drench systems, for wetting and cooling storage tanks, require less water capacity and pressure than traditional fire water hose systems that rely on powerful water jets to reach into storage areas.
- Dry chemical powder is effective for snuffing out small fires in the early stages. Many large fires have been prevented by quick operator action from a well placed hand-held extinguisher of this type. However, metal temperatures may rise quickly and the low auto-ignition temperature of Methanol (385C) often results in spontaneous re-ignition from these surfaces, e.g., powder merely excludes oxygen whereas water removes heat from the fire.
- Fog/fine spray settings on hose nozzle will absorb Methanol vapour fumes, quench fire heat and provide a curtain shield for upwind advancement to a fire source. This technique is designed to isolate a leaking Methanol pump that may have caught fire and prevent the fire from spreading to other equipment.
- Large-scale fires, such as in storage areas, require large volumes of water at high pressure to keep fires under control. Policy is often to protect adjacent equipment by cooling and dilution of burning Methanol nearby with approximately four times its volume of water, or up to the point at which a dike area has become full.
- Employees involved in handling Methanol should be given a live demonstration or have received actual fire training practice in the correct way of dealing with Methanol fires.

5. Motor Vehicle Incident

   Emergency Response: Driver

   If you are involved in a motor vehicle incident, you must stop. Failure to stop is a criminal offence. In the event of a collision, you must do the following:

   -

Set out flags, and/or emergency reflectors:

- 30 m (100 ft) in front and behind vehicle, and
- 150 m (500 ft) in front and behind your vehicle if you are on the crest of a hill;

- See that any injured persons are protected from further injury, but do not attempt to move them unless absolutely necessary;
- Notify the police;
- Notify your company (Manager);
- Do not discuss the accident, except with police officers or a company representative;
- Do not leave your cargo unguarded; and
- Do not move any of the vehicles involved until the police arrive.

Complete an accident report, indicating the following:

- Date, time, and exact location;
- Make, model, type, licence number, insurance company, owner's and passengers names, and addresses of every vehicle involved;
- Name and address of each injured person, the extent of the injuries, and where the injured person was taken;
- Descriptions and estimates of all damages to vehicle and property;
- Names and addresses of witnesses, licence number of first vehicle on the scene, and nearby address where witnesses can be found;
- Names and departments of investigating officers;
- If you can, try to make a diagram of the accident scene. Get photos at the scene, if possible; and

- If you are involved in an accident while transporting dangerous goods, you must file a report with the Federal Ministry of Transport Canada, Dangerous Goods Directorate.

10.7 Emergency Response Plan

LOCATION: 581 Premier Road, Hygrade Industrial Park, Drumheller, Alberta

POTENTIAL EMERGENCIES	The following are identified as potential emergencies: (1)Fire, (2)Medical Aid, (3)threats to commit an act that is likely to be hazardous to the health and safety of the Management or any employees, (4)if there is a possibility of an accumulation, spill, or leak of a hazardous substance in a work place (5)and to in the event of a failure of the lighting system.
EMERGENCY PROCEDURES	In the event of any of the potential emergencies occurring within or affecting the worksite, management will make the following decisions and ensures the appropriate key steps are taken: * Advise all personnel * Pull the fire alarm (only if there's a fire) to alert the nearest fire station and initiate the fire alarm within the building. * Call 911 for an ambulance (only if necessary). * Evacuate all persons to a safe muster point located on the east side of the building by the fence. There is a muster point sign hanging there.
LOCATION OF EMERGENCY EQUIPMENT	Emergency equipment is located at: * Fire Alarm:

- 1 air horn downstairs in Service
- Department Office.

* Fire Extinguisher:

- 1 in Drivers Office
- 1 in Hallway by shoes
- 1 at bottom of stairs by exit door

* Fire Hose:

- 1 in southwest corner of shop

WORKERS TRAINED IN THE USE OF EMERGENCY EQUIPMENT (List of names of workers trained and equipment trained on).

Jim Broom - Fire Extinguisher

Jim Broom - Fire Hose

Doug Jacobson - Fire Extinguisher

Doug Jacobson - Fire Hose

Sherry Broom - Fire Extinguisher

Marie Richardson - Fire Extinguisher

Scott Morgan - Fire Extinguisher

Tom Richardson - Fire Extinguisher

Bill Carruthers - Fire Extinguisher

Blain Stenberg - Fire Extinguisher

Wade Laughlin – Fire Extinguisher

	Types of Training	**Frequency**
EMERGENCY RESPONSE TRAINING REQUIREMENTS	Use of Fire Extinguishers	Orientation and annually
	Use of Fire Hose	Orientation and annually
LOCATION AND USE OF EMERGENCY FACILITIES	The nearest emergency services are located: * Fire Station: * Police: 75 Riverside Drive East - * Hospital: 351 9th Street NW - * Ambulance: 351 9th Street NW -	
FIRE PROTECTION REQUIREMENTS	* All doors to shut at all times	
ALARM AND EMERGENCY COMMUNICATION REQUIREMENTS	* Air Horn blown 3 long beeps then pause then 3 long beeps again until everyone is out * Call 911	

FIRST AID	First Aid supplies located at: * Type No. 1 First Aid Kit in Drivers Office First Aiders are: * Jim Broom - Office Day Shift Monday to Friday (7am-5pm) Transportation of ill or injured workers is by ambulance. Call 911
SAFETY DATA SHEETS (SDS)	Safety data sheets are located: SDS's are located in the Drivers Office. A sign has been placed in the office
PROCEDURES FOR RESCUE AND EVACUATION	For Rescue and Evacuation: * Evacuate and direct all persons to the safe designated gathering point in the staff parking lot (Muster Area) and account for everyone including visitors and clients. * Assist ill and injured workers to evacuate the building. * Provide first aid to workers if required. * Call 911 to arrange for transportation of ill or injured workers to the nearest heath care facility if required.
DESIGNATED RESCUE AND EVACUATION WORKERS	The following workers are trained in rescue and evacuation:

10.8 Emergency Response Practice

Emergency drills and employee training will be used to ensure that responses under emergency conditions are effective and efficient. Workers shall, for each site, know the following:

- Pre-arranged emergency signals and evacuation procedures;
- Where the Emergency Response Manual and phone numbers are kept;
- Which employees may have trouble understanding English or have any hearing impairment that could affect communications;
- How many workers there are at the site; and
- Where first aid kit, eyewash, showers, fire fighting and spill response equipment is located.

It is recommended that employees should be trained and annually practiced in proper use of firefighting equipment in their work areas.

If you are the receiver of an emergency call, document as neatly as possible, the following information:

- Name, phone number, location of caller;
- Nature of incident;
- Cause of incident and how serious it is;
- Specific location and time of incident;
- Is anyone affected or likely to be affected? and
- Take down the time and date you received the call/information.

At the scene:

- Try to prevent further injury and/or damage. If required, all personal shall evacuate and meet at the main gate or at a designated evacuation point;
- Ensure “no further danger” to yourself or others;
- Perform first aid, as required;
- Contact local RCMP, fire department and/or ambulance, if required;
- In a product spill, contact TDG, OH&S, (refer to TDG manual for reportable volumes), if required;
- If the incident involves injury, ensure the Manager is contacted immediately;
- If able, be prepared to provide assistance to emergency response personnel, arrange for transportation for injured personnel; and
- Prepare to submit statement or written reports of the incident, as required.

Note: If an injured employee is alone at a remote work site, every effort shall be made to provide assistance rather than have a worker return to the office or obtain medical aid on his own.

10.9 Resuming Work

1. Fatality or Serious Injury Incidents

   Following an incident where a serious injury or fatality has occurred, government agencies will investigate the cause and extent of damage.

   Work at the scene of a fatality MUST NOT resume until permission has been obtained from the appropriate government agency.

2. Incidents Resulting in Loss or Damage

   Where company property has been damaged or lost, or where revenue from property has been lost, evidence will need to be maintained in an undisturbed state until the company appointed insurance adjuster or government agencies involved have given permission to resume operations.

3. Logging of Events

   Depending on the type of emergency, one or more forms will have to be filled in and filed with the company.

   Once these forms have been filled in, they are a legal document and may be used as evidence in the investigation.

   All forms should be prepared promptly and with care, reporting ONLY the facts and should never express an opinion as to cause or causes.

   Remember to be specific and log the events in a chronological order.

   Important note: Alberta Jobs, Skills, Training, and Labour **must be notified** under the following circumstances:

   - Fatalities (OH&S and RCMP must also be notified);
   - Hospital stays (resulting from work place injury) of 2 days or more;
   - Collapse of a crane, hoist or lifting device;
   - Collapse of a building or structure; or
   - Fire, flood or explosion.

References

- Public Health Agency of Canada – Pandemic Plans (Canada and International) https://www.canada.ca/en/public-health/services/flu-influenza/pandemic-plans.html

- Alberta Government Emergencies and Public Safety.https://www.alberta.ca/emergencies-public-safety.aspx

Forms

- Emergency Drill Form
- Emergency Equipment Inventory
- Emergency Preparedness Inspection Form
- Emergency Response Checklist
- Epidemic/Pandemic Emergency Phone List
- ERP Forms:
  - All Clear Message
  - Empty Residence Notice
  - Environmental Monitoring Log
  - Evacuation Centre Registration Form
  - Evacuee Daily Expense Claim Form
  - External Agency Post Incident Evaluation
  - Incident Event Log
  - Resident Evacuation Message
  - Resident Notification Message
  - Resident Sheltering Message
  - Roadblock Registration Log

- Telephone/Evacuation Contact Log
- Site Emergency Procedures Form
- Suspect and Vehicle Identification Worksheet
- Telephone Threat Report

Hazard Identification and Assessment

1.0 Introduction

A hazard at the workplace is any condition that has the potential to cause injury, illness, or loss. A hazard assessment is one of the most effective ways to ensure a safe work environment and is a legal requirement. It is a careful look at what could harm workers, damage property, cause process downtime, or environmental damage at a workplace.

Richardson's Bulk Sales Ltd has a formal process in place to identify all potential hazards. This process will include the use of Hazard Assessments (Generic, Site-Specific, and Job Safety/Hazard Analyses (JSAs/JHAs)), as well as Inspections, and Hazard Reporting. The Hazard Identification process will be used for routine and non-routine activities as well as new processes, changes in operation, products or services, as applicable.

The benefits of conducting a written hazard assessment include:

- Reducing the number and severity of incidents;
- Identifying the need for worker training;
- Identifying inadequate or missing procedures;
- Identifying the need for equipment maintenance;
- Reducing production losses and property damage; and
- Increasing worker involvement in health and safety issues.

A hazard assessment involves the identification, assessment and control of hazards. This is done by determining what tasks are performed (**Task Inventory**), listing the hazards associated with each task (**Identification**); assessing the level of risk for the hazards identified (**Risk Rating**); implementing strategies to eliminate or reduce the risk involved (**Controls**) and following up (**Corrective Action**) to

ensure that the control strategies chosen are implemented and that recommended changes are completed in a timely manner.

2.0 Types of Hazard Assessments Used

2.1 General Hazard Assessments – Risk Analysis by Job Task

The first stage in completing this task is preparing an inventory of all company positions, and then grouping them into similar job groups, e.g. Administrative, Management/ Supervision, Operator, Mechanic, etc.

A listing of tasks, for each position or job group, will be generated using the **Job-Task Inventory**, which will also identify the competencies required for each position. A **Risk Analysis by Job Task**, will be performed which includes the tasks identified in the Job Task Inventory that are normally performed by each employee. These Hazard Assessments can be used to identify Richardson's Bulk Sales Ltd's most critical tasks by job position which can then be used for training new employees and for annual refresher training.

2.2 Site or Job Specific Hazard Assessments

A **Site or Job Specific Hazard Assessments** will normally need to be conducted and documented prior to work starting, on the day of the job, at a new work site (unless working conditions are covered in the general hazard and risk assessments). The hazard assessment must be repeated prior to the introduction of a new process or if a new piece of equipment is introduced or if at any time the work process or environment changes temporarily or permanently. Work sites include temporary or mobile work sites and work sites not owned by the Company.

A frequent or even daily **Site or Job Specific Hazard Assessment** may be required to identify hazards that arise when work locations, processes, conditions, or equipment change often, and hazards arise that cannot be anticipated in the formal hazard assessment system. For daily or more frequent hazard assessments that meets this criteria, the **Site-Specific Hazard Assessment** or **Pre-Job Hazard Assessment/ Tailgate Safety Meeting** forms can be used along with the hazard identification checklist.

Site-specific hazard assessments will be conducted with the inclusion of affected employee at the worksite.

2.3 Job Safety Analysis – Job Hazard Analysis

A **Job Safety/Hazard Analysis** (JSA/JHA) is a task broken down into its individual steps with a hazard assessment performed for each step. This may be performed due to the task risk level (such as for the critical tasks identified in the **Risk Analysis by Job Task**) or because it is a standard recurring activity. Preparing JSA/JHAs for specific recurring high risk tasks can facilitate establishing Safe Job Procedures which provide safe stepwise instructions for carrying out standard tasks.

3.0 Worksites and Documentation

Richardson's Bulk Sales Ltd will prepare a report of the results of any hazard assessment conducted and the methods used to control or eliminate the hazards identified. The date when the hazard assessment was prepared or revised will be recorded.

All potential hazards must be systematically identified, assessed, prioritized, and eliminated or controlled prior to work commencing. Employees, contractors, and/or all other work site parties will be actively involved in the hazard identification process and the hazards and controls will be reviewed with all who are affected by them. Hazard controls must be reviewed before and after implementation to ensure that they do not create any new hazards for the worker.

Hazard re-assessments or the creation of new hazard assessments are carried out according to the Hazard Identification, Assessment and Control Policy and are required:

- When a work process or operation changes;
- When a new work process or product (e.g., chemical) is introduced;
- When new regulations are implemented that affect a specific written procedure; and
- Before work commences at a new work site:
    - Before the construction of significant additions or alterations to a work site;

- When Inspection or Incident Reports indicate a need;
- When first-aid records indicate a trend; and
- When valid employee suggestions are received.

Risk Analysis by Job Tasks or Formal Hazard assessments are reviewed annually according to the Policy.

The best way to control a hazard is to remove the hazard from the process or site. When eliminating the hazard is not feasible other control measures must be implemented. These measures may include isolating the hazard (**Engineering Control**), writing a Safe Work Practice to work safely despite the hazard (**Administrative Control**), or the required use of personal protective equipment to shield against and minimize the risk of the hazard (**PPE Control**).

By re-assessing known hazards, it can be determined if adequate controls have been taken, if the required controls are being applied correctly, and if more needs to be done to control the hazards.

4.0 Hazard Identification

The following definitions are used to define the relationship between hazards and their potential risk factors:

Hazard: A source of danger with the potential for loss or injury.

Risk: The chance of a loss occurring: a measure of the probability, exposure, and potential severity of harm or loss.

Health hazard: A chronic hazard that typically occurs over an extended period of time. It includes such things as exposure to biological and chemical products, noise, vibration, stress, fatigue, and conditions that can cause soft tissue injuries such as repetitive strain injuries (RSIs).

Safety hazard: An acute hazard that typically occurs instantly. It includes such things as exposure to physical hazards, driving hazards, dangerous atmospheres, and energy sources such as mechanical, electrical, pneumatic, hydraulic, radiation, thermal, stored, and gravity.

Employees will be trained to understand how to identify potential hazards associated with their workplace. Recognition and control of hazards will ensure that corrective actions are completed in a timely manner prior to an incident occurring. Employees will be trained in the hazard identification process including the use and care of proper PPE.

A Hazard Identification list contains a sample of categories and the types of hazards that may be present at the worksite for each category.

Hazardous Atmospheres

- Carbon dioxide
- Explosive gas
- Flash fire hazard
- Flammable substances
- H_2S / Toxic gases
- Oxygen-deficient atmosphere
- Ignition source within 25 m of hydrocarbon substance
- Sludge residue

Energy Sources

- Electrical
- Hydraulic
- Mechanical
- Pneumatic
- Rotation
- Stored Energy

Electrical Hazards

- Condition of tools and cords
- Defective power equipment
- Lighting levels too low
- Overhead powerline
- Powered mobile equipment
- Underground services
- Working on or near energized equipment

Personal Risk

- Complacency
- Contact with moving parts
- Defective hand tools
- Driving
- Entanglement
- Equipment backing
- Equipment operation
- Fatigue
- Frustration
- Poor guarding

- Lack of PPE
- Lack of safe work procedures
- Repetitive work
- Rushing
- Violence and harassment
- Pinch points
- Work alone

Access / Egress Hazards

- Access / egress
- Confined space
- Ladders
- Trapped by
- Trench / excavation

Cranes and Hoisting

- Aerial devices
- Cranes / hoisting equipment
- Mechanical lifting
- Overhead work
- Rigging / ropes / slings / cables

Environmental Hazards

- Air borne particles
- BTEX
- Chemical storage and handling
- Dust and debris
- Radiation
- NORMs
- Harmful substances
- High / low temperatures
- Noise levels
- Housekeeping
- Inclement weather
- Poor lighting
- Vibrations (excessive)
- Pits and ponds

Permits Required

- Confined space
- Ground disturbance
- Hot Work
- Lock out / Tag out
- Safe Work Permit

For a new work site, a non-routine job or a particularly hazardous task, a site-specific hazard assessment or task specific hazard assessment will be performed. In these cases, the main tools for identifying hazards will be the Safe Work Permit, the Pre-Job Planning Meeting, the Job Safety/Hazard Analysis form (JSA/JHA), and the Site Inspection Report. A list of possible hazards will be provided to allow the workers to evaluate the hazards associated with a particular work site.

Other commonly used methods of hazard identification are:

- Physical inspections, both informal and planned;
- Process Hazard Analysis, which involves following a process from start to finish and identifying the hazards at each stage;
- Incident Investigation findings; and
- Employee Hazard Reporting.

5.0 Hazard Risk Rating

Once the hazards have been identified, they must be rated for risk and controlled. Risk rating involves considering the **Likelihood** of a loss when the hazard is present, the and the potential **Severity** of the hazard, if a loss was to occur. Using this approach, the hazard within each task can be rated as Low Risk, Moderate Risk, High Risk or Critical Risk. These ratings will prioritize actions in order to control the risks. See the table titled **Hazard And Risk Management (HARM)** Process for a visual explanation of the rating process.

The following Risk Rating Table describes the elements used to rate the risk of each hazard in terms of Probability, and Severity where P x S = RISK.

Using the **Risk Analysis by Job Task** spreadsheet, a particular job assignment will yield a total Overall Risk Factor, which is a relative indicator of the overall level of risk associated with that job as well as a Maximum Risk Hazard, which highlights the highest rated task and hazard within that job description. The spreadsheet contains conditional formatting, which highlights High Risk hazards in red and Moderate Risk hazards in yellow.

It is not appropriate to compare jobs in terms of which job is more dangerous, rather this exercise should be used to ensure that all jobs are performed safely with the required controls in place and functioning. Even a hazard with a Minimum Risk rating can potentially result in a serious injury or loss.

Hazard And Risk Management (HARM) Process

The Hazard and Risk Management process is a systematic method of identifying and dealing with hazards. HARM can be broken down into four separate elements.

A hazard is defined as a condition with a potential of causing injury to personnel, damage to equipment or structures, loss of material, or reduction of ability to perform a prescribed function.

IDENTIFY

Identification of hazards is primarily accomplished through one or more of the following mechanisms:

- While conducting work related activities;
- Daily operational or pre-job/post-job checks;
- Conformance and compliance inspections;
- Environmental, Health & Safety program audits; and
- As a result of incidents or accidents.

Regardless of the mechanism of discovery, the hazards shall be reported and, if possible, the situation shall be made safe prior to re-commencing operations.

All reports of hazards shall be documented and retained on file for two years.

EVALUATE

Hazards are assessed in relation to their health, safety, environmental, reputational and business impact while also considering potential consequences and likelihood of reoccurrence (Risk Assessment Matrix).

Hazards and control measures must be re-assessed periodically and whenever significant changes warrant it.

Tools to aid in hazard assessment include:

- Risk Assessment Matrix;
- Hazards and Operability Study (HAZOP);
- Quality Risk Assessment (QRA);
- Health Risk Assessment (HRA); and
- Environmental Impact Assessment (EIA).

ELIMINATE / CONTROL

The primary goal of the Hazard and Risk Management Process is to eliminate or control hazards. Once a hazard has been identified, the threats to the release of that hazard must also be identified. In this way, suitable barriers and controls against the release of a particular hazard can be put in place. Examples are as follows:

- If possible, eliminate the hazard;
- Daily Guarding;
- Conformance Barriers;
- High pressure alarms;
- Procurement standards;
- Codes of practice and safe operating procedures;
- Training and competence;
- Secondary containment;
- Planned maintenance routines; and
- PPE.

Hazard Control initiatives should always be considered in the following order:

- If possible, eliminate the hazard;
- Eliminate;
- Procedural Controls; and
- Personal Protective Equipment.

RECOVER

Should controls fail, mitigation and recovery measures shall be taken.

These mitigation and recovery measures are planned and documented prior to a hazard being realized.

These include:

- Emergency Response Plans;
- Spill Response Plans;
- Spill Cooperatives;
- Mutual Aid Agreements;
- Sprinkler and deluge systems;
- Firefighting equipment and training; and
- Business Continuity Plans.

SEVERITY (S)	
Level 1	• No damage or injury or adverse consequences.
Level 2	• Personnel – First aid injury, no lost time or disability. • Public – Minor impact. • Environment – Contained spill/release. • Equipment – Minor damage, work slowdown, equipment downtime.
Level 3	• Personnel – Medical Aid Injury or Restricted Work Injury. • Public – Greater than minor impact, loss of confidence/some injury. • Environment – Moderate uncontained release. • Equipment – Moderate damage, work slowdown, equipment downtime.
Level 4	• Personnel – Lost time injury. • Public – Exposed to a hazard that could or will produce injuries. • Environment – Major uncontained release. • Equipment – Major damage, results in major slowdown, downtime.
Level 5	• Personnel – Life threatening, fatal. • Public – Exposed to life threatening hazard. • Environment – Large uncontained release. • Equipment – Loss of critical equipment or shutdown of operation.

X

PROBABILITY (P)	
Level 1	Mishap occurs only in exceptional circumstances.
Level 2	Has rarely occurred (e.g. Every 1 in 50 years).
Level 3	Has occurred at some time (e.g. Every 1 in 20 years).
Level 4	Has occurred infrequently (e.g. Every 1 in 5 years).
Level 5	Has occurred frequently (Occurs in order of one or more per year and likely to reoccur within 1 year).

=

SCORE	ACTION
1 - 4	**Low Risk** Continued operation is permissible with minimal controls; monitor the hazard and take action if the degree of risk increases. Covered by individual's competency and skill.
5 - 10	**Moderate Risk** Continue after taking action to manage overall level of risk by implementing appropriate controls to lower risk. Supervisor level approval required prior to work site activity, if risk cannot be sufficiently lowered.
11 - 19	**High Risk** Do not proceed until sufficient control measures has been implemented to reduce risk to an acceptable level. Area Supervisor or Management approval prior to work site activity, if risk cannot be sufficiently lowered, preferably to Minimum Risk level.
20 - 25	**Critical Risk** Requires escalation to Senior Management responsible for risk management oversight. Should be constantly monitored and reviewed monthly.

- Eliminate
- Procedural Control
- PPE

6.0 Hazard Reporting

The hazard reporting system is used to deal with any dangerous work practices and unsafe conditions which are encountered at work during daily activities.

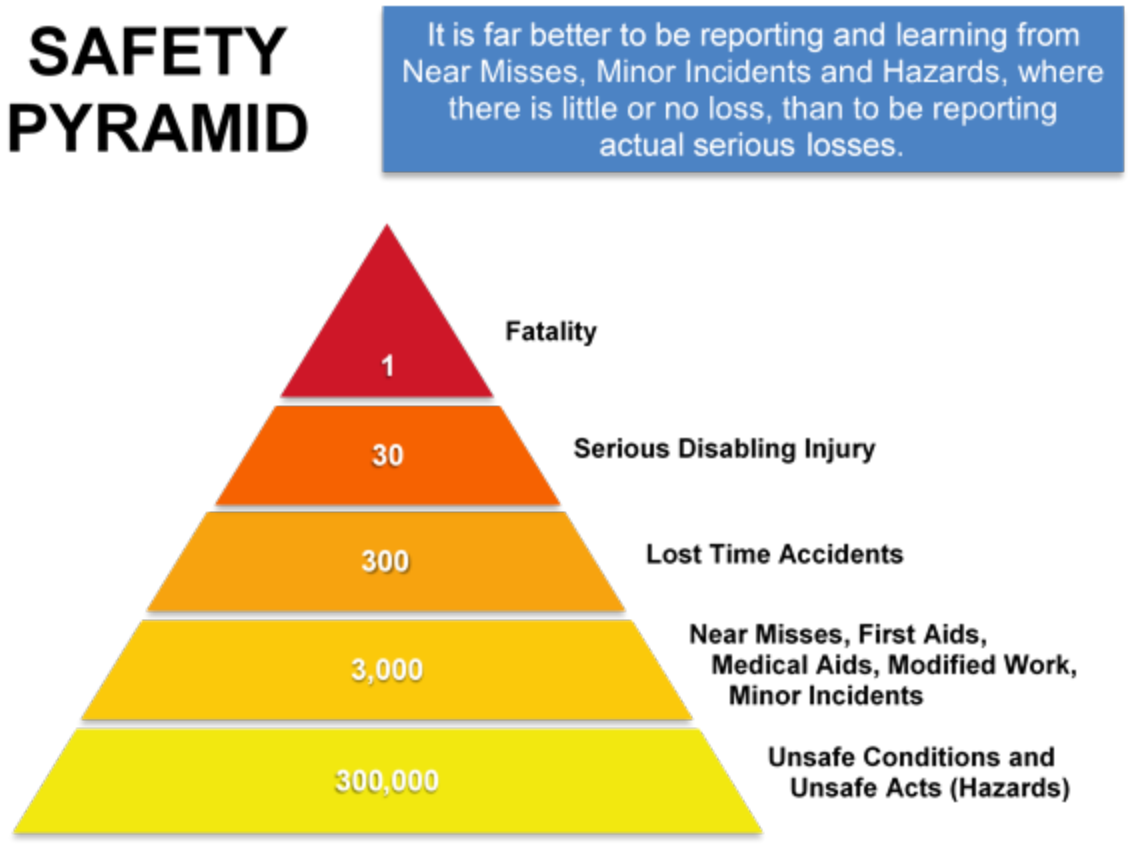
Workers will inform their immediate supervisor of any hazards encountered on work sites. These should be documented in writing on a Hazard Report. An employee who believes on reasonable grounds that there has been a contravention of any safety related regulation, or that there is likely to

be an accident or injury to health arising out of, linked with, or occurring in the course of employment must immediately make a complaint to the their supervisor. The hazard will be assessed by the supervisor who will be responsible to investigate and implement any appropriate control measures that need to be established. A work order or equivalent may be generated for this hazard and a competent worker will be assigned to correct the hazard by the supervisor. A target date will be established for completion. Corrective actions like this will be recorded on the Corrective Action Register and followed up on by the supervisor's manager and/or the safety coordinator regularly to ensure completion of tasks.

A hazard report must include the following:

- Date reported;
- Description of the hazard and its location;
- Risk presented;
- Control measures needed;
- Interim actions taken, if any; and
- Name and signature of worker who reported the hazard.

The Safety Pyramid below illustrates the typical relationship between losses and the number of Near Misses and Hazards that occur. Many more hazards and near misses should be reported relative to the actual losses that are experienced. Underreporting of near misses may result in unsafe conditions, which result in greater losses.



7.0 Hazard Assessment Communication and Training

In-house training will be provided to all employees required to conduct or understand hazard assessments and can be documented by competent approved employees using the On-the-Job Training form and filed accordingly.

Hazard assessments that are performed on job types using the Risk Analysis by Job Task matrix will be prepared with the assistance of incumbent employees. Once completed, these generic hazard assessments will be reviewed with all affected employees and with any new employees. This review

will be documented by having employees sign off on their hazard assessment. The most critical tasks identified by this hazard assessment for each job position must be reviewed as well as any specific JHA/JSAs performed on these critical tasks. An annual review of these assessments will take place (listed as a check point on the Annual Safety Checklist) and a meeting with all affected employees will be held annually to review any changes to their hazard assessment and to refresh their understanding of the hazards, risk ratings, and controls.

Forms

- Access Permit
- Corrective Action Register
- Job Task Inventory
- Risk Analysis by Job Task (Acceptable to use Incident Report form)
- Hazard, Near Miss, & Incident Report Form
- Hazard Report Form
- Job Safety Analysis
- Pre-Job Hazard Assessment/Tailgate Safety Meeting
- Site-Specific Hazard Assessment

Hazard Control

1.0 Definitions and Procedure

When an existing or potential hazard to workers is identified during a hazard assessment, Richardson's Bulk Sales Ltd will take measures to eliminate the hazard, or if elimination is not reasonably practicable, control the hazard. This will be done with the inclusion of workers affected by the hazards and proposed controls.

- If reasonably practicable, Richardson's Bulk Sales Ltd will eliminate or control a hazard through the use of engineering controls.
- If a hazard cannot be adequately controlled using engineering controls, Richardson's Bulk Sales Ltd will use administrative controls that control the hazard to a level as low as reasonably achievable.
- If the hazard cannot be adequately controlled solely by using engineering and/or administrative controls, Richardson's Bulk Sales Ltd will ensure that the appropriate personal protective equipment (PPE) is used by workers affected by the hazard.
- When hazards are identified OHS legislative requirements will be verified to assist in establishing compliant control methods. Richardson's Bulk Sales Ltd may use a combination of engineering controls, administrative controls, and personal protective equipment if there is a greater level of worker safety because a combination is used.
- High hazard items will be given priority for hazard controls.
- The implementation of hazard controls will follow these steps:
    1. There must be dedicated individual(s) who is/are responsible for the implementation;
    2. When completed, the implementation must be properly documented;

3. Follow-up must occur to ensure that implemented controls are in fact being utilized;
4. A review process, both before and after implementation, must be in place to avoid creating new hazards derived from the corrective measures; and
5. The implementation process will be documented on the **Corrective Action Register.**

- All control methods will be monitored or frequently reviewed with the work site personnel to continue to ensure that the hazard is being effectively controlled.
- Controls indicated on the General Hazard and Risk Assessment form will be labelled in the following manner to identify the type of control: Engineering (E), Administrative (A), and PPE (P).
- All workers will be trained in the hazard identification process. This includes knowledge of the process, the forms of identification, and the risk controls used to eliminate or mitigate the risks, including the use and care of proper PPE.
- Risk controls are connected to a variety of industry recommended standards, guides (e.g., CSA Standards, ASME Standards, InUnison Standards, IRP Guidelines, API Standards, and manufacturers' specifications), and government legislation. Richardson's Bulk Sales Ltd will use the applicable standards and regulations that are related to its work activities.

2.0 Engineering Controls

Engineering controls should be used first and provide the highest degree of control because they eliminate or control the hazard at its source.

The use of engineering controls includes:

- **Elimination** - Completely removing a hazardous job, tool, process, machine, or substance;
- **Substitution** - Substituting or replacing one substance or process with another that would not pose a potential hazard;
- **Redesign** - Hazards may be "engineered out" through redesign of the work site, work processes, and jobs;

- **Isolation** - Hazards may be isolated through containment or enclosure;
- **Automation** - Some processes can be automated or mechanized to avoid worker contact;
- **Barriers** - Some hazards can be blocked or barricaded;
- **Absorption** - Engineering controls that would absorb the hazard, such as baffles that block or absorb noise; and
- **Dilution** - Some hazards can be diluted or dissipated.

3.0 Administrative Controls

If engineering controls are not practical, then administrative controls can be considered.

Administrative controls include:

- Planning and communication;
- Codes of Practice, Safe Operating Procedures, and Safe Work Practices;
- Safe Work Permits;
- Work/rest schedules limiting exposure to the hazard;
- Limiting hours of work;
- Scheduling hazardous work during times when exposure to workers is minimized;
- Monitors and alarm systems;
- Training;
- Safety meetings; and
- Posters and bulletins.

4.0 Personal Protective Equipment

Personal protective equipment (PPE) must always be used as a last line of defense in controlling hazards, generally in addition to other control methods. PPE is less desirable as a control method since it does not eliminate the hazard. The PPE must be properly selected, maintained, and worn by workers.

5.0 Corrective Action and Follow-Up

Once a hazard has been identified, rated, and has had controls put into place Richardson's Bulk Sales Ltd will review its corrective measures to ensure that:

- New hazards were not created by the corrective measures;
- All affected workers are informed of changes that are made to control hazards;
- Workers are following the hazard controls determined to be required; and
- Necessary hazard controls, such as writing of a new procedure or installation of a new machine guard, were performed and completed. This requirement can be tracked through the Corrective Action Register. Richardson's Bulk Sales Ltd Management is required to follow-up on outstanding work orders and corrective action to ensure action items are performed in a timely manner.

A Management of Change (MOC) Process may be used to ensure that new hazards are not introduced when new control measures are implemented.

Incident Reporting and Investigation

1.0 Program and Requirements

1.1 Reporting and Investigation Requirements

Richardson's Bulk Sales Ltd requires all incidents that have caused illness, injury, loss of product, damage to property or the environment, or work site downtime to be reported immediately.

Richardson's Bulk Sales Ltd requires that “near misses”, events which under slightly different circumstances could have caused any of the above losses, to be reported in the same manner.

Richardson's Bulk Sales Ltd requires work refusals to be reported immediately.

An investigation will be conducted to identify the root cause(s) for high risk incidents and near misses and to recommend actions to prevent recurrence.

Investigations will be carried out by competent people designated by Richardson's Bulk Sales Ltd and will involve workers in the investigation process who are knowledgeable in the type of work involved.

1.2 Definitions

Richardson's Bulk Sales Ltd has adopted the following definitions with regards to incident reporting:

- **Incident** (Actual Loss): Someone hurt, something broken, something spilled or released, something shutdown, or work disrupted unintentionally.

- **Hazard:** A source of danger; a potential for loss or injury; a condition or practice with the potential to cause physical harm to a person; a loss of product; damage to property; or work site downtime.
- **Near Miss:** An event, whereby under slightly different circumstances, there could have been an actual incident in which a loss or injury was incurred.

Richardson's Bulk Sales Ltd recognizes three (3) levels of response to incidents and near misses:

- **Notification:** Refers to an immediate action of reporting incidents and near misses (by the most rapid means, usually directly in person or by telephone);
- **Reporting:** Refers to filling out the reports required by both Richardson's Bulk Sales Ltd and any federal and provincial regulators.
- **Investigation:** Refers to a detailed review of the circumstances leading up to, and including, the exposure. The investigation shall be initiated as soon as possible. As well as documenting the basic and immediate causes, incident investigation requires a more in-depth review by identifying the root causes and indirect contributing factors.

1.3 Investigations

- In order to encourage reporting, Richardson's Bulk Sales Ltd has adopted a “FACT FIND, NOT FAULT FIND” approach to Incident Reporting and Investigation. Richardson's Bulk Sales Ltd will only apply the Progressive Discipline system, as a result of an incident, if an employee involved has either flagrantly or knowingly abused the safety rules or procedures, or if an employee has repeatedly committed the same infraction or error.
- Richardson's Bulk Sales Ltd will supply incident investigation training to any key personnel who will be responsible for conducting incident investigations as described in the Responsibility and Accountability section of this health and safety program. Incident investigation training will include:

    - How to gather information;
    - How to take witness statements after an incident;
    - How to preserve and collect evidence; and
    - How to provide assistance in a formal investigation.

- Outside resources who have the requisite training may be used if the requisite competencies are not available within the company.
- All Richardson's Bulk Sales Ltd workers will be provided with training on the incident reporting and investigation process. This training will be provided to ensure that all workers are aware of how and when to report incidents (including near miss incidents) and to inform workers of when and how incidents and near misses are investigated.
- Managers and supervisors who have assigned responsibilities with respect to any aspect of accident investigations will receive appropriate training in the investigation procedures contained in this section of the Health and Safety Manual for which they have authority or responsibility.
- Workers who are knowledgeable in the type of work involved in the incident will be involved in the investigation.

2.0 Types of Incidents, Hazards, and Near Misses to be Reported

The following are some examples of the types of incidents that must be reported to a supervisor or health and safety committee member or representative.

2.1 Internal Reporting

- Personal injury
- Occupational illness

- Chemical exposure
- Fire/explosion
- Environmental damage
- Equipment damage
- Motor Vehicle accident
- Product contamination
- Operational upset or downtime
- Material loss
- Hazardous gas exposure
- Toxic or flammable gas release
- Spill/release
- Property damage
- Security/theft
- Workplace violence
- Harassment
- Sexual harassment
- Third-party/public involved
- Regulatory non-compliance

Near miss incidents which may cause any of the above or otherwise resulted in a “loss” must be reported in the same manner as an actual incident.

Any Richardson's Bulk Sales Ltd worker who is injured or becomes ill as a result of a job-related condition or incident must notify his or her supervisor as soon as possible. The supervisor will ensure that the proper documents and reports are filed both internally and externally.

Failure to promptly report an injury can result in the claim being challenged by both Richardson's Bulk Sales Ltd and the Workers Compensation Board. Workers will be instructed to promptly report injuries.

In the event of an incident requiring transportation of an injured party, Richardson's Bulk Sales Ltd will provide transportation to the nearest medical treatment centre and cover any related costs.

Under some circumstances, off-the-job safety event reporting may be encouraged to promote safe behaviours at all times.

Richardson's Bulk Sales Ltd management will review all Incident and Near Miss Reports and Investigations.

2.2 Provincial Reporting and Investigation Requirements

1. Injuries and Incidents to be Reported

   The following types of injuries or incidents must be reported by Richardson's Bulk Sales Ltd, as the employer or when acting as Prime Contractor to a Director of Inspection and include the date, time, place, and nature of the injury or incident as soon as possible:

   - Mine or mine site incidents specified in the OHS Code (Call the OHS Contact Centre at 1-866-415-8690);
   - A potentially serious incident (PSI). Use the PSI Online Reporting Service:www.alberta.ca/report-potentially-serious-incidents.aspx. An Alberta MyAlberta Digital ID for Business will be required for on-line notifications; and
   - A serious injury or incident (Call the OHS Contact Centre at 1-866-415-8690 to report the following incidents):
     - An injury or incident that results in the death of a worker;
     - An injury, illness, or incident in which there is reason to believe the worker has been or will be admitted to a hospital beyond treatment in an emergency room or urgent care facility;

- An unplanned, uncontrolled fire, explosion, or flood that causes serious injury or has the potential of causing a serious injury;
- The collapse of or upset of a derrick, crane, or hoist;
- The collapse or failure of a component of a building or structure that is necessary to the structural integrity of the building or structure; and
- If any worker is exposed to radiation in excess of the maximum limits prescribed in the OHS Code the prime contractor or employer must make a report to the Director with the time, place and nature of the exposure.

2. Report Contents and Investigation

If a reportable injury or incident referred to above occurs at a work site or if any other injury or any other incident that has the potential of causing serious injury to a person occurs at a work site, Richardson's Bulk Sales Ltd, as the employer or when acting as the Prime Contractor, shall:

- Report the time, place and nature of the injury, illness or incident to a Director as soon as possible;
- Carry out an investigation into the circumstances surrounding the injury or incident;
- Prepare a report outlining the circumstances of the injury or incident and the corrective actions, if any, undertaken to prevent a recurrence of the injury or incident;
- Ensure that a copy of the report is readily available and provided to an officer on demand; and
- Provide a copy of the report to a Director of Inspection, the Joint Health and Safety Committee or Health and Safety Representative, if applicable, or, if there is no committee or representative, make it available to workers once the investigation is complete.

Richardson's Bulk Sales Ltd shall retain the report for at least two years after the serious injury or incident at the work site.

3. Preserving the Scene of an Incident and Visit by OHS Officer

   Except as otherwise directed by a Director of Inspection, an Occupational Health and Safety Officer or a peace officer, a person shall not disturb the scene of an incident required to be reported under (1.) above and its immediate area, or alter, move, or remove equipment, documents, or other information except as necessary in:

   - Attending to persons injured or killed;
   - Preventing further injuries; and
   - Protecting property that is endangered as a result of the incident.

   An OHS officer or investigator may visit the scene of the incident to gather information or conduct an investigation and gather materials and information according to section 34(1) of the Act. No person is allowed to interfere or hinder an officer performing their duties or functions. Every person at a work site must cooperate with an officer attending or investigating an incident according to sections 35(1) and 36(1) of the Act.

4. Potentially Serious Incidents (PSI)

   A PSI is any event where a reasonable and informed person would determine that under slightly different circumstances, there would be a high likelihood for causing a serious injury or illness to a person and there is reasonable cause to believe that a corrective action may need to be taken to prevent recurrence. The person does not need to be a worker and does not need to have suffered an injury.

   The following factors should be taken into consideration to determine if the incident is a PSI:

   - The actual circumstances of the incident;
   - The hazards that were present at the time of the incident;
   - The appropriate controls in place at the time of the incident;

- Whether under slightly different circumstances the incident may have resulted in a serious injury; and
- Similar incidents that have occurred at Richardson's Bulk Sales Ltd workplaces in the past two years that resulted in a serious injury.

The employer or prime contractor will conduct an investigation according to (2.) above.

Alberta Government Publication LI016 Reporting and Investigating Injuries and Incidents https://ohs-pubstore.labour.alberta.ca/li016-1, may be used in order to assist in determining whether an incident is a PSI under Alberta Legislation.

Energy Safety Canada – Potentially Serious Incidents: A Guideline on Identification and Reporting,https://www.energysafetycanada.com/_Resources/Guidelines-Reports/POTENTIALLY-SERIOUS-INCIDENT-(PSI)-GUIDELINE, may also be used to determine whether an incident is a PSI in various provincial jurisdictions.

2.3 Federal Reporting Requirements

Richardson's Bulk Sales Ltd employees may be classified as federally regulated for health and safety and/or subject to Canadian Federal safety legislation at certain worksites. When required the Richardson's Bulk Sales Ltd incident and investigation program will comply with the federal reporting and investigation requirements contained in the Canada OHS Regulations Part XV and described below. These regulations apply to employers who are federally regulated under the Canadian Labour Code.

In this section:

Disabling injury means an employment injury or an occupational disease that:

- Prevents an employee from reporting for work or from effectively performing all the duties connected with the employee's regular work on any day subsequent to the day on which the injury or disease occurred, whether or not that subsequent day is a working day for that employee;
- Results in the loss by an employee of a body member or part thereof or in the complete loss of the usefulness of a body member or part thereof; or
- Results in the permanent impairment of a body function of an employee.

Minor injury means an employment injury or an occupational disease for which medical treatment is provided and excludes a disabling injury.

1. Hazardous Occurrence

   A hazardous occurrence is a health and safety incident that has or is likely to cause injury. An accident is an incident that has caused an illness or an injury. Part XV of the OHS Regulations requires that every accident, occupational disease and other hazardous occurrence be investigated without delay. Certain hazardous occurrences, as defined under the regulations, have additional government reporting and investigation requirements as described in this section.

   Richardson's Bulk Sales Ltd will adhere to all of the requirements of Part XV of the OHS Regulations: Hazardous Occurrence Investigation, Recording and Reporting. The Health and Safety Committee or Health and Safety Representative as the case may be, will receive a copy of all hazardous occurrence investigation reports as required by the regulations.

As soon as possible after learning of an accident or hazardous occurrence, that has or is likely to cause injury, Richardson's Bulk Sales Ltd will:

- Act to ensure that the occurrence does not happen again;
- Appoint a qualified person to carry out an investigation; and
- Notify the work place committee or representative of the occurrence and of the name of the investigator.

2. Hazardous Occurrence Reporting

Reports Within 24 Hours

Richardson's Bulk Sales Ltd must report to a health and safety officer by telephone, telex, or fax as soon as possible but within 24 hours after becoming aware of an occurrence that resulted in:

- Death of an employee (even if it appears to be from natural causes);
- Permanent disabling injury of an employee, or temporary disabling injury of two or more employees from the same occurrence;
- Permanent impairment of a body function of an employee;
- An explosion;
- Damage to a boiler or pressure vessel that results in fire or rupture of the boiler or pressure vessel; and/or
- Damage to an elevating device that renders it unusable, or a free fall of an elevating device.

Authorization may be required from a health and safety officer before disturbing an accident scene where an employee has been killed or seriously injured. Canada Labour Program offices have an after-hours emergency telephone number that can be used to contact a health and safety officer. Call 1-800-641-4049 to report a death, serious injury or refusal to work.

Reports Within 72 Hours

In addition to the 24 hour report to the Labour Program, where a boiler or pressure vessel, or elevating device is damaged, Richardson's Bulk Sales Ltd must record in a log within 72 hours a description of the occurrence including date, time and location. The record must include the causes of the occurrence and the corrective measures taken or the reason for not taking correctives measures. Richardson's Bulk Sales Ltd must immediately send a copy of this record to the Health and Safety Committee or Health and Safety Representative as the case may be.

Reports Within 14 days

The employer must report in writing to a health and safety officer, within 14 days, occurrences that resulted in:

- Disabling injuries (temporary or permanent);
- Electric shock, toxic atmosphere or oxygen deficient atmosphere that caused an employee to lose consciousness;
- Rescue, revival or other similar emergency procedures; and/or
- A fire or an explosion.

The report should either be submitted using the form, Hazardous Occurrence Investigation Report (LAB 1070), or it must contain all the information required by this form and deemed acceptable to the Labour Program. Addresses and telephone numbers for the various district offices are available on the Labour Program website or by calling 1-800-641-4049.

3. Motor Vehicle Accidents on Public Roads

   Motor vehicle accidents on public roads are subject to the same recording and reporting requirements identified above. If police investigated the accident, the police report must accompany the report on the investigation conducted by the police and the health and safety committee. Both the employer's report and the police report must be submitted to a health and safety officer.

4. Annual Reports

   Each year, Richardson's Bulk Sales Ltd is required to submit to the Minister the Employers Annual Hazardous Occurrence Investigation Report (LAB 1009) by March 1st for the 12-month period ending December 31st, even if there have not been any hazardous occurrences. This report asks for the total number of: disabling injuries, minor injuries, deaths, occupational diseases, and other hazardous occurrences that have occurred in the past year.

   The Employer's Annual Hazardous Occurrence Report (LAB 1009) is sent to:

   Occupational Health and Safety

   Labour Program - Human Resources and Skills Development Canada

   165 Hôtel-de-Ville Street

   Gatineau, Quebec K1A 0J9

   Telephone: 877-568-9609

   The form may also be sent by E-mail to: EAHOR.INFO@labour-travail.gc.ca

3.0 Incident Reporting and Investigation

Richardson's Bulk Sales Ltd has adopted the following three levels of internal Reporting and Investigation. All external reporting and investigation requirements from 2.2 must be followed regardless of the internal classification of an incident.

3.1 Near Miss/Minor Incident Report

This form of report can initially be made out by a worker who observes either an event commonly referred to as a Near Miss or is involved in a minor incident.

Typically, this form of report contains only the following entries:

- Name of reporting worker;
- Name of the person reviewing the incident (usually a supervisor);
- Date and time;
- Location;
- Category of loss – injury, illness, property, environmental, equipment, vehicle;
- Description of occurrence;
- Immediate action taken; and
- Corrective actions to prevent similar occurrence.

Near misses should be reported immediately to a supervisor and the report should be submitted the same day. An immediate determination will be made by the supervisor or management as to whether external reporting is required according to 2.2 and all other criteria in this Manual. Required external reports will be submitted by management.

Management and Supervision will encourage reporting all incidents and may set goals for the number of near miss incidents that they expect to receive.

These reports should be reviewed by the worker's supervisor and will be tabulated for statistical purposes and shared with other workers in order to inform them of situations that may also affect them. Near Miss incidents that had serious potential consequences will be investigated.

3.2 Incident Report

The next level of reporting involves incidents in which losses (greater than minor losses mentioned above) have occurred. These events are recorded on standard format incident report forms by the supervisor in charge, with the help of the worker or crew members involved in the incident.

These incidents must be verbally reported immediately once the situation has been controlled. The written incident report should be issued within 24 hours.

The Incident Report includes the following entries:

- Name of reporting worker, supervisor, and witnesses and contact information;
- Date and time of incident;
- Location – more specific detail;
- Category of loss – injury, illness, property, environmental, equipment, vehicle;
- More detailed description of the occurrence, along with sketches, pictures, etc.;
- If injury related, detail regarding type and severity of injury;
- If non-injury related, details regarding the equipment or process involved and estimated cost to rectify;
- Immediate and subsequent action taken, in greater detail;
- A limited section on causes of the incident; and
- Limited description of follow-up activities to prevent a re-occurrence.

3.3 Incident Investigation

An incident investigation is performed when the loss, or the potential for loss (near miss), exceeds Company limits or where required by legislation. Employees who are knowledgeable in the activities and/or the involved with the incident will be asked to assist and be involved with the investigation. Richardson's Bulk Sales Ltd will determine when an investigation must occur. Investigations will be conducted for:

- Lost time accidents, illnesses or injuries;
- Damage or downtime resulting in a loss of greater than the current specified level;

- A spill or release that must be reported;
- All incidents where harm or disturbance to the public occurred;
- Work refusals; and
- A near miss which had the potential to result in any of the above.

The Incident Investigation component of the Company Health and Safety program will:

- Determine the immediate and basic (root) causes of an incident, and
- Take corrective action to eliminate or correct these causes and to reduce the potential of a future recurrence of the incident.

The intent of the investigation is not to fix blame on those involved in incidents. More importantly, the identification of immediate and basic causes, management control functions, and education resulting from the occurrence should be the primary objective.

Richardson's Bulk Sales Ltd will investigate all serious incidents immediately or as soon as it is practical after medical treatment and after the area has been stabilized. Supervisors will try to gather information for the investigation during the shift on which the incident occurred.

The incident investigation process must include the involvement of workers who conduct the type of work associated with the incident.

3.4 Incident Causation Codes – Root Cause Analysis

Incident Causation Codes are intended to assist the investigator(s) in the identification of the Immediate Causes and Basic Causes that led to the occurrence of the incident.

The Incident Causation Codes table has four columns entitled:

- Incident Report (section);
- Title;

- Incident Causal Factors; and
- Code.

The Table is further subdivided into other sections to allow investigators to select the "Cause Factors" related to the incident and to record them in Section 5 of the Investigation Form entitled "Cause Analysis".

1. Immediate Causes

    Incident Immediate Causes consist of either:

    - Substandard practices (unsafe acts) on the part of personnel, or
    - Substandard conditions (unsafe conditions) in the workplace.

2. Basic Causes

    Basic Causes are often referred to as "Underlying Causes". These are system failures that, when not corrected, will allow "Immediate Causes" to be present in the workplace.

    There are three Basic Cause categories to be considered. They are:

    - Personal factors;
    - Job factors; and
    - Type of contact and type of energy source.

    When completing determining the "Cause Analysis" of the Investigation, always:

    - Identify the Immediate Causes (substandard practices and/or substandard conditions) first, and
    - Then identify the Basic Causes ("Personal Factors", "Job Factors", and "Contact/Energy Source") that are associated with the incident.

The identification of "Immediate and Basic Causes" is critically important to reaching a determination on what needs to be done to ensure that the incident is prevented from recurring.

Senior Management must review and sign off on all Incident Investigations.

3.5 Loss Causation Model

Lack of Control - Failure to Maintain Compliance with Adequate Standards For:

- Leadership and Administration
- Management Training
- Planned Inspections
- Task Analysis and Procedures
- Incident Investigation
- Task Observations
- Emergency Preparedness
- Organizational Rules
- Personal Protective Equipment
- Health Control
- Program Evaluation System
- Engineering Controls
- Personal Communications
- Group Meetings
- General Promotion
- Hiring and Placement

- Incident Analysis
- Employee Training
- Purchasing Controls
- Off-the-Job Safety

Basic Causes

Personal Factors

- Inadequate Capability
- Physical/Physiological
- Mental/Psychological
- Lack of Knowledge
- Lack of Skill
- Stress
- Physical/Physiological
- Mental/Psychological

Job Factors

- Inadequate Leadership or Supervision
- Inadequate Engineering
- Inadequate Purchasing
- Inadequate Maintenance
- Inadequate Tools, Equipment, Materials
- Inadequate Work Standards
- Abuse or Misuse
- Wear and Tear

- Improper Motivation

Immediate Causes

Substandard Practices

- Operating Equipment Without Authority
- Failure to Warn
- Failure to Secure
- Operating at Improper Speed
- Making Safety Devices Inoperable
- Removing Safety Devices
- Using Defective Equipment
- Failing to Use PPE Properly
- Improper Loading

Substandard Conditions

- Inadequate Guards or Barriers
- Inadequate or Improper Protective Equipment
- Defective Tools, Equipment, or Materials
- Congestion or Restricted Action
- Inadequate Warning System
- Fire and Explosion Hazards
- Poor Housekeeping, Disorder
- Noise Exposure
- Radiation Exposure

- Improper Placement
- Improper Lifting
- Improper Position for Task
- Servicing Equipment in Operation
- Horseplay
- Under Influence of Alcohol and/or Other Drugs
- Temperature Extremes
- Inadequate or Excess Illumination
- Inadequate Ventilation

Incident (Contacts)

- Struck Against (Running or Bumping Into)
- Struck By (Hit By Moving Object)
- Fall to Lower Level
- Fall on Same Level (Slip and Fall, Trip Over)
- Caught On (Snagged, Hung)
- Caught Between (Crushed or Amputated)
- Contact With (Electricity, Heat, Cold, Radiation, Caustics, Toxics, Noise)
- Overstress, Overexertion, Overload

- Caught In (Pinch and Nip Points)

Loss

Personal Harm	Property Damage	Process Loss
• Major Injury or Illness (Hospitalization)	• Major (> $50,000)	• Major (> $50,000)
• Serious Injury or Illness (Medical Aid)	• Serious (> $1,000)	• Serious (> $5,000)
• Minor Injury or Illness (first aid)	• Minor (< $1,000)	• Minor (< $5,000)

4.0 Corrective Action and Incident Trend Analysis

In order to ensure that planned remedial actions and recommendations resulting from an investigation are completed in a timely manner, it is critical that these actions are listed on a Corrective Action Register, inputted into the Company Work Order process and reviewed regularly for progress. As actions are completed they should be signed off. Actions that are delayed in being performed must be reviewed by senior management and moved up in priority if required.

Richardson's Bulk Sales Ltd management will appoint a key person to be responsible for coordination of all corrective actions resulting from incident investigations, as well as other reporting processes. The key person will oversee insertion of the corrective actions into the work plan and final completion.

All actions will be documented and filed. In addition, the key person will perform a quality control function by reviewing the report for quality and thoroughness. Incident reports will be compiled and tabulated in order to establish incident trends.

At regular intervals, Richardson's Bulk Sales Ltd will perform an incident trend analysis of the investigation findings to determine whether unacceptable or previously unrecognized trends are developing, and also whether control measures are having a positive effect on safety in the workplace. These statistics and trends will be presented and made available to all employees.

5.0 Communication

Besides ensuring that the corrective action items are promptly addressed, it is important that all workers, especially those directly involved with the incident, are informed of the results of any Incident Investigation. Effective communication to Richardson's Bulk Sales Ltd employees of all incidents is an important control that will be used to prevent safety incidents.

Investigation results will be shared through safety meetings, bulletins or any other form of communication that is appropriate to the nature of the incident and the findings of the investigation.

There will be at least one general safety meeting per year dedicated to reviewing the procedures and importance of incident, near miss and hazard reporting.

Forms

- Incident Report Form (Generic)
- Incident Investigation Form (Generic)
- Incident Report Form (Oil and Gas)
- Incident Investigation Form (Oil and Gas)

References

- Canada Occupational Health and Safety Regulations – Part XV.https://laws-lois.justice.gc.ca/eng/regulations/SOR-86-304/index.html

- Alberta Occupational Health and Safety Act Compliance and Enforcement Part 7, Sections 33-38. https://www.alberta.ca/ohs-act-regulation-code.aspx

Management Communication and Reporting

Richardson's Bulk Sales Ltd will ensure the effective and timely communication of Health and Safety related issues. Through this communication policy Richardson's Bulk Sales Ltd will confirm its commitment to the Health and Safety program.

Some of the methods that may be used for sharing or disseminating H&S information include:

- **General Meetings** – Management will regularly meet with employees, contractors, subcontractors, vendors, and clients to demonstrate their corporate commitment to safety.
- **Work Site Tours** – Managers will undertake periodic work site tours to observe work practices, to conduct conformance and compliance inspections, and to talk to workers about safety activities, initiatives, and concerns.
- **Safety Meetings** – General, Pre-Job, and weekly safety meetings will be used to disseminate safety-related information. These meetings will be used to orientate workers; identify workplace hazards; review existing policy, review operating procedures and guidelines; discuss and determine control measures; and acknowledge safety and performance issues.
- **Bulletins and Notifications** – Safety bulletins and notifications will be issued as required to employees, contractors, and subcontractors to identify safety concerns, changes in regulations and other relevant information.
- **Reporting** –Safety reports, including injury, near miss, and incident reports, will be posted or distributed at work sites.
- **Worker Feedback** – Opportunities will be provided for suggestions and feedback to allow for worker contributions and constructive criticisms of the Health and Safety Program.
- **Performance Reviews** – Richardson's Bulk Sales Ltd will ensure that annual Employee Job Safety Performance Reviews are conducted.
- **Goals and Objective** – Richardson's Bulk Sales Ltd will list the annual goals and objectives for the Health and Safety Program and post or distribute these. These goals and objectives will be reviewed quarterly.

1.0 Management and SupervisorTours

Annually, senior management will clearly reiterate to all employees the Company's commitment to health and safety and the Company's corporate safety policy.

Position	Formal/Informal	Frequency
Supervisor	Informal	Daily Work Areas Supervised
Middle Management	Formal	Monthly
Senior Management	Formal	Bi-Annually
Executive Management	Formal	Annual

2.0 Safety Awards Program

Richardson's Bulk Sales Ltd may from time to time institute a Safety Awards Program to target certain goals or objectives.

Richardson's Bulk Sales Ltd will tailor the safety awards program to the desired objectives and seek to provide a meaningful reminder of the commitment to safety that made the award possible.

Safety Award Programs will be presented jointly by senior management and the Health and Safety Manager.

3.0 Motivating Actions for Senior Management

- Provide clear, reasonable, and timely responses to Health and Safety concerns raised by the workforce.
- Sign a Health and Safety policy which reflects the importance of Health and Safety in the workplace.
- Participate in setting yearly measurable Health and Safety goals for the organization. Communicate these goals and provide regular updates (at least quarterly).
- Ensure that Health and Safety is an agenda item for all management meetings.
- Participate in all general safety meetings and as many other safety meetings as possible.
- Participate in Occupational Health and Safety audits, site inspections, and incident investigations.
- Review incident and accident investigation reports and the Corrective Actions Register regularly (at least quarterly) and communicate incident and accident investigation results to all employees following a review.
- Share Health and Safety news items and alerts with employees through newsletters and bulletins.
- Participate in a formal review process for yearly Health and Safety goals and objectives with managers, supervisors, or Health and Safety committee members or representatives.
- Perform periodic informal safety inspections.
- Make sure management is accessible to all employees for any safety concerns.

Forms

- Comment and Suggestion Form

- Employee Job Safety Performance Evaluation Form
- Management Tour Report
- Safety Checklists

Obligations of Work Site Parties

Work site parties have specified health and safety obligations under Part 1 of the Alberta OHS Act and the OHS Regulation. These obligations form an integral part of the responsibilities and accountabilities described in this section of the Health and Safety Manual. Richardson's Bulk Sales Ltd, in addition to acting as an employer, may also from time to time be acting as one or more of the work site parties listed in the Act who have prescribed obligations for health and safety. Richardson's Bulk Sales Ltd will ensure that all parties at its work sites adhere to their obligations for health and safety under the Act and Regulation. Richardson's Bulk Sales Ltd will also adhere to its obligations when acting as a work site party listed in the Act.

As part of the orientation program, all new employees will review and sign a copy of their respective Health and Safety responsibilities and accountabilities. Employee Health and Safety performance will be measured annually based upon their respective levels of responsibility.

Work Site Obligations and Levels of Responsibility

There are five general levels of responsibility and accountability within Richardson's Bulk Sales Ltd's organization at places of employment and/or worksites. They are:

1. Management (Employer);

2. Supervisors;

3. Employees and workers;

4. Contractors ("Contracting Employers" under the Act); and

5. Visitors.

The senior management of Richardson's Bulk Sales Ltd (employer) is responsible for:

- Senior management have employer responsibilities under the Act;
- Ensuring the health, safety and welfare of employees, any other workers, other employer, or any person present at work sites where Richardson's Bulk Sales Ltd work is being carried out and other persons in the vicinity of work sites who might be materially affected identifiable and controllable by hazards originating from the work site;
- Ensuring that workers have and understand their rights under the AB OHS Act including:
    - The right to be informed of work site hazards and the means to eliminate or control those hazards (the Right to Know);
    - The right to meaningful participation in health and safety activities pertaining to their work and work site including the ability to express health and safety concerns (the Right to Participate);
    - The right to refuse dangerous work (the Right to Refuse); and
    - The ability to work without being subject to disciplinary action for exercising a right or fulfilling a duty imposed by the Act, the Regulations, or the OHS code;
- Ensuring that no employees are subjected to harassment or violence at the work site;
- Cooperating with the Joint Health and Safety Committee or Health and Safety Representative in all matters and to resolve health and safety concerns in a timely manner;
- Making funds and processes available to effectively accommodate the Company's Health and Safety needs;
- Setting and communicating annual goals for improvement and constructively analyzing the results;
- Encouraging employee and contractor involvement in the safety process;

- Ensuring that all operations, including those of contractors and subcontractors, meet government safety requirements;
- Ensuring that all incidents are reported and, where necessary, investigated and that corrective action is taken to prevent a recurrence;
- Ensuring that workers engaged in the work of that employer are adequately trained in all matters necessary to perform their work in a healthy and safe manner;
- Ensuring that training needs are identified and met;
- Taking the necessary action to correct any dangerous working conditions brought to their attention by workers;
- Understanding, implementing, enforcing and ensuring that employees are aware of their rights and duties under the AB OHS Act, the Regulations, the OHS Code, Codes of Practice, Standard Operating Procedures, associated Safe Work Practices, and Safety Rules;
- Providing appropriate supervision at work sites and ensuring that supervisors are competent and familiar with the AB OHS Act, the Regulations, and the OHS Code as it pertains to the work being performed;
- Providing appropriate and well-maintained safety equipment for each task;
- Cooperating with any person exercising a duty imposed by the AB OHS Act, the Regulations, and the OHS Code;
- Evaluating and monitoring the Company's Substance Abuse and Violence/Harassment in the Workplace Programs on an ongoing basis; and
- Completing a risk assessment at least every year for all safety sensitive job positions.

The Richardson's Bulk Sales Ltd Supervisor's and line manager's responsibilities include:

- Taking all precautions necessary to protect the health and safety of the workers under their supervision;
- Ensuring that their direct reports are "fit for duty" as related to their assigned tasks;

- Identifying and meeting safety and operational training needs;
- Identifying and correcting hazards and dangerous work conditions;
- Correcting unsafe acts in a proactive, positive manner;
- Clearly understanding their respective annual Health and Safety goals and working diligently towards achieving them each year;
- Understanding, implementing, and enforcing the AB OHS Act, the Regulations, and the OHS Code and all Richardson's Bulk Sales Ltd Codes of Practice, Standard Operating Procedures, associated Safe Work Practices, and Safety Rules;
- Complying with the AB OHS Act, the Regulations, and the OHS Code;
- Cooperating with any person exercising a duty under the AB OHS Act, the Regulations, and the OHS Code;
- Ensuring that appropriate and well-maintained equipment is available and used to perform the work activity;
- Meeting regulatory compliance and Company conformance requirements;
- Ensuring that workers are informed about job hazards and are prepared to deal with any site-specific hazards on the work site;
- Ensuring that workers apply all hazard controls to the workplace as specified in each applicable hazard assessment;
- Conducting daily tours of all worksites directly supervised in order to observe employee compliance with health and safety standards and practices, and to conduct two-way communication with employees;

- Reporting concerns to Richardson's Bulk Sales Ltd about unsafe or harmful work , work sites, and taking reasonable steps to ensure that it is acts or conditions that occur or have occurred;
- Ensuring that personal protective equipment (PPE) is readily available at the work site and taking reasonable steps to ensure that it is correctly used, stored, maintained, and replaced when necessary;
- Ensuring that none of the workers under their supervision are subjected to or participate in harassment or violence; and
- Reporting all incidents. This may include conducting investigations into the facts leading up to and including the incident and determining the root cause to prevent a recurrence.

Workers employed by Richardson's Bulk Sales Ltd are responsible for:

- Taking reasonable care to protect the health and safety of yourself and others at or near a work site;
- Cooperating with Richardson's Bulk Sales Ltd and supervisors in protecting the health and safety of yourself and others working for Richardson's Bulk Sales Ltd and those not working for Richardson's Bulk Sales Ltd who are present at your work site;
- Reporting for work “fit for duty” and/or notifying their direct supervisor of any mental or physical conditions that may impact the performance of their assigned work tasks;
- Refraining from causing or participating in violence or harassment;
- Adhering to all regulations, guidelines, and safety standards as required by government regulatory agencies and those communicated by management and supervisors;
- Applying all hazard controls as instructed and specified by the applicable hazard assessments;

- Following all appropriate Codes of Practice, Safe Operating Procedures, associated Safe Work Practices, and Safety Rules contained in the Company's Health and Safety Manual;
- Reporting to your employer or supervisor a concern about an unsafe or harmful work site act that occurs or has occurred or an unsafe or harmful work site condition that exists or has existed, and, if possible, correcting the unsafe condition;
- Observing activities of fellow employees and contractors to ensure their safety and the safety of those around them and correcting unsafe acts in a proactive, positive manner to prevent an incident from occurring;
- Refusing to perform work or particular work that he or she believes on reasonable grounds constitutes an undue hazard at the work site or constitutes an undue hazard to the worker's health and safety or to the health and safety of another worker or another person;
- Not performing work that may endanger the worker or others when not competent to do so, except when under the direct supervision of a worker who is competent to perform the work;
- Reporting all incidents, injuries, and illnesses to their supervisor;
- Participating in, and using, all training offered by the Company;
- At all times, when the nature of the work requires, use all devices and wear all personal protective equipment designated and provided for your protection by your employer or required to be used or worn by the worker by the Act, the Regulations, and the OHS Code; and
- Complying with any person exercising a duty imposed by the AB OHS Act, the Regulations and the OHS Code.

Contractor (contracting employers) responsibilities and obligations include:

- Complying will the AB OHS Act, the Regulations, and the OHS Code;

- When directing the activities of another employer involved in work at a work site ensuring, as far as it is reasonably practicable to do so, that the employer complies with the Act, the Regulations, and the OHS Code in respect of the work site;
- Ensuring that the owner and any employer, prime contractor, supplier, or service provider on a work site is informed of any existing or potential work site hazards that may affect workers or other persons at the work site;
- Ensuring that the contractor's work site processes and procedures do not create a hazard to the health and safety of any person;
- Advising the Prime Contractor at a work site of the name of every employer or self-employed person whose activities are directed by the contractor;
- Cooperating with any person who exercises a duty under the AB OHS Act, the Regulations, and the OHS Code;
- Ensuring that their employees are mentally and physically fit for the duties being assigned to them;
- Insisting on safe performance throughout their operations by ensuring that all employers and employees are competent to do their work properly and are aware of their responsibilities and accountabilities;
- Ensuring that an effective and compliant health and safety program is in place or that they work to the standards of the Company's health and safety program;
- Providing the time and resources required to enable employers and employees to conduct their activities safely;
- Identifying and correcting hazards, dangerous work conditions, and unsafe acts;
- Ensuring that appropriate and well-maintained equipment is available and utilized to perform the work activity;

- Ensuring that all incidents are reported and investigated, and corrective action is taken to prevent a recurrence;
- Ensuring that workers are informed about job hazards and are prepared to deal with any site-specific hazards and emergencies on the work site;
- Ensuring that workers are aware of Right to Refuse Dangerous Work legislation, and;
- Ensuring that personal protective equipment (PPE) is readily available at the work site, correctly used, stored, maintained, and replaced when necessary.

Obligations of Other Work Site Parties

Other parties named under the Act who may be present at or involved with work sites and who have prescribed obligations under the Act include:

1. Suppliers;
2. Service Providers;
3. Owners;
4. Employers (Non-Contractor)
5. Prime Contractors (see Prime Contractor SWP); and
6. Temporary Staffing Agencies.

All parties have an obligation to adhere to the requirements of the AB OHS Act, the Regulations and the OHS Code, and cooperate with any person exercising a duty related to these pieces of legislation.

When acting as one of the above work site parties, in addition to acting as an employer, Richardson's Bulk Sales Ltd will adhere to its obligations under the Act and as described herein.

1.

Supplier Obligations

- Ensure that any personal protective equipment or equipment that the supplier supplies is in safe operating condition, ensure that any harmful substance the supplier supplies is safe to use, when used in accordance with the manufacturer's specifications.
- If the supplier has responsibility under an agreement to maintain equipment, ensure that the equipment is maintained in a safe condition, in accordance with the manufacturer's specifications, if any, and in compliance with the applicable safety legislation.
- Every supplier shall ensure that any personal protective equipment, equipment, harmful substance, or explosive that the supplier supplies complies with the Act, the Regulations, and the OHS Code.
- Provide a notice to all of the employers supplied with equipment, or to the purchasers or lessees of the equipment, when the supplier becomes aware or ought reasonably to be aware that personal protective equipment, equipment, or harmful substances that are supplied or about to be supplied do not comply with a standard prescribed under the Regulations or the OHS Code.
- Ensure that any personal protective equipment, equipment, or harmful substance is supplied with a written copy of the manufacturer's specifications and any other instructions for safe use, as applicable, if such specifications and instructions exist.

2. Service Provider Obligations

- Ensure that any service provided to a person to meet an obligation in the Act, the Regulations or the OHS Code will enable the person to comply with this legislation.
- Ensure that services provided to a person to meet an obligation in the Act, the Regulations, or the OHS Code are completed by workers who are competent to provide those services.
- Ensure that no person at or near a work site is endangered as a result of the service provider's activity.

3.

Owner Obligations

- Ensure that the land, infrastructure, and any building or premises on the land that is under the owner's control, is provided and maintained in a manner that does not endanger the health and safety of workers or any other person.
- Ensure that any hazard identified by the owner is communicated to all workers, employers, contracting employers, prime contractors, suppliers, and service providers that are conducting work activities, or may be reasonably anticipated to conduct work activities, in relation to the land, infrastructure, and any building or premises on the land.

4. Employers (Non-contractor) Obligations

- Conduct the employer's work so as to ensure that the self-employed person or any other person is not exposed to hazards from activities at the work site.
- When working on a project that has a prime contractor, advise the prime contractor that the self-employed person is working on the project.
- Comply with all duties imposed on employers and workers by the AB OHS Act, the Regulations, and the OHS Code as if the requirement were directly imposed upon the self-employed person.
- Report to all affected employers and persons at the work site a concern about an unsafe or harmful work site act that occurs or has occurred or an unsafe or harmful work site condition that exists or has existed.

Employers at a work site have "senior management" responsibilities and obligations for their employees and all others affected by their work, as described above.

5. Temporary Staffing Agencies Obligations

- Ensure the worker to be assigned to another employer is suitable to perform the task for which the worker is to be assigned.
- Ensure that the worker is equipped with any necessary personal protective equipment prior to deployment to the other employer or will be so equipped prior to commencing work activities with the other employer.
- That the other employer is capable of ensuring the health and safety of the worker.

6. Multiple Obligations

When Richardson's Bulk Sales Ltd or other work site parties have multiple obligations under the Act Richardson's Bulk Sales Ltd will ensure that:

- Persons who have multiple obligations meet the obligations of each function, and
- If the same duty is applied to more than one person at a work site, that no other party is relieved of their duplicate duty unless:
- Simultaneous compliance would result in unnecessary duplication of effort and expense, and
- The health and safety of any person at the work site is not put at risk by compliance with that duty by only one person.

Forms

- Contractor Obligations
- Employee Obligations
- Management Obligations
- Other Employers Obligations

- Supervisor Obligations
- Visitor Obligations

Rules

Purpose

Safety rules are written to protect the health and safety of all employees, workers, the public, and visitors and to ensure that all regulatory and Company requirements are consistently met throughout the organization.

Scope

General safety rules apply at all times at Company workplaces and while on company business.

Richardson's Bulk Sales Ltd rules will be:

- Reviewed by management to ensure they are consistent with both Company and legislative requirements;
- Reviewed as a refresher at safety meetings;
- Presented during new employee orientations and on-the-job training sessions; and
- Distributed, posted and accessible to all employees.

All employees are required to comply with the rules.

1.0 Prohibitions

The following are prohibited at all Company owned or operated work sites:

- Verbal abuse, harassing behaviour, or any physical violence by the public, co-workers, or workers from other companies;
- Possession or consumption of alcohol, regulated drugs (cannabis/marijuana) or illicit drugs;
- Arriving for work, or remaining at work, when an employee's ability to perform the job safely and efficiently is impaired;
- Riding any hoist, vehicle, machinery, or other equipment which is not specifically approved by Richardson's Bulk Sales Ltd to accommodate riders;
- Fighting, gambling, horseplay, and practical jokes with the potential to cause injury or damage or which is viewed as unwanted by the recipient(s);
- The use of any listening device which may impede a worker from hearing verbal warnings, alarms, or equipment noise that would affect the workers safety;
- Theft or vandalism;
- Cleaning, adjusting, or repairing machinery while it is in motion or energized;
- Operating any tool, piece of equipment, or machinery without appropriate authorization or training;
- Explosives, fireworks, firearms, ammunition, knives, or hunting equipment;
- Removing and not replacing guards on equipment, machinery, power tools, moving belts, drive chains, and reciprocating parts;
- Rendering ineffective any safety control or feature;
- Unauthorized altering or removing of locks, tags, blinds, chocks, blocking, pressure limiting devices, blinds, or any other item being used to control hazardous energy;

- Damaging, disabling, or interfering with safety, firefighting, or first-aid equipment;
- Smoking in non-designated, prohibited, hazardous or non-legal locations is prohibited. Carrying any device designed to create a spark, heat or ignition including all of the devices named herein is prohibited in non-designated and hazardous locations. Smoking includes cigarettes, pipes, vapour cigarettes and all devices related to igniting or heating tobacco, or any tobacco substitutes, or any material that is heated or ignited and subsequently inhaled or allowed to disperse in any manner;
- Failure to follow any instruction, rule or safety requirement; and
- Disparaging or making harmful comments about the Company in any public forum.

2.0 Requirements for All Workers

Requirements for all workers include:

- Reporting to your place of employment “fit for work”;
- Immediately reporting and documenting all observed hazards which either exist or have occurred, including equipment related hazards and any unsafe conditions;
- Reporting and documenting all “incidents,” including near misses;
- Participating in pre-job, weekly, or regularly scheduled safety meetings;
- Storing, maintaining, servicing, and wearing all safety and personal protective equipment required by Richardson's Bulk Sales Ltd; and
- Ensuring that required safety training certifications and current/applicable class of driver's licence are available.

3.0 Alcohol and Drugs

All employees and contractors shall adhere to the following rules with respect to alcohol and drugs:

- All employees, contractors, and worksite parties must follow the requirements of the Substance Abuse Program;
- No employee shall be permitted to work at any work site owned or operated by Richardson's Bulk Sales Ltd when they are under the influence or after effects of alcohol, illegal drugs, or regulated drugs (marijuana/cannabis) as defined in (Substance Abuse Program, section 1.5 Alcohol and Drug Rules). If an employee is found to be under the influence or suffering from the effects of alcohol, illegal or regulated drugs, they will be removed from the work area and suspended from work immediately;
- No employee may take prescription or non-prescription drugs that may affect his or her ability to work safely and efficiently. The individual must notify his or her supervisor immediately before reporting for work. Employees may not abuse prescription or non-prescription drugs and these must only be taken as intended and recommended by the manufacturer and a health care professional;
- No employees are permitted to operate a Company vehicle (or any vehicle on company business) while under the influence of alcohol, illegal or regulated drugs, non-prescription drugs, or prescription drugs (as defined in Substance Abuse Program, section 1.5) which may affect their ability to operate the vehicle safely;
- No employee is permitted to possess drug paraphernalia at the worksite or in a company vehicle. Drug paraphernalia includes any personal property that is associated with the use of any drug, substance, chemical, or agent the possession of which is unlawful in Canada, or the use of which is regulated by legislation such as marijuana/cannabis;
- No employee will commit a criminal act related to the possession, ingestion, consumption, cultivation, or trafficking of an illegal or regulated drug. This will result in their dismissal and the notification of legal authorities;

- Employees must self-refer if they have a substance abuse problem which may reasonably be expected to result in their being unfit for work. Richardson's Bulk Sales Ltd may require the employees participation, if eligible, in a substance abuse and monitoring program in order to maintain employment; and
- Social events must be managed by company employees in a responsible way to avoid potential health and safety risks. Reasonable steps must be taken to ensure that the safety and wellbeing of all individuals is protected and that no individual drives while impaired by any drug or alcohol after participating in Company sponsored functions.

4.0 Fit for Duty Requirement

To be fit for duty:

- The employee must be physically and mentally capable to safely and efficiently perform their assigned work duties. Employees may be, or become, unfit for duty for a variety of physical, physiological, or psychological reasons. Employees who believe that they are or have become unfit for duty must cease or not begin work and report to their supervisor;
- Richardson's Bulk Sales Ltd will ensure that no person enters or remains at the job site while under the influence of any drugs and/or alcohol as defined in our Substance Abuse Program;
- Employees must abide by all provisions in Richardson's Bulk Sales Ltd's Fatigue Management Policy, Substance Abuse Policy and Substance Abuse Procedure. Employees who report to work and are unfit for duty in contravention of these policies and practices will be subject to discipline;

- Employees must report all prescription and non-prescription drugs and medications they are taking which may cause them to be impaired or otherwise unfit for duty. This includes over-the-counter medications such as allergy or cold and flu medications which can also cause impairment;
- Employee's activities and behaviours will be monitored by supervisors to determine if an employee should be removed from the work site because they are unfit for duty. Employees who are unfit for work will be removed from the work site in a respectful and confidential manner while the cause or causes are investigated;
- Richardson's Bulk Sales Ltd verifies that workers are trained on Richardson's Bulk Sales Ltd's Fit for Duty policies and procedures; and
- If an employee is determined to be unfit for duty and removed, Richardson's Bulk Sales Ltd will use the site-specific process in place to provide reasonable assistance to the employee to safely leave the worksite and move to a secure, supervised and appropriate location. Any other evaluation and assistance that may be provided to eligible employees will be determined according to the provisions of this Health and Safety Manual and the Employee Assistance Program.

5.0 Enforcement and Discipline

5.1 Responsibility

Managers and supervisors are responsible for ensuring that the Enforcement and Discipline Policy is communicated and adhered to by all workers.

Workers are responsible for ensuring that they know and understand the implications of the Enforcement and Discipline Policy.

Any worker who knowingly fails to comply with legislated requirements, policies, procedures, practices, rules, or reasonable instruction given by a person qualified to do so may be subject to disciplinary proceedings.

Richardson's Bulk Sales Ltd recognizes that in certain cases, the worker may have contributed to or caused an incident, broken a safety rule, or has been careless. In an effort to not discourage workers from reporting incidents, Richardson's Bulk Sales Ltd will not normally employ disciplinary measures unless the incident is a repeat offence or constitutes flagrant or willful disregard of company rules.

Where applicable, all stages of discipline will be recorded on the supplied form and filed accordingly.

Richardson's Bulk Sales Ltd employees will be informed for the company's Progressive Discipline Program. Methods to be used will include an annual review at a safety meeting and a dedicated topic for new employee orientations which will include the requirement to read and acknowledge the company's policy.

5.2 Implementation of Disciplinary Process for Violations

Violations of Policies, Rules, Instructions and Procedures

When policies, rules, instructions, and procedures are violated in a willful or dangerous manner, then these circumstances warrant disciplinary action. Supervisors will implement the following progressive disciplinary procedure in a timely manner. In all instances, disciplinary action should be applied on a fair and consistent basis while maintaining strict confidentiality.

1. Verbal Reprimand

   The supervisor should clearly identify the employee's improper conduct compared with the desired standards of performance and the consequences of non-compliance to the employee. The supervisor should document the major points of the interview for the record and subsequent follow-up if necessary.

   Note: At each stage of the Disciplinary Process, it is important to obtain the commitment from the employee to correct the substandard condition. Without this commitment, more severe discipline should be considered.

2. Written Reprimand

   If performance does not improve over a reasonable time period, the supervisor shall notify the employee, in writing, of the performance deficiencies, required improvements, time frame, and the consequences of non-compliance. At this stage, such consequences may include suspension or dismissal.

3. Suspension

   Supervisors have the option of suspending an employee (without pay) in an effort to correct improper conduct. The supervisor should consult with Management and/or the Human Resources Department, prior to the suspension, to ensure compliance with legal requirements. Suspension may be considered appropriate, as a remedial aid, under the following circumstances:

   - If the desired behaviour is not observed following a written reprimand;
   - In the case of a serious offence, where the written reprimand stage may be skipped; and
   - In some serious cases, or when Management and/or Human Resources are unavailable to advise, the employee may be asked to leave work immediately (for example – an act of violence outside of normal working hours). In this case, the worker should be told they are "suspended pending investigation".

   Upon confirmation of suspension, the employee should be notified in writing that they are relieved of their responsibilities and that the employee will incur a loss of pay for a limited time period. The time period will vary from one (1) to ten (10) working days, depending on the seriousness of the incident and on the employee's work record.

4. Dismissal

   Dismissal, as a disciplinary action, should only be used when all other remedial efforts have failed to result in the required performance improvement or when the degree of misconduct is very serious.

   Dismissal decisions must be supported by complete and clear "due process" documentation, and the improper conduct and the disciplinary steps taken so far must be noted.

The employee's Manager and Manager of Human Resources should be consulted prior to the final decision being taken on dismissal. An employee, dismissed as a result of the disciplinary process, shall be dismissed without notice or pay in lieu of notice.

6.0 10 Life Saving Rules

Adoption of Life Saving Rules

Richardson's Bulk Sales Ltd has adopted Energy Safety Canada's (ESC) and the Safety Standards Council's "Life Saving Rules" (LSR). Richardson's Bulk Sales Ltd agrees to implement the rules according to the Life Saving Rules - Industry Accepted Standard, in its current edition. The standard is available from ESC.

Richardson's Bulk Sales Ltd will ensure that the specific standards its health and safety management system, as described in this Health and Safety Manual (HSM), follow the guiding principles and terms and conditions described in the Industry Accepted Standard.

Importance of the Life Saving Rules

Richardson's Bulk Sales Ltd recognizes that ESC has determined that the Life Saving Rulers cover 80% of the fatalities registered under WCB oil and gas funding codes in the Western Canadian Provinces. In adopting the LSRs standard Richardson's Bulk Sales Ltd will be contributing to saving lives in the oil and gas industry. Richardson's Bulk Sales Ltd considers the Life Saving Rules to be a key component of its stated goal of "Zero Losses".

The Life Saving Rules

The following is a list of the ESC Life Saving Rules and the main Richardson's Bulk Sales Ltd health and some of the main safety management system programs and policies that are aligned with the LSRs. Richardson's Bulk Sales Ltd has integrated the LSRs throughout the HSM and the list of supporting programs and policies does not reflect all aspects of the LSRs that have been incorporated in the health and safety management system.

Failure to Follow the Life Saving Rules and Interventions

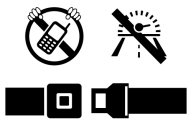
- Richardson's Bulk Sales Ltd considers any breach of the LSRs to be serious because of the potential fatal consequences.
- Breaches of the LSRs will be dealt with as a serious incident and reported and investigated according to our incident reporting and investigation program and where individuals have been found accountable for a breach of the rules, they will be subject to our disciplinary program above.
- Breaches of Life Saving Rules recorded in incident reports will cite the specific LSR number that was breached.
- Breaches of LSRs will be tracked in order to address root causes and improve our safety system.
- Where a Life Saving Rule (or any other safety rule) has been, or is likely to be breached, all Richardson's Bulk Sales Ltd employees are empowered to immediately take appropriate action, up to and including stopping work, in order to prevent further harm and obtain assistance.

The Life Saving Rules

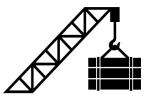
The Life Saving Rules and Richardson's Bulk Sales Ltd **Implementation**

ICON AND TITLE		RULE DESCRIPTION	RULE DETAILS
1.	Confined Space 	Obtain authorization before entering a confined space	• I confirm energy sources are isolated • I confirm the atmosphere has been tested and is monitored • I check and use my breathing apparatus when required • I confirm there is an attendant standing by • I confirm a rescue plan is in place • I obtain authorization to enter
2.	Working at Height 	Protect yourself against a fall when working at height	• I inspect my fall protection equipment before use • I secure tools and work materials to prevent dropped objects • I tie off 100% to approved anchor points while outside a protected area
3.	Work Authorization 	Work with a valid permit when required	• I have confirmed if a permit is required • I am authorized to perform the work • I understand the permit • I have confirmed that hazards are controlled, and it is safe to start • I stop and reassess if conditions change
4.	Energy Isolation 	Verify isolation and zero energy before work begins	• I have identified all energy sources • I confirm that hazardous energy sources have been isolated, locked, and tagged • I have checked there is zero energy and tested for residual or stored energy

5.	Line of Fire 	Keep yourself and others out of the line of fire	• I position myself to avoid:
			  • Moving objects
			  • Vehicles
			  • Pressure releases
			  • Dropped objects
			• I establish and obey barriers and exclusion zones
			• I take action to secure loose objects and report potential dropped objects

6.	Bypassing Safety Controls 	Obtain authorization before overriding or disabling safety controls	• I understand and use safety-critical equipment and procedures which apply to my task • I obtain authorization before: • Disabling or overriding safety equipment • Deviating from procedures • Crossing a barrier
7.	Driving 	Follow safe driving rules	• I always wear a seatbelt • I do not exceed the speed limit, and reduce my speed for road • conditions • I do not use phones or operate devices while driving • I am fit, rested and fully alert while driving • I follow journey management requirements

8.	Hot Work 	Control flammables and ignition sources	• I identify and control ignition sources
			• Before starting any hot work:
			  • I confirm flammable material has been removed or isolated
			  • I obtain authorization
			• Before starting hot work in a hazardous area, I confirm:
			  • A gas test has been completed
			  • Gas will be monitored continually

9.	Safe Mechanical Lifting 	Plan lifting operations and control the area	• I confirm that the equipment and load have been inspected and are fit for purpose • I only operate equipment that I am qualified to use • I establish and obey barriers and exclusion zones • I never walk under a suspended load
10.	Fit for Duty* 	Be in a state to perform work safely	• I will be physically and mentally in a state to perform my assigned duties • I commit to not being under the influence of alcohol or drugs • I will inform a supervisor immediately if I or a co-worker may be unfit for work

Safe Work Permit System

1.0 Introduction

The Safe Work Permit (SWP) is designed to control the risks to workers engaged in hazardous or non-routine work. This permit performs three functions:

- It is a checklist to ensure necessary safety precautions have been taken prior to beginning the work;
- It reminds workers of the necessity to perform work safely when working; and
- For non-routine, high risk work, a Safe Work Permit is an industry document of choice for effectively controlling certain high-risk activities. Hazard Assessments may be required in addition to the SWP. Safe Work Permits and Hazard Assessments are a legislated requirement for certain high risk and/or non-routine work.

A Safe Work Permit provides for:

- Identification of the specific work location;
- Opportunity for the work site to be inspected prior to commencing the work activity;
- Identification of a Prime Contractor (as applicable);
- Identification of the workers engaged in the work activity;
- Atmospheric monitoring information and requirements (as applicable);
- Control of hazardous energy sources;
- Emergency contact information; and
- Timelines (start and termination of work activity).

Richardson's Bulk Sales Ltd will determine the responsibility for issuing a Safe Work Permit at respective work sites. Failure to issue a required permit is a serious safety transgression.

Richardson's Bulk Sales Ltd will train employees in their authority and responsibility to stop any work that is not being carried out safely or will be carried out under unsafe conditions.

Safe Work Permits (SWPs) are hazard control tools. They are used to ensure that hazards associated with certain defined tasks are identified, discussed, and that appropriate controls are listed so that the work activity is ultimately carried out in a safe manner.

2.0 Types of Work Typically Requiring Safe Work Permits

The SWP system shall be used for the following types of work:

- Confined Space Entry;
- Hot Work;
- Lockout/tag out of electrical, mechanical, pneumatic, hydraulic, or kinetic energy sources;
- Work in areas where toxic fumes or gases may be present;
- Work in areas where oxygen-deficient atmospheres may exist;
- Opening of process vessels, equipment, lines, and piping;
- Hot tapping;
- Work at elevated heights;
- Conducting excavation or other ground disturbance work;
- Control of entry into production areas by non-qualified personnel; and
- Any other work of inherently high hazard or of a non-routine nature.

It may be desirable to have all work performed by outside contractors or other work site parties, regardless of risk, controlled through the use of the Safe Work Permits.

3.0 Responsibility

3.1 Management's Responsibility

It is the responsibility of Richardson's Bulk Sales Ltd management to ensure that SWP requirements are distributed to all work locations and that it is understood by all supervisors, employees, and contractors who may be affected by it. Richardson's Bulk Sales Ltd management will provide the resources necessary for all work locations to effectively implement the SWP system and will audit the application of this system to confirm compliance.

3.2 Supervisors' Responsibility

Richardson's Bulk Sales Ltd supervisors will apply and enforce SWP procedures. Supervisors will ensure that employees and contractors are trained and competent to use the Safe Work Permit system and associated procedures and will advise management of any deficiencies. Richardson's Bulk Sales Ltd, supervisors are responsible for authorizing SWPs and for ensuring that the safety precautions specified in the SWP continue to be met for the duration of the work.

3.3 Employees' and Contractors' Responsibilities

Richardson's Bulk Sales Ltd employees and contractors will apply these SWP procedures and inform supervisors of any problems or deficiencies in their application. Employees and contractors shall immediately suspend work and inform the issuing authority (supervisor/operator) when the safety precautions outlined in the SWP cannot continue to be met.

4.0 General Safe Work Permit Procedure

When planning and executing work that falls under a Safe Work Permit requirement the following steps shall be taken:

1. Consider both the obvious and hidden hazards associated with the task at hand. In some cases, it may be necessary to call upon expert advice regarding unfamiliar procedures or equipment;

2. The supervisor/operator (issuing authority), together with affected workers, shall jointly plan the work and the safety precautions necessary for safe completion. This will entail reviewing all contents of the SWP form and may additionally require institution of special safety precautions not specifically mentioned on the SWP. If so, any applicable safety measures will be noted on the SWP;

3. A separate hazard assessment may need to be carried out for high risk or unusual tasks;

4. The issuing authority shall consider and implement related Codes of Practice, Standard Operating Procedures, and associated Safe Work Practices as they apply to the work at hand (e.g., respiratory protection, lockout/tag out, confined space entry, etc.);

5. When considering issuance of a SWP, the issuing authority shall take into account other concurrent or planned activities or events that may be impacted by the work. If concurrent, planned activities or events are incompatible with the work at hand, one or the other may have to be postponed;

6. The issuing authority shall, prior to issuing a SWP, consider external factors such as: adverse weather (e.g., lightning), worker fatigue, worker competence, resources, etc.;

7. All adjacent workers or operations that may be affected must be notified, in advance, of the SWP being issued;

8. The time period and number of workers that the SWP is valid for shall be agreed upon and entered in the SWP;
9. When both the issuing authority and worker(s) are satisfied that all of the safety precautions will be met prior to commencing work, and will continue to be met for the duration of the work, the issuing authority and senior worker will sign the SWP. The SWP has now been "issued";
10. If not already involved in the process, all workers participating in the duties covered by the SWP must be informed of the conditions of the SWP and should sign off on the document;
11. Both receiving authority and workers shall continuously monitor work conditions to ensure that safe working conditions, as specified in the SWP, are maintained. If at any time these conditions cannot be maintained, work shall immediately be suspended and shall remain suspended until conditions are again met;
12. On occasion, the work situation may change enough that the conditions of the SWP are no longer valid. In these cases, work shall cease, the SWP will be cancelled, a new assessment of the task will be undertaken, and a new SWP will be issued; and
13. When work has been satisfactorily completed and a return to normal operations been made, the SWP shall be returned to the issuing authority for debrief, close-out, and filing.

Safe Work Permits will be reviewed at the beginning of each shift change. Under no circumstances may a SWP be transferred between workers, crews, or shifts. SWPs for non-routine activities should expire every 24 hours. If a new worker, crew, or shift must take over work covered by a SWP, the existing SWP shall be cancelled and the process for a new SWP begun. This is essential to ensure that all hazards have been addressed and safety of the new workers, crew, or shift can be assured.

5.0 Close-Out

When a job falling under a SWP has been satisfactorily completed and operations have returned to normal, the worker responsible for the SWP shall return the SWP to the issuing authority. The issuing authority shall debrief the worker to ensure all of the required steps have been taken to ensure safe return to normal operations.

Depending on the task, the issuing authority and the worker may perform a joint inspection of the area where the work was performed before signing off. In addition, where there is a risk of post work fire hazards, a follow-up inspection or fire watch must be scheduled.

Other affected workers or operations shall be notified of the work completion/return to normal operations.

Finally, the issuing authority shall gather all copies of the SWP and file them for a period of three (3) years (if atmospheric monitoring activities have been included) or two (2) years (if atmospheric monitoring activities have not been included).

Forms

- Safe Work Permit

References

- Alberta Occupational Health and Safety Code, Part 2: Hazard Assessment, Elimination, and Control.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Work Safe Alberta, Safe Work Permits.https://open.alberta.ca/publications/sh013-general-safety

Safety Inspections and Monitoring Work Sites

1.0 Purpose of Inspections and Policy

Once hazards have been controlled and work commences at a site, safety inspections will be carried out, whose purpose is to check for compliance with established safe work practices and procedures and to uncover any new hazards not found during the initial Hazard Assessment. Ongoing periodic inspections of the work sites and work site conditions are required to monitor and improve upon work procedures. Joint Health and Safety Committees (JHSC) or Health and Safety Representatives (HSR) are required to be involved in work site inspections that are scheduled at regular intervals. Inspection reports will identify new hazards, which can be assessed for recommended control measures.

Inspections will address work activities, equipment, materials and work areas. Both general and specific checklists will be created to assist in the inspection process. Completed checklists must be filed for future reference. Deficiencies noted on an inspection must have a corrective action assigned to a responsible person, a completion period established and be tracked in the Corrective Action Register.

2.0 Types of Inspections

2.1 Pre- and Post-Operating Inspections

Vehicles, equipment, and machinery typically require daily pre- and post- operational inspections, which may include such items as lubrication and adjustments.

The basic procedure for conducting a planned inspection is:

- The JHSC or HSR identifies the inspector or the inspection team;

- Locate and review reports of previous inspections;
- Obtain an inspection report form drafted to appropriately reflect the type of hazards that may exist in the particular workplace;
- Proceed with the inspection tour;
- During the tour, get off the “beaten path” and look over, under, around, behind, inside, etc.;
- Take the time to observe the activities of selected personnel;
- Take immediate corrective action where there is imminent danger;
- Record all unsafe acts and conditions, such as:
    - Unsafe acts (e.g., improper use of machinery or not wearing PPE);
    - Unsafe conditions (e.g., poor lighting, cluttered work area, or tripping hazards); and
    - Hazards to health of workers (e.g., exposure to fumes, noise, or hazardous waste);
- Rank the unsafe acts/conditions on completion of the tour;
- Identify corrective action required for each unsafe act/condition;
- The JHSC or HSR will assign a person to be responsible for each corrective action and assign a date/time for completion;
- Richardson's Bulk Sales Ltd and JHSC or HSR will follow up to ensure corrective action is completed; and
- Distribute copies of the inspection report to all employees at safety meetings and to the manager of the work site.
- Richardson's Bulk Sales Ltd will keep copies of all health and safety documents produced as a result of inspections that are carried out.

Items to Inspect

Work site inspections will focus on:

- Physical layout and conditions of the work site including location, terrain, season, and weather;
- Hazards associated with the materials handled;
- Condition and compliant usage of safety and personal protective equipment;
- Work practices and behaviour of people at the work site;
- Conformance and compliance issues; and
- Level and quality of supervision provided to workers.

Inspections will include, but not be limited to:

- Slipping, tripping, and falling hazards;
- Safety devices and monitoring systems;
- Work site lighting and electrical systems;
- Storage of controlled products;
- Faulty or missing emergency response equipment (e.g., fire extinguishers, hoses, and first-aid kits);
- Improper or missing warning/hazards notification signs;
- Faulty machinery, cables, tie-downs, etc.;
- Housekeeping activities;
- Inadequate or missing safety and personal protective equipment;
- Appropriate resource and reference materials;

- Firefighting capability;
- Integrity of tanks, vessels, and containers (including secondary containment);
- Mechanical and hand tools;
- Overhead hazards/underground utilities;
- Flammable, corrosive, or explosive materials; and
- Condition of equipment and vehicles.

2.2 Preventative Maintenance Programs and Equipment Inspections

Richardson's Bulk Sales Ltd will ensure that all equipment used at a work site:

1. Is maintained in a condition that will not compromise the health or safety of workers using or transporting it;
2. Will safely perform the function for which it is intended or was designed;
3. Is of adequate strength for its purpose; and
4. Is free from obvious defects.

Richardson's Bulk Sales Ltd will implement and supervisors will enforce a preventative maintenance (PM) program in order to reduce downtime and ensure the safe operation of all equipment and processes. PM programs will follow manufacturers' specifications and requirements. Manufacturer manuals will be retained and available for consultation.

Preventative maintenance inspections (PMI) will be integrated into the PM program to ensure compliance.

Results of PMIs will be used to ensure safe operation, predict future repairs, and prevent unplanned outages or downtime caused by unexpected failures.

Competent employees and supervisors will be responsible to administer the preventative maintenance program in accordance with applicable manufacturers' specifications and legislated requirements. They will also be responsible for establishing the necessary PMI schedules and filing of related reports. These reports will be made available for equipment operators and maintenance employees.

Accepted industry-standardized codes and standards will be used for the PM program, including:

- CSA, ASME, or API Standards;
- Industry Recommended Practices; and
- Manufacturer's specifications.

2.3 Third-party Inspections

Often, specialized equipment is inspected on a contracted basis by third parties. Examples of equipment that may fall into this category are fire extinguishers, alarm systems, first-aid equipment, self-contained breathing apparatus, heavy equipment, and technical equipment requiring sophisticated calibration. These inspections will be included in any overall inspection checklists and records retained.

2.4 Legislated Inspections

Richardson's Bulk Sales Ltd will verify and adhere to all requirements for legislated inspections. Inspections for which there may be legislated requirements include (but not limited to):

- Refusal to work inspections (see Right to Refuse Dangerous Work);
- Inspections related to the investigation of serious injuries and incidents under the AB OHS Act;
- Regular inspections carried out with the involvement of the JHSC or HSR;

- Inspections to be carried out according to a written order of a Director under the AB OHS Act;
- Equipment used for confined space entry;
- Crane inspections and logbook inspections;
- Fall protection equipment and components;
- Powered mobile equipment;
- Commercial vehicles;
- Maintenance of personal vehicle for company business;
- Rigging;
- Scaffolds;
- Derricks and masts; and
- Drilling and service rigs.

Federally Regulated Requirements

When working under the Canadian Labour Code Part II Section 125 Richardson's Bulk Sales Ltd will, in respect of every workplace it controls and, in respect of every work activity carried out by an employee in a workplace that is not controlled by Richardson's Bulk Sales Ltd, to the extent that Richardson's Bulk Sales Ltd controls the activity, ensure that the workplace committee or the health and safety representative inspects each month all or part of the workplace, so that every part of the workplace is inspected at least once each year.

3.0 Inspection Training

Managers, supervisors, employees, JHSC members, Health and Safety Representatives who are asked to participate in conducting inspections will be provided with appropriate training. The training will cover required pre-planning, conducting the inspection, identification of hazards,

assigning of corrective actions, follow-up, and close-out of deficiencies identified as part of the inspection. This training will be documented in the Training Schedule Matrix. Certified training or on-the-job training may be used. Certificates should be copied and placed on file and On-the-job Training forms will be filled out to document the training.

4.0 Management Review

Richardson's Bulk Sales Ltd working with the JHSC and HSR will require a specified senior manager to review the completed inspection reports and Corrective Action Register and ensure that all deficiencies have been corrected in a timely manner.

5.0 Inspection Frequency – All Work Areas and Areas of Operation

Inspections in this policy are carried out independently of hazard assessments, scheduled preventative maintenance activities, and those inspections required by law for commercial vehicles. Inspections are used measure the effectiveness of the health and safety program and to establish whether hazards are being identified and corrected. They provide a snapshot of worksite safety conditions.

In general, the inspection program will be carried out according to the schedule below:

General Inspection Program (see Inspection Schedule Form for company specific program)

Position	Formal/Informal	Frequency
JHSC or HSR with Employees	Formal	Monthly
Front Line Supervisor	Formal	Monthly
Middle Management	Formal	Monthly

Senior Management	Formal	Bi-Annually
Executive Management	Formal	Annually

The specific inspections that are carried out by Richardson's Bulk Sales Ltd along with the frequency and responsible parties will be tracked on the Inspection Schedule Form and updated as required.

The names of the employees, supervisors, and managers carrying out these inspections will be entered on the specific inspection form or checklist that is being used. All deficiencies that require further controls will be tracked on the Corrective Action Register, or the appropriate equipment log.

Forms

- Inspection Program Schedule
- Work Site Inspection Form

References

- CCOHS Effective Workplace Inspections.http://www.ccohs.ca/oshanswers/prevention/effectiv.html
- Alberta OHS Act Part 2 Health and Safety Committees, Representatives and Programs.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Alberta Occupational Health and Safety Code, Part 2: Hazard Assessment, Elimination, and Control.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Canadian Labour Code Part II, OHS, Section 125. https://laws-lois.justice.gc.ca/eng/acts/L-2/section-125.html

Training

1.0 Pre-Hiring Competency Requirements

Richardson's Bulk Sales Ltd's process to ensure that workers are "competent" will begin at the hiring stage. Hiring requirements for competency:

- An adequate job description of the position to be filled will be prepared that allows the hiring personnel to judge whether the applicants are suitably qualified;
- A review of the applicant's resume or application;
- Meeting with the applicant to determine:
  - Level of education;
  - Level of knowledge and experience in the position;
  - General attitude towards the workplace and, in particular, safety; and
  - Whether any issues exist that would prevent the applicant from performing their duties safely;
- Verification of all applicant credentials and certificates of training;
- Checking applicant's references according to Company policy for the position; and
- Any required medical and drug testing required per Company policy and the position.

2.0 Training and Education

Training is an important part of the Richardson's Bulk Sales Ltd's Health and Safety Program. It ensures that workers have the necessary skills, explains the need for safe operations, improves communication, and gives workers the confidence to work efficiently and safely.

Richardson's Bulk Sales Ltd will create a Master Training Schedule showing what certifications, on-the-job training and experience levels are required for each job group. Richardson's Bulk Sales Ltd will track employee training status to ensure that all required training and re-training is performed in a timely manner.

2.1 Responsibilities

Richardson's Bulk Sales Ltd management will ensure that supervisors are aware of the training requirements and worker orientations required for new employees in the positions which they are supervising. Richardson's Bulk Sales Ltd will ensure that supervisors and employees are competent to provide the training that they have been assigned to deliver. Richardson's Bulk Sales Ltd and supervisors will ensure that new employee or new position training meets all regulatory requirements and Company policy.

It shall be the responsibility of every worker to participate in any Safety Training that Richardson's Bulk Sales Ltd requires for the work being performed.

3.0 Safety Orientation

3.1 New and Transferred Employee Orientation

Richardson's Bulk Sales Ltd may use a standardized general orientation which covers standard orientation requirements and is an accepted industry standard for the work in which they are involved.

This training will be supplemented by a Richardson's Bulk Sales Ltd specific training program which includes all company standards and rules as well as the position specific training required to verify that minimum safety standards have been met prior to allowing new employees (or employees in new positions) to begin their work duties.

New employees, transferees, contractors, subcontractors, employers, self-employed persons, and visitors will be given a safety orientation appropriate to their work by a competent company

designate **prior to work commencing**. Site-specific training covering the affected topics will be provided and documented for employees working at a new worksite. Topics covered in orientation and site-specific training will include one or more of the following:

- Review of Richardson's Bulk Sales Ltd Health and Safety Program, highlighting specific areas;
- Review of Richardson's Bulk Sales Ltd safety policies, and Safe Work Practices;
- How to access and refer to manufacturer or engineers' specifications for tools, equipment, and machinery that they are required to work with or operate;
- Specific job hazards and controls from the Hazard Assessment applicable to that person's work;
- Health and Safety responsibilities;
- Job responsibilities and all other work site parties' responsibilities;
- Job expectations and employee conduct on and off the work site;
- Harassment, and violence policy;
- Workers' rights (right to refuse dangerous work, right to know, right to participate, and not being subject to discrimination for exercising a legislated right or duty);
- Applicable Workplace Hazardous Materials Information System information (WHMIS 2015);
- Applicable Transportation of Dangerous Goods information;
- Other applicable workplace OHS legislation;
- Working Alone Program;
- Return to Work Program;
- Care and use of required personal protective equipment (PPE) and clothing;
- The safe operation of the equipment they are required to operate;

- Hazard reporting, assessment, elimination, and control requirements;
- Requirement to report all hazards and incidents (including near misses);
- Personal Protective Equipment requirements;
- Emergency response procedures (including alarms);
- Fire prevention and fire extinguishers;
- Location of all emergency response equipment;
- Muster area locations; and
- Site-specific safety requirements.

The Worker Safety Orientation Acknowledgement Form, will be signed off and dated by the worker and the person performing the orientation, and kept on file. Successful completion of the New Worker Orientation should also be recorded on the Safety Training Record.

3.2 Site-Specific Orientation

A site-specific orientation will be provided to employees who are working at a new site for the first time or according to prevailing policies. This orientation will be based on:

- Site owner orientation material;
- Work permits; and
- Site-specific Hazard Assessment carried out by Richardson's Bulk Sales Ltd site supervisor or equivalent.

The site-specific orientation will include as a minimum:

- Emergency response procedures;
- Hazard, incident, and near miss reporting;

- PPE requirements;
- Site-specific health and safety policies; and
- Site-specific hazard assessments/permits.

The site-specific orientation may be documented through owner orientation records, work permits, and safety meeting minutes. The supervisor in-charge will verify that all employees have received the site-specific orientation prior to beginning work.

3.3 Orientation for "Other Employers and Visitors"

Other employers who might be present at Richardson's Bulk Sales Ltd worksite can include:

- Contractors;
- Self-employed persons;
- Service providers;
- Suppliers;
- Visitors;
- Representatives of outside agencies; and/or
- Inspectors.

All "other employers" will receive a site-specific orientation appropriate to their scope of activities before they are permitted to access a Richardson's Bulk Sales Ltd worksite.

The orientation will be based on the **Worker Safety Orientation Acknowledgement Form** with an appropriate reduced scope.

All "other employers" will be required to review and acknowledge their respective obligations.

4.0 On-the-Job Training and Competency

1. Workers will be made aware of the hazards associated with the jobs that they are to perform and the required competencies. Workers must demonstrate competency to perform the jobs safely. On-the-job training will be provided to all workers new to a job or a task. This training will also be provided if work procedures or requirements are changed.

2. A “competent worker” is one who is adequately qualified, suitably trained, and has sufficient experience to safely perform the work without, or with only a minimal degree of, supervision.

3. Competency will be established for each job position and recorded on the Job Task Inventory form. Competency is the combined knowledge, skills, and sufficient experience required to successfully perform a work task with little or no supervision. A given discipline or position may require multiple competencies. Competency will be assessed by the employee’s direct supervisor and the required competencies will be discussed with the employee.

4. Supervisors will oversee the On-the-job training for the tasks identified in the Hazard and Risk Assessment by position (formal hazard assessment) and will sign off the On-the-job training form to deem the worker competent to perform the task safely and independently. The normal reassessment period after hiring or reassignment will be three months unless noted differently on the On-the-Job Training form and as agreed with the employee when hired, transferred, or assigned a new position. Thereafter competency will be evaluated yearly as part of the Employee Health and Safety review.

5. Training will be conducted by supervisors or their designates familiar with the work site and competent in the particular job for which they are providing training.

6. If work is to be done that may endanger a worker, Richardson's Bulk Sales Ltd will ensure that the work is done:
    - By a worker who is competent to do the work, or
    - By a worker who is working under the direct supervision of a worker who is competent to do the work.
7. The new worker may review a written job description, including all applicable safe work practices and procedures and may then receive a verbal description of the job, including a list of the hazards and controls in place.
8. On-the-job training may consist of the following stages:
    - A new worker is teamed up with a "competent" worker or trainer who has demonstrated his or her ability to train new workers. A supervisor oversees the training process. The new worker observes as the trainer performs his or her duties. The experienced worker stops to provide instruction and verify learning over a reasonable period of time;
    - When the trainer is satisfied that the new worker can work safely, the new worker starts working on his or her own, with regular visits from the trainer;
    - The new worker may be tested in an appropriate manner to confirm knowledge of the new job. Results are documented. Upon successful completion, the new worker proceeds to perform the job on his or her own; and
    - The trainer checks back with the new worker at regular intervals to confirm proficiency and safety.
9. The on-going monitoring and coaching of a worker is a major duty and responsibility of supervisors. The supervisor is responsible for ensuring safety that his or her workers are competent to perform their duties safely.
10. Refresher training will be performed and recorded using the **On-the-Job Training** Form:

- As required by any formal certifications and will be tracked on the **Training Matrix**;
- Where a supervisor establishes a need based on observation, incident or for any other reason; and/or
- When changes are made to jobs, tasks, materials, or equipment used.

5.0 Behaviour Based Safety (BBS)

Richardson's Bulk Sales Ltd believes that most safety incidents have the behaviour of the person(s) directly or indirectly involved as a key contributing factor. BBS programs focus on the actions and behaviour of the worker that can lead to incidents causing injury and damage. Richardson's Bulk Sales Ltd may incorporate formal or informal BBS programs to support its Health and Safety system.

BBS systems emphasize educating employees to recognize when certain states or human factors exist that can lead to behaviours that increase the chances of incurring an injury or loss.

The four states which may lead to safety incidents include:

- Rushing;
- Frustration;
- Fatigue; and
- Complacency.

The resulting behaviours from these states involve:

- Eyes not on task;
- Mind not on task;
- Moving into or being in the line of fire; and
- Losing your balance, traction, or grip.

BBS programs include worker education as well as worker observation, feedback, and reporting. Fewer unsafe behaviour observations in the workplace correlate with a reduction in workplace incidents. BBS programs record safety observations. The percentage of observations that are safe is tracked as well as the type of unsafe behaviours that are recorded or observed. Feedback is provided to employees and the results are analyzed and acted upon. As the “percent safe” observations increase, injuries and losses are expected to be reduced.

Behaviour Based Safety can be an important and effective part of a Health and Safety program and Behaviour Based Safety/Job Observation procedure provides general guidance on Richardson's Bulk Sales Ltd’s program when utilized.

6.0 Certifications

Required certifications for each particular job group will be clearly listed on Richardson's Bulk Sales Ltd’s Master Training Schedule. The following certificates are examples of what typically might be required depending on the work being done and the specific worksite:

- Designated workers on any Richardson's Bulk Sales Ltd work site must have first-aid training as specified in the applicable OHS Code;
- H_2S Alive;
- Ground Disturbance;
- Transportation of Dangerous Goods (TDG);
- Confined Space;
- Workplace Hazardous Materials Information System (WHMIS);
- All-Terrain Vehicle (quad or snow machine);
- Defensive Driving;

- Fall Protection/Fall Arrest;
- Respiratory Protection;
- Gas Testing Certification;
- Incident Investigation; and
- Hazard Identification Assessment and Control.

Richardson's Bulk Sales Ltd will maintain a Master Training Schedule indicating which workers have received training and what the expiry date for each training topic is. Richardson's Bulk Sales Ltd will monitor these records to ensure that no one reports to work without the necessary training certification.

7.0 Supervisor Training

Due to the key role that supervisors perform, Richardson's Bulk Sales Ltd employees in supervisory positions will be required to receive additional training in the following areas:

- Job responsibilities;
- Applicable legislation;
- Detailed review of Company policies and procedures;
- Detailed emergency response training;
- Leadership training (supervisory skills):
    - Resolution of work refusals;
    - Management of drug and alcohol issues (Substance Abuse program);
    - Enforcement practices and disciplinary program;
    - Return to work accommodation (modified work program); and

- Training, coaching and motivational skills.

Any training provided will be documented and followed up with refresher training at appropriate intervals.

Forms

- On-the-Job Training Form
- Supervisor Safety Training Schedule
- Worker Orientation Acknowledgement Form

References

- CSA Z1000-06, Occupational Health and Safety Management.
- ECS's Common Safety Orientation.https://www.energysafetycanada.com/Standards/Industry_Standards/Common-Safety-Orientation
- Alberta Occupational Health and Safety Act, Section 1 General Obligations.https://www.alberta.ca/ohs-act-regulation-code.aspx

Warning and Hazard Signs

Flagging, tape, information tags, and warning or hazard signs may be used to inform workers of hazards, hazardous areas, or to control access to hazardous areas.

Warning sign examples:

Important: WHMIS signs with appropriate symbols must be displayed on all hazardous products containers under WHMIS 2015. No sign may be removed unless the hazard has been removed.

In addition to actual signage, it is recommended that the following be posted in Company workplaces:

- Health and Safety Policy;
- Safety Rules; and
- Emergency Response Action Plans and Phone Lists.

Bear Awareness

Purpose

This Safe Work Practice is intended to provide a general awareness of bear human interaction issues so that employees can avoid bear encounters and be aware of the safety requirements of working near or around bears. To avoid and deal with potential bear encounters, it is important to have a basic understanding of bears, bear behaviour, and what to do if a bear is encountered.

Scope

The information and precautions identified within this safe work practice shall be applied at all Richardson's Bulk Sales Ltd locations where the potential for encounters with bears are known or are likely to occur. When working in bear habitat, training specific to the location and situation will be developed and provided by local conservation officers or other equivalent experts. This training will include a hazard assessment and the required control measures to bear proof the location and protect workers.

Procedures

1.0 Understanding Bears and Bear Behaviour

All bears are potentially dangerous. When threatened or surprised, they may defend themselves, their young, and their territory. All bears (even younger and very small bears) are very strong, fast, surprisingly agile, and capable of inflicting fatal injuries in an attack.

1.1 Distinguishing the Two Bear Species

In North America, there are both black and grizzly bear populations. You should consult a conservation officer to verify the numbers and types of bears which are present in your work or recreation area.

It is important to distinguish the two bear species as black bears and grizzly bears can react very differently to human encounters. Learning about bear types will help you to identify what bear you are being confronted with, why the confrontation has occurred, and from this, more effectively determine what measures can be taken in the future to avoid or mitigate any negative encounters. Table 1 provides descriptive characteristics of both species for identification purposes.

1.2 Understanding Bear Behaviour

There are a few key characteristics and behaviours that can help you to avoid or evaluate bear encounters:

- Bears have a curious, investigative nature;
- Bears have an acute sense of smell;
- Bears are intelligent. They figure out how to gain entrance to containers, vehicles, and buildings that smell attractive to them, and they remember these skills;
- All bears have personal space around them and feel scared or threatened when this space is invaded;
- Bears that have repeated contact with people with no negative experience may learn to tolerate people;
- A bear that has learned to associate food with people will actively search for food or garbage in areas frequented by people; and
- A bear's life revolves around food.

1.3 Bears Require Personal Space

The size of personal space required by a bear varies from animal to animal. When this personal space is invaded, the bear feels scared or threatened and two things can occur – a fight or a flight.

1.4 Bear Aggressive Behaviours

There are two types of behaviours associated with aggressive bear encounters:

- Defensive, and
- Predatory.

Recognizing the difference between the two behaviours is important because knowing the right response may prevent serious injury or death. A bear that begins by being curious about or indifferent to a person's presence can easily become aggressive depending upon people's response.

Predatory attacks by bears are rare. Both black and grizzly bears have been linked to predatory attacks.

Black Bear	**(Ursus Americanus Pallas)**
Colour	Varies from pure black to cinnamon or blond - most are black with brownish muzzle, often a white patch below throat or across chest.
Height	About 90 centimetres at the shoulder.
Length	About 1.5 metres.

Distinguishing Characteristics	Smallest member of the North American bear family. Usually has a straight facial profile with long nostrils. Feet are flat soled with short curved claws. Smaller than a grizzly and has a higher shoulder-rump line. Agile climber.
Grizzly Bear	**(Ursus Arctos Horribilis Ord)**
Colour	Varies from black to blond - frequently with white tipped fur giving a grizzled appearance.
Height	A little over one metre at the shoulder - reaches 1.8 to 2 metres when standing on hind legs.
Weight	Averages about 200 kg with some weighing up to 450 kg - females are generally smaller than males.
Distinguishing Characteristics	Prominent humps over the shoulder formed by the muscles of the massive forelegs. Sloping back line. Dished or concave face. Long curved claws. A small grizzly is often hard to distinguish from a large black bear.

2.0 Safety Precautions

Practicing some basic precautions will aid in avoiding encounters with bears. When you are working in bear habitat, remember the following points:

- If possible work with a team (bear attacks on groups of individuals are rare), and be loud:
- Whistle, talk, or sing. Loud human sounds are more effective than bells;
- Consider carrying compressed air horns to make your presence known;
- Stay in open areas and look ahead and around you; and

- Do not wear headphones as this may prevent you from hearing warning noises from the bear or fellow workers.
- Observe the wind direction. Be especially alert if you are traveling into the wind. The bear may not pick up your scent and be forewarned of your presence. If you are working in dense brush or near rushing water, the bear may not hear you;
- Avoid dead animals and berry patches. These are prime food sources for bears. Circling crows or ravens often indicate the presence of a carcass;
- Be observant and watch for bear signs. Fresh tracks, droppings, and new diggings are all signs that a bear is in the area. If you see fresh bear signs, leave the area immediately;
- Leave your dog at home. Dogs may initiate aggressive behaviour by bears;
- Never approach a bear, and especially do not approach a cub;
- When staying in a work camp know and follow all bear safety rules. Report all bear encounters immediately; and
- When camping overnight in a wilderness area, take the following additional precautions:
- Camp away from animal game trails, walking trails, or any ridge or open path. Bears use these to easily move from one area to another;
- Keep a meticulously clean camp or worksite: Odours from food and garbage attract bears. Do not leave food, garbage, coolers, utensils, or cooking equipment around your site. Lock food away in a vehicle or hang it between two trees at least four metres (13 feet) off the ground. Garbage should be packed in airtight bear proof containers and taken with you when you leave. Do not bury garbage or food scraps; a bear can easily locate these and dig them up;
- Do not cook in or near your camp or worksite. The food odours left over are a strong attractant to bears; and
- Avoid use of any scented cosmetics and toiletries.

3.0 Bear Encounters

Even when you follow all precautions, you may still have an encounter with a bear. While there is no guaranteed method of dealing with a bear confrontation, some of the points that follow have proven useful:

- Leave the area. Do not purposely alert a bear to your presence if it is not aware of you. If you see the bear from a distance, take a wide detour or leave. If you cannot retreat, then wait for the bear to move from your path. Always leave the animal an escape route;
- If a bear is aware of your presence stay calm and assess the situation. The bear may just leave the area:
    - Watch the bear's behaviour. Try to determine if the bear is a grizzly or a black bear;
    - Beware if cubs or a food source, such as a carcass, is present;
    - Try to warn companions (without shouting), gather groups together and take any children by hand; and
    - If the bear is close, avert your eyes since a direct stare may further stimulate an aggressive bear.
- Move slowly. Slowly back up and speak to the bear in a soft monotone voice. Make sure the bear has an escape route. Yelling or sudden movements may provoke an attack. Never throw anything at a bear, and do not try to run away;

- Monitor the bear for aggressive behaviour. The bear may snap its jaws and make a “woofing” sound. It may keep its head low and have its ears laid back. If the bear moves towards you consider this an aggressive act. Sometimes a bear will try to bluff its way out of a threatening situation by charging and then veering away at the last second. A bear that rears on its hind legs and waves its nose in the air is trying to identify you. Remain still and speak in low tones. If the bear does not display aggressive behaviour, continue talking to it and back away slowly. Remember – never run; and
- Climbing a tree is an option but does not guarantee safety. If the bear is behaving aggressively, back slowly towards the tree. Carefully remove your pack or jacket and set it on the ground to distract the bear. Climb as high into the tree as you can. Although adult grizzlies rarely climb trees, a large one can easily reach over 4 metres (13 feet). Stay in the tree until you are sure the bear has left the area, and then leave the area quickly. Be aware that people have been pulled out of trees by grizzly bears and that black bears are good climbers and a tree might not afford an escape from them.

4.0 Bear Attacks

There is no guaranteed life-saving method of surviving a bear attack. Each situation is unique. It is very important to try to stay calm, determine the bear species and whether the attack is defensive or predatory. Defensive attacks can become predatory if you trigger a prey response by fleeing or playing dead prematurely.

4.1 Defensive Attacks

If a bear charges and it seems clear that it is a defensive encounter (because the bear was surprised, you came too close, there is no exit for the bear, cubs are present, or it was feeding on a carcass), you should stand your ground and lie face down on the ground at the moment just before contact is made. To “play dead” prematurely may actually encourage a bear to attack and change a defensive attack into a predatory one. Lying on your stomach will aid in protecting your face and vital organs.

Follow these directions:

- Leave a pack on if you are wearing one as it will help protect you;
- Clasp your hands around the back of your neck to protect it;
- Don't shout. Remain as quiet and still as possible;
- Roll back onto your stomach if the bear rolls you over;
- Don't move until you are sure the bear has left the area. Moving or shouting out may result in the bear resuming the attack; and
- If the attack is prolonged or if the bear starts to bite, fight back as it has now likely become a predatory attack.

It is important to remember that most people survive defensive bear attacks.

4.2 Non-defensive Encounters and Predatory Attacks

A bear that exhibits non-defensive behaviour may only be curious, looking for a handout, or attempting to exert its dominance. A bear that is aware of a human presence and approaches showing no signs of stress is behaving in a non-defensive manner. The head may be up, the ears forward, and there will be little or no vocalization. The bear may not have the intention of killing and eating the person, but non-defensive encounters can turn predatory.

Stalking and following quietly at a distance is usually a sign of a predatory bear. The bear may circle around a person to try to detect their scent; it will remain quiet and will likely approach in a slow, hesitant manner with its head up and ears erect before making a rush from a short distance.

If a bear has detected a person, continues to approach and comes within about 10 metres (about the length of a school bus) without any indications of leaving, a person should try to intimidate the bear. In a non-defensive encounter, it is extremely important that people not be submissive when the bear is at such a close range. This may involve acting aggressively towards the bear.

You should:

- Not run and should keep facing the bear;
- Not stare the bear in the eye – this is a show of dominance;
- Act more aggressively as the bear gets closer;
- Make yourself as large as possible by standing on a stump, log, or moving uphill;
- Shout at the bear in a loud, commanding voice;
- Prepare and use a deterrent, such as bear spray or bear bangers;
- Pick up a stick or rocks to use as a weapon;
- Stomp your feet and use rapid hand movements; and
- Become extremely forceful; in most cases the bear will move off.

If the bear physically attacks and contact is made, you should FIGHT BACK. In a predatory attack, you are fighting for your life. You have no other choice but to be as aggressive and forceful as possible using whatever weapons are at hand. Predatory attacks are rare, but they do occur. Playing dead is not an option as the bear does not see you as a threat but rather as a food source.

5.0 Bear Deterrents

Deterrents can be used to prevent a physical encounter with a bear and to provide a negative experience for the bear that will dissuade it from future contact with humans. **All deterrents require specific training.**

5.1 Noise Deterrents

Noise deterrents provide negative auditory and visual experiences. Noise deterrents include, but are not limited to, the following:

- Air horn;

- Bangers;
- Screamers;
- 12-gauge crackers; and
- 12-gauge whistle crackers.

5.2 Physical Deterrents

These include projectiles fired at a bear to condition it to avoid humans. These would only be handled by trained conservation officers or equivalent in response to a problem. Bear spray is another physical deterrent which can be carried and deployed by individuals, it has worked as a last resort. Carrying and knowing how and when to use bear spray is being encouraged by most government organizations responsible for safety in bear habitats.

Bear Spray

All bear pepper sprays have three components in common:

- Oleoresin capsicum that elicits an intense burning sensation;
- A carrier that thins and dilutes the oleoresin capsicum; and
- A propellant that supplies the energy to expel the carrier and active ingredient.

Proper Use of Bear Spray

Bear spray has been used to stop and turn away many attacking bears. Even if it does not prevent a mauling, it still has the potential to diminish the duration and severity of the attack. The spray must enter the bear's eyes, nose and mouth to be effective. Do not apply bear spray as a repellent.

- The spray should be carried at a quick-draw position when you may encounter a bear. This may include at night if you are sleeping in a tent;

- Avoid spraying upwind since the spray may be blown back and incapacitate you;
- If a bear charges, begin spraying when the bear gets within the range indicated on the spray can (likely disturbingly close, the bear will almost be upon you); and
- The initial blast should be released when the bear is just within range. If it does not deter the bear and a charge continues, the rest of the spray should be released at the bear's head.

Workers will require specific training in the use of bear spray. The training should be delivered by a competent expert on bears, bear spray and local conditions. This training should include trial discharges of spray. Consult local regulations governing owning and carrying bear spray and make sure that you have verified that the spray is certified to your jurisdiction's requirements.

References

- Petroleum Safety Council - Bear Awareness and Avoidance Program.
- Bear Safety, Parks Canada. http://www.pc.gc.ca/eng/pn-np/mtn/ours-bears/securite-safety.aspx
- Bear Safety, BC Parks. http://www.env.gov.bc.ca/bcparks/explore/misc/bears/bearsaf.html
- Bears and Industrial Workers – Government of Albertahttps://www.alberta.ca/bears-and-industrial-workers.aspx
- Government of Saskatchewan – Staying Safe in Bear Countryhttps://www.saskatchewan.ca/government/news-and-media/2014/july/14/bear-country

Behaviour Based Safety/Job Observations

Purpose

An analysis of safety incidents shows that most have the behaviour of the person(s) involved as a key contributing factor. Although many incidents are attributed to errors committed by those involved, doing nothing further about the underlying behaviours means accepting that the injury was not preventable. Behaviour Based Safety (BBS) programs attempt to determine which behaviours are preventing incidents and which ones are causing them.

This SWP will establish the requirements for observation-based and behaviour-based BBS programs so that site-specific BBS safety program procedures can be established.

Scope

Behaviour Based Safety (BBS) programs can increase safety awareness and contribute towards continuous improvement in safety performance. This SWP will be applied at all work sites owned or operated by Richardson's Bulk Sales Ltd where a BBS system is in-place.

Procedure

1.0 Observation Programs - Principles

1. Typically, a BBS observation program consists of observing employees performing various jobs and recognizing both safe and unsafe acts performed during that observation. They provide direct, measurable information on employees' work practices. Job observations should never be used to discipline employees. They are intended to help employees identify the safest ways to perform their work.

2. Fewer unsafe behaviour observations in the workplace, is correlated to a reduction in workplace incidents. In BBS programs observers are trained on how to make positive observations and provide constructive feedback, which will improve the likelihood that critical behaviours are performed safely. All observations are recorded, and the percentage of the observations that are safe is tracked. As the "percent safe" increases, injuries tend to come down – dramatically, in some cases.

3. The following key concepts provide the basis for an observation-based program:

    - All injuries and occupational illnesses can be prevented;
    - Safety is everyone's responsibility;
    - Line management has the responsibility to train all employees to work safely;
    - Line management must create a non-punitive (e.g., without blame or punitive actions) environment for the program to be successful;
    - All construction and operation exposure can be reasonably safeguarded;
    - Positive observation cards recognizing exemplary safety actions are an important part of the program;
    - Preventing injuries and incidents contributes to business success; and
    - Working safely is a condition of employment.

4. Employees should be provided training on job observation. The training program shall:

    - Define who is trained and how much;
    - General employee awareness; and

- Ensure that all employees involved in the process are trained in the classroom and on the job.

Types of training to be provided shall include:

- Management training;
- New employee training; and
- Refresher training.

The training programs will include:

- Program objectives and incident metrics to be reviewed;
- How to conduct the observation;
- How to complete the observation form;
- What do the behaviours mean;
- How to provide effective feedback on observed behaviours;
- Role playing (mentoring and coaching); and
- That employees should be aware they may be observed at any time.

2.0 Observation-Based Process

1. In observation-based practices, the Observer meets the worker at the worksite and introduces himself and the job he is going to do. The process is open and transparent. The Observer monitors the worker and notices his safe behaviours. He also monitors the at-risk behaviours the worker is putting himself in.
2.

Upon completion of an observation, the Observer is expected to have a discussion with the observed to get feedback. The Observer will:

- Review the observation results with observed employee;
- Start with positive comments;
- Reinforce safe behaviours observed first;
- Describe unsafe behaviours observed;
- Obtain feedback from observed employee on why the work was performed that way; and
- Re-emphasize that the purpose of observations is to help employees perform their jobs safely, not to punish or discipline.

3. They both discuss the at-risk behaviours until the worker agrees to try the suggested recommendation made by the Observer, or a compromise is agreed upon.
4. Job observations must be documented on an observation form or checklist. Records of observations shall be kept on file.
5. Management and/or the Safety Department shall analyze results to identify trend and enhancements that can be made to make work activities safer. Work observations will be regularly reviewed for trends in the workplace and communicated to all employees.
6. Once trend analyses are completed, appropriate action plans must be developed to address unsafe behaviours. Action planning will include:
    - Evaluate unsafe behaviours from trend analysis and prioritize;
    - Develop an action plan for unsafe behaviours based on comments and feedback from data sheets;
    - Designate responsible parties and time-frames within the action plan;

- Define who is responsible for action planning; and
- Ensure management support.

7. Action Plans are carried out over the course of a set time period. Follow-up is necessary to ensure the closure of all actions listed within the Action Plan. The follow-up process will include:
    - Define a frequency for review of action plans;
    - Assign accountability for closeout of action plans within the organization; and
    - Archive action plans.
8. The Corrective Action Register is an excellent method of tracking action items and ensuring prompt remedial changes.

Forms

- Job Safety Observation Form

References

- Construction Owners Association of Alberta – Best Practice for Behaviour Based Safety. https://www.coaa.ab.ca/library/behaviour-based-safety-best-practice/

Blood-Borne/Air-Borne Pathogens Exposure

Purpose

This safe work practice work exposure control plan has been developed by Richardson's Bulk Sales Ltd to protect occupationally exposed workers from the hazards of blood-borne and air-borne pathogens, in particular Hepatitis B, Hepatitis C, HIV, and Tuberculosis (TB).

Scope

Richardson's Bulk Sales Ltd will assign responsibility for the establishment, implementation, and maintenance of all aspects of this Exposure Control Program. The procedures will be reviewed as required by regulations or when conditions change. Designated first-aid responders are the most potentially affected employees who will potentially be exposed to blood and/or other potentially infectious materials.

The conditions and requirements of the safe work practice will be applied and enforced at all work sites owned or operated by Richardson's Bulk Sales Ltd where workers may be exposed to the potential hazards associated with blood-borne and/or air-borne pathogens.

Richardson's Bulk Sales Ltd will follow the requirements of the Alberta Occupational, Non-Occupational and Mandatory Testing and Disclosure Act. Post exposure assessment management and treatment will follow Alberta Health's - Alberta Post-Exposure Management and Prophylaxis Guidelines, February 2015.

Definitions

Air-borne Pathogens: Infection-causing microorganisms usually spread by droplets expelled into the air by coughing or sneezing. These pathogens include Tuberculosis (TB), German Measles (Rubella), and Influenza.

Biohazardous Material: A pathogenic organism, including a blood-borne pathogen, which, because of its known or reasonably believed ability to cause disease in humans, would be classified as Risk Group 2, 3, or 4 as defined by the Public Health Agency of Canada, or any material contaminated with such an organism.

Blood-borne Pathogens: Pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, Hepatitis B Virus (HBV), Hepatitis C (HCV), and Human Immunodeficiency Virus (HIV).

Exposure Incident: A specific eye, mouth, other mucous membrane, non-intact skin, or potential contact with blood or other potentially infectious materials that results from the performance of an employee's duties.

Medical Sharp: A needle device, scalpel, lancet, or any other medical device that can reasonably be expected to penetrate the skin or other part of the body.

Procedure

1.0 Exposure Control

Exposure control will follow the requirements of Part 35 of the AB OHS Code: Health Care and Industries with Biological Hazards.

Richardson's Bulk Sales Ltd will ensure that a worker's exposure to blood borne pathogens or other biohazardous material is controlled:

- Under universal precautions all patients are considered to be possible carriers of blood-borne pathogens. The guideline recommends wearing gloves when handling blood or body fluids, wearing face shields when there was danger of blood splashing, and disposing of all needles and sharp objects in puncture-resistant containers. Universal precautions must be observed to prevent contact with blood or other potentially infectious materials. All workers who perform first aid/CPR should use the proper personal protective equipment.

Appropriate and effective hand washing and sanitizing facilities will be provided at each job site. Workers must wash hands and any other skin immediately following contact of body areas with blood or other potentially infectious materials.

1.1 Personal Protective Equipment

Disposable latex gloves and safety eyewear shall be worn when the employee may have contact with blood. Pocket masks or mouthpieces will be used while performing CPR.

Face protection will be used in any situation where splash contact with the face is possible or a suspected respiratory tract infection is present. Facial protection may consist of using both a face mask and eye protection. The first choice is to mask the patient, if this is not feasible, the provider should wear a mask. If a face shield is used, a mask must still be used.

1.2 Housekeeping

All equipment and working surfaces shall be cleaned and decontaminated after contact with blood or other potentially infectious materials. The decontamination shall occur as soon as it is feasible using an appropriate disinfectant. All contaminated materials (e.g., gloves, pocket masks, or clothing) shall be collected and sealed in plastic bag for proper disposal.

Where needles or other drug injection paraphernalia are encountered, the material is to be handled with tongs or pliers, double bagged, and placed in a sharps container. This material will be stored and disposed of in a bio-hazardous waste “sharps container”.

2.0 Post-Exposure Evaluation and Follow Up

Following report of an exposure incident, the exposed worker will be provided with a confidential medical evaluation and follow-up, including:

- Documentation of the route of exposure and the circumstances of the exposure incident;
- Suggested treatment for high risk exposures as indicated by medical personnel. (Baseline testing of the exposed employee is suggested following exposure);
- Identification and documentation of the source individual;
- Testing the source individual's blood for HCV/HBV/HIV/TB antigens as soon as feasible after exposure;
- When possible, exposed individuals will be advised of the source individual's test results and informed of applicable laws and regulations concerning the disclosure of identity and infectious status of the source individual; and
- Richardson's Bulk Sales Ltd's post exposure assessment management and treatment will follow Alberta Health's - Alberta Post-Exposure Management and Prophylaxis Guidelines, February 2015.

3.0 Training

Workers will receive initial training and an annual refresher course, which will include the following:

- A review of the local legislative requirements of the Blood-borne/Air-borne Pathogens Program and Company Exposure Control Plan;
- A general explanation of the epidemiology and symptoms of blood-borne/air-borne diseases;
- An explanation of the modes of transmission of blood-borne/air-borne pathogens;
- An explanation of the use and limitations of the methods that will prevent or reduce exposure, including appropriate work practices and personal protective equipment;
- Description and picture of needles and drug paraphernalia; and
- An explanation of the procedures to follow if an exposure incident occurs, the method of reporting the incident, and the medical follow-up that will be available.

4.0 Record Keeping

Medical Records: An accurate record for each employee with an occupational exposure will be kept in a confidential file. These files will be under the direct control of the Manager, Human Resources.

Forms

- Blood-borne/Air-borne Pathogen Exposure Consent Form
- Blood-borne/Air-borne Pathogen Post-Exposure Evaluations
- Blood-borne/Air-borne Pathogen Training Form

References

- Alberta Occupational Health and Safety Act, Section 20(1) Medical Examination. https://www.alberta.ca/ohs-act-regulation-code.aspx
- Alberta Health, Alberta Post-Exposure Management and Prophylaxis Guidelines.https://open.alberta.ca/dataset/58f4a061-4647-45a1-bd66-6c13c18c534e/resource/f1df0fa5-01d7-444b-8004-059c1335b515/download/6861344-2013-PEP-Guidelines-2013-01-01.pdf
- Public Health Agency of Canada Disease Prevention and Control Guidelines.https://www.canada.ca/en/public-health/services/reports-publications/disease-prevention-control-guidelines.html
- Saskatchewan Occupational Health and Safety Regulations 2020, Part 6: General Health Requirements, Section 6-22 Exposure Control Program. http://www.publications.gov.sk.ca/details.cfm?p=4355

Cellular Telephone Usage While Driving

Purpose

Cellular telephone usage is very prevalent and in the absence of rules can occur regularly at work or while conducting company business. Richardson's Bulk Sales Ltd will use this SWP to establish the minimum guidelines for its employees and workers to follow with respect to the safe use of communication equipment (usually cellular telephones) by drivers of vehicles.

Scope

This safe work practice applies to all Company workers engaged in driving any vehicle operated while performing any activity or service for Richardson's Bulk Sales Ltd.

The use of handheld cellphones while driving is prohibited and subject to distracted driving regulations.

Procedure

1.0 Hazards

Cellular telephone created hazards include:

- Inattention to the task at hand by the driver;
- Limitation of driver control and/or responses (one hand on steering wheel);
- Related distractions, such as checking e-mail and messages; and
- Potential ignition source in explosive atmospheres.

2.0 Rules

In an effort to reduce the risks associated with operating a cellular telephone while driving a vehicle or exposing a cellular telephone to any potentially explosive atmosphere, the following rules shall be followed:

- Drivers must obey all provisions of any applicable Distracted Driving legislation;
- Drivers shall not place any calls while driving;
- Drivers shall not consult, operate, or view the cellular telephone in any manner while driving. This can only be done after pulling off the road safely and coming to a stop;
- Do not take incoming calls;
- If a call is to be received using hands free technology, pull off the road, park in a place that does not endanger yourself or other road users, and complete the call;
- Ensure cellular telephones are left in the vehicle, or an otherwise safe location, while refuelling at gas stations or in any location where a potentially explosive atmosphere may exist; and
- Determine all worksite hazardous flammable and explosive atmosphere protocol requirements prior to entering a controlled area or worksite with a cellular telephone. Always verify what electronic equipment and what ratings are required prior to bringing any equipment to a worksite.

References

- Health Canada, Safety and Safe Use of Cellular Telephones.http://www.hc-sc.gc.ca/hl-vs/alt_formats/pacrb-dgapcr/pdf/iyh-vsv/prod/cell-eng.pdf

- Alberta's Distracted Driving legislation – Bill 16 Summary. http://www.transportation.alberta.ca/distracteddriving.htm
- ICBC, Distracted Driving.https://www.icbc.com/road-safety/crashes-happen/Distracted-driving/Pages/default.aspx

Chemical Hazards, Biological Hazards, and Harmful Substances

Purpose

This code of practice is intended to provide guidance and direction to Richardson's Bulk Sales Ltd employees, supervisors, and managers when developing, applying, and enforcing the health and safety measures required to protect workers exposed to any hazardous substance, to ensure that exposure is kept as low as reasonably achievable (ALARA), and does not exceed occupational exposure limits. Certain substances and processes (as defined in Schedule 1, Table 1 of the Alberta OHS Code) require a COP if workers may be exposed at the thresholds determined by legislation. This COP will be used along with the COP for the specified substance to establish the task and site-specific safe job procedures.

Scope

This code of practice may be used an awareness tool for asbestos, lead, and silica exposure where workers are not expected to be working with or near these substances under normal conditions, but where the substances might conceivably be encountered from time to time or where awareness training is seen as an added level of safety. Being aware of how these substances might be encountered and the hazards that they pose may be determined to be a reasonable precautionary measure to avoid accidental exposure in the workplace. If workers are expected to work with or might be exposed to these substances a code of practice specific to the substance may be required.

The conditions of this code of practice shall apply to all work sites owned or operated by Richardson's Bulk Sales Ltd.

Definitions

Harmful substance: A substance that, because of its properties, application, or presence, creates or could create a danger, including a chemical or biological hazard, to the health and safety of a worker exposed to it.

Restricted area: An area of a work site where there is a reasonable chance that the airborne concentration exceeds the occupational exposure limit.

Exposed worker: A worker who may reasonably be expected to work in a restricted area at least 30 workdays in a 12-month period.

Procedure

1.0 General Exposure Limits

1.1 Worker Exposure to Harmful Substances – Company Responsibilities

- Richardson's Bulk Sales Ltd will ensure that a worker's exposure to any substance listed in Schedule 1, Table 2 is kept as low as reasonably achievable (ALARA).
- Richardson's Bulk Sales Ltd will ensure that a worker's exposure to any substance listed in Schedule 1, Table 2 does not exceed its occupational exposure limits listed in Schedule 1, Table 2.
- If no occupational exposure limit is established for a harmful substance present at a work site, Richardson's Bulk Sales Ltd will ensure that a worker's exposure to that substance is kept as low as reasonably achievable.
- A worker may not be exposed to a substance listed in Schedule 1, Table 2 at a concentration exceeding its ceiling limit at any time.

- Richardson's Bulk Sales Ltd will ensure that no persons shall use a harmful or hazardous substance in a workplace where it is reasonably practicable to substitute a substance for it that is not a hazardous substance.
- Where a hazardous substance is to be used for any purpose in a workplace and an equivalent substance that is less hazardous is available to be used for that purpose, the equivalent substance shall be substituted for the hazardous substance where reasonably practicable.
- As soon as reasonably practicable, Richardson's Bulk Sales Ltd will inform the Joint Health and Safety Committee or Health and Safety Representative, in writing, if a worker has been exposed to more than the occupational exposure limit of a substance, and of the steps taken to control the overexposure.

1.2 Exposure to Multiple Substances

Richardson's Bulk Sales Ltd will take all reasonably practicable steps to ensure that, if a worker is exposed to more than one substance listed in the respective provincial chemical substance listing during a single work shift and the toxicological effects have similar modes of toxic action, then the value of D in the formula:

$$D= \frac{C_1}{T_1} + \frac{C_2}{T_2} + \cdots + \frac{C_n}{T_n}$$

does not exceed 1, where C1, C2...Cn refer to the airborne concentrations during exposure to contaminants 1, 2,...n, and T1, T2,... Tn are their respective occupational exposure limit values expressed in the same units as Cn.

1.3 Exposure during Shifts Longer than Eight Hours

If a worker is exposed to a substance listed in Schedule 1, Table 2 during a single work shift that is longer than 8 hours, Richardson's Bulk Sales Ltd will ensure that equivalent protection from adverse health effects is achieved by adjusting the 8-hour exposure limit using the following formulas:

adjusted exposure limit = 8-hour occupational exposure limit x daily reduction factor, where daily reduction factor =

$$\left\{\frac{8}{h} \times \frac{(24 - h)}{16}\right\}$$

and h = hours worked per day.

2.0 Richardson's Bulk Sales Ltd Responsibilities

2.1 Airborne Concentration Measurements

- If a person measures the airborne concentration of a harmful substance for the purposes of complying with the occupational exposure limits as required by this Code, the person must make the measurement in accordance with the approved methods under the Alberta OHS Code.
- Richardson's Bulk Sales Ltd will ensure that the person undertaking airborne measurements is competent to do so. Richardson's Bulk Sales Ltd will record the results of the measurements and keep them for three years from the date on which the measurements were taken.

2.2 Hazard Assessments and Training

If a worker may be exposed to a harmful substance at a work site, Richardson's Bulk Sales Ltd will identify the health hazards associated with the exposure, assess the worker's exposure and establish procedures to minimize the worker's exposure to the harmful substance. Health hazards may include skin irritation, throat irritation, burning of the eyes, blindness, vomiting, loss of consciousness, and in rare cases, death.

Current SDSs will be available for all WHMIS controlled substances on the list.

Richardson's Bulk Sales Ltd will ensure that workers who may be exposed to a harmful substance at a work site:

- Are informed of the health hazards associated with exposure to that substance;
- Are informed of measurements made of airborne concentrations of harmful substances at the work site;
- Are trained in the procedures to minimize exposure and apply the training;
- Are trained in WHMIS for chemical, biological hazards, and harmful substances, including procedures developed by Richardson's Bulk Sales Ltd to minimize the workers' exposure to harmful substances; and
- Are evaluated for competency in training to ensure that they understand the risk, hazards, and controls.

Workers who are provided with training under subsection (2) must use the procedures appropriately and apply the training.

2.3 Worker Overexposure

If a worker is exposed to more than the occupational exposure limit of a substance, the Company will immediately:

1. Identify the cause of the overexposure;
2. Protect the worker from any further exposure;
3. Control the situation so that no other workers are exposed to the substance at airborne concentrations that are more than the occupational exposure limit; and
4. Explain to the worker the nature and extent of the overexposure.

2.4 Emergency Baths, Showers, and Eye Wash Equipment

If a worker is present at a work site where chemicals harmful to the eyes or skin are used, the Company will ensure that the worker has immediate access at the work site to emergency baths, showers, eye wash equipment, or other equipment appropriate for the potential level of exposure.

2.5 Worker Decontamination

If a worker may be contaminated by a harmful substance at a work site, Richardson's Bulk Sales Ltd will:

1. Provide the facilities, including showers, the worker needs to remove the contamination before the worker leaves the work site, and
2. Ensure that only those articles and clothing that have been properly decontaminated or cleaned are taken from the work site by the worker.

2.6 Storage of Harmful Substances

Richardson's Bulk Sales Ltd will ensure that a harmful substance used or stored at a work site:

1. Is clearly identified, or its container is clearly identified;
2. Is used and stored in such a way that the use or storage is not a hazard to workers; and
3. Richardson's Bulk Sales Ltd shall keep and maintain a record of all hazardous substances that are used, produced, handled, or stored for use in the workplace.

3.0 Asbestos Awareness – Responsibilities and Training

3.1 Asbestos Containing Materials (ACM) - Hazards

- Asbestos is a known cause of asbestosis (a serious lung disorder) and various types of cancer. Prolonged exposure to asbestos may result in a fatal disease. Asbestos may be encountered in a variety locations and manners. Asbestos has been used for:
  - Heat resistant clothing;
  - Automotive linings;
  - Building materials- insulation, ceiling and floor tiles, drywall, siding, sprayed on materials in various building locations etc.; and
  - Piping and boiler insulation.
- Asbestos fibres in the air are hazardous and as a result any asbestos source which can easily be crushed and broken-up with hand pressure (referred to as friable) are a ready source of fibres;
- Sources of friable asbestos materials include: insulation and sprayed on materials;
- Any asbestos containing material can release fibres if is cut, broken, abraded, sawn or struck; and
- Asbestos fibres can be released during demolition work or while performing alterations and modifications to existing structures, buildings, facilities and equipment. Any such work must first be evaluated for the presence or likely presence of asbestos containing materials as part of a hazard assessment.

3.2 If ACMs are Encountered:

- You may encounter signs and/or labels which indicate that "asbestos containing material" (ACM) or "presumed asbestos containing material" (PACM) is present;
- ACM and PACM material must not be disturbed and no work in these areas should proceed until a hazard assessment has been performed which addresses the safety measures to be taken to protect workers from exposure to asbestos;
- If asbestos may be present and must be disturbed, certified and competent asbestos abatement companies and technicians will be required;
- Never attempt to work on or near suspected asbestos containing materials;
- Always make sure that your workplace has been certified to be asbestos free and that you understand and comply with all procedures should asbestos containing materials be encountered or suspected;
- If you may be working near or come in contact with ACM or PACM you must receive asbestos training. This training must be specific to the hazards which you might be exposed to and the specific control measures which will be required; and
- This training may be provided by Richardson's Bulk Sales Ltd, the facility owner or by other certified and competent third parties.

3.3 Asbestos Worker Training Requirements

If you are asked to work with asbestos or are asked to work in a restricted area due to asbestos as described above, then Richardson's Bulk Sales Ltd is required to:

- Ensure that a worker who works with asbestos receives the training necessary to perform the work safely; and
- Ensure that a worker who enters a restricted area that is designated as a restricted area due to the presence of asbestos:
    - Has successfully completed a course of instruction approved by a Director of Occupational Hygiene, and

- Has the original valid certificate of completion of the course issued to the worker in the worker's possession.

All Richardson's Bulk Sales Ltd employees are prohibited from working with ACMs or in asbestos restricted areas unless they have received approved asbestos training.

4.0 Lead Awareness

4.1 Where Lead is Encountered

- Inorganic lead is a malleable, blue-gray, heavy metal. Lead can be used as a pure metal, combined with another metal to form an alloy, or in the form of a chemical compound.
- The primary use of lead is for automobile lead-acid storage batteries. Lead-formed alloys are typically found in ammunition, pipes, cable covering, building material, solder, radiation shielding, collapsible tubes, and fishing weights.
- Lead is also used in ceramic glazes and as a stabilizer in plastics.
- Lead was used extensively as a corrosion inhibitor and pigment in paints but concerns over its toxicity led to a ban of its use in paint for residential and public buildings.
- Lead is still used in industrial coatings and workers may be exposed to lead dusts and fumes while cutting, grinding, welding and blasting.
- Construction workers are exposed to lead during the removal, renovation, or demolition of structures painted with lead pigments.

- Workers may also be exposed during installation, maintenance, or demolition of lead pipes and fittings, lead linings in tanks and radiation protection, leaded glass, work involving soldering, and other work involving lead metal or lead alloys.
- In general industry, workers come in contact with lead in solder, plumbing fixtures, rechargeable batteries, lead bullets, leaded glass, brass, or bronze objects, and radiators. Lead exposure can occur not only in the production of these kinds of objects but also in their use.

4.2 Health Effects of Lead

- Lead enters the body primarily through inhalation and ingestion.
- Today, adults are mainly exposed to lead by breathing in lead-containing dust and fumes at work, or from hobbies that involve lead.
- Lead passes through the lungs into the blood where it can harm many of the body's organ systems.
- While inorganic lead does not readily enter the body through the skin, it can enter the body through accidental ingestion (eating, drinking, and smoking) via contaminated hands, clothing, and surfaces.
- Workers may develop a variety of ailments, such as neurological effects, gastrointestinal effects, anemia, and kidney disease.

4.3 Lead Exposure Limits

- The OEL for lead and inorganic lead compounds is 0.05 mg/m^3.
- Lead exposure should be reduced to ALARA levels.

4.4 Lead — Air Monitoring

- If a worker may be exposed to lead in harmful amounts at a work site, Richardson's Bulk Sales Ltd will ensure that air monitoring and surface testing for lead is regularly conducted to confirm that the controls in place are effective.

4.5 Medical Monitoring for Lead

- Richardson's Bulk Sales Ltd will ensure that blood testing for lead levels is available to a worker if the worker at a work site could reasonably be expected to have an elevated body burden of lead.
- Richardson's Bulk Sales Ltd will ensure that a worker exposed to lead is informed of the availability of the blood lead test, and the Company will pay for the cost of a blood level test.
- An exposed worker may refuse to undergo a blood level test by giving Richardson's Bulk Sales Ltd a written statement refusing it.
- Where the worker has a blood level that indicates lead poisoning, an occupational health and safety officer, under the direction of a Director of Medical Services, may require Richardson's Bulk Sales Ltd to remove the worker from further lead exposure.

4.6 Lead Exposure Control Plan

1. Richardson's Bulk Sales Ltd will develop an exposure control plan for lead if:
    - A worker at the work site may be exposed to airborne lead in excess of its occupational exposure limit for more than 30 days in a year, or
    - A worker's exposure to lead at the work site could result in an elevated body burden of lead through any route of entry.
2. The exposure control plan must include at least the following:

- A statement of purpose and the responsibilities of individuals;
- Methods of hazard identification, assessment, and control;
- Worker education and training;
- Safe work practices if these are required by the hazard assessment under this Code;
- Descriptions of personal and work site hygiene practices and decontamination practices;
- Processes of health monitoring, including biological testing;
- Methods of documentation and record keeping; and
- Procedures for maintenance of the plan, including annual reviews and updating.

3. A worker must follow the exposure control plan and practice the personal and work site hygiene practices established by Richardson's Bulk Sales Ltd to minimize lead exposure at the work site.

5.0 Silica Awareness

5.1 Where Crystalline Silica is Encountered

- Crystalline silica is an important industrial material found abundantly in the earth's crust. It is a mineral that occurs in several forms.
- Quartz, the most common form, is a component of sand, stone, rock, concrete, brick, block, and mortar.

- Many of these materials are used every day across a wide variety of industrial settings, including construction, mining, manufacturing, maritime, and agriculture.
- Occupational exposure to crystalline silica often occurs as part of common workplace operations involving cutting, sawing, drilling, and crushing of concrete, brick, block, rock, and stone products (such as in construction work).
- Operations using sand products (such as glass manufacturing, foundries, and sand blasting) can result in worker inhalation of small (respirable) crystalline silica particles from the air. These types of exposures can lead to the development of disabling and sometimes fatal lung diseases, including silicosis and lung cancer. Hydraulic fracturing in the oil and gas industry may also expose workers to the hazards of crystalline silica.
- Processes historically associated with high rates of silicosis include sandblasting, sand-casting foundry operations, mining, tunneling, cement cutting and demolition, masonry work, and granite cutting.

5.2 Health Effects of Crystalline Silica

- Inhalation of respirable crystalline silica particles has long been known to cause silicosis, a disabling, non-reversible and sometimes fatal lung disease.
- Respirable crystalline silica also causes lung cancer.
- The National Institute for Occupational Safety and Health (NIOSH) has also recommended that respirable crystalline silica be considered a potential occupational carcinogen.
- In addition, exposure to respirable crystalline silica has been associated with other respiratory diseases, such as chronic obstructive pulmonary disease (including bronchitis and emphysema), as well as kidney and immune system diseases.

5.3 Silica Exposure Limits

The OEL for crystalline silica and respirable particulate cristobalite and quartz has been established at 0.025 mg/m^3. Silica exposure must be kept ALARA.

5.4 Use of Crystalline Silica in Abrasive Blasting

If conducting abrasive blasting or similar activities, Richardson's Bulk Sales Ltd will, if reasonably practicable, ensure that crystalline silica is replaced with a less harmful substance.

6.0 Asbestos, Lead, and Silica Awareness – Common Requirements

6.1 Restricted Areas – Asbestos, Lead and Silica

Restricted area means an area of a work site where there is a reasonable chance that the airborne concentration of asbestos, silica, or lead exceeds or may exceed the occupational exposure limit for one or more of them.

Richardson's Bulk Sales Ltd will ensure that only a person authorized by Richardson's Bulk Sales Ltd or by law enters a restricted area.

Richardson's Bulk Sales Ltd will post signs that clearly indicate that:

- A harmful substance is present in the area;
- Only authorized persons may enter the area; and
- Eating, drinking, and smoking are prohibited in the area.

Signs posted in restricted areas must:

- Be in a conspicuous location at the entrances to and on the periphery of each restricted area, as appropriate, and
- Remain posted until the area is no longer a restricted area.

Richardson's Bulk Sales Ltd will:

- Provide workers in a restricted area with protective clothing that protects other clothing worn by the worker from contamination by asbestos, silica, or lead;
- Ensure that workers' street clothing is not contaminated by asbestos, silica, or lead; and
- Ensure that a worker does not leave a restricted area until the worker has been decontaminated.

6.2 Protective Clothing Used in Restricted Areas Containing Asbestos or Lead

If clothing used in a restricted area containing asbestos or lead is reused and not discarded, Richardson's Bulk Sales Ltd will have the clothing laundered in the appropriate manner and at appropriate intervals to ensure that:

- The clothing is decontaminated, and
- There is no cross-contamination of other clothing by asbestos or lead.

Richardson's Bulk Sales Ltd will ensure that clothing contaminated with asbestos or lead that is to be laundered prior to being reused is stored and transported in sealed containers.

Containers used for laundry must be clearly labelled:

- To identify the contents;

- To indicate that the contents are a hazard; and
- To warn workers that dust from the contents should not be inhaled.

6.3 Health Assessments and Notifiable Diseases

Notifiable Diseases

Diseases related to exposure to asbestos, lead, or silica may be notifiable diseases under Section 47 of the OHS Act. Richardson's Bulk Sales Ltd will advise a medical director as required if a worker may have developed a disease related to exposure to these substances.

This section applies to an exposed worker who may be exposed to asbestos or silica.

A health assessment of the worker must include the following:

- The identity of the worker and Richardson's Bulk Sales Ltd;
- The date of the medical examination, chest x-ray, and spirogram;
- The specified chest X-ray including a radiologist's report;
- The required spirogram, conducted by a pulmonary function technician;
- A history covering:
- Occupational exposures to asbestos, silica, or other industrial dusts and carcinogens;
- Significant exposures to asbestos, silica, other dust, and carcinogens during non-work-related activities;
- Significant symptoms that may indicate silicosis, pneumoconiosis, asbestosis, or cancer;
- Past and current medical diagnoses of respiratory disease; and

- The worker's smoking history.
- A written interpretation and explanation of the results by a physician of the assessment with particular reference to the worker's exposure to airborne substances.

A physician must give the written interpretation and explanation of the results of a health assessment to the worker not more than 60 days after the tests are completed.

The physician must ensure that the records of the health assessment are kept for not less than 30 years.

The person with custody of the health assessment record must ensure that no person, other than the worker or health professional who conducts the health assessment, has access to the exposed worker's health assessment unless:

- The record is in a form that does not identify the worker, or
- The worker gives written permission for access by another person.

Richardson's Bulk Sales Ltd will ensure that a worker undergoes a health assessment:

- Not more than 30 calendar days after the worker becomes an exposed worker, and
- Every two years after the first health assessment.

If an exposed worker received a health assessment from a previous employer within the immediately preceding two years, the worker must inform the current employer of the date or approximate date of that health assessment.

Richardson's Bulk Sales Ltd will ensure at all times that an exposed worker has received a health assessment within the immediately preceding two years.

Workers may refuse to undergo part or all of a health assessment by giving Richardson's Bulk Sales Ltd a written statement refusing it. Richardson's Bulk Sales Ltd will not coerce, threaten, or force a worker into refusing part or all of a health assessment.

Richardson's Bulk Sales Ltd will pay the cost of the health assessment, medical interpretation, and explanation (employees only) required by this section.

Richardson's Bulk Sales Ltd will ensure that, if it is reasonably practicable, a health assessment is performed during normal hours of work.

Richardson's Bulk Sales Ltd will not make deduction from the worker's (employees) wages, salary, or other remuneration or benefits for the time that an exposed worker:

- Undergoes a health assessment, or
- Travels to or from a health assessment.

References

- Alberta Occupational Health and Safety Code, Part 4: Chemical Hazards, Biological Hazards, and Harmful Substances.https://www.alberta.ca/ohs-act-regulation-code.aspx
- AB OHS Code Explanations Guide - Chemical Hazards, Biological Hazards, and Harmful Substances.https://www.alberta.ca/ohs-act-regulation-code.aspx

Commercial Vehicle Transportation

Purpose

Richardson's Bulk Sales Ltd has developed this safe work practice based on the federal and provincial regulatory requirements for commercial vehicle transportation to provide guidance in developing site-specific commercial transportation safety programs.

Scope

The conditions and requirements contained within this safe work practice shall be applied and enforced by all Company employees involved in commercial transportation activities. "Commercial Vehicle" means a commercial vehicle or a combination of commercial vehicles that is registered for a gross weight of more than 4500 kilograms. A Richardson's Bulk Sales Ltd specific Transportation Safety Program will be developed and implemented as outlined in this SWP and as required by the applicable federal and provincial regulations.

Procedure

1.0 Provincial Versus Federal Carrier

Upon initial vehicle registration, all commercial vehicles operating solely within Alberta registered for a weight of 11, 794 kg or greater, or operating outside Alberta registered for more than 4,500 kg must apply for a Safety Fitness Certificate that displays the appropriate Operating Status (provincial or federal). The certificate assigns a safety fitness rating and an operating status according to the requirements of the Alberta Traffic Safety Act (TSA).

If a commercial vehicle works only within Alberta, it is deemed to be a provincial carrier under the AB Traffic Safety Act and Regulations. If the carrier travels outside the province, all commercial vehicles operated by the carrier are deemed to be federal carriers and must comply with the federal Motor

Vehicle Transport Act. All federal commercial vehicles with a gross vehicle weight over 4,500 kg must adhere to the Federal Hours of Service legislation contained in the National Safety Code.

The following table is a summary of some of the standard requirements.

Activity	Provincial Carrier (Alberta)		Federal Carrier
	4,500 – 11,793 kg	>11,793 kg	>4,500 kg
Documented pre-trip inspection	Must perform inspection but currently exempt from documented requirements	Required as per NSC Standard 13	Required as per NSC Standard 13
Maintenance	Periodic maintenance	Full CVIP	Full CVIP
Hours of Service	Not regulated except through Employment Standards	Hours of Service as per Alberta Drivers' Hours of Service Regulation	Hours of Service as per NSC Standard 9
Logbook	Not required	>11,793 kg required unless "short trip" conditions are satisfied – 160 km radius, etc.	>4,500 kg required unless "short trip" conditions are satisfied – 160 km radius, etc.
Cargo Securement	As per NSC Standard 10	As per NSC Standard 10	As per NSC Standard 10

2.0 Alberta TSA Requirements

2.1 Vehicle Weights - Richardson's Bulk Sales Ltd shall not:

- Operate a commercial vehicle on a highway when the weight of the vehicle exceeds the maximum allowable weight for that vehicle;

- Operate a commercial vehicle on a bridge when the weight of the vehicle exceeds the maximum weight specified for that bridge;
- Operate a commercial vehicle on a highway that is subject to a road ban when the weight of the vehicle exceeds the maximum weight allowed for that vehicle under the road ban; and
- Operate a commercial vehicle on a highway if any portion or part of the vehicle exceeds the dimensions prescribed in a permit or under this Act.

2.2 Compliance with Maintenance Standards

- A person shall not operate or permit another person to operate a commercial vehicle on a highway if the vehicle or any equipment pertaining to the vehicle is in a condition that is likely to cause danger to persons or property.
- Commercial vehicles must comply with the following standards:
  - Vehicle Equipment Regulation;
  - The Motor Vehicle Safety Act (Canada); and
  - The Motor Vehicle Safety Regulations (Canada) applicable at the time of manufacture of the vehicle.
- Richardson's Bulk Sales Ltd will carry out a maintenance and inspection program for the carrier's commercial vehicle as required by the Vehicle Inspection Regulation (AR 211/2006).
- Richardson's Bulk Sales Ltd will maintain a copy of the maintenance and inspection program in each location where maintenance and inspection of the Richardson's Bulk Sales Ltd's commercial vehicles are carried out, and shall ensure that the copy is readily accessible to the employees of who carry out the maintenance and inspection program.
- When a commercial vehicle requires repair:
  -

The replacement parts used in the repair of that vehicle:

- Must be designed for the application for which they are used;
- Must be in proper working condition; and
- Must be properly installed.

- The repair must be completed in a manner so as to ensure the safe operation of the vehicle.

- When Richardson's Bulk Sales Ltd receives a notice of a defect in respect of one of its commercial vehicles, Richardson's Bulk Sales Ltd shall immediately:
  - Repair or otherwise modify the vehicle, in accordance with instructions provided by the manufacturer in the notice, or
  - If instructions are not given by the manufacturer, repair, or otherwise modify the vehicle as necessary to correct the defect.

2.3 Daily Trip Inspection Requirements

- Richardson's Bulk Sales Ltd shall not permit a driver to drive and a driver shall not drive a commercial vehicle unless:
  - The commercial vehicle has been inspected in accordance with the daily trip inspection requirements set out in this section; or
  - No major defect was detected in the vehicle during the daily trip inspection.

- A daily trip inspection is valid for 24 hours from the time recorded in the trip inspection report.

- Inspections carried out by designated, competent, and authorized persons with respect to a truck, truck-tractor, or trailer, will consist of the items specified in Schedule 1 of NSC Standard 13, Part 2 (see Related References).
- If a driver or a person authorized by Richardson's Bulk Sales Ltd to conduct a trip inspection under this section believes or suspects that there is a safety defect in a commercial vehicle inspected under this section, the driver or the person authorized by Richardson's Bulk Sales Ltd shall report the defect to the owner of the commercial vehicle:
    - Without delay if the defect is a major defect, or
    - In a timely manner, and not later than the next required daily trip inspection, in all other cases.
- A carrier shall ensure that a copy of the inspection schedule, that is applicable to the commercial vehicle, is located in the vehicle. A driver shall, on the request of a peace officer, produce to the peace officer for inspection the inspection schedule.
- A carrier shall require every driver employed to prepare a trip inspection report in accordance with this section.
- The driver shall prepare, for each commercial vehicle driven, the trip inspection report:
    - In a legible written format, or
    - In a legible electronic format acceptable to the Registrar.
- The trip inspection report must:
    - State the licence plate number, the commercial vehicle identification number, or unit number of the commercial vehicle;
    - Record the odometer or hubometer reading of the commercial vehicle at the time of the inspection;

- State the name of the carrier operating the commercial vehicle;
- State the name of the municipality or location on the highway where the commercial vehicle was inspected;
- Indicate:
    - Each defect in the operation of every item required to be inspected, or
    - That no defect was detected;
- State the time and date that the report is made;
- State the name of the person who inspected the commercial vehicle and include a statement signed by that person stating that the commercial vehicle has been inspected in accordance with the applicable requirements;
- Contain the name and signature of the driver or the person making the report; and
- In the case of a trip inspection under section 11 of the Commercial Vehicle Safety regulation (bus or motor coach):
    - Record the brake adjustment measurement;
    - Indicate the nature of all repairs carried out to rectify defects determined during the inspection; and
    - State the trade certificate number of the Heavy Equipment Technician that conducted the inspection.

- Richardson's Bulk Sales Ltd shall not permit a driver to drive, and no driver shall drive, a commercial vehicle unless the driver has the trip inspection report in that driver's possession.
- A driver shall, within 20 days after the completion of a trip inspection report, forward the original of the report to the home terminal of the carrier who is responsible for the commercial vehicle.
-

Richardson's Bulk Sales Ltd shall:

- Ensure that the driver forwards the original of the trip inspection report as required under by the Commercial Vehicle Safety Regulation, Section 13;
- Deposit the original of the trip inspection report at its principal place of business within 30 days of receiving it; and
- Keep each original of the trip inspection report in chronological order for each vehicle for at least six months after receiving it.

- If a driver observes any safety defects in the commercial vehicle while driving the vehicle, the driver shall record the safety defects in the trip inspection report or otherwise in a written document and report that defect to the carrier.
- Richardson's Bulk Sales Ltd shall not permit a driver to drive, and a driver shall not drive, a commercial vehicle unless, before doing so, the carrier or the person has:
  - Repaired or corrected any major defect listed on the trip inspection report, or
  - Certified on the report that repair or correction is unnecessary.
- Exemption (see Related References) – the driver of a commercial vehicle in Alberta that is registered for a gross weight of less than 11,794 kilograms, or a combination of vehicle's where the sum of their registered weights is less than 11,794 kilograms is exempt from the requirements to:
  - Carry or produce the applicable schedule of the NSC Standard 13, Part 2 as required by the Commercial Vehicle Safety Regulation AR121/2009 subsections 10(9) and (11), and
  - Prepare, carry, or produce a trip inspection report as required by the Commercial Vehicle Safety Regulation subsections 12(2), (5) and (6).

The inspection must be performed, but it is not necessary to document it for those commercial vehicles <11,794 kilograms.

2.4 Cargo Securement Requirements

- Richardson's Bulk Sales Ltd shall not permit a commercial vehicle driver to operate a commercial vehicle where the cargo transported in or on the commercial vehicle is not contained, immobilized, or secured in accordance with NSC Standard 10 (see Related References) as it relates to the particular type of commercial vehicle.
- Richardson's Bulk Sales Ltd will ensure that drivers of that cargo transported by a commercial vehicle is contained, immobilized or secured by the driver so that it cannot:
    - Leak, spill, blow off, fall from, fall through or otherwise be dislodged from the commercial vehicle, or
    - Shift upon or within the commercial vehicle to such an extent that the commercial vehicle's stability or manoeuvrability is adversely affected.
- Section 11(4) of Standard 10 - Cargo Securement: a tiedown or a component of a tiedown to secure cargo to a vehicle shall not be used unless it is marked by the manufacturer with respect to its working load limit (WLL).

2.5 Hours of Service – Requirements

- This Regulation applies with respect to the operation of a vehicle that is registered under the Act for a gross weight of 11,794 or more kilograms;
- A Richardson's Bulk Sales Ltd driver is on duty during any period of time that the driver is:
    - Checking in or preparing reports at the commencement or termination of a work shift;
    - Inspecting, servicing, repairing, conditioning, or starting a vehicle;

- Driving a vehicle;
- In the case of a vehicle that is being operated by co-drivers, travelling as one of the drivers, except the time that the driver spends resting en-route in a sleeper berth;
- Participating in the loading or unloading of a vehicle;
- Inspecting or checking the load of a vehicle;
- Waiting, at the request of Richardson's Bulk Sales Ltd for a vehicle to be serviced, loaded, or unloaded;
- Waiting for a vehicle or load to be checked at customs, at a vehicle inspection station, or by a peace officer;
- At the request of Richardson's Bulk Sales Ltd, travelling as a passenger to a work assignment when the driver has not been off duty for at least 8 consecutive hours immediately prior to departure;
- Waiting at a point en-route due to an accident involving the vehicle that the driver is operating or other unplanned event; or
- At the request of Richardson's Bulk Sales Ltd or otherwise engaged, waiting in readiness for work at any place other than:
    - A private residence, or
    - A motel, hotel or other similar place of rest, where the accommodation is provided by Richardson's Bulk Sales Ltd.

- Richardson's Bulk Sales Ltd will not permit a driver to commence a work shift unless the driver has been off duty for at least 8 consecutive hours immediately prior to commencing the work shift.

Where a driver is driving a vehicle that is equipped with a sleeper berth, the driver may take the time off duty in two periods of rest if:

1. Neither of the two periods of rest is less than two hours;
2. The aggregate of the time spent resting in the sleeper berth immediately preceding and immediately following the time on duty is at least eight hours in total; and
3. The aggregate of the driving time immediately preceding and immediately following the resting time in the sleeper berth does not exceed 13 hours in total.

- Richardson's Bulk Sales Ltd shall not permit a driver during the driver's work shift:
  - To exceed 13 hours of driving time, or
  - To drive at any time after the driver has been on duty for 15 or more consecutive hours.
- A Richardson's Bulk Sales Ltd driver shall not during the driver's work shift:
  - To exceed 13 hours of driving time, or
  - To drive at any time after the driver has been on duty for 15 or more consecutive hours.

- A driver may, in the case of unexpected adverse driving conditions, exceed by not more than 2 additional hours the number of hours that the driver is permitted to drive under this Regulation if the trip as originally planned could have been completed within the driving time or the time on duty. A driver may continuously drive a vehicle:

    1. For a period of time of up to four consecutive hours, if at the conclusion of driving for that period of time the driver takes at least 10 consecutive minutes off duty or of non-driving time, or

    2. For a period of time that exceeds that permitted under clause (1.) but does not exceed six consecutive hours, if at the conclusion of driving for that period of time the driver takes at least 30 consecutive minutes off duty or of non-driving time.

- Richardson's Bulk Sales Ltd shall ensure that for each work day, a daily log is maintained by every driver employed or otherwise engaged by the carrier.

The following information must be entered in a daily log:

- A graph grid in the form set out in the Schedule;
- The date;
- The odometer reading at the commencement of driving;
- The total number of kilometres or miles driven by the driver during the work day;
- In the case where a vehicle is being operated by co-drivers, the total number of hours that the vehicle has travelled during a work day;
- The vehicle's unit or licence plate number;
- The name of the carrier for whom the driver worked during the work day;
- The name and signature of the driver;

- The name of any co-driver;
- The time of commencement of the work shift and the location at which the driver commenced the work shift; and
- The address of the principal place of business and of the home terminal of each carrier for whom the driver is employed or otherwise engaged during the work day.
    - A driver shall at all times during the driver's work shift have in the driver's possession and available for inspection:
        - All bills of lading and other shipping documents, and
        - Any fuel and accommodation receipts for expenses incurred en-route.
    - Richardson's Bulk Sales Ltd shall retain at its principal place of business every copy of the daily log for a period of at least six months from the date that the information is recorded in the daily log.

2.6 Commercial Vehicle Certificate and Insurance - Requirements

When Richardson's Bulk Sales Ltd is the registered owner of a commercial vehicle and is required to operate the vehicle under the authority of a safety fitness certificate will establish, maintain, and follow a written safety program that, in a manner that is clearly documented and addresses matters relating to the safe use and operation of commercial vehicles, including:

- Speed limits, seatbelt use, drug and alcohol use, defensive driving, load security, and fuelling;
- Proper records and recording of information including, as required, bills of lading, manifests, dangerous goods documents, time records, drivers' daily logs, and weigh slips;
- Policies that drivers are expected to comply with the law, policy, and procedures related to driver training, responsibilities, conduct, and discipline;
- Instructions for the use of safety equipment, including, as required, the use of fire extinguishers, goggles, and hard hats;

- Training for employees about safety laws and their application and an ongoing program for evaluating their driving skills;
- Retention of complete records for each driver in accordance with section 41 of the Alberta Commercial Vehicle Certificate and Insurance Regulation; and
- Policies for ensuring that drivers are properly qualified for the type of vehicle they operate.

Richardson's Bulk Sales Ltd as the registered owner of a commercial vehicle who is required to operate the vehicle under the authority of a safety fitness certificate will maintain, for each of Richardson's Bulk Sales Ltd's drivers, a driver record file containing the following information:

- The driver's completed application form for employment with the registered owner;
- A copy of the driver's abstract when the driver is first hired or employed, dated within 30 days of the date of employment or hire;
- Annual updated copies of the driver's abstract, to be kept on file;
- The driver's employment history for the three years immediately preceding the time the driver started working for the carrier;
- A record of the driver's convictions of safety laws in the current year and in each of the four preceding years;
- A record of any administrative penalty imposed on the driver under safety laws;
- A record of all collisions involving a motor vehicle operated by the driver that are required to be reported to a peace officer, including personal infractions both inside and outside Alberta;
- A record of all training undertaken by a driver related to the operation of a commercial vehicle and compliance with safety laws;
- A copy of a current TDG training certificate; and
- A copy of a current medical certificate for the driver.

2.7 Mandatory Provincial Training

New Class I and Class II commercial drivers must complete Mandatory Entry-level Training (MELT) by an Alberta approved driving school consisting of in-class, in-yard, and in-vehicle training.

2.8 Obtaining and Renewing a Safety Fitness Certificate

Safety Fitness Certificates will have expiry dates and must be renewed.

New carriers must complete a Safety Fitness Certificate application. New carriers are also required to complete the Pre-Entry Program for New National Safety Code Carriers. This includes:

- Successful completion of the online Safety Fitness Certificate Compliance course;
- A passing mark in the SFC Compliance Knowledge Test administered by an Alberta registry agency; and
- Successful completion of the new carrier compliance review within 9 to 12 months of being issued a safety fitness certificate. Carriers must contact a certified third party auditor who will conduct the new carrier compliance review and submit it to Alberta Transportation.

Existing carriers with permanent Safety Fitness Certificates will be required to renew their Safety Fitness Certificate. They will be issued a Safety Fitness Certificate with an expiry date. Following this, all carriers will need to renew their certificate every 3 years.

3.0 Summary of Maintenance and Safety Program Requirements for Federally-Regulated Alberta-Based Commercial Trucks / Tractors / Trailer

Program Requirements	Safety Fitness Certificate with a "Federal" Operating Status [1]			
	When Vehicle / Driver is Operating INSIDE Alberta [2]		When Vehicle / Driver is Operating OUTSIDE Alberta [3]	
	4,501 – 11,793 kg	11,794 kg or more	4,501 – 11,793 kg	11,794 kg or more
Written Maintenance Program	Yes	Yes	Yes	Yes
➢ Complete Vehicle Files	Yes	Yes [11]	Yes [14]	Yes [11,14]
Daily Trip Inspection [4]				
➢ Driver Training [5]	Yes	Yes	Yes	Yes
• Conduct inspection	Yes [7,8,9]	Yes [7,8,9]	Yes [7,8,9]	Yes [7,8,9]
• Document and Produce "trip inspection report"	No [6,10,12]	Yes [6,10,12]	No [6,12,14]	Yes [6,12,14]
• Produce a copy of Schedule 1 of NSC Standard 13, Part 2 [7]	No	Yes	Yes	Yes
Continuous and Regular Vehicle Maintenance				
➢ Staff Training [5]	Yes [8]	Yes [8]	Yes [8]	Yes [8]
➢ At facility/On-Road compliance	Yes [8]	Yes [8]	Yes [8]	Yes [8]
CVIP *(annual inspection)*	No	Yes [13]	No [14]	Yes [14]
Written Safety Program	Yes	Yes	Yes	Yes
➢ Employee Training [5] and Driver Evaluation	Yes	Yes	Yes	Yes
➢ Complete Driver Files	Yes	Yes	Yes	Yes
Hours of Service				
➢ Driver Training [5]	Yes [10]	Yes [10]	Yes [15]	Yes [15]
➢ Compliance On-Road	Yes [10]	Yes [10]	Yes [15]	Yes [15]
Cargo Securement *(standards regulation only)*				
➢ Driver Training [5]	Yes [10]	Yes [10]	Yes	Yes
➢ Compliance On-Road	Yes [16,17]	Yes [16,17]	Yes [16,17]	Yes [16,17]

Notes:

1. “Federal” Operating Status authorizes operation outside of Alberta of commercial vehicles (including farm-plated vehicles) registered in Alberta for a weight of more than 4,500 kilograms.
2. These columns apply when the driver and the specified size of vehicle operate on a trip point-to-point solely within Alberta. All regulatory requirements of Alberta and of the federal government must be met.
3. These columns apply when any part of a trip involving the specified size of vehicle travels outside of Alberta. All applicable regulatory requirements of Alberta, the federal government and the jurisdiction(s) in which the vehicle/driver travels must be met.
4. “Daily Trip Inspection” means a trip inspection of a commercial vehicle or combination of commercial vehicles conducted by following and inspecting the specified items identified in Schedule 1 of the NSC Standard 13, Part 2.
5. Training of all applicable carrier staff (such as drivers, managers, administration, mechanics, etc.) in all “safety laws” is required by Section 40(1) (e) of the Commercial Vehicle Certificate and Insurance Regulation, AR 314/2002. This includes: trip inspection, hours of service, cargo securement, carrier policies in safety and maintenance programs, etc.
6. A “daily trip inspection report” must be completed when a trip inspection is conducted on a vehicle or combination of vehicles. Report must meet minimum requirements: legible; licence number/Unit number; odometer or hubometer; carrier name; location inspected; each defect or no defect; date/time of report; name of person inspecting; name and signature of driver or person inspecting.
7. Schedule 1 of NSC Standard 13, Part 2 identifies the list of minimum daily trip inspection items to be inspected. A copy of the complete Schedule needs to be located in each commercial vehicle and must be produced on the request of a peace officer.

8. Truck, truck-tractor or trailer shall not be operated if it fails to comply with standards in Schedule 1 (i.e. general markings, lift axles, etc.) and Schedule 2 (i.e. general equipment, mechanical fitness) of Commercial Vehicle Safety Regulation, AR 121/2009.

9. An owner shall not permit a driver to drive and a driver shall not drive a commercial vehicle if a “major defect” is detected in the vehicle during the daily trip inspection or at any other time using Schedule 1 of NSC Standard 13, Part 2.

10. When operating point-to-point in Alberta, the registered owner of a registered farm-plated vehicle and its driver(s) is not required to comply to this National Safety Code regulatory requirement on-road or in their written safety and/or maintenance program.

11. Carriers operating vehicles registered for 11,794 kilograms or more that are required to complete a “trip inspection report” (see Notes 7 and 13) must retain trip inspection reports in chronological order for each vehicle for at least 6 months after receipt.

12. Whether or not a trip inspection report must be completed before trip begins, if driver observes any safety defects in Schedule 1 of NSC Standard 13, Part 2, while driving the vehicle, the driver shall record the defects in a trip inspection report or otherwise in a written document and report that defect to the carrier responsible for the vehicle. If defect is “major”, then do not drive vehicle.

13. When operating point-to-point in Alberta, the vehicle registered as a farm-plated vehicle requires no CVIP (annual inspection).

14. When operating vehicles outside Alberta, maintenance program and vehicle files must include trip inspections, repairs, and/or CVIP forms only when the jurisdiction(s) in which they are operated require the inspections to be completed.

15. Federal regulations in this area do not apply to a driver or carrier operating a 2- or 3-axle vehicle (full or empty) that is used to transport primary products of a farm, forest, sea or lake if the driver or the motor carrier is the producer of the products.

16. Section 17(5) of the Commercial Vehicle Safety Regulation, AR 121/2009 states that Sections 10 and 22 (number and strength of securement ties) of the National Safety Code Standard 10 cargo securement do not apply to farm-plated vehicles hauling hay or straw within a 50-kilomtre radius of the load's origin provided specified criteria are met. Note #17 below still applies.

17. Section 17(4) for cargo securement under the Commercial Vehicle Safety Regulation, AR 121/2009 requires a driver, carrier or owner of a commercial vehicle to ensure cargo is contained, immobilized or secured so that it cannot leak, spill, blow off, fall from, fall through or otherwise be dislodged from the vehicle or shift upon or within the commercial vehicle to such an extent that the commercial vehicle's stability or maneuverability is adversely affected. Also, Section 65 of the Alberta Vehicle Equipment Regulation, AR 122/2009 requires any vehicle to be constructed to carry the goods and any cargo to be secured such that it does not shift, sway, blow off, fall off, leak or otherwise escape.

4.0 Summary of Maintenance and Safety Program Requirements for Federally-Regulated Alberta-Based Commercial Trucks / Tractors / Trailer

Program Requirements	Safety Fitness Certificate with a "Provincial" Operating Status [1]		NON-NSC Companies [2]
	Operating only IN Alberta		Operating only IN Alberta
	4,501 – 11,793 kg	11,794 kg or more	4,501 – 11,793 kg
Written Maintenance Program	Yes	Yes	No
➢ Complete Vehicle Files	Yes	Yes [10,16]	No
Daily Trip Inspection [3]			
➢ Driver Training [4]	Yes	Yes	No
• Conduct inspection	Yes [6,7,8]	Yes [6,7,8]	Yes [6,7,8]
• Document and Produce "trip inspection report"[5]	No [17]	Yes [6,10,11]	No [16,17]
• Produce a copy of Schedule 1 of NSC Standard 13, Part 2 [6]	No	Yes [6,11]	No
Continuous and Regular Vehicle Maintenance			
➢ Staff Training [4]	Yes [7]	Yes [7]	No [7]
➢ Compliance at Facility and On-Road	Yes [7]	Yes [7]	No [7]
CVIP *(annual inspection)*	No	Yes [12]	No
Written Safety Program	No	Yes	No
➢ Employee Training [4] and Driver Evaluation	No	Yes	No
➢ Complete Driver Files	No	Yes	No
Hours of Service			
➢ Driver Training [4]	No	Yes [9]	No
➢ On-Road Compliance	No	Yes [9]	No
Cargo Securement *(standards regulation only)*			
➢ Driver Training [4]	Yes	Yes [9]	No
➢ Compliance On-Road	Yes [14,15]	Yes [14,15]	Yes [14,15]

Notes:

1. "Provincial" Operating Status authorizes operation solely within Alberta of commercial vehicles registered in Alberta for a weight of 11,794 kilograms or more. No permit is available authorizing a "Provincial" carrier to leave Alberta at any time. An Alberta carrier leaving the province with any vehicle registered over 4,500 kilograms for any reason requires a "Federal" Operating Status.

2. A non-NSC company (or individual) who has commercial vehicles registered between 4,501 and 11,793 kilograms and who does not leave Alberta does not require an Alberta Safety Fitness Certificate (SFC) but must meet the specified compliance requirements.

3. "Daily Trip Inspection" means a trip inspection of a commercial vehicle or combination of commercial vehicles conducted by following and inspecting the specified items identified in Schedule 1 of the NSC Standard 13, Part 2.

4. Training of all applicable carrier staff (such as drivers, managers, administration, mechanics, etc.) in all "safety laws" is required by Section 40(1) (e) of the Commercial Vehicle Certificate and Insurance Regulation, AR 314/2002. This includes: trip inspection, hours of service, cargo securement, carrier policies in safety and maintenance programs, etc.

5. A "trip inspection report" must be completed when a trip inspection is conducted on a vehicle or combination of vehicles. Report must meet minimum requirements: legible; licence number/unit number; odometer or hubometer; carrier name; location inspected; each defect or no defect; date/time of report; name of person inspecting; name and signature of driver or person inspecting.

6. Schedule 1 of NSC Standard 13, Part 2 identifies the list of daily trip inspection items that need to be inspected. A copy of the complete Schedule needs to be located in each commercial vehicle and must be produced on the request of a peace officer.

7. Truck, truck-tractor or trailer shall not be operated if it fails to comply with standards in Schedule 1 (i.e. general markings, lift axles, etc.) and Schedule 2 (i.e. general equipment; mechanical fitness) of Commercial Vehicle Safety Regulation, AR 121/2009.

8. An owner shall not permit a driver to drive and a driver shall not drive a commercial vehicle if a “major defect” is detected in the vehicle during the daily trip inspection or at any other time using Schedule 1 of NSC Standard 13, Part 2.

9. When operating point-to-point in Alberta, the registered owner of a registered farm-plated vehicle and its driver(s) is not required to comply to this National Safety Code regulatory requirement on-road or in their written safety and/or maintenance program.

10. Carriers operating commercial vehicles registered for 11,794 kilograms or more that are required to complete a “trip inspection report” (see Notes 5 and 11) must retain the original trip inspection reports in chronological order for each vehicle for at least 6 months after receiving it.

11. If a driver observes any safety defects in Schedule 1 of NSC Standard 13, Part 2, on vehicle while driving, the driver shall record the defects in a trip inspection report or otherwise in a written document and report that defect to the carrier responsible for the vehicle. If defect is “major”, then do not drive vehicle.

12. When operating point-to-point in Alberta, the vehicle registered as a farm-plated vehicle requires no CVIP (annual inspection).

13. Legislation in this area does not apply to a driver or carrier transporting agricultural products in any vehicle or transporting products of a forest, lake or river in a 2- or 3-axle vehicle where the driver or the driver’s employer produced the products.

14. Section 17(5) of the Commercial Vehicle Safety Regulation, AR 121/2009 states that Sections 10 and 22 (number and strength of securement ties) of the National Safety Code Standard 10 cargo securement do not apply to farm-plated vehicles hauling hay or straw within a 50-kilometre radius of the load's origin provided specified criteria are met. Note #15 below still applies.

15. Section 17(4) for cargo securement under the Commercial Vehicle Safety Regulation, AR 121/2009 requires a driver, carrier or owner of a commercial vehicle to ensure cargo is contained, immobilized or secured so that it cannot leak, spill, blow off, fall from, fall through or otherwise be dislodged from the vehicle or shift upon or within the commercial vehicle to such an extent that the commercial vehicle's stability or maneuverability is adversely affected. Also, Section 65 of the Alberta Vehicle Equipment Regulation, AR 122/2009 requires any vehicle to be constructed to carry the goods and any cargo to be secured such that it does not shift, sway blow off, fall off, leak or otherwise escape.

16. When a "provincial" carrier is required to have a safety fitness certificate (i.e. has one or more commercial vehicles registered for 11,794 kilograms or more that does not leave Alberta), then their maintenance program must address the maintenance and inspection requirements for all commercial vehicles registered to that company for more than 4,500 kilograms.

17. Whether or not a trip inspection report must be completed before trip begins, if driver observes any safety defects in Schedule 1 of NSC Standard 13, Part 2, while driving the vehicle, the driver shall record the defects in a trip inspection report or otherwise in a written document and report that defect to the carrier responsible for the vehicle. If defect is "major", then do not drive the vehicle

5.0 National Safety Code Standards

Safety-related NSC standards cover safety ratings, work site audits, driver and carrier profile systems, trip inspection reports, driver hours of service, commercial vehicle maintenance and inspections, and load security. The code's administrative standards cover self-certification for drivers, single-driver licensing, a classified driver's licence system, medical standards, knowledge and performance testing, and a driver-examiner training program.

A brief overview of the current Standards has been provided in this safe work practice by Richardson's Bulk Sales Ltd as an overview and for quick reference.

Definitions found within the standards:

"Cycle" means:

- A motor carrier shall require that a driver follows either cycle 1 or cycle 2;
- No motor carrier shall request a driver to drive unless the driver has taken at least 24 consecutive hours of off-duty time in the preceding 14 days, regardless of the cycle;
- Cycle 1, under which on-duty time is accumulated over a period of seven days, the driver must not exceed 70-hours of on-duty time;
- Cycle 2, under which on-duty time is accumulated over a period of 14 days, the driver must not exceed 120-hours of on-duty time and must not exceed 70-hours of on-duty time without a 24 hour off-duty time; and
- Cycle 1 must be followed by at least 36 consecutive hours of off-duty time, and cycle 2 must be followed by at least 72 hours of off-duty time. Switching from cycle 1 to cycle 2 must be preceded by 36 hours of off-duty time; a cycle change from cycle 2 to cycle 1 must be proceeded by 72 hours of off-duty time.

“Day”, in respect of a driver, means a 24-hour period that begins at the hour designated by the motor carrier for the duration of the driver's cycle.

“Duty status” means any of the following periods:

- Off-duty time, other than time spent in a sleeper berth;
- Off-duty time spent in a sleeper berth;
- Driving time; or
- On-duty time, other than driving time.

6.0 NSC Standards Summary

1. NSC Standard 1: Single Driver's Licence Concept

   A standard implemented by all jurisdictions, which makes it an offence for a driver to hold more than one licence. In addition, a series of administrative procedures have been agreed upon to ensure driving infractions are assigned to a single licence and record.

2. NSC Standard 2: Knowledge and Performance Tests (Drivers)

   A standard that sets out the process for standardized testing of commercial drivers and includes the criteria for both written and road tests. It also identifies the key elements that will be evaluated by government officials charged with administering the tests.

3. NSC Standard 3: Driver Examiner Training Program

   A standard designed to upgrade the skills and knowledge of driver examiners and ensure that they are consistent across Canada.

   Note: With respect to NSC Standard 3, the content has been deemed to go beyond the scope of this safe work practice. Therefore, no summary will be provided and no further discussion is necessary in this regard.

4. NSC Standard 4: Classified Driver Licensing System

   A standard that renders more uniform the classification and endorsement system for driver's licences and ensures that a licence issued in one province/territory is recognized in all provinces/territories.

5. NSC Standard 5: Self-Certification Standards and Procedures

   A standard that outlines the criteria that must be met to permit carriers and driver training schools to train commercial drivers.

Note: With respect to NSC Standard 5, the content has been deemed to go beyond the scope of this safe work practice. Therefore, no summary will be provided and no further discussion is necessary in this regard.

6. NSC Standard 6: Medical Standards for Drivers

   The Canadian Council of Motor Transportation Administrators (CCMTA) Medical Standards for Drivers, initially Standard 6 of the National Safety Code for Motor Carriers, sets the medical criteria used to establish whether drivers are medically fit to drive. The standard addresses both private and commercial drivers.

7. NSC Standard 7: Carrier and Driver Profiles

   A standard that is designed to provide jurisdictions with a record of driver and carrier performance in terms of compliance with safety rules and regulations.

   In accordance with the Transportation Canada Motor Vehicle Act, Richardson's Bulk Sales Ltd shall maintain in writing or readily readable electronic or optical form the records that show that all records are retained for a least five years.

8. NSC Standard 8: Short-Term Suspension

   A standard that describes the criteria for placing a driver out of service on a short-term (24-hour) basis when a peace officer has reasonable and probable grounds to believe that the driver's ability is affected by alcohol or drugs.

9. NSC Standard 9: Hours of Service

   - A standard that describes the number of hours a commercial driver can be on duty and operate a commercial vehicle. It outlines the requirement to complete daily logs, describes the various cycles of operation, and sets out driver and carrier record keeping requirements.

   - Electronic Logging Devices (ELDs)

- ELDs must be used by federal carriers subject to the HOS requirements. ELDs connect to the electronic control module of a vehicle.
- ELDs must be certified by an accredited certification body.
- The use of the ELD must comply with the requirements of the Federal HOS regulations sections 77-79 and 83.
- Commercial motor vehicle drivers need to enter some of the information from their record of duty status (such as on-duty time related to fueling, loading or unloading), the ELD will automatically record other information like driving time, odometer readings, and engine power-up.
- The driver if requested by an inspector, must be capable of preparing a handwritten daily log from the information stored in the device for each day on which the device is used.
- The ELD automatically must record when it is disconnected and reconnected and keep a record of the time and date of these occurrences.
- Any hard copy of the daily log that is generated from the information that is stored in the ELD must be signed on each page by the driver attesting to its accuracy.
- The motor carrier must provide blank daily log forms in the commercial vehicle for the driver's use.

CCMTA has published an interpretation/guidance document on the federal rule. A color copy can also be downloaded from the CCMTA website. http://ccmta.ca/en

- No motor carrier shall request, require, or allow a driver to drive and no driver shall drive after the driver has accumulated 13 hours of driving time in a day. No motor carrier shall request, require, or allow a driver to drive and no driver shall drive after the driver has accumulated 14 hours of on-duty time in a day;
- Log book requirements:
  - Start time of the day if different than midnight;

- Co-drivers, if applicable;
- Cycle schedule;
- Licence plate or unit number;
- Daily starting odometer readings;
- Name and address of home terminal;
- Comments on any deferred off duty time for the previous day;
- Location and time of each change to duty status;
- Daily total hours in each status, kilometres driven (exclude personal use), and final odometer readings;
- Verify daily log sheet for accuracy and sign each day's log sheet; and
- Ensure that the driver has in his or her possession the original copy of the log sheets for the previous 14 days and forwards the original to the home terminal for final storage within 20 days (records must be maintained for a minimum of six months).

- No motor carrier shall request, require, or allow a driver to drive and no driver shall drive if:
    1. The driver's faculties are impaired to the point where it is unsafe for the driver to drive;
    2. Driving would jeopardize or be likely to jeopardize the safety or health of the public, the driver or the employees of the motor carrier;
    3. The driver is the subject of an out-of-service declaration; or
    4. The driver, in doing so, would not be in compliance with these Regulations.

KEY ASPECTS OF FEDERAL HOURS OF SERVICE LEGISLATION

Daily Off Duty Time

- No driving after 13 hours of driving or 14 hours on duty in a day.
- Minimum of ten hours off duty must be taken every day.
- Ten hours of off duty time must include at least two hours of off duty time that does not form part of a period of eight consecutive hours.
- "Day" is a 24-hour period specified by the carrier for the duration of the driver's cycle.
- Off duty periods are > 30 minutes

Work Shift Rules

- After 13 hours of driving, you have to take eight consecutive hours off before you can drive again.
- After 14 hours of on duty time, you have to take eight consecutive hours off before you can drive again.
- No driving after a maximum of 16 hours (elapsed time since the conclusion of the most recent period of eight or more consecutive hours of off duty).
- The 16 hours includes all time and activities including off duty time of less than eight hours.
- Eight consecutive hours off duty resets the work shift.

Reduced Off Duty Time

- May defer two of the ten hours off duty in a day (that is not part of the eight consecutive) to the following day by adding two hours to the consecutive eight hours on Day 2.
- This provision may be exercised every 2nd day, if the driver chooses.

Sleeper Berth Splits

- Single drivers using a sleeper berth must take ten hours off duty, but may split the sleeper berth time into two periods provided neither is less than two hours.
- Team drivers using a sleeper berth must each take eight hours off duty, but may split the sleeper berth time into two periods provided neither is less than 4 hours.
- Must still comply with daily requirements.
- Max of 13 hours driving
- No driving after 14 hours on duty
- Minimum of 10 hours off duty
- No driving after accumulating (before and after the sleeper period)
- 13 hours driving
- 14 hours on duty
- 16 hours in the work shift
- The 16 hours is calculated by excluding qualified sleeper berth periods.

Sleeper Berth Rules

- Must still comply with daily requirements.
- Max of 13 hours driving
- No driving after 14 hours on duty
- Minimum of 10 hours off duty
- No driving after accumulating (before and after the sleeper period):
- 13 hours driving
- 14 hours on duty

- 16 hours in the work shift
- The 16 hours is calculated by excluding qualified sleeper berth periods.

Sleeper Berth Specifications

- Must meet prescribed standards as set forth in Schedule 1 of the regulations.

Cumulative Cycles

- Select and specify one of two cycles:
- Cycle 1 – 70 hours on duty in 7 days
- Cycle 2 – 120 hours on duty in 14 days (must take 24 consecutive hours off duty once the driver has accumulated 70 of on duty time)
- Cycle switching or resetting only allowed after completing required off duty period.
- Cycle 1 – 36 hours off
- Cycle 2 – 72 hours off

Mandatory 24 Hours Off Duty

- Mandatory consecutive 24 hours off duty in preceding 14 days, regardless of the cycle.

Daily Log Radius Exemption

- Exempt from completing a daily log if:
- Stay within a 160 km radius
- Return to home terminal each day to begin eight hours off duty
- Carrier maintains accurate and legible records for each day indicating:
- Hour at which each duty status starts and ends

- Total hours in each status
- Elected cycle
- Records kept for six months

Personal Use Exemption

- Driving time is not considered to be on duty provided that:
- CMV is unloaded
- Not towing a trailer
- Maximum of 75 km per day
- Odometer readings are recorded in remarks
- Driver is not subject to an OOS declaration

Federal Oilwell Service Vehicle Cycle Exemption Permits (Alberta)

- Must meet the regulatory definition of an oilwell service vehicle.
- Exempt from cycle requirements with a valid permit.
- 3 periods of off duty time, each at least 24 hours long, must be taken in any 24 day period (periods do not have to be consecutive) instead of following Cycle 1 or 2.
- Waiting and standby times are treated the same, but will be included as part of the maximum 16 hours of elapsed time.
- Must have an acceptable fatigue management program in-place.
- Must have provided HOS and fatigue management training to drivers.

- Must provide an electronic copy of their Fatigue Management Program to Alberta Transportation.
- Must have provided ECS Oilfield Driving Awareness (ODA) Training or CAODC Driver training plus any other ECS training expected for the job.
- Drivers must produce proof of training in the above to an enforcement officer if requested.
- Consult Alberta Transportation Permit Applications: transportation.alberta.ca

Other

- Drivers will be required to carry at least 14 days of logs regardless of what cycle they are operating under.
- Motor carriers, shippers, consignees or any other person will be responsible for ensuring a driver does not drive if:
    - The driver is fatigued to a point where it is unsafe or driving would jeopardize highway safety;
    - The driver is subject to an out-of-service declaration; and/or
    - The driver, in doing so, would contravene the regulation.
- A motor carrier is also required to:
    - Monitor each driver's compliance to regulatory requirements;
    - Take remedial action if violations are identified;
    - Record and retain all information related to the monitoring and any action taken; and/or
    - Similar changes have been implemented north of 60.

10. NSC Standard 10: Cargo Securement

    A standard that outlines the specific requirements for securing loads to commercial vehicles to ensure they do not shift, move, or spill onto the roadway.

    Cargo shall be firmly immobilized or secured on or within a vehicle by structures of adequate strength, blocking, bracing, dunnage or dunnage bags, shoring bars, tiedowns, or a combination of these.

    Richardson's Bulk Sales Ltd Cargo Securement Requirements

    1. General Requirements

        - With respect to cargo securement Richardson's Bulk Sales Ltd is primarily engaged in transporting heavy packaged equipment, tanks, mobile accommodation trailers and rig matting.
        - Richardson's Bulk Sales Ltd will not permit a driver to operate, and a driver will not operate, a commercial vehicle where the cargo transported in or on the commercial vehicle is not contained, immobilized or secured in accordance with NSC Standard 10 (see Related References) as it relates to the particular type of commercial vehicle.
        - Richardson's Bulk Sales Ltd and all drivers of commercial vehicles will ensure that cargo transported by a commercial vehicle is contained, immobilized or secured so that it cannot:

(a) Leak, spill, blow off, fall from, fall through or otherwise be dislodged from the commercial vehicle, or

(b) Shift upon or within the commercial vehicle to such an extent that the commercial vehicle's stability or manoeuvrability is adversely affected.

Section 11(4) of Standard 10 - Cargo Securement. This section reads as per the following – "a person shall not use a tiedown or a component of a tiedown to secure cargo to a vehicle unless it is marked by the manufacturer with respect to its working load limit (WLL)".

- Richardson's Bulk Sales Ltd and drivers will ensure that any cargo remains secured on or in the transporting vehicle under all conditions that can be expected to occur on the roads being driven on. Both Richardson's Bulk Sales Ltd and the driver are responsible for planning and understanding the nature of the trip and road conditions which will be encountered.
- Richardson's Bulk Sales Ltd drivers will be given awareness training in the types of losses that an improperly secured load can result in, including loss of: life, load, cargo, vehicle. Drivers will be instructed on the nature of the fines which they and Richardson's Bulk Sales Ltd may incur for improperly secured loads.

2. Commodity Securement Requirements

Specific commodities and products have additional or different securement requirements. These requirements are documented in the referenced standards and in the Driver's Cargo Securement Handbook. Unless you have been trained by Richardson's Bulk Sales Ltd to load, secure and unload a specific type of cargo you may not proceed with loading or moving that load. For information these special commodities include the following:

- Logs/Dressed Lumber;
- Metal Coils;

- Paper Rolls;
- Concrete Pipe;
- Intermodal containers;
- Automobiles, Light Trucks, and Vans;
- Heavy Vehicles, Equipment, and Machinery;
- Flattened or Crushed Vehicles;
- Roll-On/Roll-Off and Hook Lift Containers; and
- Large Boulders.

Additional requirements under separate regulations may also apply for transportation of certain types of dangerous goods or hazardous materials.

3. Non-Commodity Cargo Requirements

   Richardson's Bulk Sales Ltd's non commodity cargo is primarily skid mounted packaged heavy equipment, tanks, mobile accommodation trailers and rig mats.

   The potential exists for occasional movements of other cargo and the general requirements of NSC-10 apply to all cargo.

   - Special provisions for securing heavy vehicles, machinery and equipment that operate on tracks or wheels (loaders, bulldozers, excavators) or individually weigh more than 4500 kg.
   - A minimum of 4 tie-downs (use discussed below) each with a WLL of 2268 kg must be used to prevent cargo movement forward, rearward, side to side and vertically.

- More tiedowns may be required to satisfy the general cargo securement requirements (NSC Section 2) that state: “The sum of the working load limits from all tiedowns must be at least 50% of the weight of the cargo.”
- The tiedowns must be attached at the front and rear of the vehicle or on the engineered mounting points designed for that purpose.
- Lower and secure to the vehicle all accessory equipment such as shovels, booms etc. Restrain articulated vehicles to prevent articulation. Set the parking brake on equipment being transported.
- If a non-standard cargo is to be moved Richardson's Bulk Sales Ltd will first determine if a hazard assessment is required. If a hazard assessment has been performed and a cargo securement procedure is required, the Company will ensure this procedure is written and all drivers are trained before loading and securing the cargo.

4. Cargo Securement Pre-Trip Requirements

The following general cargo securement conditions must be met before an Richardson's Bulk Sales Ltd driver can operate a commercial motor vehicle or before Richardson's Bulk Sales Ltd can require or permit a driver to operate a commercial motor vehicle.

- The commercial motor vehicle’s cargo must be properly distributed and adequately secured.
- The commercial motor vehicle’s structure and equipment (doors, tarps, cargo securement devices, etc.) must be secured.
- The cargo or any other object must not:
- Obscure the driver’s view ahead or to the right or left sides;
- Interfere with the free movement of the driver’s arms or legs;

- Prevent the driver's access to accessories required for emergencies; or
- Prevent the free and ready exit of any person from the commercial motor vehicle's cab or driver's compartment.

All cargo must be contained, immobilized, or secured such that it does not leak, spill; blow off the vehicle; fall from the vehicle; fall through the vehicle, become dislodged from the vehicle; and/or shift upon or within the vehicle to such an extent that the vehicle's stability or manoeuvrability is adversely affected.

Richardson's Bulk Sales Ltd will ensure that any material used for blocking or bracing such as chocks and cradles are to be strong enough to withstand being split or crushed by the cargo or tiedowns. This requirement also applies to any material used for dunnage.

5. Cargo Securement System Specifications

Richardson's Bulk Sales Ltd and the driver will ensure that each cargo securement system is able to withstand a minimum amount of force in each direction.

- Forward Force = 80% of cargo weight when braking while driving straight ahead.
- Rearward Force = 50% of cargo weight when accelerating, shifting gears while climbing a hill, or braking in reverse.
- Sideways Force = 50% of cargo weight when turning, changing lanes, or braking while turning.
- Upward Force = 20% of cargo weight when traveling over bumps in the road or cresting a hill.

For the purposes of dump trucks and water trucks item 9 is satisfied when the cargo is "Fully Contained."

Richardson's Bulk Sales Ltd and drivers will only use approved securement systems and components. All securement system components will be inspected prior to use.

The securement system chosen must be appropriate for the cargo's size, shape, strength, and characteristics.

The articles of cargo must have sufficient structural integrity to withstand the forces of loading, securement, and transportation.

A securing device is any device specifically manufactured to attach or secure cargo to a vehicle or trailer, including the following:

Synthetic Webbing

- Chain
- Wire rope
- Manila rope
- Synthetic rope
- Steel strapping
- Clamps and latches

Blocking

- Front-end structure
- Grab hooks
- Binders
- Shackles
- Winches
- Stake pockets

D-rings

- Pocket
- Webbing ratchet
- Bracing
- Friction mat

6. Vehicle Structure Anchor Points

   All elements of the vehicle structure and anchor points must be strong enough to withstand the forces described above. All elements of the vehicle structure and anchor points must be in good working order, including no obvious damage, no distress no weakened parts and no weakened sections.

   - Floors;
   - Walls;
   - Decks;
   - Tiedown anchor points;
   - Headboards;
   - Bulkheads;
   - Stakes;
   - Posts; and
   - Anchor points.

7.

Use of Tie-Downs

- Richardson's Bulk Sales Ltd uses tiedowns for securing heavy vehicles and equipment. For the purposes of this procedure a tiedown refers to any combination of securing devices that attaches cargo to, or restrains cargo on a vehicle, and is attached to anchor point(s).
- Richardson's Bulk Sales Ltd through its procurement specifications will ensure that tiedowns are be designed, constructed, and maintained so that the driver can tighten it. All components of a tiedown will be inspected before use for knots or obvious damage, distress, weakened parts; and/or weakened sections.
- Richardson's Bulk Sales Ltd will ensure that each tiedown is attached and secured so that it does not become loose or unfastened, open, or release during transit. All tiedowns and other components of a cargo securement system must be located within rubrails (when present). This requirement does not apply when the width of the load extends to or beyond the rubrails.
- Richardson's Bulk Sales Ltd will ensure that resistant edge protection is be used if a tiedown could be cut or torn when touching an article of cargo.

General use of Tiedowns

- Tiedowns can be used in two ways:
- Attached to the cargo:
- Tiedowns attached to the vehicle and attached to the cargo, or
- Tiedowns attached to the vehicle, pass through or around an article of cargo, and then are attached to the vehicle again;
- Pass over the cargo:

- Tiedowns attached to the vehicle, passed over the cargo, and then attached to the vehicle again.
- Tiedowns should be placed as follows:
- Place the tiedown as close as possible to the spacer;
- Position the tiedowns as symmetrically as possible over the length of the article.
- Position the tiedowns to preserve the integrity of the article.
- Tiedowns attached to the cargo work by counteracting the forces acting on the cargo. The angle where the tiedown attaches to the vehicle should be shallow, not deep (ideally less than 45°). To counteract the undesired direction of cargo movement attach the tiedown so that it pulls in the opposite direction.
- Tiedowns that pass over the cargo work by increasing the pressure of the cargo on the deck and keeps the cargo from shifting. Tension these tiedowns to as high an initial tension as possible. The steeper the tiedown angle, the less shifting (ideally more than 45°).
- When there is low friction between the cargo and the deck (for example, with snow, ice, sand, gravel, and oil) Use tiedowns attached to the cargo; Use a means to improve the friction such as friction mats or tiedown that pass over the cargo; or Use blocking and tiedowns.

8. Cargo Condition Prior to Transport

   Richardson's Bulk Sales Ltd will ensure that all types of cargo meet one of three conditions:

- **Condition 1:** Cargo is **fully contained** by structures of adequate strength. Cargo cannot shift or tip and Cargo is restrained against horizontal movement by vehicle structure or by other cargo. If the cargo is contained in a sided vehicle, the vehicle structure MUST be strong enough to withstand the forces (see minimum force figures above).
- **Condition 2:** Cargo is immobilized by structures of adequate strength or a combination of structure, blocking, and bracing to prevent shifting or tipping.
- **Condition 3:** To prevent shifting or tipping, cargo is immobilized or secured on or within a vehicle by tiedowns along with blocking, bracing, friction mats, other cargo, void fillers; and/or combination of these.

For articles of cargo placed beside each other and secured by side-to-side tiedowns. Either place them in direct contact with each other, or prevent them from shifting towards each other by using blocking or filling the space with other cargo.

Some articles have a tendency to roll. To prevent rolling, provide more than one point of contact, Lift the cargo off the deck, and Place chocks, wedges, a cradle, or other equivalent means that prevent rolling. These must be secured to the deck.

For articles that have a tendency to tip, prevent tipping or shifting by bracing the cargo.

If cargo is not prevented from forward movement (for example, by the headboard, bulkhead, other cargo, or tiedown attached to the cargo), secure the cargo according to the following requirements:

Article Description	Minimum # of Tiedowns
1.52 m (5 ft) or shorter500 kg (1,100 lb.) or lighter	1
1.52 m (5 ft) or shorterOver 500 kg (1,100 lb.)	2

More than 1.52 m (5 ft), but 3.02 m (10 ft.) or less	2
Longer than 3.02 m (10 ft.)	2 + 1 tiedown for every additional3.02 m (10 ft.), or part thereof

1. Working Load Limits

   The Working Load Limit is the maximum load that may be applied to a component of a cargo securement system during normal service. The WLL is assigned by the component manufacturer. The WLL for a tiedown is the lowest WLL of any of its parts or anchor points it is attached to, whichever is less. Every device contributes to the WLL of the securement system.

   The minimum WLL requirement for the securement system is 50% of the weight of the cargo. More tiedown capacity should be used if you need to secure an article against any movement.

   Some manufacturers mark their securing devices with a numeric WLL value. Other manufacturers mark components using a code or symbol that is defined in a recognized standard. For example, a piece of grade 7 chain may be marked with a 70 or 700, in accordance with the standard of the National Association of Chain Manufacturers. The standard then gives the WLL for that piece of chain, depending on its size.

   Richardson's Bulk Sales Ltd will only procure and use components that are rated and marked by their manufacturer **and** will ensure that all securement devices are adequately marked. **Drivers will not secure using a component whose WLL is not marked by the manufacturer or have a standard rating.**

   Friction mats, which are not marked by the manufacturer, are assumed to provide a resistance to horizontal movement equal to 50% of the cargo weight that is resting on the mat.

The sum of the working load limits of each device used to secure an article on a vehicle is called the aggregate working load limit. To calculate Aggregate Working Load limit, add together:

- 50% of the WLL of each end section of a tiedown that is attached to an anchor point, or
- 50% of the WLL of each end section that is attached to the cargo.

Richardson's Bulk Sales Ltd will ensure that the Aggregate Working Load limit of any securement system must be at least 50% of the weight of the cargo being secured.

2. Richardson's Bulk Sales Ltd Securement Inspections

   Richardson's Bulk Sales Ltd will ensure that the driver carries out the following cargo securement inspection activities.

Driver action required	**Pre-Trip**	**Within first 80 km (50 mi)**	**When duty status of driver changes**	**At 3 hour intervals or every 240 km (150 mi), whichever is first**
Inspect Cargo and Securing devices	Yes	Yes	Yes	Yes
Inform Carrier if Packaging is Not Adequate	Yes			
Adjust Cargo and/or Securing devices	As Necessary	As Necessary	As Necessary	As Necessary

Add Additional Securing devices	As Necessary	As Necessary	As Necessary	As Necessary

For clarity and based on this procedure, Richardson's Bulk Sales Ltd will ensure that each driver carries out the following activities and inspections as they relate to cargo securement and will train drivers in how to carry out the inspections and pass/fail criteria:

Pre-Trip

- Make sure that cargo is properly distributed and adequately secured.
- Make sure that all securement equipment and vehicle structures are in good working order and used consistent with their capability.
- Stow vehicle equipment.
- Make sure that nothing obscures front and side views or interferes with the ability to drive the vehicle or respond in an emergency.
- Inform an Richardson's Bulk Sales Ltd supervisor if the cargo requires additional pre-trip preparation, self-securement or packaging.

Periodic Inspections during Transit

- Inspect cargo and securing devices.
- Adjust cargo or load securement devices as necessary to ensure that cargo cannot shift on or within, or fall from, the commercial motor vehicle.
- As necessary, add more securing devices.

11. NSC Standard 11: Commercial Vehicle Maintenance and Inspection (PMVI) Standards

A standard that outlines maintenance and periodic inspections in terms of:

- Maintenance Standards;
- PMVI – Trucks & Truck Tractor;

- PMVI – Trailer, Semi-Trailer, and C-Dolly;
- PMVI – Bus; and
- Contacts and References.

12. NSC Standard 12: CVSA On-Road Inspections

    A standard that contains the Commercial Vehicle Safety Alliance on-road inspection criteria. Copyright CVSA. The reader will be required to contact CVSA directly to view and/or obtain a copy of this document. Please contact the Commercial Vehicle Safety Alliance at the following website. http://www.cvsa.org/.

13. NSC Standard 13: Trip Inspection

    A standard that prescribes daily trip inspection requirements:

    1. Part 1: General Requirements:

        - Trucks, tractors, and trailers shall be inspected in accordance with Schedule 1 of National Safety Code Standard #13 every 24 hours;
        - Richardson's Bulk Sales Ltd shall not permit a person and no person shall drive a commercial vehicle on a highway when a major defect is present on the vehicle; and
        - When no defects are detected during an inspection, the person conducting the inspection shall record that fact on the inspection report(s). A person conducting an inspection shall record on the inspection report any defects detected during the inspection and shall report such defects to Richardson's Bulk Sales Ltd or a person appointed by Richardson's Bulk Sales Ltd prior to the next required inspection.

    2. Part 2: Schedules:

- Schedule 1: Truck, Tractor, and Trailer;
- Schedule 2: Bus;
- Schedule 3: Motor Coach (Daily); and
- Schedule 4: Motor Coach (30 days or 12,000 kilometres (7,500 miles)).
- The daily vehicle trip inspection standard is intended to ensure early identification of vehicle problems and defects and to prevent the operation of vehicles with conditions that are likely to cause or contribute to a collision or vehicle breakdown;
- Daily vehicle trip inspection is a continuous process designed to protect drivers and alert carriers to mechanical problems. The general objective of daily vehicle trip inspections is to promote an improved level of safety and compliance in commercial vehicles operating on the highway; and
- The following table is an excerpt from NSC Standard 13 listing the areas that must be inspected and what constitutes a minor and major defect.

Schedule 1 – Truck, Tractor & Trailer

Application: This schedule applies to trucks, tractors and trailers or combinations thereof exceeding a registered gross vehicle weight of 4500 kg.

1. Air Brake System

Defect(s)	Major Defect(s)
Audible air leak.	Pushrod stroke of any brake exceeds the adjustment limit.
Slow air pressure build-up rate.	Air loss rate exceeds prescribed limit.

Inoperative towing vehicle (tractor) protection system.

Low air warning system fails or system is activated.

Inoperative service, parking or emergency brake.

2. Cab

Defect(s)	Major Defect(s)
Occupant compartment door fails to open.	Any cab or sleeper door fails to close securely.

3. Cargo Securement

Defect(s)	Major Defect(s)
Insecure or improper load covering (e.g. wrong type or flapping in the wind).	Insecure cargo. Absence, failure, malfunction or deterioration of required cargo securement device or load covering.

4. Coupling Devices

Defect(s)	Major Defect(s)
Coupler or mounting has loose or missing fastener.	Coupler is insecure or movement exceeds prescribed limit. Coupling or locking mechanism is damaged or fails to lock.

Defective, incorrect or missing safety chain/cable.

5. Dangerous Goods

Major Defect(s)

Dangerous goods requirements not met.

6. Driver Controls

Defect(s)

Accelerator pedal, clutch, gauges, audible and visual indicators or instruments fail to function properly.

7. Driver Seat

Defect(s)

Seat is damaged or fails to remain in set position.

Major Defect(s)

Seatbelt or tether belt is insecure, missing or malfunctions.

8. Electric Brake System

Defect(s)

Loose or insecure wiring or electrical connection.

Major Defect(s)

Inoperative breakaway device.

Inoperative brake.

9. Emergency Equipment & Safety Devices

Defect(s)

Emergency equipment is missing, damaged or defective.

10. Exhaust System

Defect(s)

Exhaust leak.

Major Defect(s)

Leak that cause's exhaust gas to enter the occupant compartment.

11. Frame and Cargo Body

Defect(s)

Damaged frame or cargo body.

Major Defect(s)

Visibly shifted, cracked, collapsing or sagging frame member(s).

12. Fuel System

Defect(s)

Missing fuel tank cap.

Major Defect(s)

Insecure fuel tank.

Dripping fuel leak.

13. General

Major Defect(s)

Serious damage or deterioration that is noticeable and may affect the vehicle's safe operation.

14. Glass and Mirrors

Defect(s)

Required mirror or window glass fails to provide the required view to the driver as a result of being cracked, broken, damaged, missing or maladjusted.

Required mirror or glass has broken or damaged attachments onto vehicle body.

15. Heater/Defroster

Defect(s)

Control or system failure.

Major Defect(s)

Defroster fails to provide unobstructed view through the windshield.

16. Horn

Defect(s)

Vehicle has no operative horn.

17. Hydraulic Brake System

	Major Defect(s)
Brake fluid level is below indicated minimum level.	Parking brake is inoperative Brake boost or power assist is inoperative. Brake fluid leak. Brake pedal fade or insufficient brake pedal reserve. Activated (other than ABS) warning device. Brake fluid reservoir is less than ¼ full.

18. Lamps and Reflectors

	Major Defect(s)
Defect(s)	When lamps are required:
Required lamp does not function as intended.	Failure of both low-beam headlamps.
Required reflector is missing or partially missing.	Failure of both rearmost tail lamps.
	At all times:
	Failure of a rearmost turn-indicator lamp.
	Failure of both rearmost brake lamps.

19. Steering

Defect(s)	**Major Defect(s)**

Steering wheel lash (free-play) exceeds required limit.

20. Suspension System

Defect(s)	Major Defect(s)
Air leak in air suspension system.	Damaged (patched, cut, bruised, cracked to braid, mounted insecurely) or deflated air bag.
Broken spring leaf.	Cracked or broken main spring leaf or more than one broken spring leaf.
Suspension fastener is loose, missing or broken.	Part of spring leaf or suspension is missing, shifted out of place or in contact with another vehicle component.
	Loose U-bolt.

21. Tires

Defect(s)	Major Defect(s)
Damaged tread or sidewall of tire.	Flat tire.
Tire leaking (if leak can be felt or heard, tire is to be treated as flat).	Tire tread depth is less than wear limit.
	Tire is in contact with another tire or any vehicle component other than mud-flap.
	Tire is marked “Not for highway use”.
	Tire has exposed cords in the tread or outer side wall area.

22. Wheels, Hubs and Fasteners

Defect(s)	Major Defect(s)
Hub oil below minimum level. (When fitted with sight glass.)	Wheel has loose, missing or ineffective fastener.
Leaking wheel seal.	Damaged, cracked or broken wheel, rim or attaching part.
	Evidence of imminent wheel, hub or bearing failure.

23. Windshield Wiper/Washer

Defect(s)	Major Defect(s)
Control or system malfunction.	When necessary for prevailing weather condition.
Wiper blade damaged, missing or fails to adequately clear driver's field of vision.	Wiper or washer fails to adequately clear driver's field of vision in area swept by driver's side wiper.

14. NSC Standard 14: Safety Rating

    A standard that establishes the motor carrier safety rating framework by which each jurisdiction assesses the safety performance of motor carriers.

    Note: With respect to this Standard, no information is required or provided to meet the intent of the SWP.

15. NSC Standard 15: Facility Audits

    A standard that outlines the audit process used by jurisdictions to determine a carrier's level of compliance with all applicable safety standards.

Note: With respect to NSC Standard 15, the content has been deemed to go beyond the scope of this safe work practice. Therefore, no summary will be provided and no further discussion is necessary in this regard.

16. NSC Standard 16: First-Aid Training

    A voluntary standard that outlines the basic elements that should be contained in a basic first-aid course for commercial drivers.

7.0 Schedule Maintenance

Inspection Type	Vehicle Type	Inspection interval (Kilometers, time or hours)	Comments
Daily Trip Inspection	Truck, Trailers, Tractors	Every 24 hours	Complete written Daily Trip Inspection form if required. Report all defects and document repairs
Lubrication Interval (Oil changes and greasing)	Trucks	Every 250 hours	Drive train, steering and grease port
	Trailers	Every 250 hours	Drive train, steering and grease port
	Tractors	Bi-weekly	Scissor. All grease points
Schedule Maintenance Inspection	Trucks	Every 250 hours	Include fuel and air filters
	Trailers	Every 250 hours	Include fuel and air filters

Tractors	-	-	
"CVIP" Inspection	Truck, Trailers, Tractors	Annually	Required every 12 months before next CVIP expires - to be completed by a certified CVIP station

8.0 Alberta Transportation Regulatory Compliance Audit Requirements

The Safety requirements of Richardson's Bulk Sales Ltd's HSM must be followed for all activities related to driving and are part of the Transportation safety program. The following requirements apply specifically to commercial vehicle operation Transportation Safety programs:

- Richardson's Bulk Sales Ltd will ensure that a copy of their Safety Fitness Certificate is carried in the cab of each commercial vehicle, as specified by the Commercial Vehicle Certification and Insurance Regulation;
- Employees will report all traffic violations, including personal violations, to Richardson's Bulk Sales Ltd;
- Driver's Abstracts will be pulled annually by Richardson's Bulk Sales Ltd and will be reviewed. Abstracts will be kept on the driver's file;
- Richardson's Bulk Sales Ltd will keep track of driver's licence expiry dates and ensure that no active driver's licences expiry while on duty;
- Richardson's Bulk Sales Ltd will ensure that applicable transport legislation is available in electronic format at Richardson's Bulk Sales Ltd's head office;

- Richardson's Bulk Sales Ltd will conduct periodic (no less than annually) internal reviews of all driver files, hours of service, vehicle files, accident analysis, training, and other safety systems to ensure continued compliance with legislation;
- The Richardson's Bulk Sales Ltd Transportation Safety Program, as applied to the operation of commercial vehicles, applies to all staff and contractors authorized to operate the carrier's commercial vehicles;
- Operation of commercial vehicles will include:
    - Adherence to speed limits, and in particular, to existing road conditions;
    - The mandatory use of seatbelts by all occupants of the vehicle before proceeding;
    - Absolutely no drug or alcohol use that would impair the driver's ability to drive safely;
    - The practicing of Defensive Driving at all times;
    - Confirmation that all equipment onboard has been securely fastened to the vehicle prior to departure; and
    - Following of all safe fueling practices.

- Proper records and recording of information will be retained including the following, for compliance purposes:
  - Bills of Lading;
  - Manifests;
  - Transportation of Dangerous Goods (TDG) Documents;
  - Time records;
  - Driver's daily logs; and
  - Weigh slips.
- All Richardson's Bulk Sales Ltd drivers of commercial vehicles will comply with the law and with the procedures outlined in this manual;
- Richardson's Bulk Sales Ltd will ensure that all personnel required to drive commercial vehicles will be trained in the use of all required safety equipment, including fire extinguishers, goggles, hardhats, and advanced warning triangles;
- Richardson's Bulk Sales Ltd Health & Safety Manual contains an Enforcement and Discipline Policy and Procedure. All drivers of commercial vehicles will be instructed in this policy and procedure. In addition, all drivers are required to sign the Driving Policy acknowledgement form;
- Richardson's Bulk Sales Ltd will conduct an evaluation of the driving skills of each driver required to operate commercial vehicles at least once every two years using a suitable Driver Commentary form;
- All Richardson's Bulk Sales Ltd's driver's records as highlighted in AR314/2002 – Section 41(1) – shall be kept on file for the duration of the driver's service with Richardson's Bulk Sales Ltd;
- Richardson's Bulk Sales Ltd requires the following in order to be deemed qualified to operate Company vehicles:

  - Correct class of license for the vehicle;
  - Clean driving record and/or a defensive driving course;
  - Observed driving by trainer for the bulk of training jobs;
  - Discipline taken after two driving offences; and
  - Hours of service training course.

- No one shall operate or permit another person to operate a Richardson's Bulk Sales Ltd commercial vehicle if the vehicle or its equipment is in a condition that is likely to cause danger to person or property;
- All drivers of Richardson's Bulk Sales Ltd commercial vehicles will receive training in:
  - Hours of service requirements;
  - Trip Inspection requirements;
  - Load Securement requirements; and
  - Any other applicable safety training as applicable, e.g. weights and dimensions, permit conditions, etc.
- Documentation for the above training will be kept on file for the duration of the driver's service;
- Richardson's Bulk Sales Ltd will review each driver's compliance with the Safety Program as applied to commercial vehicle operation. The review will be performed at the same time as the annual Job Safety Performance Evaluation;
- Richardson's Bulk Sales Ltd will report, or cause to report all collisions to the local police as required by legislation;
- All collisions involving Richardson's Bulk Sales Ltd vehicles will be reported, investigated, and reviewed by Richardson's Bulk Sales Ltd management. As part of the review, means of preventing a recurrence will be considered. Refer to Incident Reporting and Investigation of the manual for details;

- Company management will consider consequences with drivers involved in preventable collisions, including but not limited to additional training or discipline according to Richardson's Bulk Sales Ltd discipline policy and procedures;
- Richardson's Bulk Sales Ltd will fully abide by the Safety Plan and retention of documents required by the regulations including the strict adherence to legislation and Company policies and procedures related to the following:
    - Speed limits, seatbelt use, drug and alcohol use, defensive driving, load security, and fuelling;
    - Proper records and recording of information including, as required, bills of lading, manifests, dangerous goods documents, time records, drivers' daily logs, and weigh slips;
    - Instructions for the use of safety equipment, including, as required, the use of fire extinguishers, goggles, and hard hats;
    - Training for employees about safety laws and their application and an ongoing program for evaluating their driving skills;
    - Policies for ensuring that drivers are properly qualified for the type of vehicle they operate;
    - A copy of the driver's abstract in a form satisfactory to the Registrar when the driver is first hired or employed, dated within 30 days of the date of employment or hire and annual updated copies of the driver's abstract in a form satisfactory to the registrar;
    - A record of all training undertaken by a driver related to the operation of a commercial vehicle and compliance with safety laws; and
    - A copy of a current medical certificate for the drive.
- Richardson's Bulk Sales Ltd will ensure that its Maintenance Program meets the standard as set forth in the Commercial Vehicle Safety Regulation – Schedule 2 and those applicable parts within the Alberta Vehicle Equipment Regulation and the Canadian Motor Vehicle Safety Act and Regulation in force at the time of equipment manufacture. Refer to the Richardson's Bulk Sales Ltd Maintenance Program.

9.0 Use of Fire Extinguishers

Drivers should only use fire extinguishers if it is safe to do so. Where there is a requirement to use a fire extinguisher workers should use the PASS method:

- Pull - Pull the safety pin by breaking the seal;
- Aim – Aim the nozzle, horn or hose at the base of the fire;
- Squeeze - Squeeze the handle;
- Sweep – Sweep from side to side moving carefully toward the fire, keep the extinguisher aimed at the base of the flame and sweep back and forth until the flames appear to be out.

General instructions:

1. Remove the fire extinguisher from its bracket.
2. Approach the fire from upwind if possible.
3. hold the extinguisher in an upright position.
4. Continue to use until the fire is out and the fire extinguisher is empty.
5. Replace the safety pin and return it to your compartment.
6. Have the extinguisher recharged immediately or replaced before your next run.
7. Report use of fire extinguisher to supervisor.

10.0 Use of Warning Devices

During the night time a commercial vehicle will not be stationary on a highway outside the limits of an urban area unless;

- The hazard lights are alight if functional; and

- Advanced warning triangles are placed without delay on the highway in line with the commercial vehicle at a distance of approximately 30 metres behind and in front of the commercial vehicle.

When there is insufficient light or conditions where objects are not clearly distinguishable at 150 metres, commercial vehicles will not be stationary outside of the limits of an urban area unless;

- The hazard lights are alight if functional, and
- Advanced warning triangles are placed without delay on the highway in line with the commercial vehicle at a distance of approximately 75 metres behind and in front of the commercial vehicle.

During the day time a person will not permit a commercial vehicle to be stationary on a highway outside the limits of an urban area unless;

- The hazard lights are alight if functional, and
- Advanced warning triangles are placed without delay on the highway in line with the commercial vehicle at a distance of approximately 75 metres behind and in front of the commercial vehicle.

Warning triangles and hazard lights are used to make other traffic aware of parked commercial vehicles.

11.0 Monitoring Driver Compliance

Richardson's Bulk Sales Ltd shall monitor the compliance of each driver with the Hours of Service regulation. When Richardson's Bulk Sales Ltd finds evidence of non-compliance Richardson's Bulk Sales Ltd shall issue a notice documenting the non-compliance and shall take immediate remedial action.

Richardson's Bulk Sales Ltd shall record the dates on which the non-compliance occurred, the date of the notice of non-compliance and the remedial action taken.

As a federal motor carrier, Richardson's Bulk Sales Ltd will monitor driver's hours of service records in accordance with the following standards:

- Verify that all drivers have a record for all calendar days;
- Check all drivers to ensure that drivers apply the Regulations to all roads, both public and private (forestry roads), as well as waterways (ferries) in Canada;
- Check all drivers for all form and manner compliance (i.e. name, date, etc.);
- Check all drivers for fatigue-related violations (i.e., driving over hours, two logs for one day, false logs, etc.);
- Use independent (i.e., that the driver does not create or can modify) supporting documents to verify hours of service records (e.g. fuel receipts, tach cards, bills of lading with shipping times, etc.);
- Train new drivers/dispatchers/safety staff until carrier is satisfied that they understand the rules;
- Check drivers, dispatchers, and safety staff with previously identified problems more frequently until carrier believes they now are following the rules;
- Record dates on which non-compliance occurred and record date that the motor carrier issued a notice of non-compliance;
- An employee will be designated to be responsible for performing internal monitoring, preparing the summary reports, taking actions, etc.;

- Richardson's Bulk Sales Ltd will keep all driver files at the principal place of business in Alberta. These Richardson's Bulk Sales Ltd records will be:
    - Retained for at least five years from the date they are created, established or received (unless specified otherwise by specific legislation), and
    - Available for inspection by a peace officer during the carrier's regular business hours.
- Richardson's Bulk Sales Ltd is responsible for ensuring that the designated employee has the appropriate training and experience to conduct internal auditing of hours of service records and shall document the relevant training and experience on file;
- Richardson's Bulk Sales Ltd shall document the training and experience of the delegated employees relevant to internal auditing of hours of service records and retain the information on file;
- Richardson's Bulk Sales Ltd shall address all identified deficiencies with individual staff, taking appropriate actions (e.g. re-training or discipline) and documenting the actions taken in the staff's file; and
- The designated employee shall prepare a summary report at least monthly of the findings of this internal audit (even if no evidence of non-compliance is found), the corrective actions taken, provide this report at least to carrier's senior management, and retain all such reports for at least six months (longer is recommended).

It is Richardson's Bulk Sales Ltd's responsibility to ensure that the all drivers, including new drivers, comply with the regulations.

References

- Alberta Traffic Safety Act. http://www.qp.alberta.ca/574.cfm?page=T06.cfm&leg_type=Acts&isbncln=9780779738533
- Alberta Vehicle Equipment Regulation. http://www.qp.alberta.ca/574.cfm?page=2009_122.cfm&leg_type=Regs&isbncln=9780779740567

- Alberta Commercial Vehicle Safety Regulation. http://www.qp.alberta.ca/574.cfm?page=2009_121.cfm&leg_type=Regs&isbncln=9780779740512
- Alberta – Drivers Hours of Service Regulation. http://www.qp.alberta.ca/574.cfm?page=2002_317.cfm&leg_type=Regs&isbncln=9780779733934
- Alberta – Commercial Vehicle Certificate and Insurance Regulation https://www.qp.alberta.ca/documents/Regs/2002_314.pdf
- National Safety Code Standard 10 – Cargo Securement, Guidance and Interpretations . https://www.ccmta.ca/web/default/files/PDF/Interpretations_and_Guidance_2016.pdf
- National Safety Code for Motor Carriers – NSC Standard 13 – Trip Inspection. https://www.ccmta.ca/en/national-safety-code
- Alberta Exemption from Trip Inspection Documentation Requirements. http://www.transportation.alberta.ca/Content/docType276/Production/Edmanual.pdf
- Alberta Transportation – Preparing Written Maintenance and Safety Programs. https://www.alberta.ca/safety-and-maintenance-programs-commercial-carriers.aspx
- Canada Transport Act. http://www.tc.gc.ca/eng/acts-regulations/menu.htm
- Canadian Council of Motor Transportation Administrators. http://ccmta.ca/en/
- Canadian Transportation Agency. http://www.otc-cta.g

Confined Space Entry

Purpose

Confined spaces are restricted spaces where ingress, egress, or rescues are difficult and which may become hazardous to workers entering the space. The purpose of this code of practice is to provide workers with the information necessary to identify a confined space , and the required elements which must be considered in order to create a site-specific procedure (SSP) to control the hazards for workers who must enter confined spaces.

Scope

This code of practice has been designed to provide the required technical information necessary for the development of respective site-specific procedures. The conditions and requirements of this code of practice and resulting site-specific procedures shall be rigidly applied and enforced at all work sites owned or operated by Richardson's Bulk Sales Ltd. This COP will adhere to the requirements of the Alberta OHS Code Part 5: Confined Spaces.

Definitions

Restricted Space: An enclosed or partially enclosed space, not designed or intended for continuous human occupancy, which has a restricted, limited, or impeded means of entry or exit because of its construction.

Entry into a restricted space does not require an entry permit or air testing; however, other considerations such as a safe means of ingress, egress, and a rescue plan may be required.

Confined space: A restricted space that may become hazardous to a worker entering it because of:

- An atmosphere that is or may be injurious by reason of oxygen deficiency or enrichment, flammability, explosivity, or toxicity;
- A condition or changing set of circumstances within the space that presents a potential for injury or illness; or
- The potential or inherent characteristics of an activity that can produce adverse or harmful consequences within the space.

Confined spaces are not designed for continuous human occupation, may not have a convenient means of escape, or may not easily allow for rescue of personnel within the space.

Procedure

1.0 General and Regulatory Requirements

1.1 Training

1. Richardson's Bulk Sales Ltd will ensure that a worker assigned duties related to confined space or restricted space entry is trained by a competent person in:
    - Recognizing hazards associated with working in confined spaces or restricted spaces, and
    - Performing the worker's duties in a safe and healthy manner.
2. Richardson's Bulk Sales Ltd will keep records of the training given under (1).
3. Richardson's Bulk Sales Ltd will ensure that competence in the following is represented in the workers responding to a confined space or restricted space emergency:
    - First aid;

- The use of appropriate emergency response equipment; and
- Procedures appropriate to the confined space or restricted space.

1.2 Entry Permit System

1. A person must not enter a confined space at a work site without a valid entry permit.
2. Richardson's Bulk Sales Ltd will establish an entry permit system for a confined space that:
    - Lists the name of each worker who enters the confined space and the reason for their entry;
    - Gives the location of the confined space;
    - Specifies the time during which an entry permit is valid;
    - Takes into account the work being done in the confined space; and
    - Takes into account the code of practice requirements for entering, being in, and leaving a confined space.
3. Richardson's Bulk Sales Ltd will ensure that, before a worker enters a confined space, an entry permit is properly completed, signed by a competent person, and a copy is kept readily available.
4. Based on a review of similar confined spaces, Richardson's Bulk Sales Ltd will issue an entry permit that can be used for a number of similar confined spaces.

1.3 PPE and Emergency Equipment

1. Richardson's Bulk Sales Ltd will ensure that:
    - If a lifeline is required in a confined space or a restricted space, it is used in a manner that does not create an additional hazard;

- The safety and personal protective equipment required under this Code is available to workers entering a confined space or a restricted space;

1.
   - A worker who enters, occupies, or leaves a confined space or restricted space uses the safety and personal protective equipment;
   - The personal protective equipment and emergency equipment required under this Code is available to workers undertaking rescue operations in a confined space or restricted space;
   - Equipment appropriate to the confined space or restricted space, including personal protective equipment, is available to perform a timely rescue; and
   - A communication system is established that is readily available to workers in a confined space or a restricted space and is appropriate to the hazards.

2. Richardson's Bulk Sales Ltd will ensure that all personal protective equipment and emergency equipment required for use in a confined space or a restricted space are inspected by a competent person to ensure the equipment is in good working order before workers enter the confined space or the restricted space.

1.3 Hazardous Substances and Energy

1. Richardson's Bulk Sales Ltd will ensure that workers within a confined space are protected against the release of hazardous substances or energy that could harm them.
2. Richardson's Bulk Sales Ltd will ensure that a worker does not enter a confined space unless adequate precautions are in place to protect a worker from drowning, engulfment, or entrapment.
3. Richardson's Bulk Sales Ltd will ensure that any hazardous energy in a restricted space is locked/tagged out.
4. Richardson's Bulk Sales Ltd will ensure that any hazardous energy in a restricted space is controlled in accordance with Part 15.

1.4 Unauthorized Entry

Richardson's Bulk Sales Ltd will ensure that persons who are not authorized by them to enter a confined space or a restricted space are prevented from entering.

1.5 Traffic Hazards

Richardson's Bulk Sales Ltd will ensure that workers in a confined space or a restricted space are protected from hazards created by traffic in the vicinity of the confined space or restricted space.

2.0 Atmospheric Hazards in Confined Spaces

2.1 Testing the Atmosphere

1. If the hazard assessment identifies a potential atmospheric hazard and a worker is required or authorized by the Company to enter the confined space, Richardson's Bulk Sales Ltd will ensure that a competent worker performs a pre-entry atmospheric test of the confined space to:
    - Verify that the oxygen content is between 19.5% and 23.0% by volume, and
    - Identify the amount of toxic, flammable, or explosive substance that may be present.
2. Richardson's Bulk Sales Ltd will ensure that the testing required by subsection (1.) is performed using calibrated test instruments appropriate for the atmosphere being tested and the instruments are used in accordance with the manufacturer's specifications.
3. Richardson's Bulk Sales Ltd will ensure that, as often as necessary, after the first time a worker enters the confined space, a competent worker:

- Performs the tests specified in (1.), and
- Identifies and records any additional hazards.

4. If tests identify additional hazards, Richardson's Bulk Sales Ltd will deal with the identified hazards in accordance with the COP.
5. Richardson's Bulk Sales Ltd will ensure that the procedures and practices put into place under (4.) are included in the code of practice.
6. Richardson's Bulk Sales Ltd will ensure that the results of tests required by this section are recorded.
7. Richardson's Bulk Sales Ltd will ensure that if there is any potential for the atmosphere to change unpredictably after a worker enters the confined space, the atmosphere is continuously monitored.
8. If the atmospheric testing identifies that a hazardous atmosphere exists or is likely to exist in a confined space, Richardson's Bulk Sales Ltd will ensure that the confined space is ventilated, purged, or both before a worker enters the confined space.

2.2 Fire and Explosion Hazards – General Protection

1. A person must not enter or work at a work area if more than 10% of the lower explosive limit of a flammable or explosive substance is present in the atmosphere.
2. The above does not apply to a competent, properly equipped worker who is responding in an emergency.

Atmospheric testing results should be assessed before a worker is exposed to potentially dangerous atmospheres.

Note: Richardson's Bulk Sales Ltd has adopted the highest regulatory standard in setting the maximum LEL of 10% that workers may be exposed to. Workers may not enter or remain in a work area if the LEL is greater than 10%. Entry or work in higher LELs will only be allowed where permitted by provincial or federal legislation, and then only after a formal risk assessment is completed and

written approval from Management has been obtained. Legislated maximum LELs may be lower for hot work in confined spaces according to the jurisdiction. Consult the Confined Space SWP and refer to local legislation prior to establishing LELs for confined space entry or work.

2.3 Emergencies and Emergency Planning

Emergency Response:

1. Richardson's Bulk Sales Ltd will ensure that a worker does not enter or remain in a confined space or a restricted space unless an effective rescue can be carried out;
2. A worker must not enter or stay in a confined space or restricted space unless an effective rescue can be carried out; and
3. Richardson's Bulk Sales Ltd will ensure that the emergency response plan includes the emergency procedures to be followed if there is an accident or other emergency, including procedures in place to evacuate the confined space or restricted space immediately:
    - When an alarm is activated;
    - If the concentration of oxygen inside the confined space drops below 19.5% by volume or exceeds 23.0% by volume; or
    - If there is significant change in the amount of hazardous substances inside the confined space.

2.4 Tending Worker

- For every confined space or restricted space entry, Richardson's Bulk Sales Ltd will designate a competent worker to be in communication with a worker in the confined space or restricted space, and
- Richardson's Bulk Sales Ltd will ensure that the designated worker has a suitable system for summoning assistance.

2.5 Qualifications

The safety stand-by person may require the following competencies, depending upon the confined space hazard assessment and entry plan:

- Respiratory protection;
- Operation of any required specialized safety equipment;
- Training on the hazard controls identified in the applicable safe work practices and codes of practice;
- The physical capability and any specialized training required to carry out the rescue of personnel, if required to do so; and
- The ability to immediately summon a competent backup person before they enter a confined space to conduct a rescue or for any other reason.

Any worker being provided with the services of a safety stand-by may question the qualifications, experience, or knowledge of the safety stand-by.

2.6 Duties of a Safety Stand-by Person

A safety stand-by person is a worker who observes a work task for the purpose of:

- Rescue, if required;
- Fire suppression;
- Monitoring atmospheric conditions from outside of the hazardous area;
- Monitoring the air supply to air line supplied-air units; and
- Providing communication between workers and other parts of the operations or rescue personnel in the event of an emergency.

2.7 Requirements by Classes of Confined Spaces

Low Hazard Space

- The worker in a confined space must have a continuous means of summoning the safety stand-by person, who shall be positioned outside the hazardous area;
- The safety stand-by must check on the wellbeing of workers in the confined space at least every 20 minutes or as previously arranged; and
- The safety stand-by must have a means of immediately summoning backup or rescue personnel.

Medium Hazard Space

- The safety stand-by must be stationed at or near the entrance;
- The safety stand-by must visually observe or otherwise check on the wellbeing of workers in the confined space at least every 20 minutes, or more often, depending on the nature of the hazard;
- Workers in the confined space must have a means of summoning the safety stand-by person; and
- The safety stand-by must have a means of immediately summoning backup or rescue personnel.

High Hazard Space

- The safety stand-by person must be stationed at the entrance to the confined space. Their sole responsibility is the safety of those in the confined space;
- The safety stand-by must visually observe, or otherwise continuously monitor, the workers in the confined space;

- The safety stand-by will prevent the entanglement of lifelines and air lines, and will monitor the breathing equipment gauges;
- Workers in the confined space must have a continuous means of summoning the stand-by person;
- The safety stand-by must be equipped and capable of performing a rescue; and
- The safety stand-by will not leave his or her post unless suitably relieved.

2.8 Emergency Actions

In the event of any emergency, the safety stand-by person must do the following:

- Communicate the emergency information to appropriate backup or support personnel using the emergency response call system;
- Clearly define the emergency call or request;
- Proceed with site-specific emergency actions; and in the case of a “man down”:

Evacuate: Get to a safe area immediately. Move upwind if release is downwind of you. Move crosswise if release is upwind of you;

Alarm: Call for help (e.g., “Man Down!”) using the ER system;

Assess: Do a head count. Consider other hazards;

Protect: Put on breathing apparatus before attempting a rescue;

Rescue: Remove victim to a safe area;

Revive: Apply rescue breathing, if necessary; and

Medical Aid: Arrange transport of victim to medical aid. Provide information to emergency medical services (EMS).

3.0 Hazard Assessment and Control for Confined Spaces

3.1 Restricted Spaces

Restricted spaces may include but are not limited to:

- Towers;
- Elevated platforms and/or structures;
- Trenches (excavations);
- Sumps, piping trenches, and sewer systems;
- Scaffold, vertical ladders, and overhead walkways;
- Process vessels, such as drums, accumulators, boilers, exchangers, etc.;
- Storage tanks and diked areas (e.g., tank farms);
- Underground and above ground vaults;
- Buildings with only one access/egress doorway; and
- Areas where access or egress is limited by structures, piping, valves, or other equipment.

The presence of potentially serious hazards in a restricted space results in that space being classified as a “confined space” subject to the requirements of this COP.

3.2 Hazards Resulting in Confined Space Designation

The potential hazards which might be encountered while occupying restricted spaces and which will normally result in their being classified as a confined space, may include:

- Oxygen deficiency or enrichment;
- Asphyxiate gas (e.g., carbon monoxide, ethane, methane, helium, and nitrogen);
- Toxic atmospheres created by poisonous gases, vapours, dusts, or fumes;
- Engulfment, trapped by materials, or internal/external construction components, such as structures, sludge, sediment, ladders, weirs, baffles, or platforms, etc.;
- Potential and/or moving machinery;
- Uncontrolled introduction of steam, gas, or produced fluids; and
- Other hazards, such as excessive noise, heat, cold, radiation, and any tripping/falling obstacles.

3.3 Hazard Assessment

If a worker will enter a confined space or a restricted space to work, Richardson's Bulk Sales Ltd will appoint a competent person to:

- Identify and assess the hazards the worker is likely to be exposed to while in the confined space or restricted space;
- Specify the type and frequency of inspections and tests necessary to determine the likelihood of worker exposure to any of the identified hazards;
- Perform the inspections and tests specified;
- Specify the safety and personal protective equipment required to perform the work; and
- Identify the personal protective equipment and emergency equipment to be used by a worker who undertakes rescue operations in the event of an accident or other emergency.

If the hazard assessment identifies a potential atmospheric hazard and a worker is required or authorized by Richardson's Bulk Sales Ltd to enter the confined space, Richardson's Bulk Sales Ltd will ensure that a competent worker performs a pre-entry atmospheric test of the confined space to:

- Verify that the oxygen content is between 19.5% and 23.0% by volume;
- Identify the amount of toxic, flammable, or explosive substance that may be present; and
- Ensure that records of testing results are recorded and maintained.

4.0 Confined Space Entry Preparations

4.1 Training, Certification, and Assessment of Personnel

Prior to entry into confined spaces:

- Only competent authorized personnel are permitted to enter confined spaces. Until such time as they are trained in confined space entry, personnel are not permitted to enter any space identified as, or which they or any other person suspects of being, a confined space;
- All employees and contractors must be trained in how to identify a restricted and confined space if they might encounter one while working. The Confined Space Identification Formula/Chart – Table 1 (located at the end of this COP) should be reviewed with all workers prior to their entry into any work areas at their work sites;
- All workers involved in a confined space entry and named on a confined space permit as having responsibilities under the permit must be trained advised of the job scope, attend a pre-entry safety meeting, be provided with a site-specific orientation, and review the confined space entry site-specific procedure. For complex or multi-vessel entries, it may be prudent to also review the conditions of this code of practice; and
- All employees, workers, and contractor personnel performing confined space entry must have valid training certificate, endorsed by a recognized Confined Space Entry Training Institution, and shall present their valid certificate for examination by supervisor(s) when requested.

4.2 Pre-planning Considerations:

- Design out confined spaces wherever possible;
- Build in safeguards for permanent confined spaces;
- Create a detailed confined space inventory for the work site;
- Develop written site-specific procedures for all confined space entry activities;
- Train all personnel in confined space identification;
- Train designated personnel in confined space assessment (to determine level of risk);
- Conduct site assessments to confirm completeness of the confined space inventory;
- Determine rescue requirements based on site-specific configurations of individual confined spaces;
- Train and certify selected personnel in confined space rescue;
- Apply the Safe Work Permit and Confined Space Entry Permit system to all confined space assessments/entries;
- Determine what blinding, blanking, and lockout/tag out requirements are required for defined confined spaces;
- Designate a confined space entry coordinator;
- Determine safeguards and or control functions for each specific confined space entry;
- Identify safeguards for other site-specific hazards; and
- Create and maintain a personnel confined space entry log.

4.3 Emergency Response

1. Evacuation

    - The most critical component of any confined space entry is establishing an effective emergency response plan, and
    - Richardson's Bulk Sales Ltd will ensure that the emergency procedures to be followed if there is an accident or other emergency in a confined space, will include procedures to evacuate workers immediately:
    - When an alarm is activated;
    - If the concentration of oxygen inside the confined space drops below 19.5% by volume or exceeds 23.0% by volume; or
    - If there is any change that is likely to occur, or has occurred, such that the confined space may or has become, more hazardous than anticipated initially under the existing entry permit hazard controls.

2. Rescue Requirements

    - The project coordinator or work site supervisor, in conjunction with the Health and Safety confined space specialist, will formulate specific confined space rescue plans specific to each confined space, availability, and training level of site personnel, proximity to off-site resources, and any other considerations specific to the confined space entry, and
    - Where confined space entries are frequent and recurring, access/egress hardware and extrication hardware specific to the recurring application should be installed or readily available on site.

A safe means of entry and exit from the confined space must be established for the designated rescuers under the rescue conditions that might reasonably be expected. Rescuers may have equipment and injured workers, which may complicate normal ingress and egress.

Rescue teams and those workers designated to respond to a confined space emergency, must have the following training:

- Appropriate level of First Aid, the use of any specialized emergency response equipment likely to be required, and
- The procedures specific to the confined space.

4.4 Safe Work Permit/Confined Space Entry Permit System Application

Permit issuers must be trained in this Code of Practice and in the proper issuance of Safe Work Permits and Confined Space Entry Permits.

Permit issuers must also be familiar with the requirements for designating confined space entry coordinators, safety attendants, rescue teams, and other related personnel.

Re-entry requirements to confined spaces after work breaks or periods of absence must be established. Atmospheric testing must be repeated, and the presence and proper operation of all safeguards must be confirmed prior to re-entry and resumption of the planned work.

4.5 Lockout/Tag Out Procedure – Control of Hazardous Energy

The Lockout/Tag Out (LOTO) Control of Hazardous energy system is designed to prevent injury or death from the accidental activation of equipment, or non-isolation of potential sources of energy, during servicing or maintenance activities.

Control of hazardous energy is an important component of every confined space entry:

- All workers who may be affected by LOTO shall be trained in its application;
- LOTO materials must be available at the work site and should be specifically suited to the types of equipment found at a given location. In addition, on-site equipment that may require LOTO must have the isolation/de-energize/deactivation points clearly marked with signs;

- All affected workers must be informed of the procedure prior to removing equipment from service;
- All equipment will be shut down in accordance with the manufacturers' specifications or safe operating procedures;
- All energy sources will be isolated, locked, and tagged. The lockout tag will contain all relevant information;
- All equipment will be test started to ensure that equipment will not start after isolation; and
- When restoring service, all equipment will be safely brought back on-line.
- Only authorized personnel are allowed to attach or remove lockout and tag out devices. Personnel must at no time attempt to remove, bypass, or disable these devices. For specific details pertaining to lockout/tag out requirements, refer to Lockout/Tag Out and applicable provincial regulations.

4.6 Safeguards Determination for a Specific Confined Space Entry

Safeguards for atmospheric hazards include, but are not limited to:

- Purging the space to remove toxic, combustible, or other contamination;
- Physically isolating the space (blinding or blanking) from further contaminants;
- Ventilating the space to achieve and maintain an O_2 level sufficient to allow work to be conducted without the use of breathing apparatus and to avoid a build-up of toxic or combustible contaminants;
- One self-contained breathing apparatus (SCBA) for each person who may be involved in support activities or in a rescue of personnel within the confined space;

- Supplied air breathing apparatus (SABA) for personnel working within the confined space when:
- A clean breathing atmosphere cannot be ensured at all times when personnel are in the confined space, or
- The work is of extended duration and SABA is specified to allow greater mobility to personnel in cramped work areas within the confined space.
- Headwear, body wear, hand wear, and footwear specific to the nature or content of the confined space.

5.0 Confined Space Hazard Classifications and Entry Requirements

5.1 Levels 1, 2, and 3

Level 1 – Low Hazard

- A Level 1 – Low Hazard confined space is one in which there does not exist and there is not likely to exist:
- An explosive or toxic gas, vapour, dust, or fumes, or
- An O_2 content of less than 19.5% or greater than 23% by volume.

Level 2 – Medium Hazard

- A Level 2 – Medium Hazard confined space is one in which there has existed or was likely to have existed:
- An explosive or toxic gas, vapour, dust, or fumes, or
- An O_2 content of less than 19.5% or greater than 23% by volume, which has been purged, ventilated, and otherwise made safe for human occupancy.

Level 3 – High Hazard

- A Level 3 – High Hazard confined space is one in which there exists or is likely to exist:
- An explosive or toxic gas, vapour, dust, or fumes, or
- An O_2 content of less than 19.5% or greater than 23% by volume and which cannot be ventilated to provide and maintain an atmosphere safe for human occupancy.

5.2 High Hazard Confined Spaces Entry

1. Entry into high hazard confined spaces will require:
    - Completion of a Confined Space Entry Permit;
    - Completion of a Safe Work Permit that details the findings of the preceding assessment;
    - A review of the Site/Job Specific Hazard Survey and appropriate safeguards to be implemented;
    - A safety attendant stationed at the point(s) of access to the space;
    - A suitable means of communication when normal verbal communication between the entrants and the safety attendant (positioned at the entry point to the confined space) is not possible;
    - Appropriate atmospheric monitoring equipment;
    - Intrinsically safe electric and electronic devices;
    - Personal protective equipment expected for the hazards; and
    - Rescue and extrication personnel and equipment.
2.

Safeguards will be implemented to control atmospheric hazards of toxicity, combustibility, and O_2 enrichment or deficiency. These include but are not limited to:

- Purging;
- Isolating the space from further contamination though owner approved procedures (See Lockout/Tag Out and related procedures);
- Removing sources of contamination (e.g., sludge, liquids); and
- Ventilating the space to maintain an O_2 sufficient atmosphere free of toxic contaminants and combustible vapours.

3. Additional precautions include:

- A safety attendant must be stationed at the point of entry to the confined space;
- The atmosphere within the confined space must be continuously monitored for the presence of toxic or combustible vapours or reductions in O_2 level, as physical entry may result in fugitive emissions caused by agitation of fluids or scale;
- Provisions for continual communications with personnel within the confined space;
- Extraction harness and lanyard must be worn by the entrants unless they can be reached from one or more entry points; and
- Respiratory protection equipment relevant to any residual hazard must be worn and emergency egress respiratory equipment must be available for emergency donning and exit from the confined space.

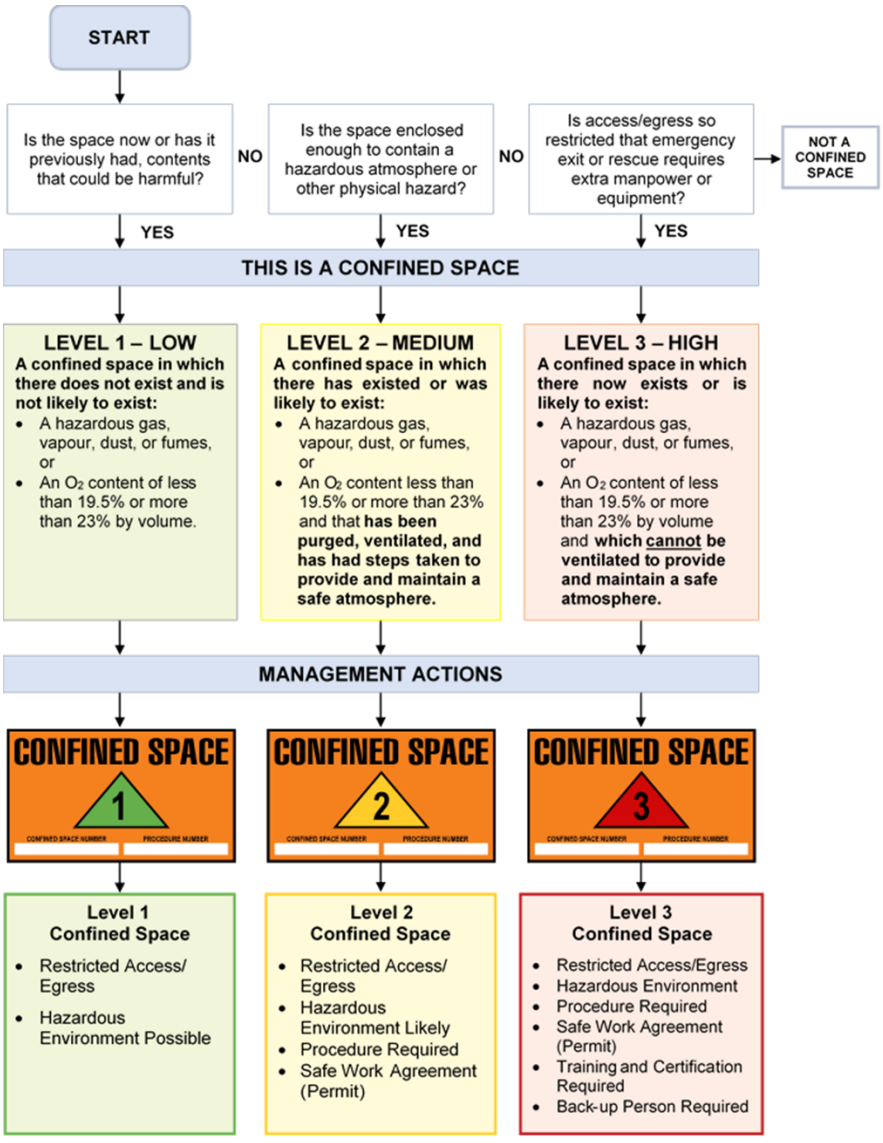
The potential hazards of the work carried out in the confined space must be detailed in the Site/Job Specific Hazard Survey and may require additional personnel who are trained in reducing or eliminating particular hazards.

The Confined Space Entry Permit and Safe Work Permit must be posted at the entry point to the confined space. Provisions may have to be made for such postings (e.g., a sandwich board). This should be part of any routine signage and barricade kit.

4. Exit and debriefing

After exiting the confined space, a debriefing session will be held with all personnel (including site supervisors) who participated in the confined space entry and in carrying out the planned work. Debriefing notes will then be entered into the Confined Space Entry Log.

Table 1 – Confined Space Identification Formula/Chart



This code of practice can only be made site-specific via:

- The completion of the Site/Job-Specific Hazard Survey, and
- The filing and use of applicable Safe Work Permit and Confined Space Entry Permit.

The survey must be completed by individuals trained in hazard assessment and the survey should be attached to the related Safe Work Permit.

Table 2 – Site/Job Specific Hazard Survey – Page 1

SITE/JOB SPECIFIC HAZARD SURVEY

ATMOSPHERIC HAZARDS	**YES**	**NO**
1. Toxic substances/particulates, gases, vapours, mists, fumes.		
2. O_2 deficiency or enrichment, < 19.5% or > 23% by volume.		
BIOLOGICAL HAZARDS		
3. Bio-hazardous material, sanitation concerns.		
ELECTRICAL		
4. Use of electrically powered tools or equipment. Static electricity.		
5. Proximity to electrical energy sources, known voltage_____.		

ENVIRONMENTAL (Non-ecological)

6. Reduced illumination or visibility.

7. Proximity to water, possibility of engulfment.

8. Extreme temperature/weather considerations.

ERGONOMIC

9. Excessive lifting, lowering, pushing, pulling.

10. Extreme access or egress limitations, cramped quarters.

11. Other stress factors including extended hours of work/service.

FALLING HAZARDS

12. Work above ground with temporary support structures.

13. Lifting from depth. Lowering from height/personnel hoists.

FIRE/EXPLOSIVES SAFETY

14. Use of flame generating apparatus or processes (e.g., hot work).

15. Use of flammable products or substances.

16. Use of explosives.

HAZARDOUS MATERIALS

17. WHMIS hazardous products.

18. Pyrophoric iron.

19. Potential for spills. Generation of wastes.

MECHANICAL **YES NO**

20. Isolation. Can it be safely isolate, depressed, blinded, vented, and purged?

21 Use of powered hand tools or machines.

22. Proximity to energy sources, running machines or equipment.

23. Overhead hazards. Stockpiled materials.

24. Extraneous materials, debris.

NOISE AND VIBRATION

25. Noise levels in excess of 85 dBA.

26. Vibratory processes or equipment.

PRESSURIZED FLUIDS

27. Compressed gas containers.

28. Pressurized piping above or below ground.

PUBLIC PROXIMITY

29. Public access.

30. Public property at risk.

RADIATION

31. Radiography.

32. Other electromagnetic, ionizing, non-ionizing energy.

33. Naturally Occurring Radioactive Materials

SECURITY

34. Potential theft, vandalism, or other illegal acts.

SURFACE/TERRAIN

35. Work surface slippery, narrow.

36. Slopes, elevations.

TRAFFIC/ACTIVITY

37. Other work processes in proximity.

38. Excessive traffic, equipment, vehicular, pedestrian.

TRENCHES or EXCAVATIONS

39. Sloping and spoil pile setback required.

40. Engineered controls required.

Forms

- Confined Space Entry Log
- Confined Space Entry Permit
- Site/Job Hazard Survey for Confined Space Entry

References

- Alberta Occupational Health and Safety Code Part 5: Confined Spaces, and Part 18: Personal Protective Equipment.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Oil and Gas Occupational Safety and Health Regulations, under Part II of the Canada Labour Code, Part XII: Confined Spaces; Part XIII: Safety Materials, Equipment, Devices, and Clothing, Respiratory Protection, Section 13.7 and 13.8.http://laws.justice.gc.ca/eng/regulations/SOR-86-304/FullText.html
- Occupational Health and Safety – Guideline on How to Prepare a Code of Practice for Confined Space Entry.https://open.alberta.ca/publications/cs001-confined-space
- CCOHS Confined Space Program. http://www.ccohs.ca/oshanswers/hsprograms/confinedspace_program.html

Contractor Management Program

Purpose

The performance of contractors, subcontractors, employees, and self-employed persons is an important factor with respect to the protection of the health and safety of employees, workers, the public, and the environment in which Richardson's Bulk Sales Ltd conducts its business. Richardson's Bulk Sales Ltd has implemented a Contractor Management Program to ensure that every contractor working for Richardson's Bulk Sales Ltd is assessed prior to beginning work and is determined to be capable of conducting their work in a safe, efficient and competent manner.

Scope

The conditions and requirements of the Contractor Management Program apply to all Richardson's Bulk Sales Ltd worksites and the employees who direct, work with, or employ contractors.

Definitions

Owner: In respect to a work site, owner means the person who is registered under the Land Titles Act as the owner of the land on which work is being carried out or may be carried out, or the person who enters into an agreement with the owner to be responsible for meeting the owner's obligations under this Act, the Regulations, and the OHS Code and/or the person who is in control of the work site.

Prime Contractor: The prime contractor for a work site is the contractor, employer, or other person who enters into an agreement with the owner or person in control of the work site to be the prime contractor. If no documented agreement has been made or is in force, the prime contractor is by default the owner or the person in control of the work site. The prime contractor shall ensure the health and safety of workers and shall ensure that all the safety regulations are complied with in respect to the work site. A "Prime Contractor" must be identified at every construction and oil and

gas work site if there are two or more employers or self-employed persons, or one or more employers and one or more self-employed persons involved in work at the work site (see Prime Contractor).

Contractor: In the context of this program, a contractor means a person, partnership, or group of persons who, through a contract, an agreement or ownership, directs the activities of one or more employers or self-employed persons involved in work providing goods or services to Richardson's Bulk Sales Ltd at any Company work site.

Employer: a person who employs or engages one or more workers, including a person who employs or engages workers from a temporary staffing agency.

Other Employer: refers to an employer who may be present at a Richardson's Bulk Sales Ltd worksite for a required purpose such as a supplier, a service provider, an inspector, or any other employer present. Richardson's Bulk Sales Ltd may or may not have a formal contract covering the activities of an “other employer”.

Self-Employed Person: Means a person who is engaged in an occupation but is not in the service of an employer for that occupation.

Site Representative: The Richardson's Bulk Sales Ltd person at the work site who has been designated to represent Richardson's Bulk Sales Ltd and is held responsible and accountable for ensuring that required tasks are carried out safely and as planned. The Site Representative may be a Company employee (typically a supervisor or manager), a consultant, or the designated prime contractor representative.

Procedure

1.0 Guidelines for Prime Contractor and Other Employer Selection and Evaluation

1.1 Prime Contractor Selection

Richardson's Bulk Sales Ltd will strive to continuously improve Contractor Environmental Health and Safety (EH&S) performance by using the following safety initiatives and evaluation criteria:

- Establishing and maintaining an effective EH&S program using defined performance criteria;
- Including all EH&S specific requirements in contracts;
- Including site or task specific EH&S requirements in contractor bid packages;
- Requesting EH&S information from each prospective contractor and evaluating the information provided. The safety information will include safety training provided, Company safety statistics, safety documentation, insurance certificates, WCB clearances, and performance, as well as contract specific requirements for the work or services to be provided;
- Identifying the specific training requirements for individual types of contractors;
- Requiring participation pre-job meetings that include EH&S expectations;
- Requiring that the contractor conduct formal EH&S orientations;
- Reviewing contractor EH&S performance regularly along with improvement goals; and
- Using EH&S performance information to evaluate and rank contractors.

1.2 Contractor, Other Employers, and Self-Employed Persons Selection

Contractors, other employers, and self-employed persons hired for jobs that are potentially hazardous will be evaluated before hiring to make sure that they are capable of effectively managing the safety, health, and environmental considerations of the job. This evaluation will include:

- Determining the contractor’s commitment to safety as demonstrated by an ongoing safety program that is supported by senior management, and

- Evaluating the contractor's response to requests for information, which may include:
  - Accident / incident frequency and severity rates;
  - Safety staffing plan and applicable EH&S responsibilities;
  - A description of the orientation program to be provided by the contractor to all employees on site;
  - Reviewing important/significant policy and procedure that the contractor has implemented (e.g., Enforcement and Disciplinary Action, Substance Abuse, Harassment, Violence, Firearms, etc.);
  - Provision of WCB coverage (current and for the applicable industry); and
  - Appropriate General Liability Insurance coverage.

1.3 Other Employers Present at Richardson's Bulk Sales Ltd Worksites

- Other employers who are present at a Richardson's Bulk Sales Ltd and are performing a required function or activity may or may not have a contract with Richardson's Bulk Sales Ltd that addresses persons engaged in activities at Richardson's Bulk Sales Ltd worksites.
- Other employers whose contract addresses activities at Richardson's Bulk Sales Ltd worksites will be subject to all the health and safety conditions, monitoring, and evaluations imposed on contractors.

- Other employers who do not have a contract or equivalent with Richardson's Bulk Sales Ltd, or whose contract does not normally anticipate being at a Richardson's Bulk Sales Ltd worksite, will be subject to and acknowledge the obligations in this HSM.
- The other employers without contracted health and safety conditions for any reason will be under the direct supervision of a Richardson's Bulk Sales Ltd employee and directly subject to the Richardson's Bulk Sales Ltd health and safety program while engaged in their activities at Richardson's Bulk Sales Ltd worksites.
- Other employers without contracted health and safety conditions will require pre-approval or approval before engaging in any activities at a Richardson's Bulk Sales Ltd worksite to ensure that they are capable of meeting all health and safety conditions for the activities that they will be engaged in.
- Other employers without contracted health and safety conditions will be subject to monitoring and evaluation as established under this SWP to the extent that this might be applicable.

2.0 Contractor HSE Management Policy

Richardson's Bulk Sales Ltd has a contractor management policy which requires that:

- Contractors are responsible for developing and maintaining their own health and safety program;
- Contractors direct their own work, but they must comply with all legislated, site and Richardson's Bulk Sales Ltd safety, health, and environmental regulations;
- Contractors will provide their employees with appropriate, functional safety and personal protective equipment and will ensure that it is used;

- Contractors must report incidents, injuries, property damage, and regulatory inspections to the Richardson's Bulk Sales Ltd's representative;
- Contractors must furnish Richardson's Bulk Sales Ltd with copies of any regulatory, administrative, or statutory reports concerning environmental infractions or an accident, incident, or occupational illness;
- Contractors must ensure that their workers have the required safety, health, and/or environmental training as required by provincial regulations, industry best practice, and/or Company requirements; and
- Contractors be evaluated on their EH&S performance. This evaluation will be used as one of the criteria for selecting Contractors in the future.

3.0 Contractor Responsibilities and Requirements

3.1 Sub-Contractors and Self-Employed Persons

Richardson's Bulk Sales Ltd will ensure that any sub-contractors and self-employed persons hired by the contractor adhere to the same standards and safety requirements as those imposed on the contractor.

- Subcontractors and self-employed persons must be included under the provisions of the safety program of another contractor who has been evaluated. In the event that a subcontractor does not have a Health and Safety Manual or program, the contractor is responsible for making sure the subcontractor is subject to their safety program and fully aware and capable to follow all applicable Health and Safety policies, procedures, and regulations which are to be followed. In particular:

- The contractor must ensure that subcontractors and self-employed persons are aware of the client's Drug and Alcohol policy. Subcontractors must adhere to the requirements of the Drug and Alcohol policy at all times while at the work site, and
- The contractor must ensure that subcontractors and self-employed persons are aware of incident reporting and investigation requirements. Subcontractors must report all incidents to the contractor and participate in the contractor's incident investigation. Richardson's Bulk Sales Ltd will participate in the contractor's investigation alongside the subcontractor and/or self-employed person. If a subcontractor or a self-employed person is involved in an incident, the contractor is responsible for reporting the incident to Richardson's Bulk Sales Ltd and/or the Owner Client. Richardson's Bulk Sales Ltd's responsible to ensure that all incidents involving subcontractors are reported to the Owner Client.

3.2 Safety Programs

The prime contractor is responsible for making sure that all workers at each site are working under a safety program that complies with all legislated and Richardson's Bulk Sales Ltd requirements and must ensure that any employer on a work site is made aware of any existing or potential work site hazards that may affect that employer's workers.

3.3 Approval Status

- All companies supplying contracted services to Richardson's Bulk Sales Ltd must be on the Approved Contractors List. These companies are required to have their own health and safety programs and are responsible for the safety performance of any subcontractors and self-employed persons that they hire;
- For a contractor, use the Contractor Pre-Qualification Information Request Letter and the Contractor Pre-Qualification document or the Contractor Variance Program form; and
- Advise the contractor to complete and submit documentation to Richardson's Bulk Sales Ltd's Contractor Management Program Manager.

4.0 Richardson's Bulk Sales Ltd Contractor Project Management Process

4.1 Pre-Project Meeting

Richardson's Bulk Sales Ltd representative who hires the contractor must conduct a pre-project meeting with the contractor before the project starts or the contractor moves to the worksite. This will serve to ensure that all EH&S expectations and responsibilities are made known before any work starts.

The meeting discussion points may include, but are not limited to the following:

- Richardson's Bulk Sales Ltd and contractor responsibilities;
- Job and safety supervision;
- Required safety and personal protective equipment;
- Emergency response initiatives;
- Safe work practices and procedures;
- Location of first-aid facilities and supplies;
- Communication requirements;
- Incident/accident reporting and investigation requirements;
- Subcontractor participation;
- Weekly and pre-job safety meetings;
- Hazard assessment, elimination, and control (JSAs); and
- Site orientation and applicable health/safety rules.

4.2 Contractor Supervision

Richardson's Bulk Sales Ltd will designate and maintain adequate levels of competent supervision during the project. Consideration will be given to:

- The scope of the task and potential risks;
- The contractor's experience and training; and
- The Prime Contractor's Responsibilities.

4.3 Non-Compliance and Performance Evaluation

All contractors are assigned a Richardson's Bulk Sales Ltd supervisor who is responsible for contractor performance and the contract. Any instances of non-compliance are reported by the supervisor as either an incident or a contractual breach and tracked on the Richardson's Bulk Sales Ltd Corrective Action Report (CAR). All contractor non-compliance issues, incidents, and CARs are forwarded to the contract administrator or equivalent.

The contract administrator will determine if there are contractual issues associated with the non-compliance and the supervisor will determine if the non-compliance affects the ability of the contractor to remain at the work site or equivalent while corrective actions are being established and implemented, particularly in the case of environmental and/or health and safety non-compliance.

All contractors will be evaluated on their EH&S performance after the job is completed by reviewing the contract administrator's log of adherence to contractual or purchase order requirements and the CARs or incidents associated with the contractor. Richardson's Bulk Sales Ltd's representative who hired the contractor will ensure that the evaluation is completed prior to the end of the project and is incorporated in the conditions of the contract or purchase order.

Forms

- Approved Contractor Variance Program
- Approved Contractors List (Additions and Deletions Request)
- Contractor Pre-Qualification Information Request Letter
- Contractor Pre-Qualification Questionnaire

References

- Alberta Occupational Health and Safety Act – Part 1.https://www.alberta.ca/ohs-act-regulation-code.aspx
- British Columbia Occupational Health and Safety Regulations, Part 20: Construction, Excavation, and Demolition Sections 20.1A to 20.3.https://www.worksafebc.com/en/law-policy/occupational-health-safety
- Energy Safety Canada, Contractor Management Systems Guideline. https://www.energysafetycanada.com/Attachments/DownloadResource?attachmentGuid=3f3556d2-f701-472a-a372-c6fd19552f6e&open=True
- Saskatchewan Employment Act 2013, Part III Section 5 Duties.
- Saskatchewan Occupational Health and Safety Regulations. http://www.publications.gov.sk.ca/details.cfm?p=4355

Cranes, Hoists, and Lifting Devices

Purpose

Richardson's Bulk Sales Ltd may require the use of lifting devices as part of its work activities. This safe work practice establishes the minimum requirements for establishing equipment and worksite-specific procedures for the safe operation and maintenance of cranes, hoists of any description, winches, A-frames, and gin poles. It also applies to pile driving equipment or any lifting device and associated rigging equipment (slings, wire ropes, chains, etc.) used by a trained, competent, and authorized worker.

Scope

This SWP will apply to all work sites owned or operated by Richardson's Bulk Sales Ltd that employ on a temporary or permanent basis any of the lifting devices identified above. It shall also include similar equipment supplied or provided by any contractor to the Company.

Procedure

1.0 Operator Requirements

1. Richardson's Bulk Sales Ltd will ensure that a lifting device is only operated by a competent worker authorized by Richardson's Bulk Sales Ltd to operate the equipment.
2. At Richardson's Bulk Sales Ltd's request, an operator, before operating the equipment, must be able to demonstrate that the worker is competent in the equipment's operation and load charts and in the code of signals for hoisting operations.
3. No worker, other than the competent worker authorized by Richardson's Bulk Sales Ltd, may operate a lifting device.

4. Before operating a particular lifting device, the operator must be familiar with all recent entries in its log book.
5. Prior to performing any lift, the operator shall prepare the crane/hoisting equipment to receive the load, determine the weight of the object being lifted, and ensure that the cables, lifting device, and any slings, wire ropes, chains, etc. used in the lift are of sufficient strength to support the weight of the load.
6. If the operator of a lifting device has any doubts as to the safety of workers in the vicinity of the lift, the operator must not move any equipment or load until the operator is assured that the working conditions are safe.
7. The operator of a lifting device that is travelling with the load must ensure that the load is positioned as close to the ground as possible.
8. No worker shall allow any part of their body to extend under any load being handled by a crane or other lifting device. Tag lines must be used to guide and control the load where excessive movement is possible.
9. Operators will carry out a pre-use inspection of the lifting device as required by the manufacturer and any prevailing legislation.

2.0 Supervisor Requirements

1. The work site supervisor shall ensure the authorized operator is aware of his or her responsibilities governing the use of the applicable lifting device or equipment by ensuring that:
    - The operator has received training, is qualified, and certified (where required) to operate the specific device or lifting equipment to be used;
    - The operator is familiar with the manufacturers' specifications for safe operation and maintenance of the specific equipment to be used;
    - The operator is familiar with relevant federal, provincial, or territorial regulations, and that they are understood and complied with; and

- That a competent person directly supervises the assembly and disassembly of a crane and is assisted by competent persons.

2. The work site supervisor is responsible for ensuring that any lifting device is operated only by a competent, authorized worker.
3. Richardson's Bulk Sales Ltd shall not require an operator to operate motorized materials handling equipment unless the operator:
    - Is directed by a signaller, or
    - Has an unobstructed view of the area in which the equipment is to be operated.
4. The work site supervisor will ensure that a signaller is designated to direct the operator, as necessary, to properly place and control the loads. Supervisors will ensure that:
    - A primary designated signaller has been designated;
    - Signallers use industry-accepted signals and wear a high visibility vest, armlet, or other piece of clothing that clearly identifies workers as a designated signaller;
    - Before giving the signal to proceed, a signaller has verified that there are no hazards in the immediate vicinity;
    - The equipment operator only takes signals only from the designated signaller;
    - Only one designated signaller at a time gives signals to the equipment operator;
    - A STOP signal is only to be given by the designated signaller; and
    - Additional signallers (secondary) are used where signals cannot be transmitted properly between the designated signaller and the equipment operator.

3.0 Richardson's Bulk Sales Ltd Responsibilities

Richardson's Bulk Sales Ltd will ensure that:

1. Upon request and for any lifting equipment being used, it can produce:
    - Maintenance inspection documentation;
    - *Log book (if applicable);
    - Current operator's licences (if applicable); and
    - Certificate of inspection covering the specific equipment and associated rigging.
2. Richardson's Bulk Sales Ltd will set up a paper or electronic log book for each lifting device at a work site in accordance with the applicable OHS Regulations. Log books will adhere to the following requirements:
    - The log book will be readily available for examination;
    - The most current version of the log book will accompany the lifting device; and
    - If ownership of a lifting device is transferred, the log book will also be transferred with the equipment.
3. A log book includes:
    - The date and time when any work was performed on the lifting device;
    - The length of time in lifting service;
    - All defects and deficiencies and when they were detected;
    - Inspections, including examinations, checks, and tests;
    - Repairs and modifications;
    - Record of certification;

- Any matter or incident that may affect the safe operation; and
- Each entry into the log book will be signed by the person doing the work or identified in the electronic log book.

4. Motorized or manual materials handling equipment shall be legibly marked with sufficient information so as to enable the operator to determine its safe working load (lifting capacity). Where this information is not available from the manufacturer, or if it is a locally-fabricated device, it must be determined by a registered professional engineer.
5. No motorized or manual materials handling equipment shall be used with a load that exceeds its safe working load.
6. Richardson's Bulk Sales Ltd will ensure that all hoisting or lifting devices meet the applicable standards for design and construction.
7. Richardson's Bulk Sales Ltd will ensure that work is arranged so that a load does not pass over workers. A worker must not stand or pass under a suspended load unless the worker has been effectively warned of the danger and the operator of the device knows that the worker is under the suspended load.
8. Workers will not be lifted or otherwise transported on any hoisting or lifting equipment or device unless the equipment or device has been specifically designed for the purpose.
9. Inspections:
    - Annual inspections will be carried out in accordance with legislated requirements and manufacturer's specifications by a competent person with the appropriate certification or documented technical competency to conduct inspections of the type of crane or hoist system being inspected.
    - All records of inspections will be maintained as described in 1., 2. and 3. of this section.
    - Pre-use inspections will be carried out and recorded as set out in C 1.0 (9.).
10.

Maintenance:

- A Regular maintenance program shall put into effect to ensure that all components of the lifting device are in good condition (e.g., brakes, body, cables, sheaves, etc.).
- Written records of maintenance and inspection results for any rigging, lifting, and hoisting equipment shall be available for review.

11. Richardson's Bulk Sales Ltd will ensure that a lifting device is only operated by a competent worker who has received appropriate training based on the specific type of equipment to be used and is authorized by Richardson's Bulk Sales Ltd to operate the equipment.
12. Richardson's Bulk Sales Ltd will ensure that an operator who uses a remote control to operate a lifting device is visually distinguishable from other workers at the work site.
13. A crane or hoist will not be used unless the following is readily available at the workplace where the crane or hoist is to be used: the portions of the manufacturer's manual related to the assembly, erection, dismantling, inspection, routine maintenance and safe operation of the crane or hoist or engineers' instructions.
14. Richardson's Bulk Sales Ltd will ensure that a competent person directly supervises the assembly and disassembly of a crane. The competent person must have demonstrated their knowledge on the assembly and disassembly of the same equipment and must be trained and understand how to follow either:
    - "Engineer's instructions" mean instructions, approved in writing by a professional engineer, for the assembly, erection, dismantling, maintenance, inspection and operation of the component parts of a crane or hoist and of the assembled crane or hoist, or
    - "Manufacturer's manual" means a manual, prepared by the manufacturer of a crane or hoist, that describes the approved methods of assembly, erection, dismantling, maintenance, inspection and operation of the component parts of the crane or hoist and of the assembled crane or hoist.

4.0 Critical Lift Procedure

When lifts are performed that have a higher defined degree of risk, as described in 4.2; the following "critical lift" practice will be followed for all lifts that meet the established criteria, or at the discretion of the work site supervisor.

4.1 Responsibilities

The Work Site Supervisor will:

- Ensure that the critical lift procedure is implemented and followed by all participating workers.

Critical Lift Procedure:

- Conduct a hazard assessment using the "Critical Lift Checklist" before undertaking the lift, and
- Prepare and issue a Safe Work Permit or Lift Plan for all work according to the results of the "Critical Lift Checklist".

The Rigging Supervisor will:

- Administer the procedure, conduct a pre-job meeting, direct activities, and sign the Safe Work Permit, and
- Ensure that a Critical Lift Checklist is completed and signed by either himself/herself or the equipment operator.

4.2 Application

This procedure will apply for lifts meeting any of the identified "critical lift" specifications:

- Load exceeds 75% of the applicable equipment load chart;
- Load exceeds 50% of load chart and failure could endanger existing facilities;
- Personnel will be lifted in non-emergency situation;
- Lift is within the limits of approach to electrical lines or high-pressure gas lines;
- Helicopter used to lift in an industrial setting;
- Hazardous substances are involved;
- Two booms or lifting arrangements are required;
- Special rigging is required;
- Load transfer is required;
- Load protrudes more than 4.5 metres (15 feet) from centre of gravity;
- Wind speed exceeds 20 km/h (12 mph);
- Temperatures are lower than -30 C (-26 F); and/or
- Owner or site manager or the risk assessment process identifies the activity as a “Critical Lift”.

5.0 Handling and Managing Loads

5.1 Rated Load Capacity Labels

1. Richardson's Bulk Sales Ltd will ensure that a lifting device has a plate of weatherproof label permanently secured to it that legibly shows:
    - The manufacturer’s rated load capacity;

- The manufacturer's name; and
- The model, serial number, and year of manufacture or shipment date.

If a lifting device is not commercially manufactured, Richardson's Bulk Sales Ltd will ensure that it has a plate or weatherproof label permanently secured to it that legibly shows the rated capacity according to the professional engineer's certification.

2. Richardson's Bulk Sales Ltd will ensure that a lift calculation is completed for any lift exceeding 75 percent of a crane's rated capacity.
3. The operator of a lifting device that is travelling with a load must ensure that the load is positioned as close to the ground or grade as possible.
4. Tag and Hoisting Lines:

   If workers are in danger because of the movement of a load being lifted, lowered, or moved by a lifting device, Richardson's Bulk Sales Ltd will ensure that:

   - A worker uses a tag line of sufficient length to control the load;
   - The tag line is used in a way that prevents the load from striking the worker controlling the tag line; and
   - A tag line is used when it allows worker separation from the load.

5. Richardson's Bulk Sales Ltd will ensure that a mobile crane equipped with outriggers is set up with the outriggers on load-bearing floats or pads that are of adequate size, strength, and rigidity.

6.0 Applicable Safety Codes

- A material hoist must meet the requirements of CSA Standard CAN/CSA-Z256-M87 (R2006), Safety Code for Material Hoists;
- A mobile crane must meet the requirements of CSA Standard CAN/CSA-Z150-98 (R2004), Safety Code on Mobile Cranes with the exception of clauses 1.6 and 1.7;
- A personnel basket used with a mobile crane must be designed, constructed, maintained and used in accordance with CSA Standard CAN/CSA Z150-98 (R2004), Safety Code on Mobile Cranes, clause 5.4.7;
- Richardson's Bulk Sales Ltd will ensure that the load blocks of a mobile crane are maintained and repaired in accordance with the manufacturer's specifications or, if there are no manufacturer's specifications, in accordance with CSA Standard CAN/CSA Z150-98 (R2004), Safety Code on Mobile Cranes, clause 4.3.5.2;
- A bridge, jib, monorail, gantry, or overhead travelling crane must meet the design requirements for electrical components and functions of:
    - CSA Standard C22.1-06, Canadian Electrical Code, Part 1, Section 40, and
    - CSA Standard C22.2 No. 33-M1984 (R2004), Construction and Test of Electric Cranes and Hoists.
- A tower crane manufactured on or after July 1, 2014, must meet the requirements of CSA Standard Z248-04, Code for Tower Cranes;
- Richardson's Bulk Sales Ltd will ensure that a vehicle hoist installed on or after July 1, 2014, meets the requirements of the following:
- ANSI Standard ANSI/ALI ALCTV-2006, American National Standard for Automotive Lifts – Safety Requirements for Construction, Testing, and Validation, or
- ANSI Standard ANSI/ALI ALOIM-2000, Automotive Lifts – Safety Requirements for Operation, Inspection, and Maintenance.
- CAN/CSA-B167-96 (R2007), Safety Standard for Maintenance and Inspection of Overhead Cranes, Gantry Cranes, Monorails, Hoists, and Trolleys also applies.

Forms

- Critical Lift Checklist

References

- Alberta Occupational Health & Safety Act, Regulation, and Code, Part 6: Cranes, Hoists, and Lifting Devices; Part 14: Lifting and Handling Loads; Part 19: Powered Mobile Equipment; Part 21: Rigging. https://www.alberta.ca/ohs-act-regulation-code.aspx
- Oil and Gas Occupational Safety and Health Regulations, under Part II of the Canada Labour Code, Part XV: Materials Handling, Divisions I and II. http://laws.justice.gc.ca/eng/regulations/SOR-86-304/FullText.html

Demolition

Purpose

Demolition refers to the tearing-down of buildings, processes, facilities, equipment, or structures.

This safe work practice will describe the regulatory and Richardson's Bulk Sales Ltd safety requirements for demolition work. Demolition activities can be simple or very complex and appropriate hazard assessments and task specific safe job procedures which adhere to the principles of this SWP are required to be carried out prior to any demolition work.

Scope

This safe work practice has been designed to provide the information necessary for the development of respective site-specific procedures to deal with each unique demolition job. The conditions and requirements of this safe work practice shall be rigidly applied and enforced at all work sites owned or operated by Richardson's Bulk Sales Ltd where workers are required to participate in demolition duties.

Procedure

The requirements for all employees, contractors, and subcontractors who are working on behalf of Richardson's Bulk Sales Ltd and are based on the Alberta OHS Code, Part 30: Demolition (sections 415 – 422).

1.0 Activities Prior to Demolition

1.1 Hazard Assessment

For all demolition projects, a written hazard assessment is required prior to work beginning. If substances are identified that may pose a hazard to workers during the demolition, these substances must be removed before work begins. Richardson's Bulk Sales Ltd will consider both direct and indirect hazards. Richardson's Bulk Sales Ltd will develop work procedures that reduce or remove potential hazards.

Prior to Beginning Demolition Work Richardson's Bulk Sales Ltd will ensure that:

- A competent worker has been designated by Richardson's Bulk Sales Ltd is in charge of the demolition work at all times while work is in progress, and
- All chemical and biological substances that may be hazardous to workers during demolition are removed from the structure or the part of the structure that is being demolished.

Before work begins on the demolition or salvage of machinery, equipment, buildings, or structures, Richardson's Bulk Sales Ltd will:

- Inspect the site to identify any asbestos, lead, or other heavy metal or toxic, flammable, or explosive materials that may be handled, disturbed, or removed;
- Have the inspection results available at the work site, including any drawings, plans, or specifications, as appropriate, to show the locations of any hazardous substances;
- Ensure that any hazardous materials found are safely contained or removed;
- If hazardous materials are discovered during demolition work, that were not identified in the inspection required, ensure that all work ceases until such materials are contained or removed;
- Possible hazardous substances that might be encountered:
    - Insulation (fibreglass, asbestos, refractory ceramic fibre);

- Building materials containing asbestos;
- Lead paint;
- Silica containing materials;
- Mercury (fluorescent lights, switches, gauges);
- Polychlorinated biphenyls (liquid cooled electrical equipment, fluorescent light ballasts, paints, electrical insulating materials);
- Paints and solvents;
- Oils and lubricants;
- Fuels (gasoline, diesel);
- Batteries;
- Process chemicals;
- Glues;
- Air conditioning system or cooling system chemicals (freon, halon, other chlorofluorocarbons);
- Compressed gases;
- Welding rods and solder;
- Mold;
- Bacteria (medical waste, human or animal waste); and
- Animal or human waste (sewage contamination, manure, bird droppings, rodent droppings).

- Existing concrete at the work site is not disturbed or removed until any embedded facilities have been isolated or their location marked;
- All utilities are disconnected before demolition begins, and written confirmation of the disconnection by the person who disconnects the utilities is available at the work site;
- Workers cannot enter an area into which material is dropped, thrown or conveyed by a materials chute, and that conspicuous warning signs in the area advise of the danger; and
- If a building or structure is being demolished:
    - All glass and windows on the exterior walls of the building or structure and adjacent to a public walkway are removed before demolition begins;
    - If the demolition may affect the stability of an adjoining building or structure, the demolition is carried out in accordance with procedures certified by a professional engineer that safeguard the stability of the adjoining structure;
    - If tensioned steel cables or bars are known to be in the building or structure, demolition procedures are certified and supervised by a professional engineer;
    - If there are workers in the building or structure during the demolition, the demolition is performed floor by floor, from the top down;
    - Steel structures are dismantled column length by column length and tier by tier;
    - A structural member that is being removed:
        - Is not under stress, other than its own weight, and
        - Is secured or supported to prevent unintentional movement; and
    - Unless it is being demolished at the time, a wall or other part of the building or structure is not left unstable or in danger of collapsing unintentionally.

1.2 Disconnecting Services

Demolition must not proceed until all electric, gas, and other services that may endanger a worker have been disconnected as required by the owner of the applicable utility.

1.3 Glass Removal

If glass in a building or other structure could endanger workers, it must be removed before other demolition commences. Glass removal must proceed in an orderly manner from the top to the bottom of the structure.

2.0 Alberta Fire Code Considerations

Protection of Adjacent Building – Protection shall be provided for exposed adjacent buildings or facilities from fire.

Fire Safety Plan – Prior to the commencement of construction, alteration, or demolition operations, a fire safety plan shall be prepared for the site and shall include:

- The designation and organization of site personnel to carry out fire safety duties, including a fire watch service if applicable;

- The emergency procedures to be followed in the event of a fire, including:
  - Initiating a fire warning;
  - Notifying the fire department;
  - Instructing site personnel on the procedures to be followed once the warning has been initiated; and
  - Confining, controlling and extinguishing the fire;
- Measures for controlling fire hazards in and around the building; and
- A maintenance procedure for firefighting measures.

2.1 Access for Firefighting

- Unobstructed access to fire hydrants, portable extinguishers, and to fire department connections for standpipe and sprinkler systems shall be maintained, and
- Access routes for fire department vehicles shall be provided and maintained to construction and demolition sites.

Portable Extinguishers – In addition to the other requirements of the Code, portable extinguishers shall be provided in unobstructed and easily accessible locations:

- Where hot work operations are carried out;
- Where combustibles are stored;
- Near internal combustion engines;
- Where combustible liquids, flammable liquids, or gases are stored or handled; and
- Where temporary fuel-fired equipment is used.

Standpipe Systems – Where a building being demolished floor by floor any standpipe system shall be maintained in operable condition two floors down.

Provision for Egress – In buildings being demolished, at least one stairway shall be maintained in usable condition at all times.

Fire Warning – A means shall be provided to alert site personnel of a fire and such a means shall be capable of being heard throughout the building or facility.

Ignition Sources – Devices capable of producing ignition, internal combustion engines, temporary heating equipment, and associated devices shall be kept at a safe distance from combustible material so as not to cause ignition.

2.2 Tank, Piping and Machinery Reservoir Safety at Demolition Sites

Tanks, piping, and machinery reservoirs at a demolition site that contain combustible liquids or flammable liquids be drained and removed prior to the demolition of the building.

Tanks, piping, and machinery reservoirs that once contained combustible liquids, flammable liquids, or flammable vapours shall be purged with inert materials prior to demolition to prevent an explosion.

Disposal of Combustible Refuse – Combustible refuse in sufficient quantities to constitute a fire hazard shall be moved to a safe location.

3.0 Alberta Building Code Considerations

Part 8 of the Alberta Building Code – Safety Measures at Construction and Demolition Sites, will be adhered to:

- Measures shall be taken during demolition to protect the public in conformance with CSA S350-M, “Code of Practice for Safety in Demolition of Structures” and section 5.6 of the Alberta Fire Code 2006;

- A “Covered Way” shall be constructed where demolition presents a hazard to the public;
- If the demolition is located two metres or more away from the public way, and demolition may constitute a hazard, a fence shall be constructed to prevent public access;
- If it is not possible to prevent the public from accessing dangerous locations, persons shall be employed to prevent public access at any time of the day or night;
- Operations, where the public cannot be protected, must be carried out during times when the walkway or streets can be closed off to the public;
- Any excavations must be barricaded and have appropriate warning lights;
- Any workers employed to direct traffic during demolition operations must use the appropriate equipment and clothing and be suitably trained in traffic control; and
- Waste material shall not be permitted to fall freely from one story to another. Appropriate containers, an enclosed shaft or chute or a hoisting apparatus must be used to remove waste materials.

4.0 General Richardson's Bulk Sales Ltd Requirements

Richardson's Bulk Sales Ltd will ensure that all regulatory agencies are advised, as required, when demolition is scheduled to be performed.

The Safe Work Permit system will be used throughout the demolition process.

During demolition, continued inspections by a competent person shall be made as the work progresses to detect hazards resulting from weakened or deteriorated floors, walls, or loosened material. No employee shall be permitted to work where such hazards exist until they are corrected by shoring, bracing, or other effective means.

Richardson's Bulk Sales Ltd will consider, as part of the demolition plan, the reuse and recycling of useable parts and materials of the property to be demolished.

4.1 Safe Access

Where practicable, suitable ladders, work platforms, and scaffolds meeting the requirements of Part 8 (Entrances, Walkways, Stairways and Ladders) and Part 23 (Scaffolds and Temporary Work Platforms) of the Alberta OHS Code will be provided for and used by Company workers for activities requiring positioning at elevations above a floor or grade.

4.2 Design Loads

A temporary floor, decking, floor opening cover, or formwork must be:

- Capable of supporting a uniformly distributed live load of at least two kPa (40 psf), or
- Designed and installed in accordance with the written instructions of a professional engineer if the anticipated live load will be different than two kPa (40 psf).

Workers delivering materials to or working on a temporary floor, decking, floor opening cover, or formwork must be aware of the safe carrying capacity of the surface and of precautions necessary to prevent overloading.

4.3 Protection from Falling Materials

If falling material could endanger workers:

- The danger area must be barricaded or effectively guarded to prevent entry by workers, and conspicuous warning signs must be displayed on all sides and approaches;
- Adequate protective canopies must be installed over the danger area; or
- Adequate catch platforms or nets must be provided to stop materials from falling into areas accessible to workers.

Protective canopies must be designed and constructed to safely support all loads that may reasonably be expected to be applied to them, but in no case less than 2.4 kPa (50 psf).

4.4 Chutes

Chutes must be provided if the free fall of materials or debris being removed exceeds six metres (20 feet). Chutes at an angle of greater than 45° must be completely enclosed and have gates at each point of entry.

The discharge area of a chute must be barricaded or effectively guarded to prevent workers being injured by falling or flying debris and conspicuous signs must be posted near chute outlets to warn of the danger.

4.5 Temporary Support

During the erection or dismantling of a structure or equipment, Richardson's Bulk Sales Ltd will ensure that all partially assembled structures or components are supported as necessary to safely withstand any loads likely to be imposed on them.

4.6 Fills

A fill must be planned, constructed, used, and maintained so that no person working at the workplace is endangered by any failure or instability of the fill.

4.7 Stockpiles

A stockpile must be planned, constructed, used, and maintained so that no person working at the workplace is endangered by any instability of the stockpiled material.

4.8 Structural Integrity

If a structure is to be demolished in whole or in part, the structure and any adjoining structures, the integrity of which could be compromised by the demolition, must be supported to the extent and in a manner prescribed by a professional engineer.

Design of the support system described in the paragraph above must include a schedule, based on the stages of demolition, for installation of the components of the support system, and a copy of the support system plan must be available at the demolition site.

4.9 Protection from Falling Materials

If falling material could endanger a worker, the dangerous area must be guarded to prevent entry by workers or protected by adequate canopies. A floor or roof opening through which material may fall and endanger workers will be adequately covered.

4.10 Throwing Material

If material is to be dropped or thrown from upper floors, the area into which the material will fall must be barricaded to prevent workers from entering the area and conspicuous warning signs must be displayed to advise of the danger.

4.11 Stabilizing Walls

If a dangerous or unstable wall is to be left standing, it must be adequately braced.

4.12 Dismantling Buildings

During the dismantling or renovation of a building or structure, materials of a size or weight that may endanger workers must not be loosened or allowed to fall, unless procedures are used that will

adequately protect workers.

4.13 Housekeeping

Material and debris must not be allowed to accumulate on floors or on the ground outside the building or structure if workers will be endangered.

4.14 Stairways

Stairways, complete with handrails, must be left intact until access to the level they serve is no longer required.

References

- Alberta Occupational Health & Safety Code Part 30: Demolition.https://www.alberta.ca/ohs-act-regulation-code.aspx
- National Fire Code – 2019 Alberta Edition.https://nrc.canada.ca/en/certifications-evaluations-standards/codes-canada/codes-canada-publications/national-fire-code-2019-alberta-edition-nfcae
- CSA Code of Practice for Demolition of Structures.http://www.scc.ca/en/standardsdb/standards/2265
- National Building Code Alberta Edition Part 8 – Safety Measures at Construction and Demolition Sites. https://nrc-publications.canada.ca/eng/view/ft/?id=3e93ecc7-7ad6-43ff-ac1e-89c0d033b8aa

Dropped Objects

Purpose

Dropped Objects are a significant source of injuries and losses in the workplace. Richardson's Bulk Sales Ltd has developed this SWP to establish the procedures and control measures to be used to minimize the potential of objects being dropped at its worksites.

Scope

This SWP applies at all Richardson's Bulk Sales Ltd worksites. All Company installations and facilities must adequately identify and assess the potential for dropped objects and implement effective mitigating control measures.

Definitions

There are two types of dropped objects whose hazards must be identified and controlled, static and dynamic.

Static: A static dropped object is a solid object, initially at rest, that falls or breaks free from its original position under its own weight.

Dynamic: A dynamic dropped object is a solid object that breaks free from its fastenings due to the applied force from an impact (typically, an unplanned collision) of some other equipment or a moving object.

Procedure

1.0 Hazard Identification

Dropped Objects will be managed and controlled with other hazards in the workplace. Each work task will consider the possibility of dropped objects occurring. Once a hazard is identified, it will be assessed, giving consideration to its potential and its probability of occurrence.

Before starting any work, it is important to consider the potential for dropped objects:

- Consider the environment where you will perform the task and any other activities that may be going on around you;
- Review any Lift Plan or Collision Checklist, as appropriate;
- Visually inspect the work area for loose items and debris. Check the equipment and structures in the work area to ensure that any fasteners, bolting, covers, etc. are properly secured; and
- Check that secondary retention is in place for all items secured above the work area.

A review and risk assessment should be undertaken for all areas of worksites or facilities to determine the potential for dropped objects.

The hazard identification review should consider:

- Summary of prior incidents;
- Layout drawings of the respective area(s);
- Equipment descriptions, drawings, and operating/maintenance manuals;
- Details of any anti-collision systems; and
- Routine operating procedures for relevant operations.

Each potential dropped object should be assessed as either essential or non-essential. Where an item is non-essential it should be removed.

2.0 Hazard Controls

To reduce risk to a level that is as low as reasonably practicable (ALARP), control measures will be evaluated and implemented by Richardson's Bulk Sales Ltd.

1. Engineered Controls
    - Removal or re-positioning of tools/equipment;
    - Changing the primary securing method (e.g., nuts, bolts, screws, clamps, brackets, turnbuckles, weld, etc.);
    - Secondary Retention (e.g., wire slings, encasement, lock nuts, lock washers, tab washers, lock wire, split pins, roll pins, spring clips, clamps, safety chains, etc.);
    - Barriers (barricade hazard areas); and
    - Guards (Use toeboards, screens, or guardrails on scaffolds to prevent falling objects, or use debris nets, catch platforms, or canopies to catch or deflect falling objects).

2. Administrative Controls
    - Policies, procedures and rules;
    - Inclusion of potential dropped objects in JSAs;
    - “Safe Zone” areas;
    - Training and awareness;
    - Safety meetings;
    - Monitoring and documenting; and
    - Incident investigations to determine root cause.
3. Personal Protective Equipment (PPE) will be determined by the hazard assessments conducted prior to work. Minimum requirements include:
    - Hard hats;
    - Boots;
    - Eye protection; and
    - Gloves.

Table 1. – Drilling and Service Rig Dropped Object Hazards and Controls

Ref	Equipment / Area	Fastening Methods	Tag Number	Risks	Control	Comments
Area 1: Crown and Water Table						
1.1	Antenna	Clamp	FD-01-18	Low	Weekly Inspection	Check security of clamp
1.2	Degasser Ventine	U-bolt	FD-02-36	Low	Weekly Inspection	Check for security and corrosion
1.3	Padeye Bracket	Welded	FD-09-02	Low	6-monthly NDT / MP1	Check for cracks or deformation
Area 2: Monkeyboard Level						
2.1	Monkeyboard Access Cover	Welded Bracket	FD-06-29	Med	Weekly Inspection	Lubricate hinges and check bracket for security
2.2	Electrical Junction Box	Bolted	FD-06-61	Low	Monthly Maintenance Routine	Check box for security
2.3	½" steel airline Junction Box	U-bolted	FD-06-37	Low	Weekly Inspection	Check for security and corrosion
Area 3: Traveling Equipment						
3.1	Traveling Block	Bolts and Pins	FD-03-02	Med	Monthly Maintenance Routine	Hang off and check for wear. Ensure all fasteners are tight and split pins are in place / undamaged
Area 4: Drillfloor and Mezzanine Deck						
4.1	Strip Light	Strip Light	FD-05-69	Low	Monthly Maintenance Routine	Check security of light & safety sling
4.2	Inertia reel & safety sling	Shackled / safety sling	FD-04-56	Low	Weekly Inspection	
Area 5: Lower Substructure and BOP Deck						
5.1	Strip Light	Bolted / safety sling	FD-05-70	Low	Monthly Maintenance Routine	Check security of light & safety sling

3.0 Restricted Access Areas

The implementation of Restricted Access Areas will be considered to limit the potential risk of exposure to dropped objects. The hazard identification and risk rating process can be used to categorize all areas of the workplace into one of three zones:

1. Green Zone: where the layout and activities of the area present little likelihood of personnel being exposed to potential dropped objects under normal circumstances;
2. Yellow Zone: where the layout and activities of the area do present some risk of personnel being exposed to potential dropped objects under normal circumstances; and
3. Red Zone: where the layout and activities of the area present significant risk of personnel being exposed to potential dropped objects under normal circumstances.

Access diagrams or Zone Maps should be prepared and mounted (where practicable) at all access points to Red or Yellow Zones and at a common central site within the workplace.

For Green Zones, anyone may enter as long as no additional barriers are in place.

For Yellow Zones, only personnel with specific tasks in that zone may enter. All other personnel require the area supervisor's permission to enter or work in that zone.

In Red Zones, personnel may be more exposed to falling objects, the movement of remotely operated equipment, high pressure, and/or other hazards as determined by the risk assessment. Any personnel in the Red Zone must be required for the current operation and must be authorized by the area supervisor. A Safe Work Permit must be issued for work within the Red Zone.

4.0 Working at Heights

When working at height, the potential for dropped objects is greater.

- Use only tools and equipment approved for work at height, including the appropriate lanyards (tethers) and tool bags, and always log tools in and out on the tool register;

- Set up barriers beneath the work area and ensure the extent of the barriered zone is appropriate to the work height, with consideration of the potential 'bounce' of a dropped object;
- Check that grating is secure and use mats where there is the potential for small items to fall through the grating;
- Where a scaffolding platform is employed, ensure toe-boards are installed;
- Where the task involves loading or lifting, a Lifting Plan may be necessary as part of the pre-task planning process;
- Ensure the lifting equipment, carrier, or packaging is appropriate for the task and is in good order;
- Ensure packaging is sufficiently strong to support a load during transport;
- Ensure containerized loads are properly stacked, stored, and secured;
- Check tubulars for items left inside and employ cap ends, where practicable;
- Check tops of containers and fork lift pockets for loose items and debris;
- Daily safety meetings should discuss and identify all potential dropped object hazards; and
- When work is completed, it is important to inspect and leave the worksite safe and tidy:
    - Clear all scrap, debris and loose items from the worksite;
    - Return all tools and complete the Tools Aloft Log;
    - Remove all temporary barriers and signage; and
    - Note and communicate any lessons learned in undertaking the task.

References

- OSHA Construction e-Tool - Falling & Flying Objects.https://www.osha.gov/SLTC/etools/construction/struckby/mainpage.html
- DROPS Online (Dropped Objects Prevention Scheme). http://www.dropsonline.org/

Electrical Safety

Purpose

Richardson's Bulk Sales Ltd has developed this SWP to provide guidelines for employees so that they may work safely in proximity to electrical equipment. This SWP may also be used to provide electrical awareness level information to employees who do not normally work near electrical equipment but could be exposed to electrical hazards. The guidelines provided in this SWP will be used to develop specific Safe Job Procedures for recurring or anticipated electrical work or work near electrical hazards.

Scope

The conditions of this safe work practice shall be implemented and enforced at all work sites owned or operated by Richardson's Bulk Sales Ltd. This SWP applies to any workers who may be exposed to the hazards associated with electrical energy.

Procedure

1.0 Canadian Electrical Code and Required Electrical Practices

- The Canadian Electrical Code (CEC), Part 1, applies to electrical equipment and to the installation and application of equipment within a hazardous location. Electrical equipment includes lines, buswork, conduit switchgear, and any other electrical device. Richardson's Bulk Sales Ltd will verify that all electrical equipment and all operation and maintenance of electrical equipment meets the standards set out in the Code.
- Electrical equipment at upstream oil and gas facilities in Alberta must be designed, installed, and operated in accordance with the latest edition of the Canadian Electrical Code (CEC). The Alberta Code for Electrical Installations at Oil and Gas Facilities has been adopted in Alberta, British Columbia, Saskatchewan, and Manitoba for upstream facilities and supplements the CEC for these types of installations.
- **Employees are prohibited from working near energized high voltage equipment that cannot be de-energized and locked out.** Should the need for such work ever arise it can only be completed on an exception basis approved by management and subject to a job specific hazard assessment. Should such work ever be required it will be subject to all provisions of the CEC and provincial regulations including (but not limited to) the use of written approved procedures, appropriate insulating barriers and the use of arc flash PPE. Only trained qualified workers will be used or trained workers working under the direct supervision of qualified workers.

- While the respective Part within the Codes should be consulted for all electrical applications and work activities, the following are generally accepted safe work practices that will be implemented and enforced at all Company work sites.
- Hazard assessments will be carried out prior to beginning any work on or near electrical equipment, lines, or buswork. Work on or near any high voltage electrical equipment, as defined by the lesser threshold of the Canadian Electrical Code or the facility owner, will be identified as a specific hazard to be assessed, evaluated, and controlled prior to entering, accessing, or approaching any such high voltage equipment.

1. Richardson's Bulk Sales Ltd will ensure that only authorized competent persons (suitably certified, qualified, trained, and experienced) make repairs or carry out maintenance activities on any electrical equipment, lines, buswork, etc., regardless of the voltage classification. All unsafe appliances, lines, and electrical apparatus are to be reported immediately to a supervisor or are to be removed and repaired by a qualified tradesperson. Richardson's Bulk Sales Ltd will permit only competent, qualified electrical workers to construct, install, alter, repair, or maintain electrical equipment. Only qualified electrical workers may enter electrical rooms and enclosures containing live parts. Where work is to be performed on or near high voltage electrical equipment as defined by the Canadian Electrical Code, special training and precautionary measures are required. These measures may require specialized insulating PPE against arc-flash, other shielding and insulating materials, barriers, or shielded tools.
2. Richardson's Bulk Sales Ltd will mark or tag as unsafe and remove from service any equipment with damaged or defective electrical components (e.g., damaged power cord or plug) that may render it unsafe for use.
3. All employees shall be provided basic electrical safety training. Employees will be provided training on working safely with electricity, recognition of electrical hazards, prevention of electrical shock and arc flash, and recognition of electrical shock and arc flash hazard labels. Employees working near high voltage electrical equipment will be provided with awareness training specific to the hazards to which they might be exposed as well as safe approach distances required.
4. Richardson's Bulk Sales Ltd will ensure that electrical equipment shall be of a type and rating approved for the specific purpose for which it is to be used.

5. When used outdoors or in a wet or damp location, portable electrical equipment shall be protected by an approved, CSA-certified, ground fault circuit interrupter.

6. All operating electrical equipment shall be kept in a “safe and proper working condition”. Periodical documented inspections will be performed as to serviceability of all electrical equipment, including equipment dedicated to emergency service. Infrequently used electrical equipment shall be thoroughly inspected prior to activation.

7. All electrical equipment and electrical energy sources will be guarded and protected against mechanical injury, environmental damage, and accidental contact by means specified in the Canadian Electrical Code. This may include approved enclosures, height above ground, guard fences, and impact posts, etc.

8. Arc-producing electrical equipment installed outdoors must not be installed within one metre (3.3 feet) of any combustible gas relief device or vent.

9. Richardson's Bulk Sales Ltd will ensure that all electrical installations are constructed or installed so that the probability of the spread of fire is reduced to a minimum with respect to floors, hollow spaces, firewalls, or fire partitions, vertical shafts, ventilation, and air-conditioning ducts.

10. Potentially environmentally hazardous locations containing electrical equipment or enclosures will be rendered safe for human occupancy prior to opening any sealed electrical device, and the electrical device must be de-energized at the unit’s source of energy.

11. Where electrical equipment is required, only the equipment approved for the specific hazardous location shall be used.

12. A working space of one metre (3.3 feet) should be provided and maintained around the maintenance access and control panels to all electrical equipment. Flammable materials should not be stored in electrical control rooms nor in dangerous proximity to any electrical equipment.

13. Richardson's Bulk Sales Ltd will ensure that suitable illumination around electrical equipment has been provided so that inspection and maintenance activities can be conducted safely.

14. Richardson's Bulk Sales Ltd will ensure that adequate ventilation is provided and maintained to prevent the development around electrical equipment of ambient air temperatures in excess of those normally permissible for such equipment.

15. Ensure that rubber mats of the thickness and width specified in the CEC are of sufficient length to extend across the entire front of electrical switch panels containing open-type switches, and are in place for personnel to stand on while operating those panels. Mats will also be in place at the rear of panels with open-type switches where access to the rear of those panels is possible. Elevated platforms are to be in place where there is a chance of water accumulating around electrical panels.

16. Electrical equipment likely to require examination, adjustment, servicing, or maintenance while energized, shall be field marked to warn persons of potential electric shock and arc flash hazards. The markings shall be located so that it is clearly visible to persons before examination, adjustment, servicing, or maintenance of the equipment.

17. Richardson's Bulk Sales Ltd competent electrical workers will check switches or circuit breakers that are open to permit work on electrical equipment with a volt/ohm meter to ascertain that they are not live. Handles must be tagged and locked in the open position.

18. Before any work begins on an electrical conductor or electrical equipment (“electric work”) and during the progress of that work, Richardson's Bulk Sales Ltd shall ensure that the electrical conductor or electrical equipment is isolated, locked out, and connected to ground. If it is not reasonably practicable to de-energize electrical equipment before performing electrical work, alternative equivalent hazard controls must be implemented and approved before electrical work begins.

19. For work near high voltage equipment and within the safe limit of approach distances the equipment must be de-energized and locked and tagged out (LOTO). Workers must be trained in the LOTO procedure.

20. Non-electrically certified workers are, in any event, prohibited from working within the safe limit of approach of energized high voltage equipment. Any such work can only be performed by competent certified electrical workers under the provisions contained in this section and (1) above. A hazard assessment specific to the hazards posed by the high voltage equipment must be conducted and all specialized safety measures must be implemented as described in (1) above. Richardson's Bulk Sales Ltd non-electrical workers are prohibited from carrying out work within the safe limit of approach of high voltage equipment.

21. Richardson's Bulk Sales Ltd ensure that water, steam, or any conductive material is not used to clean any area near electrical motors or other electrical apparatus unless the power has been switched off and locked out.

22. Richardson's Bulk Sales Ltd competent workers will be assigned to periodically inspect and clean insulated tools and rubber protective devices. When these articles fail their inspection, they will be disposed of and replaced.

23. The path to ground from circuits, equipment, or conductor enclosures shall be permanent and continuous, shall have ample capacity to conduct safely any currents liable to be imposed on it, and shall have impedance sufficiently low to limit the voltage above ground and to facilitate the operation of the over-current devices in the circuit.

24. Richardson's Bulk Sales Ltd employees will be instructed to avoid stepping on or handling wiring. Workers shall eliminate such hazards by de-energizing and locking out the circuit(s) and restoring the wiring to its proper place.

25. Richardson's Bulk Sales Ltd workers must always operate electrical motors with the on-off switch. Never use the main disconnect switch for stopping a motor unless it is an emergency.

26. For the protection of personnel and equipment, ensure ground wires on all electrical equipment remain in place.

27. Ensure all electrical tools and equipment are grounded and/or bonded.

28. Do not remove ground plugs from extension cords. Cords that are frayed or have visibly faulty insulation must be discarded. Richardson's Bulk Sales Ltd shall ensure that an electrical extension or power supply cord used for supplying energy to any electrical equipment:

    - Is approved for the intended use and location of the electrical extension or power supply cord;
    - Is fitted with approved cord end attachment devices that are installed in an approved manner;
    - Is provided with a grounding conductor;
    - Is maintained and protected from physical or mechanical damage; and
    - Is plugged into an approved GFCI plug adapter or GFCI receptacle (if used in a damp location).

29. Cover or elevate temporary electrical cords or lines. Cords or lines must be kept clear of walkways and other areas where they may be exposed to damage or create a tripping hazard.

30. Always treat electrical equipment as if it is live.

31. Richardson's Bulk Sales Ltd will ensure that suitable signs are located on buildings, electrical equipment, equipment, and machines which read “DANGER - HIGH VOLTAGE” where the voltage is 750 volts or more, or any lesser threshold as established by facility site owners.

32. PPE requirements within the arc flash boundary shall be determined by completing an arc flash hazard analysis. PPE must cover the entire body when working within the arc flash boundary. This may include but is not limited to an arc flash suit with face shield, safety glasses, non-conductive head protection, and leather gloves and footwear. Rubber insulating gloves shall be worn for protection from electric shock due to inadvertent contact with an energized electrical conductor or circuit parts. For more information, please refer to CSA Standard Z462. Other special provisions may be required for work on or near high voltage equipment as determined by a hazard assessment.

33. Lithium batteries may explode or catch fire and cause injury if they are defective, are of poor quality, are built improperly, are used or charged improperly, or have been damaged. Workers who wear or use lithium battery powered devices can be injured if the battery catches fire or explodes. Lithium batteries must be removed from service when they are damaged or suspected of being damaged. Remove the battery and/or device if it becomes unusually warm or there is any other indication of a problem. All manufacturer recommendations concerning the storage, charging, use, and care of lithium batteries must be followed. Only use manufacturer approved batteries and manufacturer specified battery chargers certified by a national testing laboratory or equivalent. Remove batteries from chargers after they are charged.

2.0 Power Lines

2.1 Overhead Power Lines

Workers must not allow their equipment to approach overhead power lines any closer than the limits shown below:

Operating voltage of overhead power line between line conductors unless otherwise specified	**Safe limit of approach distance for persons and equipment**
0 - 750 V insulated or polyethylene covered conductors (1)	0.3 m

0-750 V bare, un-insulated\	1.0 m
Above 750 V insulated conductors (1) (2)	1.0 m
0.75 kV - 40 kV	3.0 m
69 kV, 72 kV	3.5 m
138 kV, 144 kV	4.0 m
230 kV, 240 kV	5.0 m
500 kV	7.0 m
500kV DC Pole-Ground	7.0 m

1. **Note:** [1]Conductors must be insulated or covered throughout their entire length to comply with this group.

   [2]Conductors must be manufactured to rated and tested insulation levels.

When work is to be conducted in the vicinity of an energized overhead power line, proceed as follows:

- Before work is commenced within seven metres (23 feet) of an energized overhead power line, examine the site for the possibility of conflict between mobile equipment and the power line;
- Prior to conducting the intended activity, the utility operator MUST be notified;
- Where work is being carried out near the limits set out in the above table, assign a safety watcher or flagman to assist in the work to ensure that the safe limit of approach is not violated; and
- Where the safe limit of approach cannot be maintained, the work site supervisor shall:
  - Notify the utility authority and request assistance, and
  - Cease all work until a utility line operator is on-site and provides guidance and assistance as the circumstance dictates.

2.2 Underground Power Lines

When work is to be conducted in the vicinity of an energized underground power line, proceed as follows:

- Before conducting excavation work, contact the local power authority for detailed maps identifying the underground electrical power line. Also, contact the applicable provincial One-Call centre for information on any other underground utilities. The location of any underground power lines must be suitably marked by flagging at strategic locations on the ground, and
- When any excavation is likely to be located within one metre (3.3 feet) of an underground power line, the work site supervisor must notify the appropriate utility company before disturbing the ground and request qualified, on-site direction of the work. Appropriate signs, barricades, warning lights, or any other safety measure should be used to safeguard the excavation(s). Ensure all safety measures are documented and retained on file.

3.0 Static Electricity

Sparks, resulting from the accumulation of electrical energy, may provide an ignition source for fires and explosions. A static charge can be generated from friction resulting from the passage of liquids in piping; the pouring of liquid from one container to another; the flow of air, gas, vapour, steam, water, moving belts, or flywheels; or simply by walking on surfaces or the rubbing of clothing and fabrics.

Richardson's Bulk Sales Ltd will provide:

- Pertinent information and training regarding static electricity to those workers likely to be exposed to the hazards associated with electrical static discharge near flammable materials or in explosive atmospheres, and
- Workers with training regarding the origin of static charges which workers may encounter at Richardson's Bulk Sales Ltd worksites, the hazards which these may present, and the general methods recommended for its control and dissipation.

Precautions which Richardson's Bulk Sales Ltd workers may be instructed to take while conducting work where the potential for a static discharge exists, may include:

- Wearing clothing that reduces the potential for static accumulation;
- Discharge any accumulation of static energy that may be contained on the body by touching a ground source prior to conducting any activity near flammable materials or within a potentially explosive atmosphere;
- Ensuring that all process equipment/machinery is suitably grounded and/or bonded; and
- Operating valves or flow control devices as instructed to reduce the potential for static electricity discharge.

Grounding eliminates a difference in potential between an object and the ground. Bonding eliminates a difference in potential between two objects. Grounding and bonding systems must

follow manufacturer requirements, be designed and installed by competent person and be checked by a competent person on a regular basis.

References

- C22.1-15, Canadian Electrical Code, Part 1, Safety Standards for Electrical Installations.https://store.csagroup.org
- Alberta Safety Codes Council, "Code for Electrical Installations at Oil and Gas Facilities", Alberta Queens Printer.
- National Building Code of Canada 2010 – NCR-IRC.http://www.nrc-cnrc.gc.ca/eng/publications/codes_centre/2010_national_building_code.html
- Natural Disasters – Electrical Storm Safetyhttp://www.ready.gov/thunderstorms-lightning
- BC OHS Regulations – Part 19 – Electrical Safety.https://www.worksafebc.com/en/law-policy/occupational-health-safety/searchable-ohs-regulation/ohs-regulation/part-19-electrical-safety

Employers' Quick-Guide to Controlling COVID-19 Risks

Purpose

Government Health Services have the ability to issue a notice of closure to establishments who are not able to:

- Provide evidence of appropriate COVID-19 controls to prevent the risk of transmission of the infection to staff and members of the public by a worker or member of the public;
- Provide for rapid response if a worker or member of the public develops symptoms of illness while at the place of business; and
- Maintain high levels of workplace and worker hygiene.

The purpose of this document is to help you navigate through the requirements for reopening your establishment safely, and meet required regulations and guidelines relating to COVID-19.

This is a guidance document which should be used together with the COVID-19 Management Plan and associated Forms.

Procedure

1.0 Documentation

The policy and procedure will provide you with a plan on what you need to do to reopen safely.

- Print off the COVID-19 Policy:
    - Managers should sign and date the policy, and

    - Post the policy at the entrance to show customers what your business is doing to keep them safe.

- Review the COVID-19 Management Plan.
- Provide all workers with access to the COVID-19 procedures via the InUnison platform.

2.0 COVID-19 Hazard Assessment

Employers are required to conduct a systematic risk assessment to help identify hazards in the workplace, and how they may put workers and customers at risk.

- Download the COVID-19 Hazard Assessment Form.
- Complete the form by following the instructions on the form.

3.0 Controls to Reduce COVID-19 Risk

Using the completed Hazard Assessment form implement controls identified.

- Put up signage and posters for 2 metre social distancing and hygiene expectations:
    - There are multiple posters available in the FORMS section of the InUnison platform that you can download.
- Place hand sanitizer at the entrance of your business and encourage guests to use when entering and leaving.
- Increase cleaning and disinfecting schedules (see COVID-19 Management Plan).
- Ensure that occupancy is kept at 50% maximum occupancy and 2 metre social distancing is achievable. Remove excess seating.
-

Ensure appropriate personal protective equipment and hygiene supplies are available.

- Use the PPE and Related Hygiene Materials Inventory Form available in the FORMS section of the InUnison platform that you can download.

4.0 Training Requirements

- Provide communication and training to all staff on COVID-19 risk controls:
  - Use the COVID-19 Training and Acknowledgement Form available in the FORMS section of the InUnison platform that you can download. This will provide evidence of COVID-19 specific training.
- Provide training on Company specific procedures (e.g. traffic flow, food handling, service, handling payments etc.).

5.0 Pre-screening Process

To ensure compliance and reduce the risk of closure by government health services employers need to have a process that can identify staff working at their establishment are not systematic and a process on how to manage a situation if a staff member is symptomatic:

- Provide all workers with access to the COVID-19 procedures via the InUnison platform;
- Train staff on the use of the COVID-19 Self- Assessment System on the InUnison platform; and
- Train managers on what they need to do if a worker answers **YES** to any of the self-assessment questions. Refer to the COVID-19 Management Plan: Section 4.0 COVID-19 Symptomatic, Infected, and Exposed Workers.

6.0 COVID-19 Workplace Inspection Form

The COVID-19 Workplace Inspection will provide you with a daily guide on what you need to have in place prior to opening your establishment.

- Follow the instructions on the COVID-19 Workplace Inspection available in the Events section of the InUnison platform that you can download.
- Complete the COVID-19 Workplace Inspection form to ensure that you have everything in place before you reopen your establishment to the public.

Environmental – General Waste Management

Purpose

Richardson's Bulk Sales Ltd may generate waste in the normal course of carrying out its work activities. Waste that is generated by Richardson's Bulk Sales Ltd must be characterized and disposed of or recycled in the most environmentally acceptable manner reasonably available. The purpose of this safe work practice is to define the processes by which waste is characterized and managed on both Company and client work sites.

Scope

This practice will be applied to all Richardson's Bulk Sales Ltd work sites. This procedure applies to the production, handling, safe storage, transport, collection and disposal of all waste generated by Richardson's Bulk Sales Ltd, both hazardous and non-hazardous.

Definitions

Waste: Any solid or liquid material or product or combination of them that is intended to be treated or disposed of but does not include recyclables (Alberta Waste Control Regulation). This includes wastewaters and waste fluids.

Hazardous waste: Waste that has one or more of the properties described in Schedule 1, but does not include those wastes listed in Schedule 2 (Alberta Waste Control Regulation).

Waste: Under the “Activities Designation Regulation”, for the purpose of determining whether a Registration is required under the Alberta Environmental Protection and Enhancement Act); – “An unwanted substance or mixture of substances and includes refuse and garbage “

Substance: Any matter that is capable of becoming dispersed in the environment (Alberta Environmental Protection and Enhancement Act).

Oilfield waste: Waste that results from the construction, operation, or reclamation of a well site, oil and gas battery, gas plant, compressor station, crude oil terminal, pipeline, gas gathering system, heavy oil site, oil sands site, or related facility and includes any such wastewaters or fluids (Alberta Waste Control Regulation).

Procedure

1. Richardson's Bulk Sales Ltd will estimate the waste that will be generated prior to work being performed so that the need for tanks, containers, and waste removal, if necessary, can be determined.

2. Richardson's Bulk Sales Ltd will use the most efficient material management system that is reasonably practicable to reduce the impact on the environment by limiting the amount of materials that are used, left over as waste, or transported.

3. Richardson's Bulk Sales Ltd will specify if the same wastes or scrap materials are generated for every project. Similarly, it will also specify if Richardson's Bulk Sales Ltd expects non-routine wastes to be generated during a particular project.

4. If Richardson's Bulk Sales Ltd is performing work on a client's site, Richardson's Bulk Sales Ltd will:

    - Establish a plan with the designated project or owner to ensure proper disposal of wastes, oilfield wastes, wastewater or fluids, and/or scrap or solid waste materials;

1.
    - Ensure that the owner has been informed that wastes, wastewaters, and/or solid waste materials have been or might be generated;

    - Determine with the owner how the waste is to be segregated, characterized, and how its hazardous classification will be determined;

- Determine with the owner who is approved to characterize the waste, what site licenses, permits, approvals, and regulations apply to the waste and how, and by whom, the waste will be taken off site;
- Ensure that only regulated carriers will be used to transport hazardous or non-hazardous waste as approved by the owner and according to applicable legislation;

1. • Ensure that no waste will be generated, stored, moved, or disposed of without having a waste handling and disposal plan which is approved by the site owner and is compliant with all applicable site licenses, permits, and legislation; and

1. • Ensure that only facilities which are specifically authorized to dispose of the waste generated (hazardous or not) will be used.

1. • The content of any wastewater that is generated must be known before discharging or sending off site. All wastewater must be segregated and characterized according to environmental regulations and site permitting requirements as described in point 4. If the contents of the wastewater are hazardous then the wastewater must be disposed of in a facility authorized to dispose of hazardous waste.

5. Richardson's Bulk Sales Ltd will assign a person accountable for disposition of wastes generated at all work sites.
6. Richardson's Bulk Sales Ltd will establish safe practices required to establish the immediate storage and handling of waste, scrap, or leftover materials.
7. Richardson's Bulk Sales Ltd will ensure that gloves and/or other PPE are worn while handling waste as identified by a hazard assessment. If specialized PPE or other precautions are necessary to handle waste, these will be identified.

8. Richardson's Bulk Sales Ltd will ensure that project-related wastes are stored and maintained in an organized fashion to encourage proper disposal and minimize risks to employees. Proper waste receptacles must be provided for trash and materials that may be reused or recycled during a project.

9. Richardson's Bulk Sales Ltd will encourage proper segregation of waste materials to ensure opportunities for reuse or recycling.

10. Employees and contractors who might be involved in waste handling and disposal will be instructed through in-house or third-party training programs on the proper handling, storage, and disposal of wastes and wastewater. This may consist of general instruction on disposal of wastes and wastewaters characterized as non-hazardous or other non-hazardous trash, or scrap materials. If wastes generated are un-classified or classified as hazardous, then employees will be trained as to the specific nature of the potential hazards and all the handling, storage, and disposal requirements. Records of this training will be maintained.

1.0 Waste Inventory

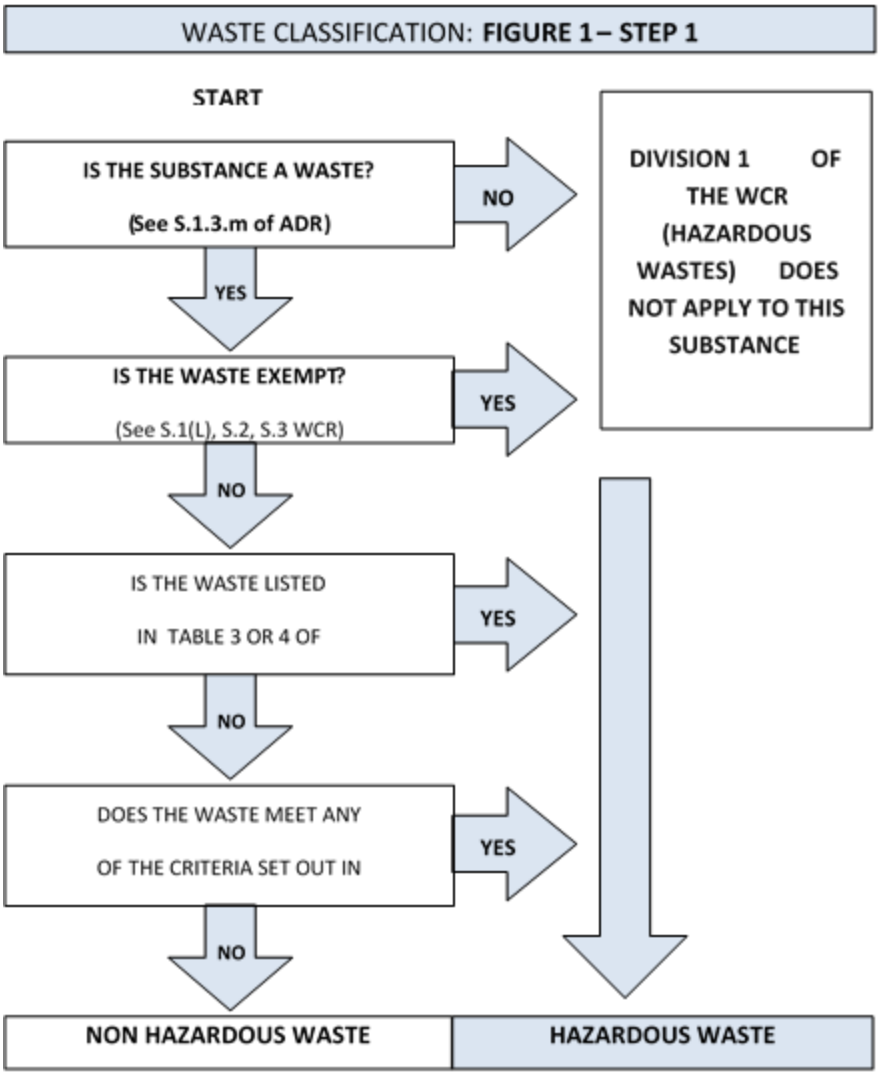
1. Richardson's Bulk Sales Ltd will review all of its normal activities and prepare a list of all wastes generated. Using this list, guidelines will be provided regarding how to dispose, reuse or recycle the various waste streams.

2. The Waste Control Regulation – Waste Classification Fig 1, will be used to assist in the classification of wastes on the list.

3. The person responsible for the disposition of wastes will be designated as the Waste Management Coordinator (WMC). The WMC will review the list annually to confirm that it is complete and accurate.

4. The WMC will conduct an annual review of the waste list and establish goals for minimizing or eliminating these wastes.

5. Where new equipment or processes are considered, the generation of wastes resulting from their use will be part of the pre-purchase assessment.



2.0 Guidelines for Waste Handling

The Waste Management Coordinator, in conjunction with the HSE Department, will perform a hazard assessment dealing with the handling of wastes and, where applicable, will establish the Safe Job Procedures required to ensure the safe handling, storage and transportation of the wastes.

In addition to the safe work practices, the Waste Management Coordinator will determine appropriate contractors who can provide transport and disposal services for each of the classified wastes and will pre-approve these groups prior to waste generation.

The following guidelines will be followed when establishing waste handling procedures:

1. Items classified as waste will be handled according to legislative requirements;
2. Organic non-hazardous waste (grass clippings) will be minimized through on-site composting wherever practicable;
3. When reasonable waste will be compacted before being placed in a storage container for off-site disposal/recycling;
4. All waste will be stored in a safe and secure manner pending collection by approved third party contractors for recovery, recycling, or disposal;
5. Access to waste containers will be restricted to Richardson's Bulk Sales Ltd's designated employees, contractors, and contracted waste collection contractors;
6. Liquid wastes shall be stored in containers appropriate for the properties of the waste. Liquid waste containers will be stored in a suitably dyked area according to regulated requirements and best practices;
7. Electronic equipment waste shall be appropriately labelled and stored securely pending disposal. The Waste Management Coordinator, in conjunction with the IT department, will ensure that all Company documents are secure and that any IT equipment has been securely and permanently stripped of all Company information;
8. The Waste Management Coordinator will ensure that all paperwork is shredded securely;
9. At Company locations for the segregation of waste for recycling, the containers will be clearly and appropriately labelled;
10. Audits and inspections will be conducted to establish regulatory compliance; and
11. Where reasonable, wastes will be evaluated and reused or recycled.

3.0 Oilfield Waste

Richardson's Bulk Sales Ltd will determine if any waste generated is “Oilfield waste”. The Alberta Energy Regulator (AER) regulates the management of oilfield wastes under the authority of the Oil and Gas Conservation Act and the Oil and Gas Conservation Regulations. The details regarding the management of oilfield wastes at the generator’s facility site, the transportation of oilfield wastes on Alberta’s public roads, and the treatment and disposal of oilfield wastes at waste management facilities are dealt with through AER directives and include:

- Directive 050 Drilling Waste Management;
- Directive 055 Storage Requirements for the Upstream Petroleum Industry;
- Directive 058 Oilfield Waste Management Requirements for the Upstream Petroleum Industry;
- ID 96-03 Oilfield Waste Management Requirements for the Upstream Petroleum Industry;
- ID 99-04 Deposition of Oilfield Waste into Landfills; and
- ID 2000-04 An Update to the Requirements for the Appropriate Management of Oilfield Wastes.

If Richardson's Bulk Sales Ltd characterizes any waste as “Oilfield Waste” then it will follow the AER requirements for identifying and disposing of the waste.

4.0 Environmental Sustainability and Best Practices

Whenever reasonably practicable Richardson's Bulk Sales Ltd will undertake to ensure that its work and operations minimize adverse impacts on the environment and maximize environmental sustainability.

4.1 Climate Protection and Greenhouse Gas (GHG) Emissions

Richardson's Bulk Sales Ltd will consider climate protection by using energy conservation measures whenever possible and reducing emissions of GHG where reasonably practicable. This includes limiting the amount of greenhouse gases by:

- Favouring the use of low-emission technologies;
- Driving less or carpooling;
- Favouring the use of renewable energy;
- Shutting down equipment when it's not in use;
- Use of energy efficient light bulbs;
- Using new energy efficient technology; and
- Using equipment with the ENERGY STAR mark.

4.2 Product Purchasing Considerations

Richardson's Bulk Sales Ltd will take into consideration the impact a product has on the environment before purchasing.

Preference will be given to products that have a reduced impact on the environment such as:

- Products made of recycled material;
- Products which can be efficiently recycled or re-used;
- Products, equipment or processes that are more energy efficient; and
- Products, equipment or processes that emit less GHG or other harmful substances.

4.3 Vehicle Operation

Richardson's Bulk Sales Ltd will encourage efficient use of vehicles and other internal combustion engines which emit GHGs and harmful substances.

Considerations will include:

- Vehicles and equipment repair with up-to-date preventative maintenance and incorporation of environmental improvements as they become available;
- Vehicles and equipment will not be left idling or running unnecessarily;
- Vehicles will use alternative fuels with lower GHG emissions where possible; and
- The most energy efficient and cleanest burning vehicles and equipment will be used when possible.

4.4 Natural Habitat Protection

- Richardson's Bulk Sales Ltd will consider plant and animal habitat protection in its work and processes. Low environmental impact activities and processes will be favoured as will those activities which minimize habitat disturbance.
- When activities may affect the local animal or plant population or habitat, a plan shall be in place to minimize any environmental impact to them.

4.5 Water Conservation

Richardson's Bulk Sales Ltd will use water conservation measures whenever reasonably practicable. Measures may include repairs on any equipment leaking water, encouraging equivalent processes that use less water and upgrading water consuming equipment or processes.

References

- Alberta – Environmental Protection and Enhancement Act.http://www.qp.alberta.ca/574.cfm?page=E12.cfm&leg_type=Acts&isbncln=9780779735495
- Alberta User Guide for Waste Managers.https://open.alberta.ca/publications/1707400
- Alberta Waste Control Regulation.http://www.qp.alberta.ca/1266.cfm?page=1996_192.cfm&leg_type=Regs&isbncln=9780779732531
- Regulations and Guidelines to the Alberta Environmental Protection and Enhancement Act.http://www.qp.alberta.ca/documents/Acts/E12.pdf
- Alberta – Environmental Protection and Enhancement Act.http://www.qp.alberta.ca/1266.cfm?page=E12.cfm&leg_type=Acts&isbncln=9780779735495

Environmental – Spill Prevention and Response

Purpose

Liquid spills may be difficult to observe and contain and have the potential to contaminate groundwater and waterways. This safe work practice establishes best environmental practice guidelines for managing liquids and drainage at Richardson's Bulk Sales Ltd worksites. Richardson's Bulk Sales Ltd will use this SWP to generate site-specific procedures for managing and controlling the possibility of spills. This safe work practice will also establish environmental continuous improvement strategies to eliminate spills.

Scope

This safe work practice will be applied at all Richardson's Bulk Sales Ltd work sites. This SWP will be applied to property and building drainage, municipal sewers, storage of bulk and packaged liquids and all Company activities which could potentially result in a spill.

Definitions

Separate Drainage System: These consist of segregated collection points or drains which flow to separate systems. Normally this is done to separate a source of water which has the potential to be contaminated from rain or surface water. The contaminated system carries sewage, washings and other effluents safely to a holding facility. They are then evaluated, treated, pumped out for disposal, or put into a municipal sewage system. The surface or clean water drains should only carry uncontaminated rainwater but may still be held for evaluation before being sent to storm sewers or natural waterways.

Combined Drainage System: Has one drain, which carries both contaminated and surface water to a holding, evaluation or treatment facility.

Procedure

1.0 Site Drainage

Drainage Plans and Guidelines:

- Richardson's Bulk Sales Ltd will identify every manhole or collection point on industrial and commercial site and characterize it as being connected to contaminated, surface, or combined drains;
- Richardson's Bulk Sales Ltd will produce a drainage plan of the site, which accurately identifies all drains and which is readily accessible;
- Richardson's Bulk Sales Ltd will check drainage plans before any new building or site work is carried out to ensure that the proper connections are made to the right drainage system. Drainage plans will be updated to reflect any alterations, additions or amendments to the drainage system;
- Drains will be identified using an appropriate system. All Richardson's Bulk Sales Ltd employee and contractors will be trained in the meaning and use of the marking system;
- All underground services should be sealed in accordance with the drainage plan so that they do not create uncontrolled drainage routes; and
- The drainage plan will include isolation facilities, such as penstocks, valves, or containment systems in areas where rainwater or liquid releases may result in contamination. The operation of these isolation facilities will be included in the site emergency procedures.

2.0 Material Handling and Storage

Richardson's Bulk Sales Ltd will ensure that a spill risk assessment is carried out for storage and material handling activities normally undertaken such as delivery, loading, unloading, and transfer of

materials (particularly hazardous substances). The risk assessment will be used to determine spill prevention control methods. Employees carrying out or responsible for this work will be trained in the spill control measures and how to recognize and report a spill hazard.

Handling of Materials:

Richardson's Bulk Sales Ltd will carry out material handling activities in the following manner to reduce the risk of spills:

- Ensure all loading and unloading areas are designated, clearly marked, and physically isolated from surface water drainage systems;
- Minimize the quantity of liquids stored on site;
- Ensure that delivery containers and piping is designed to minimize the possibility of spills and complies with all regulations for the liquids in question. Storage levels and other process conditions must be designed with fail safes to prevent spills from overfilling or overpressure;
- Fit appropriately sized drip trays to all delivery pipe inlets and remove any spilled material immediately;
- Transfer of liquids should use flow and pressure control devices to regulate and stop the flow;
- Reducing the need for materials to be moved around the work site lowers the risk of accidents or spillage. Transfer routes should be identified and kept clear at all times, the potential for environmental damage assessed, and risk reduction measures carried out;
- An emergency spill plan must be in place and all employees must be trained in their responsibilities in the event of a spill or related incident. The emergency spill plan must include the requirements for and location of emergency supplies such as: drain covers, absorbent materials, and PPE require to respond to spills; and
- The emergency spill plan must specify how spilled materials are to be disposed of according to the regulations which govern them.

Storage of Materials:

Storage hydrocarbons, chemicals, and other materials can create a spill risk. Storage containers and packages such as tanks, semi-bulk units (SBUs), drums and pails must be managed to reduce the risk of spills. These containers must be located, designed and maintained appropriately. Secondary containment systems, impervious collection areas and separate drain systems will be evaluated in order to control spills from reporting off site or causing environmental damage.

Richardson's Bulk Sales Ltd will carry out material storage activities in the following manner to reduce the risk of spills:

- Containers will be clearly labelled with product type, maximum capacity, and required health and safety information;
- Chemical substances will be stored in appropriate containers to minimize the potential for a spill. Whenever possible, chemicals will be kept in closed containers and stored so they are not exposed to storm or rain water;

- Storage facilities will be located so as to minimize the effect of any spill and away from watercourses, open drains, unsurfaced areas, or porous surfaces;
- Containers will be protected from impact damage where a hazard assessment has determined that control measures are required;
- Storage tanks and SBUs for chemicals and hazardous materials must have a secondary containment system that is capable of holding at least 110% of the tank's maximum capacity or for multiple tanks as required by the appropriate environmental regulations or the nature of the hazard. It must be impermeable to the material stored, enclose the ancillary equipment, and have no drain-down outlets or connection to the environment;
- Secondary containment for drum storage will be provided when appropriate. The capacity should be 25% of the total volume of the drums being stored depending upon the hazard and frequency of inspection;
- Controlling spills from containers beyond the secondary containment system can be minimized by proper design and control methods as determined by a hazard assessment;
- Preventative maintenance and regular inspections of storage facilities and piping will be carried out and deficiencies addressed promptly;
- Regularly remove rainwater that may have collected within open containment systems. This wastewater may be contaminated and must be disposed of appropriately in accordance with waste management legislation;
- Underground piping and storage will be minimized as leaks and spills are more difficult to detect and can lead to chronic groundwater contamination. If pipes and storage is used underground best design practices must be used for leak detection and prevention;

- Provide security measures for the work site and storage areas to prevent vandalism and theft. Storage system valves, taps, hatches or lids, and delivery hoses should be locked shut when not in use. Where possible, materials should be stored in secure buildings; and

- Leak-detection and groundwater monitoring should be used as required by environmental permits or as control measures from hazard assessments.

3.0 Process Effluents

Liquid effluents that result from commercial or industrial activities may be referred to as “process effluents” and should be segregated, evaluated and disposed of in an approved manner. Untreated or untested process effluents should not be discharged to the surface water system. Most industrial effluents will be controlled by, and subject to, environmental permitting. Richardson's Bulk Sales Ltd will follow the following guidelines when establishing specific procedures for those effluents which are generated through incidental daily activities, and rainwater which has come in contact with its processes:

- All process effluents will be disposed of in an approved manner, including:
    - Compressor blowdown;
    - Cooling water - Steam condensates;
    - Boiler blowdown;
    - Air conditioning; and
    - Run-off from washing activities.

- All washing and/or cleaning operations will be carried out in a clearly marked, designated area. This includes cleaning vehicles or other mobile equipment;
- Isolate all cleaning or wash-down areas from the surface water system and subsurface ground or porous surfaces by using drainage collection points and curbs. Wash water should be disposed of according to provincial and local regulations. Ensure that all contractors and/or cleaners know where they can dispose of waste waters properly;
- Cleaning agents may not be approved for discharge to surface water drains or municipal sewer systems. Do not allow detergents to enter any approved oil separators as the oil will be washed through;
- If yard areas are cleaned, do not allow the run-off to enter surface water drains;
- Ensure that mobile washers and degreasers are operated only in an area isolated from the surface water system;
- Before any dewatering takes place, the collected water should be tested to determine its quality and the most appropriate disposal option; and
- Silty water should never be pumped directly to a river or surface water drain. Follow all environmental regulations and permit requirements.

4.0 Spill Prevention and Emergency Training

Richardson's Bulk Sales Ltd will provide Training to all employees in the areas of environmental awareness, spill prevention procedures, and spill emergency response. This training will take into account:

- Richardson's Bulk Sales Ltd's environmental protection policy and commitment to protecting the environment;

- Employees specific responsibilities for emergency procedures;
- Employees must be instructed on the proper response procedures for spilled materials. Training will include the materials available for use, proper waste disposal, and communication procedures;
- Contractors will be trained in the relevant environmental requirements and emergency procedures before starting work;
- Incident response plans will be tested by carrying out simulations and exercises for all those who have responsibilities under the plan;
- Spill kits will be maintained at Company owned facilities, worksites, and vehicles which contain the appropriate supplies for any materials that may be spilled. Supplies will be easily accessible when required, and considerations will be made for both the type and quantity of materials;
- Richardson's Bulk Sales Ltd will designate those employees who are responsible to regularly check and maintain routine and emergency spill control and prevention equipment and devices. Richardson's Bulk Sales Ltd shall ensure the availability of adequate spill response supplies through these periodic inspections in order to assess their availability and adjust inventories as necessary;
- Train employees in the procedures for the recovery, handling, and disposal of all waste materials that may arise from incidents or emergencies; and
- Instruct employees on when and how to alert the regulatory authorities in the event of a reportable spill which may harm people, property or the environment.

5.0 Spill Response Action Plan

The following steps should be taken if a spill of a harmful substances occurs which may harm people, property, or the environment. These steps will be used to develop specific emergency response plans for the substances which Richardson's Bulk Sales Ltd uses or generates and the processes which it employs:

1. Ensure Safety
    - Ensure personal/public, electrical, and environmental safety;
    - Wear appropriate Personal Protective Equipment (PPE);
    - Never rush always determine the product that spilled before taking action;
    - Warn people in the immediate vicinity; and
    - Ensure that there are no ignition sources if the spill is of a flammable material.
2. Stop the Flow if safe to do so
    - Act to reduce the risk of environmental impacts;
    - Close valves, shut off pumps, or plug holes/leaks, set containers upright; and
    - Stop the flow of the spill at its source.
3. Secure the Area
    - Limit access to the spill area, and
    - Prevent unauthorized entry onto the site.
4. Contain the Spill
    - Block off and protect drains and culverts;
    - Prevent spilled material from entering drainage structures (ditches, culverts, drains);
    - Use a spill sorbent material to contain the spill;

- If necessary, use a dike or any other method to prevent any discharge off site;
- Make every effort to minimize contamination; and
- Contain the spill as close to the source as possible.

5. Notify/Report:

- Notify the appropriate Company supervisor of the incident and provide spill details, including:
  - Spill location;
  - Material and quantity spilled;
  - Extent of pollution;
  - Precautionary measures taken; and
  - Suspected causes of the spill.
- The supervisor will advise Company management who will initiate external calls according to spill reporting requirements; and
- Complete a Company Incident Report.

6. Clean-Up

- The spill cleanup may be coordinated with the assistance of outside technical experts and will be done in accordance with all legislated requirements.

7. Telephone Numbers

- Alberta Energy Regulator (AER): 1-855-297-8311, 1-800-222-6514 (24 hour emergency);
- Alberta Environment Pollution Control Emergency: 1-800-222-6514;
- Saskatchewan Environment: 1-306-787-9563; and

- BC Provincial Emergency Program: 1-800-663-3456.

References

- Government of Canada - Pollution Prevention Planning Fact Sheets. https://www.canada.ca/en/environment-climate-change/services/pollution-prevention/planning/fact-sheets.html

Environmental Reporting (Spills and Releases)

Purpose

Richardson's Bulk Sales Ltd has a responsibility to protect the public, property, and the environment. Richardson's Bulk Sales Ltd could become involved in a spill or release, which has the potential to create a loss. Richardson's Bulk Sales Ltd has developed this SWP in order to provide guidelines for developing the specific reporting of likely release emergencies and to have these in-place in order to quickly notify the appropriate authorities and emergency responders.

Scope

This SWP applies to all company employees at any company owned facility or location, worksite or roadway. This SWP applies to any employee if they witness a spill or release, where they have care and control of a spill or release, or where their product or process is involved in a spill or release. Refer to Emergency Spill Response Plans.

Procedure

1.0 Corporate Spill Reports

A Corporate Spill Report must be completed and submitted for:

- Any spill or release that is reportable under health safety and environmental regulations or permits;
- Any spill of an undetermined volume or of any unrecoverable volume;

- Any spill off-lease or off company-controlled premises including all spills reportable under TDG regulations;
- An unrecovered spilled substance likely to contaminate surface or ground water;
- Ground water and/or surface water contamination;
- A release or spill that may result in odour complaints from residents or area users;
- A toxic or flammable release to the air which may travel off the company's premises or operations; and
- A release that is receiving, or that may result in, media attention.

Any spill that does not meet the regulatory reporting criteria will be reported as an environmental incident.

1.1 Reports to Alberta Environment and Parks (AEP)

Any release that "has caused, is causing, or may cause an adverse effect. An "adverse effect" is defined as "impairment of or damage to the environment, human health or safety, or property" and must be reported under the Alberta Environmental Protection and Enhancement Act (AEPEA). Richardson's Bulk Sales Ltd is required to verbally notify Alberta Environment and Parks – Environmental Response Centre immediately.

The Alberta Release Reporting Regulation sets out what must be reported, how and to whom reports must be made.

1.2 Telephone Numbers

- Alberta Energy Regulator (AER): 1-855-297-8311.
- Energy/Environmental Emergency & Operational Complaint Line: 1-800-222-6514.

All reportable releases are reported through the 24-hour Energy/Environmental Emergency Line. The reports will be disseminated to the appropriate regulatory body (e.g., the AER or AEP) based on the activity, location, and extent of the release.

If unsure about substances, quantities, or levels the release should be reported.

1.3 Release Reporting Requirements - Regulations

Specific release reporting requirements are outlined in the:

- Oil and Gas Conservation Rules (OGCR), sections 8.050, 8.051, 8.190;
- The Pipeline Act, section 35; the Pipeline Rules, section 76;
- The Oil Sands Conservation Rules (OSCR), section 13;
- The Environmental Protection and Enhancement Act (EPEA), part 5 and section 110; and
- The Release Reporting Regulation, section 3.

These rules and regulations must be consulted for specific release reporting requirements.

2.0 Hydrocarbon and Oil and Gas Product Releases – AER and Alberta Environment Coordination (see Tables 2 & 3).

Spills or releases of substances regulated by the Oil and gas Conservation Act may need to be reported to the AER. This section is designed to provide the necessary guidelines and direction to develop environmental spill and release reporting procedures specific to the substances and operations' of Richardson's Bulk Sales Ltd.

Releases that meet certain criteria must be reported immediately. To report a release related to an energy development, call the 24-hour Energy/Environmental Emergency and Operational Complaint Line at 1-800-222-6514.

2.1 Unrefined Hydrocarbon Product Releases - AER

The release of these substances may be regulated by the Alberta Energy Regulator (AER):

- Conventional crude oil;
- Sour gas;
- Other produced fluids;
- Produced water;
- Synthetic crude;
- LPG;
- Dilutents;
- Pipeline breaks; and
- Incidents involving oilfield wastes.

2.2 Immediate AER Reporting

The following releases must be immediately reported (verbally by telephone) to the Energy/Environmental Emergency & Operational Complaint Line:

- A release in excess of 2 m^3 **on** a Company lease or other property or any release **off** a Company lease or other property;
- Any release from a pipeline;

- Any release, on or off a Company lease, or any size of release that may cause, that is causing, or that has caused an adverse effect;
- A release of a substance at, or in excess of, the amount listed in Table 1 below from the Transportation of Dangerous Goods (TDG) Regulations – Part 8 - https://www.tc.gc.ca/eng/tdg/publications-guide-1300.html;
- A substance listed in Table 1 of the TDG Act that is released into a watercourse, groundwater, or surface water in any amount; and
- Any cumulative releases (small spills which when undetected over a period of time, may accumulate, and have an adverse effect on the environment).

2.3 Refined Product Releases

For releases of refined products (e.g., Diesel, Gasoline, Sulphur, Solvents), Richardson's Bulk Sales Ltd is required to verbally notify the Alberta Environment and Parks Pollution Control Division (PCD) immediately upon becoming aware of a release (Release Reporting Regulation of the EPEA).

2.4 Reporting Releases (AER)

A release of an unrefined or refined substance that may cause, is causing, or has caused an adverse effect must be reported to the AER. In accordance with the OGCR, section 8.050(3); the Release Reporting Regulation, section 4; and the Pipeline Rules, Part 8, licensees must complete the release report and provide it to the regulator (in this case, the appropriate AER field centre) within seven days of the incident. In addition, at any time during incident cleanup or remediation, the AER may request an updated release report. Before the AER closes an incident file for a release, the licensee must submit a final release report.

3.0 Gases, Flaring, and Venting

Alberta Environment Pollution Control Division is the primary contact for approving flaring at work sites jointly approved by Alberta Environment and Parks and by the Alberta Energy Regulator (AER).

Flaring Reports must be submitted when flared volumes exceed the approved flaring limits permitted for that work site.

Flared volumes at an Alberta Energy Regulator (AER) approved work site must be reported to the respective AER area field office when:

- Flaring exceeds the approved limit;
- Flaring results in smoke or odours; or
- Flaring continues over a long duration (e.g., 24 hours).

Flaring and venting contraventions may also be required to be reported electronically using the AER OneStop tool.

Release of a gas or gas equivalent exceeding 30,000 m^3 must be reported to the energy/environmental emergency phone line.

4.0 Transportation of Dangerous Goods (TDG) Spill Reporting (see Table 1)

Substances regulated by the Dangerous Goods and Transportation and Handling Act do not have to be reported to AEP unless:

- They have caused or could cause an adverse effect;
- The amount exceeds the levels set out in the legislation; and
- The release is into a groundwater or surface water body.

Table 1 – TDG Release Emergency Reporting Criteria

TDG Release Emergency Reporting Quantities (8.2 TDG Regulations)

Class	Packing Group or Category	Quantities
1	II	Any quantity
2	Not applicable	Any quantity
3, 4, 5, 6.1 or 8	I or II	Any quantity
3, 4, 5, 6.1 or 8	III	30 L or 30 kg
6.2	A or B	Any quantity
7	Not applicable	A level of ionizing radiation greater than the level established in section 39 of the "Packaging and Transport of Nuclear Substances Regulations, 2015"
9	II or III, or without packing group	30 L or 30 kg

1	II	Any quantity
2	Not applicable	Any quantity
3, 4, 5, 6.1 or 8	I or II	Any quantity
3, 4, 5, 6.1 or 8	III	30 L or 30 kg

Reports and follow-up reports must be made according to Part 8 of the TDG Regulations. Immediate notification is required to:

- Alberta: Local police and Alberta EDGE (Environmental and Dangerous Goods Emergencies) at 1-800-272-9600;
- British Columbia: Local police, and Provincial Emergency Program at
- 1-800-663-3456;
- Saskatchewan: Local police, and Saskatchewan Environment and Spill Line at 1-800-667-7525; and
- CANUTEC (Canadian Transport Emergency Centre) at 1-613-996-6666, or cellular *666, for the following:
    - If any amount of infectious substance (Class 6.2) is involved;
    - If any gas leaks from a cylinder that has suffered a catastrophic failure; or
    - If a railway vehicle is involved.

Table 1 – Reportable Releases AER Regulated Energy Industry

Table 1. Reportable releases

Reportable release	Oil & gas	Mining – oil sands	Mining – coal	In situ – oil sands	In situ – coal	Pipelines	Pipeline installations	Pipeline-related activities & equipment
Any leak or break from a pipeline						X		
Release of a substance that may cause, is causing, or has caused an adverse effect	X	X	X	X	X	X	X	X
Release of a substance into a water body (as defined in the *Water Act*)	X	X	X	X	X	X	X	X
Release of a substance falling within the class set out in the first column of the schedule in the *Release Reporting Regulation* that may cause, is causing, or has caused an adverse effect and • the release is at or in excess of the quantity or emission levels set out in the second column of the schedule or • the substance is released into a watercourse, groundwater, or surface water	X	X	X	X	X	X	X	X
Release of oil, water, or unrefined product off site	X	X		X	X	X	X	X
Release of oil, water, or unrefined product exceeding 2 m^3 on site	X	X		X	X	X	X	X
A liquid spill (as defined by the *Oil Sands Conservation Rules*)		X		X				
Release of a liquid hydrocarbon exceeding 2 m^3		X		X		X	X	X
Release of gas exceeding approved volume limits or potential for adverse conditions								X
Release of gas or gas equivalent exceeding 30 000 m^3	X	X		X	X	X	X	X
Well flowing uncontrolled	X	X		X	X			

Table 2 – Reportable Releases of Common Products – Energy Industry

Table 2. Reportable releases of common products

Common refined product	Chemical class*	Reportable criteria
• Demulsifiers† • Diesel • Gasoline • Methanol† – use UN # to determine subclasses • Scale inhibitors† • Condensate	Class 3 Flammable liquids	• Any release which is causing, may cause, or has caused an adverse effect • Any release into a water body • Releases greater than 200 L (0.2 m^3) on land
• Activated carbon • Calcium carbide • Molten sulphur • Sodium	Class 4 Flammable solids	• Any release which is causing, may cause, or has caused an adverse effect • Any release into a water body • Releases greater than 25 kg on land
• Ammonium nitrate • Bleaches • Calcium nitrate ($CaNO_2$)	Class 5.1 Oxidizing substances	• Any release which is causing, may cause, or has caused an adverse effect • Any release into a water body • Releases greater than 50 kg or 50 L on land
• Methanol • Arsenic • Lead acetate • Mercuric chloride • Pesticides†	Class 6.1 Poisonous toxic substances	• Any release which is causing, may cause, or has caused an adverse effect • Any release into a water body • Releases greater than 5 kg or 5 L on land
• Acids • Amines† • Bases† • Batteries† • Caustics†	Class 8 Corrosives	• Any release which is causing, may cause, or has caused an adverse effect • Any release into a water body • Releases greater than 5 kg or 5 L on land
• Glycol • Hydraulic oil • Ammonia	Substances not regulated by *TDG*	• Any release which is causing, may cause, or has caused an adverse effect • Any release into a water body
Common unrefined product	**Chemical class***	**Reportable criteria**
• Condensate • Crude oil • Crude emulsions • Bitumen	Possibly Class 3 Flammable liquids	• Any release which is causing, may cause, or has caused an adverse effect • Any release into a water body • Releases greater than 2 m^3 on site • Any release off site
• Produced water • Oilfield wastes • Drilling waste	Substances not regulated by the *Transportation of Dangerous Goods Act*	

* Chemical class is defined by the federal *Transportation of Dangerous Goods Act*. Refer to the United Nations number on the Material Safety Data Sheet (MSDS) to determine applicable class.

† Product names that are commonly used to refer to a number of products that have various classifications. Refer to the product's MSDS to confirm *Transportation of Dangerous Goods Act* classification.

References

- Transportation of Dangerous Goods (TDG) Regulations – Part 8.https://tc.canada.ca/en/corporate-services/acts-regulations/list-regulations/transportation-dangerous-goods-regulations
- Alberta Environment and Parks – Reporting Spills and Releases.https://open.alberta.ca/publications/reporting-spills-and-releases
- Alberta Environmental Protection and Enhancement Act (AEPEA).http://www.qp.alberta.ca/documents/Acts/E12.pdf
- Alberta Energy Regulator – Incident Reporting.https://www.aer.ca/protecting-what-matters/holding-industry-accountable/incident-response.html
- Alberta Energy Regulator – FAQ Release Reporting. https://static.aer.ca/prd/documents/forms/FAQ_Release_Reporting.pdf

Exemption Standard

Objective

This standard describes the process to temporarily request an exemption to an existing policy, standard, or practice in order to allow work processes to continue under special circumstances while providing an equivalent or better level of safety.

This standard will define the process to be followed in order to grant and to control exemptions so that:

- People and assets are protected when established policies, standards, and/or procedures are modified under special circumstances;
- Risk is adequately managed as new technologies and processes that are not adequately addressed by existing safety procedures are introduced; and
- The Management of Change (MOC) process can be used in conjunction with this SWP.

Scope

This standard applies to all Richardson's Bulk Sales Ltd operations and to all exemptions against policies, standards, and procedures generated at any Company level.

Definitions

Exemption: Controlled temporary deviation from an established policy, standard, or procedure.

Procedure

1.0 Responsibilities

- Requesting supervisors and the Senior Operations Manager (SOM) designated by the President are responsible for ensuring that the requirements of this SWP, the Richardson's Bulk Sales Ltd safety system and all legislated requirements are adhered to during the initial exemption risk assessment, the development of the risk management plan, and the residual risk assessment;

- The requesting supervisor is responsible for ensuring that:
    - Adherence to this Exemption Standard is maintained at all times;
    - Enough lead time is given so as to allow sufficient time for review and approval;
    - Exemption requests are initiated before a point of no return is reached (i.e., before any irreversible option is taken that commits Richardson's Bulk Sales Ltd to a course of action that requires the exemption;
    - The risk minimization measures and additional requirements specified in the approval process are implemented before the exempted activity is started;
    - The exemption and its details are thoroughly communicated to all those involved, including third parties and any newcomers who may arrive after its initial implementation;
    - All required training in the exemption provisions is provided by competent persons before work begins;
    - The exemption is logged into the relevant database; and
    - The exemption is closed out once the exempted activity is no longer being conducted.
- The SOM is responsible for ensuring that the request is justified and that proposed risk minimization measures are adequate and for seeking advice from concerned support function(s);
- The SOM shall not ratify violations of policies, standards, or procedures that are legislated, would result in an increased hazard nor endorse a situation that cannot be reversed.
- The SOM is also responsible for logging the exemptions into the appropriate database, for continuously monitoring the Exemption Register, and for suggesting revisions to the associated document if required; and
- The SOM is also responsible for reviewing cases of repeated exemption requests and for revising the associated document if required.

2.0 Process

The following sequence shall be followed before an exemption can be issued:

1. Perform a hazard assessment to determine the level of risk associated with the proposed procedural changes. Ensure that the SOM is consulted at this stage;
2. Attempt to develop a risk control plan to lower the risk to a “minimum-risk” level. If this plan can be established immediately with processes and materials at hand, then the work can be performed without an exemption approval, as long as it is accompanied by a Safe Work Permit where all participants in the work are aware of the hazards and controls and it is approved by the SOM;
3. If the controls required to reduce the risk to an acceptable minimum level are not immediately available, then determine what additional control measures are required, fill out and have the Exemption Request Form processed and obtain the control plan elements before the work continues;
4. Forward the form to the SOM for review and approval; and
5. Upon approval by the SOM, the approved Exemption Request Form shall be returned to the requesting supervisor and filed in the Exemption Register.

If approved, the exemption can be executed on the basis of the risk control measures and additional training requirements specified in the approval process. When the activity for which the exemption was intended is completed, the requesting supervisor shall confirm to the SOM that the exemption is no longer being conducted and that the exemption is to be closed.

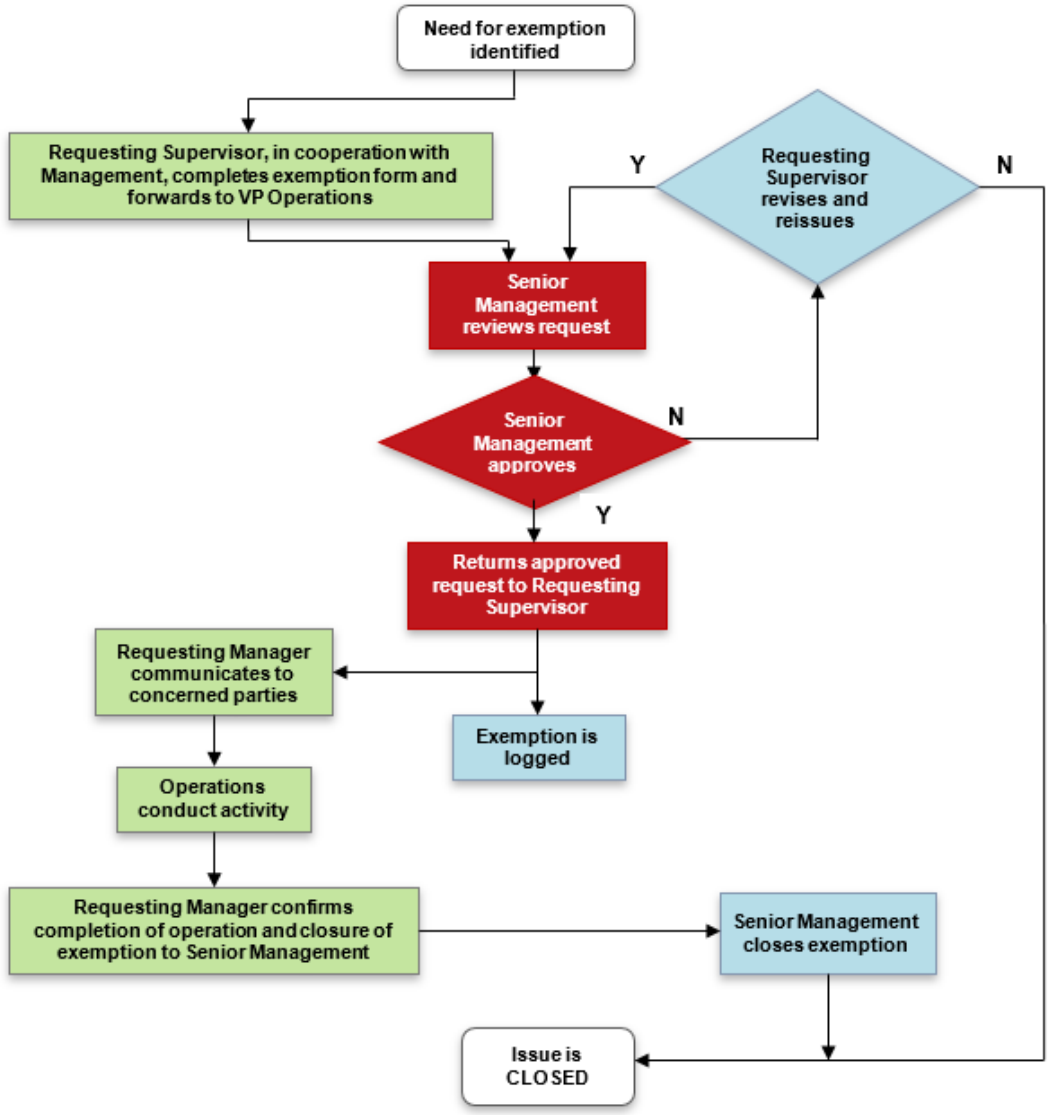
3.0 Validity of Exemptions

Exemptions will be granted for a defined time period or project and only as determined by the SOM, which shall in no case exceed one year. If repeated requests are being made for the same exemption, then the corresponding policy, standard, or procedure should be considered for a possible revision to accommodate the changed circumstances.

4.0 Exemption Register

The SOM shall file all approved Exemption Request Forms. These files shall be maintained and shall be accessible via the SOM. All exemptions shall be numbered sequentially.

Appendix 1 – Exemption Process Flow Sheet



Forms

- Exemption Request Form

References

- Alberta Occupational Health & Safety Act, Obligations of Employers, Workers, Etc., Section 2(1) Regulation and Code, Part 2: Hazard Assessment, Elimination, and Control 7(1).https://www.alberta.ca/ohs-act-regulation-code.aspx
- Occupational Health & Safety Regulation, British Columbia Regulations 296/97, Part 2: Application, Section 2.3 & Part 23: Oil and Gas, Section 23.5 Safe Work Procedures.https://www.worksafebc.com/en/law-policy/occupational-health-safety
- Occupational Health & Safety Act, Regulation, 2020, Saskatchewan Labour, General Duties of Employers, Section 21-1 Occupational Health and Safety Program. http://www.publications.gov.sk.ca/details.cfm?p=4355

Fall Protection and Fall Protection Plans

Purpose

Richardson's Bulk Sales Ltd will ensure the safety of their employees and contractors when work is performed at heights above three metres or where there is an unusual risk to workers. A site-specific Fall Protection Plan will be followed for all work that meets the established criteria.

Scope

This safe work practice establishes the guidelines to be adhered to when developing site-specific fall protection plans and will be followed at all work sites owned or operated by Richardson's Bulk Sales Ltd where the task being performed places a worker at risk from a falling hazard.

This safe work practice applies to any work where a fall of three metres (10 feet) or more may occur, where there is an unusual possibility of injury if a worker falls less than three metres, or any work taking place over water where immediate self-rescue may be impaired by the depth, temperature, or movement of the water.

Definitions

Aerial Device: A telescoping or articulating unit used for positioning a personnel basket, bucket, platform, or other device at an elevated work location.

Anchor: An engineered component for coupling a fall arrest or travel restraint system to an anchorage.

Anchorage: A structure, or part of a structure, that is capable of safely withstanding any potential forces applied by a fall protection system.

Competent Worker: A worker who exhibits the knowledge, skills, and ability to ensure his or her own safety when working independently or unsupervised.

Control Zone: The area within two metres of an unguarded edge of a level, elevated work surface that has a slope of no more than four degrees.

Fall Arrest Device: A part of a worker's personal protective equipment that stops the worker's fall and does not allow the worker to fall farther.

Fall Protection System:

- A personal fall arrest system;
- A travel restraint system;
- Fabric or netting panels intended for leading edge protection;
- A safety net;
- A control zone; or
- Use of procedures in place of fall protection equipment.

Leading Edge: The edge of a floor, roof, or formwork for a floor or other walking/working surface, which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed.

Swing Drop Distance: In a fall arresting action, the vertical drop from the onset of the swinging motion to the point of initial contact with a structure.

Work Positioning System: A system of components attached to a vertical safety line, including a full body harness, descent controllers, and positioning lanyards used to support or suspend a worker in tension at a work position.

Procedure

1.0 Fall Protection Plan Requirements

Richardson's Bulk Sales Ltd will develop fall protection plan procedures for a work site if a worker at that work site may fall three metres (10 feet) or more, and if workers are not protected by guardrails. The fall protection plan will adhere to the requirements of the Alberta OHS Code, Part 9: Fall Protection.

The fall protection plan will specify the following:

- The fall hazards at the work site;
- The fall protection system to be used at the work site;
- The procedure used to assemble, maintain, inspect, use, and disassemble the fall protection system; and
- The rescue procedures to be used if a worker falls, or is suspended by a personal fall arrest system or safety net, and needs to be rescued.

Richardson's Bulk Sales Ltd will ensure that the fall protection plan is available at the work site before the work begins.

Richardson's Bulk Sales Ltd will ensure that a worker on a boom-supported elevating work platform, boom-supported aerial device, or telescopic forklift truck work platform uses a personal fall arrest system that is:

- Connected to an anchor point specified by the manufacturer of the work platform, aerial device, or telescopic fork truck;
- If no anchor is specified by the manufacturer, connected to an anchor point certified by a professional engineer, which meets the requirements of CSA Standard Z259.16-04, design of Active Fall-Protection System; and
- When connected to the anchor point, the lanyard, if reasonably practicable, is short enough to prevent the worker from being ejected from the work platform or aerial device but is long enough to allow the worker to perform his work.

If a worker uses a personal fall arrest system or a travel restraint system, the worker will ensure that it is safely secured to an anchor point or plate that meets the regulated requirements.

Richardson's Bulk Sales Ltd will ensure that an anchor plate with multiple attachment points designed to support combinations of suspension lines, tie-back lines, and lifelines is certified in writing by a professional engineer.

Richardson's Bulk Sales Ltd will ensure that a temporary anchor point in a travel restraint system:

- Has a minimum breaking strength in any direction in which the load may be applied of at least 3.5 kilonewtons per work attached;
- Is installed, used, and removed according to the manufacture's specifications or specification certified by a professional engineer;
- Is permanently marked as being for travel restraint only; and
- Is removed from use on the earliest of:
    - The date on which the work project for which it is intended is completed, or
    - The time specified by the manufacturer or professional engineer.

Richardson's Bulk Sales Ltd will ensure that a temporary anchor used in a personal fall arrest system:

- Has a minimum breaking strength in any direction in which the load may be applied of at least 16 kilonewtons or two times the maximum arresting force per worker attached;
- Is installed, used, and removed according to the manufacturer's specifications or specifications certified by a professional engineer; and
- Is removed from use on the earliest of:
    - The date on which the work project from which it is intended is completed, or
    - The time specified by the manufacturer or professional engineer.

Richardson's Bulk Sales Ltd will ensure that:

- A worker uses a personal fall arrest system or a travel restraint system with a minimum breaking load of 16 kilonewtons or two times the maximum arresting force per worker attached;
- A worker does not use a damaged anchor until the anchor is repaired, replaced, or recertified by the manufacturer or a professional engineer;
- A worker uses an anchor connector appropriate to the work; and
- An anchor to which a personal fall arrest system is attached is not part of an anchor used to support or suspend a platform.

Richardson's Bulk Sales Ltd will ensure that a Prusik or similar knot is used in place of a rope grab only by a competent worker and only during an emergency situation.

Richardson's Bulk Sales Ltd will ensure that a flexible horizontal lifeline system meets the regulated requirements.

Richardson's Bulk Sales Ltd will ensure that a rigid horizontal fall protection system is designed, installed, and used in accordance with manufacturers' specifications or specifications certified by a professional engineer.

2.0 CSA, OHS, and ANSI Standards

Richardson's Bulk Sales Ltd will ensure that all fall protection equipment meets the following standards (or latest revisions):

Equipment	Standard
Full Body Harness	CSA Standard CAN/CSA Z259.10-60 (R1998)
Safety Belt	CSA Standard CAN/CSA-Z259.1-05

Shock Absorber	CSA Standard CAN/CSA-259.12-01 (R2006)
Connecting Components	CSA Standard CAN/CSA-Z259.1-05
Fall Arresting Devices	CSA Standard Z259.2.1-98 (R2004)
Self-Retracting Devices	CSA Standard Z259.2.2-98 (R2004)
Descent Control Devices	CSA Standard Z259.2.3-99 (R2004)
Vertical Life Line	CSA Standard CAN/CSA-Z259.2.1-98 (R2004)
Horizontal Life Line	CSA Standard CAN/CSA –Z259.13-04
Anchor Points	OHS Code, Part 9, Sections 151, 152, 153, 154, 155, 156, 157, and 158
Body Belt	ANSI Standard A10.32-2004
Design of Fall Protection System	ANSI Z259, 16-04
Safety Requirements for Personal Arrest System	ANSI Z359.1-2007

3.0 Responsibilities

3.1 Supervisors will:

- Ensure only competent employees are allowed to work independently where they are exposed to fall hazards, and
- Complete, monitor, and enforce the conditions of the Fall Protection Plan where and when applicable.

3.2 Employees will:

- Where practical, work in a manner that does not require a fall arrest or fall protection system to be required;
- Use personal fall protection systems as required by this plan; and
- Wear all associated fall arrest and fall protection equipment in accordance with the manufacturer's specifications.

4.0 General Fall Protection (Guardrails &Travel Restraint) - Temporary and Permanent Work Areas

Richardson's Bulk Sales Ltd will ensure that a worker is protected from falling at a temporary or permanent work area if a worker may fall:

- A vertical distance of three metres or more;

- A vertical distance of less than three metres if there is an unusual possibility of injury worse than an injury from landing on a solid, flat surface;
- Into or onto a hazardous substance or object, or through an opening in a work surface; and
- At a permanent work area, a vertical distance of more than 1.2 metres and less than 3 metres.

4.1 Guardrails

To meet the general protection requirements Richardson's Bulk Sales Ltd will install an engineering control such as a guardrail.

- Richardson's Bulk Sales Ltd will ensure that a worker at a permanent work area is protected from falling by a guardrail if the worker may fall a vertical distance of more than 1.2 metres and less than three metres;
- Engineering controls such as guardrails are the best method of fall protection, and must be used whenever practicable;
- A standard guardrail consists of a top rail located between 92 centimetres (36 inches) and 107 centimetres (42 inches) above the work surface, and a mid-rail that is spaced midway between the top rail and the work surface; and
- A guardrail must be capable of supporting a worker who may fall against it.

4.2 Travel Restraint Systems

If the use of a guardrail is not reasonably practicable, Richardson's Bulk Sales Ltd will ensure that a worker uses an approved travel restraint system.

- A travel restraint system prevents a worker from falling off an unguarded edge of an elevated work surface;
- It typically consists of a belt or harness the worker wears, a lanyard that clips on to it, and an anchor point. A fall arrest system stops a fall from an elevated work area. It consists of an anchor point, connectors, and a body harness, and may include a lanyard, deceleration device, or lifeline;
- A properly designed fall arrest system will prevent a falling worker from striking an object or the surface below. A travel restraint or fall arrest system must be used when a worker is exposed to a potential fall of 1.8 metres (6 feet) or greater, when guardrails are not practicable; and
- If the use of a travel restraint system is not reasonably practicable, Richardson's Bulk Sales Ltd will ensure that a worker uses a personal fall arrest system that meets the requirements of this Part.

5.0 Personal Fall Arrest Components

Richardson's Bulk Sales Ltd will ensure that all components of a fall protection system are compatible with one another and with the environment in which they are used.

5.1 Full Body Harness

Richardson's Bulk Sales Ltd will ensure that:

- A worker using a personal fall arrest system wears and uses an approved and certified full body harness, and
- A worker uses a body belt only as part of a travel restraint system or as part of a fall restrict system.

5.2 Lanyard

- Richardson's Bulk Sales Ltd will ensure that a lanyard used by a worker is made of wire rope or other material appropriate to the hazard if a tool or corrosive agent that could sever, abrade, or burn a lanyard is used in the work area, and
- When a worker works near an energized conductor or in a work area where a lanyard made of conductive material cannot be used safely, Richardson's Bulk Sales Ltd will ensure that the worker uses another effective means of fall protection.

5.3 Shock Absorber

Richardson's Bulk Sales Ltd will ensure that if a shock absorber or shock absorbing lanyard is used as part of a personal fall arrest system, it is approved to an accepted standard:

- Richardson's Bulk Sales Ltd will ensure that a personal fall arrest system consists of a full body harness and a lanyard equipped with a shock absorber or similar device, and
- A shock absorber is required with a fixed ladder fall arrest system only if it is required by the manufacturer of the system.

5.4 Connectors, Carabineers, and Snap Hooks

- Richardson's Bulk Sales Ltd will ensure that connecting components of a fall arrest system consisting of carabineers, D-rings, O-rings, oval rings, self-locking connectors, and snap hooks manufactured on or after July 1, 2014, are approved, as applicable, to an acceptable standard;

- Richardson's Bulk Sales Ltd will ensure that a carabineer or snap hook:
  - Is self-closing and self-locking, and
  - May only be opened by at least two consecutive deliberate manual actions.
- Is marked with:
  - Its breaking strength in the major axis, and
  - The name or trademark of the manufacturer.

5.5 Self-Retracting Device

Richardson's Bulk Sales Ltd will ensure that a self-retracting device used with a personal fall arrest system is:

- Approved to an accepted standard;
- Anchored above the worker's head unless the manufacturer's specifications allow the use of a different anchor location; and
- Used in a manner that minimizes the hazards of swinging and limits the swing drop distance to 1.2 metres if a worker falls.

6.0 Inspection and Maintenance

All fall protection equipment must be inspected by a person identified as competent to inspect before use. In the event that any defective equipment is identified, it will be removed from service, repaired by a qualified person, or destroyed.

Richardson's Bulk Sales Ltd will ensure that the equipment used as part of a fall protection system is inspected by the worker as required by the manufacturer before each use.

The inspection shall include:

- Hardware (inspect hardware, including snap hooks, D-rings, and buckles for damage, and check for sharp edges, corrosion, burrs, cracks, and worn parts);
- Webbing (check for tears, abrasions, mold, burns, heavy soiling, or discoloration, and chemical or heat damage);
- Cable (inspect for cuts, kinks, broken wires and fibers, corrosion, chemical contact, and severely abraded areas); and
- Labels (affixed and fully legible).

Fall protection equipment will be:

- Kept free from substances and conditions that could contribute to deterioration of the equipment, and
- Re-certified as specified by the manufacturer.

Richardson's Bulk Sales Ltd will ensure that equipment used as part of a fall protection system is removed from service, and not used until it is replaced or repaired. The defective equipment should either be returned to the manufacturer or destroyed if:

- It is defective;
- It has come into contact with excessive heat, a chemical, or any other substance that may corrode or otherwise damage the fall protection system;
- An out-of-service tag should be affixed to the equipment indicating it is defective;
- Richardson's Bulk Sales Ltd will ensure that after a personal fall arrest system has stopped a fall, the system is removed from service; and
- Richardson's Bulk Sales Ltd will ensure that a personal fall arrest system that is removed from service is not returned to service unless a professional engineer or the manufacturer certifies that the system is safe to use.

7.0 Personal Fall Arrest System (PFAS) Clearance, Maximum Arresting Force, and Swing

Richardson's Bulk Sales Ltd will ensure that a PFAS is arranged so that a worker cannot hit the ground, an object which poses an unusual possibility of injury, or a level below the work area.

Richardson's Bulk Sales Ltd will ensure that a personal fall arrest system without a shock absorber limits a worker's free fall distance to 1.2 metres.

Richardson's Bulk Sales Ltd will ensure that a personal fall arrest system limits the maximum arresting force on a worker to six kilonewtons.

A worker must limit the vertical distance of a fall by:

- Selecting the shortest length lanyard that will still permit unimpeded performance of the worker's duties, and
- Securing the lanyard to an anchor no lower than the worker's shoulder height.

If it is not reasonably practicable to attach to an anchor above the level of a worker's feet, the worker must ensure that the clearance and maximum arresting force requirements are met.

8.0 Specific Fall Protection Applications

8.1 Fixed Ladders and Climbable Structures

Richardson's Bulk Sales Ltd will ensure that if a worker is working from or on a fixed ladder or climbable structure at a height of three metres or more and is not protected by a guardrail, continuous protection from falling is provided by equipping the fixed ladder or climbable structure with an integral fall protection system that meets the applicable standards and certifications.

8.2 Fall Protection on Vehicles and Loads

If a worker may have to climb onto a vehicle or its load at any location where it is not reasonably practicable to provide a fall protection system for the worker, Richardson's Bulk Sales Ltd will:

- Take steps to eliminate or reduce the need for the worker to climb onto the vehicle or its load, and
- Ensure that if a load is not secured against movement, a worker does not climb onto the load. A worker must not climb onto a load if the load is not secured against movement.

8.3 Boom-Supported Work Platforms and Aerial Devices

Richardson's Bulk Sales Ltd will ensure that a worker on a boom-supported elevating work platform, boom-supported aerial device, or forklift truck work platform uses a personal fall arrest system connected to:

- An anchor specified by the manufacturer of the work platform, aerial device, or forklift truck;
- If no anchor is specified by the manufacturer, an anchor point certified by a professional engineer that meets the requirements of CSA; and
- When connected to the anchor, the lanyard must be short enough to prevent the worker from being ejected from the work platform or aerial device but is long enough to allow the worker to perform his or her work.

8.4 Scissor Lift or Equivalent

Richardson's Bulk Sales Ltd will ensure that a worker on a scissor lift or on an elevating work platform with similar characteristics uses a travel restraint system consisting of a full body harness and lanyard:

- Connected to an anchor specified by the manufacturer of the scissor lift or elevating work platform, and
- When connected to the anchor, the lanyard, if reasonably practicable, is short enough to prevent the worker from falling out of the scissor lift or elevating work platform but is long enough to allow the worker to perform his or her work.

These requirements do not apply if the manufacturer's specifications allow a worker to work from the scissor lift or elevating work platform with similar characteristics using only its guardrails for fall protection, and the scissor lift or elevating work platform is operating on a firm, substantially level surface.

8.5 Water Danger

Richardson's Bulk Sales Ltd will ensure that a worker uses an appropriate fall protection system in combination with a life jacket or personal flotation device if the worker:

- May fall into water that exposes the worker to the hazard of drowning, or
- Could drown from falling into the water, from other than a boat.

9.0 Procedures in Place of Fall Protection Equipment

Richardson's Bulk Sales Ltd may develop and use procedures in place of fall protection equipment in accordance with subsection if it is not reasonably practicable to use one of the fall protection systems described in this SWP, and is restricted to:

- The installation or removal of fall protection equipment;
- Roof inspection;

- Emergency repairs; and
- Situations in which a worker must work on top of a vehicle or load and the exemption requirements have been made.

Richardson's Bulk Sales Ltd will, when using procedures in place of fall protection equipment ensure that:

- A hazard assessment in accordance with the requirements of Part 2 is completed before work at height begins;
- The procedures to be followed while performing the work must be in writing and available to workers before the work begins;
- The work is carried out in such a way that minimizes the number of workers exposed to a fall hazard while work is performed;
- The work is limited to light duty tasks of limited duration;
- The worker performing the work is competent to do so. When used for inspection, investigation or assessment activities, these activities take place prior to the actual start of work or after work has been completed; and
- The procedures do not expose a worker to additional hazards.

10.0 Training

Only workers who are competent in the use and inspection of equipment and procedures are allowed to work independently where they are exposed to fall hazards. Workers who have not demonstrated competence will work only under the direct supervision of a competent worker or supervisor. All competency evaluations must be documented and filed with the worker's training and personnel files.

10.1 Training and Instruction of Workers

1. Richardson's Bulk Sales Ltd will ensure that a worker is trained in the safe use of the fall protection system before allowing the worker to work in an area where a fall protection system must be used. Training must be provided by a competent person and may be performed in-house or by a Third Party.

2. The training must include the following:

    - A review of current applicable provincial and federal legislation pertaining to fall protection;
    - An understanding of what a fall protection plan is;
    - An understanding of Richardson's Bulk Sales Ltd's fall protection policies and procedures;
    - Fall protection methods and equipment that a worker may be required to use at a work site;
    - Identification of potential fall hazards;
    - Assessment and selection of specific anchors that the worker may use;
    - Instructions for the correct use of connecting hardware;
    - Information about the effect of a fall on the human body, including:
        - Maximum arresting force;
        - The purpose of shock and energy absorbers;
        - Swing fall; and
        - Free fall.

- Pre-use inspection;
- Emergency response procedures to be used at the work site, if necessary; and
- Practice in:
    - Inspecting, fitting, adjusting, and connecting fall protection systems and components, and
    - Emergency response procedures.
- Limitations of fall arrest equipment including:
    - Physiological effects of falls and the individual trauma that may still occur when a properly fitted personal fall arrest system deploys after a fall;
    - Potentially fatal suspension trauma effects on the cardio-vascular system that can occur if a suspended worker is not rescued promptly after a fall;
    - Increased risk of injury in falls with improperly fitting harnesses;
    - The dangers of swing falls into fixed objects, that can be as serious as an unprotected fall, if the anchor point in a fall arrest system is offset from the work being performed; and
    - The requirement to consider the stretch length (up to 1.2 m) from a shock absorbing lanyard when deployed.

In addition to the training described above Richardson's Bulk Sales Ltd will ensure that a worker is made aware of the fall hazards particular to that work site and the steps being taken to eliminate or control those hazards.

Regular documented field performance evaluations should be conducted annually to ensure that this SWP and competency-based training are adhered to.

11.0 Rescue and Emergencies

A rescue plan must be in place before any work at heights can begin:

- Richardson's Bulk Sales Ltd must have a plan to retrieve a suspended worker from a fall arrest system if a fall were to occur;
- Written rescue procedures must be established and in place before any worker uses a fall arrest system at a work site;
- The plan will include method(s) to be used to rescue a suspended worker from a fall arrest system following a fall; and
- If external emergency services are to be used, Richardson's Bulk Sales Ltd will ensure they are capable of performing the required method of rescue, and that they are readily available to assist.

Where a worker falls and is restrained or suspended by the personal fall protection equipment or safety nets, the following applies:

- It is the responsibility of Richardson's Bulk Sales Ltd to rescue a suspended worker and, if necessary, to deliver the person to the hospital or central first-aid centre;
- Where possible, all rescue work will be initiated from the ground up;
- Where possible, the injured worker will be lowered to the ground;
- A secondary belay on rescuer will be used where it does not impede the process of the rescue;
- All involved rescue workers must ensure their own protection and the protection of other rescue workers participating in the rescue; and
- The worker must be examined by a doctor prior to returning to work.

Richardson's Bulk Sales Ltd will ensure that a Prusik or similar sliding hitch knot is used in place of a fall arrester only during emergency situations or during training for emergency situations and only by

a competent worker.

A full report, in accordance with Richardson's Bulk Sales Ltd's Incident Reporting and Investigation requirements, will be completed for any incident where an employee's personal fall protection system was employed.

12.0 Canadian Federal, OSHA and More Stringent Client Fall Protection Requirements

Richardson's Bulk Sales Ltd may engage in work for clients whose fall protection requirements are more stringent than Canadian provincial and federal standards. Canadian Federally regulated companies and worksites are required to provide fall protection above 2.4 m.

Client companies following US OSHA construction industry standards will require that workers be protected by a fall protection system if there is potential for a vertical fall of a distance greater than 1.8 metres (six feet). Although the Canadian provincial standard for fall protection is three metres (10 feet), Richardson's Bulk Sales Ltd may have clients who follow the US OSHA construction standard of fall protection at 1.8 metres (six feet).

When working at client's sites who follow OSHA or other more stringent requirements, Richardson's Bulk Sales Ltd will be informed of and follow and the more stringent standard and this will be indicated in the Fall Protection program.

General Industry, OSHA requires that fall protection must be used for wall openings and holes at a height of 1.2 metres (four feet) (OSHA 1910.23b).

Richardson's Bulk Sales Ltd employees will adhere to any client or worksite-specific fall protection requirements where they are more stringent than the legislated requirements or the company standard that are normally applied. If a guardrail system is not available, a fall arrest or travel restraint system must be used.

Forms

- Fall Protection Plan

References

- Alberta Occupational Health & Safety Act, Regulation, and Code Part 9: Fall Protection.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Oil and Gas Occupational Safety and Health Regulations, under Part II of the Canada Labour Code, Part XIII: Safety Materials, Equipment, Devices, and Clothing, Section 13.10.http://laws-lois.justice.gc.ca/eng/regulations/SOR-86-304/index.html

Fatigue and Safety at the Workplace

Purpose

Fatigue may be a significant influence on health and safety at work and at home. The probability of a workplace incident rises and falls with alertness levels. In an effort to identify and address health and safety issues relating to worker fatigue, Richardson's Bulk Sales Ltd has developed this fatigue safe work practice. This SWP can be used to provide guidelines for preparing Company specific fatigue hazard control procedures based on the working conditions encountered.

Scope

The conditions of this safe work practice shall be implemented and enforced at all work sites owned or operated by Richardson's Bulk Sales Ltd. The conditions also apply to contractors providing services to Richardson's Bulk Sales Ltd where their workers may be exposed to the risks or hazards associated with worker fatigue. Richardson's Bulk Sales Ltd will apply this SWP to those workers who may drive motor vehicles for extended hours or on a shift basis.

Procedure

1.0 Responsibilities

1.1 Richardson's Bulk Sales Ltd will:

- Ensure that a fatigue management process is implemented and that training is provided;
- Communicate Company expectations;
- Ensure that reporting, monitoring, and review processes are in place;

- Ensure that employee rosters allow adequate breaks for recovery between extended work hours or shifts;
- Assist, advise, and support supervisors;
- Promote the importance of the fatigue management process; and
- Follow the requirements for exemption permits issued by the Director of Employment Standards that provides for working conditions outside the Employment Standards Code.

Work tasks to control fatigue will be analyzed and evaluated periodically. Fatigue hazards will be minimized. Examples of fatigue hazards include the type of work task, the length of the task, and workplace conditions.

1.2 The employees will:

- Actively participate in the fatigue management process;
- Recognize symptoms of fatigue;
- Promptly report any fatigue-related concerns to their Supervisor (Supervision must take appropriate actions to prevent loss);
- Report any individual medical or personal situations that may have an effect on fatigue;
- Get proper rest during time off;
- Identify personal issues causing fatigue and seek assistance if required; and
- Workers must never operate motor vehicles and/or heavy equipment when fatigued to a level that their competence is impaired.

2.0 Regulatory Requirements – Alberta Employment Standards Code

Section 16(1) states that an employee's hours of work must be confined within a period of 12 consecutive hours in any one work day, unless:

- An accident occurs, urgent work is necessary to a work site or machinery, or other unforeseeable or preventable circumstances occur, or
- The Director of Employment Standards issued an exemption permit authorizing extended hours of work.

Employers must give their workers at least eight hours of rest. Travelling to and from job sites are not to be included in the eight hours of rest.

Section 19(1) states every employer must allow each employee at least:

- One day of rest in each work week;
- Two consecutive days of rest in each period of two consecutive work weeks;
- Three consecutive days of rest in each period of three consecutive work weeks; or
- Four consecutive days of rest in each period of four consecutive work weeks.

Section 19(2) states every employer must allow each employee at least four consecutive days of rest in each 24 consecutive work days.

3.0 Recognizing the Symptoms of Fatigue

Although signs of fatigue vary from worker to worker, typical physical signs and symptoms include:

- Sleepiness, including falling asleep against the individual's will (micro sleeps);
- Irritability;
- Depression;
- Giddiness;
- Loss of appetite;
- Digestive problems; and
- Increased susceptibility to illness.

In addition to physical signs and symptoms, fatigued workers may have their ability to perform mental and physical tasks impaired. These impairments can take many forms, such as:

- Slowed reactions – physical reaction speed and speed of thought;
- Incorrect actions – either physical or mental;
- Flawed logic and judgment and an inability to concentrate;
- Increased memory errors, including forgetfulness;
- Decreased vigilance;
- Reduced motivation; and
- Increased tendency for risk taking.

If a worker experiences any of these symptoms while driving, the worker should take them as a warning that he or she could fall asleep unintentionally. These symptoms include:

- Eyes closing or going out of focus by themselves;
- Difficulty keeping one's head up;
- Non-stop yawning;

- Wandering, disconnected thoughts;
- Cannot remember driving the last few miles;
- Drifting, tailgating, or missing traffic signs; and
- Jerking the car back into the lane.

If any one of these symptoms is observed, the driver must pull off the road and rest.

4.0 Health and Safety Issues

Richardson's Bulk Sales Ltd will set work hour limitations and will control job rotation schedules to control fatigue, allow for sufficient sleep, and increase mental fitness. Work scheduling will take into consideration the amount of rest between workdays, shift work, on-call time, and traveling across different time zones.

Training and education will enable employees and managers to recognize fatigue, how to control fatigue through appropriate work and personal habits both in and outside the workplace, and how to perform fatigue reporting.

5.0 Fatigue Management – Best Practices

Richardson's Bulk Sales Ltd will educate and encourage employees to follow the following fatigue management strategies:

5.1 At Work:

- Ensure that temperature and lighting of work sites are appropriate and adjustable wherever practicable;

- Provide training and information of shift work risks and managing fatigue;
- Schedule tedious and boring tasks for times when alertness is high and leave the stimulating and motivating tasks for times of day when alertness is lower;
- Use a buddy system so that colleagues help to keep each other alert and encourage breaks if signs of drowsiness appear;
- Drink caffeinated drinks strategically – avoid them at times when you are alert and use them as a countermeasure when alertness is low;
- Advise your supervisor if you have had insufficient sleep, feel tired, or are exhibiting any of the signs and symptoms of fatigue outlined above; and
- Exercise, walk around, or do some physical activity during breaks.

Richardson's Bulk Sales Ltd will provide sufficient rest breaks for workers to allow for rest and recovery time. Depending on the location, this may also include access to proper nutrition and opportunities for physical activity.

References

- Worksafe Alberta – Fatigue and Safety at the Workplace – Government of Alberta.https://open.alberta.ca/publications/erg015-1-fatigue-and-safety-at-the-workplace
- WorkSafe Alberta – Exhausted or Drunk – It Makes No Difference Behind the Wheel.http://www.ctmin.org/pdf/drunk-or.pdf
- Drivers' Hours of Service Regulation, National Safety Code.http://laws-lois.justice.gc.ca/PDF/SOR-2005-313.pdf

- BC Regulations – Part 4 – General Conditions – Section 4.20 – Impairment.https://www.worksafebc.com/en/law-policy/occupational-health-safety/searchable-ohs-regulation/ohs-regulation/part-04-general-conditions
- BC Employment Standards Act.http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/00_96113_01
- BC Employment Standards Regulations.http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/11_396_95
- Saskatchewan Employment Act, Part II Division 2. http://www.publications.gov.sk.ca/details.cfm?p=4355

Fire Prevention and Fire Safety

Purpose

Fires are a major cause of losses and present a serious health and safety hazard. Richardson's Bulk Sales Ltd has developed this Safe Work Practice to provide the necessary guidelines to control the risks posed by fire hazards and to develop fire prevention and fire emergency procedures specific to its work locations and the nature of the work being performed.

Scope

The conditions and requirements of this safe work practice will be applied and enforced at all work sites owned or operated by Richardson's Bulk Sales Ltd. This safe work practice will adhere to legislated requirements and the National Fire Protection Association (NFPA) guidelines.

Procedure

The NFPA system approach to fire safety is based on six strategies. Any fire plan presented for work sites should include the following:

- Prevention (control) of ignition;
- Design/plan to slow early fire growth;
- Detection and alarm;
- Suppression (removal of heat, air, fuel, interruption of chain reaction);
- Confinement of fire; and
- Evacuation.

1.0 Fires and Explosions Overview

Fires and explosions represent a frequent cause of serious and fatal injuries. With proper equipment and work site design, sound maintenance practices, knowledge of risks, and sound operating rules, these risks can be reduced and controlled.

1.1 Explosive Limits

The explosive limits of some common substances found at many work sites are as follows:

	EXPLOSIVE LIMITS	
	(% by volume in air)	
	Lower Limit	**Upper Limit**
Hydrogen Sulphide (H_2S)	4.0%	46%
Acetylene	2.5%	100%
Butane	1.8%	8.5%
Carbon Monoxide (CO)	12.5%	74.2%
Gasoline	1.4%	7.6%
Methane	5.0%	15.4%

Propane 2.2% 9.5%

Under no circumstances shall any hot or cold work be permitted to proceed when the atmosphere is found to exceed 10% of the lower explosive limit (LEL) for Methane gas.

The use of gasoline as a cleaning agent is strictly prohibited.

1.2 Low Flash Point of Chemicals

The flash point of a liquid is the lowest temperature at which it can vaporize to form an ignitable mixture in air. The following table lists some common organic chemicals found at work sites with low flash points (below 32°C). These chemicals present a serious risk which should be taken into account when planning work involving them.

Chemical	Flash Point (°C)
Acetone	-18
Benzene	11
Dioxane	12
Ethanol	12
Ethyl Acetate	-4
Hexane	-23

Methanol	10
Toluene	4
Triethylamine	-7

1.3 Flammable Liquids

For the purpose of this document, a flammable liquid is defined as a liquid with a flash point below 37.8°C and a vapour pressure of not more than 275.8 kPa.

1.4 Classification of Fires

Fires are classified into five separate classes. The classes have been identified in the table below along with the type of fire extinguisher which may be used for the class of fire.

Class A	Occurs in ordinary combustible materials, such as wood, cloth, and paper. Extinguishing agents most commonly used are water and dry chemical agent.
Class B	Occurs in vapour-air mixture over the surface of a flammable liquid, such as grease, gasoline, or oil. BC type dry chemical (Purple K) foam, carbon dioxide, and water-fog may be used as an extinguishing agent.
Class C	Occurs in electrical equipment - non-conducting extinguishing agents must be used. Carbon dioxide is the most suitable. Dry chemicals may be used but will require extensive cleanup of equipment after use.
Class	

D	Occurs in combustible metals, such as magnesium, titanium, zirconium, and sodium. Specialized technologies and agents have been developed to control and extinguish such fires. The most common agent is MET-L-X.
Class K	Occurs in combustible cooking media (vegetable or animal oils and fats).

2.0 Firefighting Equipment

2.1 Location and Placement of Fire Extinguishers

For the number and type of fire extinguishers that may be required at a typical work site, the following table can be consulted:

Class "A" Locations

Agent	UL Rating	Locations
Dry Chemical	2 - A: 10 BC 4 - A: 40 BC 20-A: 80 BC	Offices, warehouses, and motor vehicles other than field trucks
Water	N/A	Offices

Class "B" Locations

Agent	UL Rating	Locations
Purple K	120 BC 480 BC	Field trucks, loading, shipping, and field work sites handling Class B materials
Purple K and Foam	30 BC	Local management decision at major work sites where spill and pressure fire potential exists

Class "C" Locations

Agent	UL Rating	Locations
Carbon Dioxide	10 BC	Electrical, MCC building

A Class B (or ABC) fire extinguisher must be readily available when working with or near flammable and combustible liquids.

2.2 Inspection and Maintenance of Firefighting Equipment

A competent person must be chosen to perform inspection and maintenance activities. Inspections and maintenance of firefighting equipment must follow manufacturer's requirements. The inspection and maintenance carried out must be documented and records retained on file at each work site location.

1. Monthly Inspections
    - All units must be in their designated location, correctly installed, visible, and allow for easy access.
    - All units must be visually inspected to ensure operational reliability (e.g., fully charged, undamaged, and not tampered with).
    - The results of the inspection must be recorded for historical purposes.
2. Annual Inspections and Maintenance
    - Inspections must be performed by a qualified agency as per the manufacturer's specifications and applicable government regulations.
3. Hydrostatic Testing
    - All testing must be documented and retained on file at each work site location.
    - All units must be inspected, maintained, and serviced, in accordance with the manufacturer's specifications and NFPA requirements, in order to ensure compliance with applicable hydrostatic testing requirements.
    - All testing shall be performed by a certified/approved agency.

2.3 Firefighting and Fire Emergency Equipment – Purchase and Use

The following guidelines must be followed when procuring or using firefighting, safety, and emergency equipment:

- Install the appropriate class and size of fire suppressant equipment at all work sites;
- Locate fire extinguishers in accordance with local fire regulations, NFPA guidelines, and the guidelines detailed in this practice. All other equipment, such as first aid, eye wash stations, etc., shall be placed in areas where the highest hazards may exist;
- Once a fire extinguisher has been discharged the unit must be recharged or replaced before being returned to service;
- Make sure that orientations include training in the location of fire and safety equipment and training in their use as appropriate;
- Check all equipment at pre-established intervals (monthly) and note these inspections in the work site activity log and on the equipment if appropriate. Inspections must be performed according to the manufacturer's specifications and applicable government regulations; and
- Fire Resistant Workwear (FRW) shall be worn in designated areas. FRW is designed to provide protection to the wearer in the event of a flash fire.

2.4 Firefighting Equipment Responsibilities

1. Employees
    - Competent employees will be appointed as responsible for ensuring that the provided fire extinguishers and protection devices are suitably inspected, maintained, and serviced and that appropriate records are available for review and audit purposes.

2. Work Site Supervisor

- The work site supervisor is responsible for ensuring an adequate supply of fire extinguishers and/or fire suppression devices are available, strategically located, appropriately installed or mounted, and identified.
- The supervisor will also ensure that related training is identified, provided, and maintained.

3. Management

- Management is responsible for providing the firefighting equipment that are identified as being required through hazard assessments, legislation or applicable building codes, and enforcing the requirements of all Safe Work Practices.

3.0 General Fire Prevention Requirements

All Richardson's Bulk Sales Ltd employees are required to adhere to the following fire safety requirements:

- Good housekeeping practices must be followed particularly with respect to storing combustible and flammable materials;
- Control areas around equipment, buildings, and well heads shall be kept free of weeds and combustible materials to prevent damage and to prevent the spread of fire;
- Iron sulphide removed from the inside of a vessels must be kept wet until it can be disposed of properly;
- Smoking is prohibited on Company premises or work sites except in designated areas;
- Oily rags and oil-soaked clothing must not be left inside facilities or buildings. Clothing and hydrocarbon-contaminated materials must be removed on a regular basis. Oily rags and materials must be disposed of by placing them into a metal container located at least seven metres (23 feet) from production buildings. The rags must then be cleaned, or permanently disposed of, in an approved manner;

- When high gravity, high vapour pressure hydrocarbons and chemicals are drained into open metal containers, the open container must be appropriately grounded and/or bonded to the vessel or piping to prevent possible ignition from static electricity. Fuel hoses and nozzles must be bonded in a similar manner to prevent static charge differentials in different component materials;

- Only approved safety cans are to be used to store or transport gasoline and similar volatile liquids. The cans must be coloured red with the contents identified according to Workplace Hazardous Material Information System (WHMIS) and/or Transportation of Dangerous Goods (TDG) regulations;

- Gas detection equipment must be function-checked daily and calibrated on a regular basis (according to the manufacturer's specifications). Inspection, function, and calibration results must be documented;

- Emergency Shutdown Devices (ESDs) must be checked periodically (normally during planned shutdowns) to ensure that they are functioning properly. Ensure inspection dates and results are documented;

- Ultraviolet fire detection systems must be checked and calibrated on a regular basis. Inspection and calibration information must be documented;

- Electrical equipment installed in Class 1 Division 1 and Class 1 Division 2 areas must be classified "explosion proof" and shall be installed and maintained in that condition;

- In hazardous areas, electrical heat tracing for the classified area must be protected by ground fault interrupters; and

- Drivers of petroleum product tankers must connect the provided ground cable (located at the transfer station) to their vehicle prior to conducting loading/unloading activities.

4.0 Fire Fighting Guidelines

If a fire is detected on a work site, personnel shall proceed as follows:

- Raise the alarm - call for assistance;
- Call the appropriate numbers listed in the Emergency Response Plan and report the fire;
- Check the type and size of the fire, and determine if it can be extinguished safely;
- If possible, isolate the fuel source of the fire (e.g., work site shut down or isolated, line de-pressured if possible);
- Fight the fire using the appropriate class of fire suppressant – do not put yourself at risk;
- Be absolutely sure the fire is out and that there are no “hot spots” remaining before you leave the site;
- Complete and submit the required incident report; and
- Notify the applicable regulatory agencies.

5.0 Training

All employees will receive training in fire prevention and worksite specific emergency evacuation procedures. Workers are not to fight fires unless they are incidental and do not pose an immediate risk or they have received training in the hazards that fighting fires pose, specific firefighting safety procedures and the equipment that they will be using.

References

- Alberta Occupational Health and Safety Code, Part 10: Fire and Explosion Hazards.https://www.alberta.ca/ohs-act-regulation-code.aspx

- Canadian Electrical Code.https://store.csagroup.org
- Energy Safety Canada: Fire and Explosion Hazard Management Guideline. https://www.energysafetycanada.com/Attachments/DownloadResource?attachmentGuid=f858f46d-5925-4ec6-9b89-04f6d8bd8a03&open=True
- NFPA 10 Standard for Portable Fire Extinguishers 1998 Edition.http://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=10
- British Columbia Occupational Health and Safety Regulation – Part 5: Chemical and Biological Substances, 5.27 Flammable and Combustible Substances.https://www.worksafebc.com/en/law-policy/occupational-health-safety
- Saskatchewan Occupational Health and Safety Regulations 2020, Part 25: Fire and Explosion Hazards.http://www.publications.gov.sk.ca/details.cfm?p=4355

Firearms

Purpose

A firearm is defined under the Firearms Act as a piece of equipment capable of projecting a missile at a speed greater than 840 ft./sec. For the most part, this will include all hand guns, rifles, shot guns, compound bows, cross bows, sling shots, and all forms of related hunting equipment. Richardson's Bulk Sales Ltd may require that trained employees carry firearms. Firearms have obvious risks associated with them. This SWP will be used to develop firearm procedures specific to the work requiring firearms to be carried and potentially used.

Scope

The conditions of this firearm's SWP applies to all workers working or providing services any work site or property owned or operated by Richardson's Bulk Sales Ltd. Vehicles leased, owned, or provided by a consultant, contractor, or service agency are included under this safe work practice.

Procedure

1.0 Responsibilities

1.1 Management

Management will ensure a suitable Firearms procedure is developed to accommodate the business, regulatory, and legal requirements of the Company. Employees must be trained in the Firearms procedure and it must be reviewed on a regular basis with all workers involved.

1.2 Supervisors

Supervisors are required to monitor, apply, and enforce the conditions of the Firearms procedure and to immediately report any violation or non-conformance to management.

1.3 Workers – Firearms Prohibition

Firearms and weapons of any description are by default prohibited at all Company work sites and will not be carried, or otherwise transported, in or on a vehicle owned or leased to Richardson's Bulk Sales Ltd at any time.

2.0 Exemption from Firearms Prohibition

2.1 General Conditions

Some workers may be exposed to hazards which may be best mitigated by carrying firearms (wildlife is one example) as they perform their work-related activities. These exposures could potentially result in unwanted risk to the health and safety of the worker.

In an effort to reduce this risk, such as at remote work sites, the authorization to carry a registered firearm may be granted by management. The firearm is to be used only for personal protection or threats from wildlife. This exemption applies only to those workers who are pre-registered, trained, and authorized by local and corporate management. Richardson's Bulk Sales Ltd and employees will strictly comply with all provisions of the Canadian Firearms Act and regulations.

2.2 Application of Exemption

Conduct a hazard analysis to clearly identify the risks and all possible alternative prevention options. Contact the regional law enforcement and conservation authorities for any required information or assistance.

Only persons with the required training, and holders of a current Firearm Acquisition Certificate, will be allowed to carry firearms while employed on Company-related business. Firearms must be unloaded when not in use and locked, stored, and secured according to the laws governing firearms. Firearms and ammunition will be stored in separate lockable containers when not in use.

2.3 Responsibility on Authorization of Exemption

Exceptions to the Firearms safe work practice will require the prior written approval of the applicable supervisor.

The supervisor will be responsible for obtaining a copy of the current Firearms Acquisition Certificate and particulars of the firearm (including serial number), for maintaining suitable records for each and every person authorized under the Exemption Clause.

The supervisor and firearms user will supply an incident report for any discharge of a fire arm. The destruction of any wildlife must be immediately reported to the regional conservation authorities.

3.0 Firearm Disciplinary Action

Any person violating this control program shall be subject to disciplinary action which may include immediate dismissal.

References

- Canadian Firearms Act.https://laws-lois.justice.gc.ca/eng/acts/f-11.6/

Fires and Explosion Hazards

Purpose

This SWP provides general fire and explosion hazard assessment and risk control information so that Richardson's Bulk Sales Ltd workers may assess and evaluate ignition sources found in the workplace and control the hazards that they create. Richardson's Bulk Sales Ltd has developed this safe work practice to provide the guidelines to be used in preparing work specific procedures where fire or explosion hazards may exist.

Scope

The information contained within this safe work practice will be applied and enforced at all work sites owned or operated by Richardson's Bulk Sales Ltd or at any site were employees, workers, or third-party contractors are actively engaged in activities where flammable or combustible environments exist or where flammable and combustible products are manufactured, received, handled, stored, or shipped for transportation. This SWP will adhere to the requirements of Part 10 of the AB OHS Code.

Procedure

1.0 Training

Employees that handle or work around flammable or combustible substances must be trained in the safe handling, use, storage, and disposal of the substance. They must be provided with adequate information concerning the identity, nature, and potential hazards of the substance.

2.0 Hazard Identification - Ignition Sources

2.1 Introduction

Once fuel and oxygen are present, an ignition source is needed to complete the fire triangle. Fuels (gas, liquid, or solids) can be ignited in two ways:

- When an external ignition source with sufficient energy to ignite the fuel-oxygen mixture is present (e.g., flames, sparks), and
- When the temperature is raised above the auto-ignition temperature.

Forced ignition is the most common form of accidental ignition. An external ignition source is classified as anything that can deliver enough energy in the form of heat to ignite a substance. This category includes sources such as open flames, electric arcs, sparks, and mechanical sparks.

2.2 Hot Work

- Hot work is defined as any operation that can produce enough heat from flame, spark, or other source of ignition with sufficient energy to ignite flammable vapours, gases, or dust;
- Welding, cutting, grinding, brazing, flaming, chipping, air gouging, riveting, drilling, and soldering are all forms of hot work that can create sparks or high temperatures;
- The conditions and equipment in areas adjacent to hot work area also need to be considered when planning activities; and
- Conditions can change and new hazards can be created during hot work. For example, hydrocarbons can vaporize from the heat produced during hot work.

2.3 Static Electricity

Static electricity discharges result from the electrical charging of materials through physical contact and separation and the positive and negative electrical charges that are formed by this process. If the process is not or cannot be properly grounded a charge may build up and discharge with a static arc that can provide an ignition source for a nearby mixture of fuel vapour and air. Static electricity can be generated in many different ways.

1. Nonconductive Liquids

   A common source of static electricity is the movement and transport of nonconductive liquids. When liquids are filtered, sprayed, pumped, mixed, or flow through pipes, static electricity can be generated.

   If there is a sufficient potential difference between the surface charge and a metal tank shell when an object is lowered into a tank or vessel, a static arc may occur. This is of particular concern if there is a vapour space above the surface of the liquid.

2. Minimum Ignition Energy

   For a discharge to ignite an explosive atmosphere, there must be enough energy. The minimum ignition energies for many hydrocarbon gases and vapours is very low and can develop from a person walking.

3. Switch Loading

   Switch loading is when a product is loaded into a tank or vessel that previously held a different product with a lower flash point. The concern with switch loading is that residual low flash point liquid from the previous load could form a vapour-air mixture in the tank or vessel.

   Even when there is no standing liquid from the previous load, an explosive vapour-air mixture can be created. Static charges generated during the transfer of the new product may discharge and ignite the vapour-air mixture.

To prevent the generation of a charge:

- Splashing and misting operations should be avoided;
- Initial fill rates and maximum flow rates should be limited; and
- Hydrocarbons with dispersed water or solids should not be pumped or flowed.

To prevent charge accumulation:

- Conductive fluids should be grounded while insulated containers are being filled, and conductive parts should be bonded and grounded;
- A sufficient residence time downstream of filters and pumps should be used; and
- Antistatic additives can be added to low conductivity fuels.

2.4 Hot Surfaces

Surfaces that exceed the minimum auto-ignition temperature of a fuel have the potential to ignite the fuel or its vapours.

2.5 Electric Arcs and Sparks

Once a voltage is high enough to overcome the dielectric strength of the air, the air will ionize and allow a conductive path for electricity to flow. There may be enough energy in an arc or spark to ignite a fuel or a flammable vapour.

Some common examples of arcs and sparks as an ignition source are listed below:

- Sparking of electric motors, generators, or other electrical rotating equipment;
- Arcing between contacts (e.g., switches and relays);

- Discharge of a charged capacitor through a gas;
- Poor contacts between conductors, such as poorly fitted light bulbs and their sockets; and
- Arcs intentionally created during electric welding.

2.6 Pyrophoric Iron Sulphides

Pyrophoric materials ignite spontaneously when exposed to oxygen. These materials may include finely divided metals and iron sulphides. Iron sulphides may form when iron is exposed to hydrogen sulphide, or any other compound that contains sulphur, in an oxygen-deficient atmosphere. They may be found in vessels, storage tanks, and sour gas pipelines.

2.7 Pressure (Compression Ignition)

When gases are compressed, heat is generated. If the rate of compression is rapid enough the heat loss may be negligible, and the temperature rise will depend on compression ratio. Diesel engines work on this basic principle.

2.8 Friction and Mechanical Sparks

Mechanical sparks occur when there is excessive friction between metals or extremely hard substances. As the two substances rub against each other, small particles are torn off the surfaces due to friction.

Depending upon the nature of the metals or substances and the energy input the particles which fly off may not become hot enough to “burn” causing a visible spark.

Sparking operations are safer in cold temperatures as the spark will cool more quickly.

Lower melting point metals are safer.

Mechanical sparks can be divided into three categories:

- Low energy – can be caused by hand tools;
- Medium energy – can be caused by powered hand tools; and
- High energy – can be caused by major collisions on land or sea.

2.9 Sudden Decompression

Sudden decompression of air-hydrocarbon mixtures may ignite under certain conditions.

2.10 Catalysts

Some metals may act as a catalyst for air fuel mixtures by lowering the energy required for ignition or accelerating combustion.

3.0 Requirements for Potentially Explosive Environments and Flammable and Combustible Liquids

Prohibitions for potentially flammable or explosive environments include:

- Any source of ignition is prohibited in areas where flammable and combustible sources are handled, used, or stored. This includes cigarette smoking, sparks from welding or grinding, open-flames, etc.;
- Workers must not enter or work at a work area if more than 10% of the lower explosive limit of a flammable or explosive substance is present in the atmosphere. Atmospheric testing results should be assessed before a worker is exposed;

Note: Richardson's Bulk Sales Ltd has adopted the highest regulatory standard in setting the maximum LEL of 10% that workers may be exposed to. Workers may not enter or remain in a work area if the LEL is greater than 10%. Entry or work in higher LELs will only be allowed where permitted by provincial or federal legislation, and then only after a formal risk assessment is completed and written approval from Management has been obtained. Legislated maximum LELs may be lower for hot work in confined spaces according to the jurisdiction. Consult the Confined Space SWP and refer to local legislation prior to establishing LELs for confined space entry or work.

- Where the work or manufacturing processes involve the use of a flammable liquid, vapour, or gas, the concentration of the liquid, vapour, or gas in the work area shall not be greater than 10% of the lower explosive limit (LEL) of the substance involved;
- The above does not apply to a competent, properly equipped worker who is responding in an emergency;
- Workers must not smoke in a work area where a flammable substance is stored, handled, processed, or used;
- Workers must not use an open flame, except in accordance with hot work conditions, in a work area where a flammable substance is stored, handled, processed, or used;
- Workers must not mix, clean, or use a flammable or combustible liquid at a temperature at or above its flash point in an open vessel if a potential source of ignition is in the immediate vicinity of the activity;
- Flammable and Combustible Liquids, Vapours or Gases;
- Workers must not use a flammable or combustible liquid at a temperature above its flash point in a washing or cleaning operation, unless the washing or cleaning equipment is specifically designed and manufactured for the use of the liquid;

- Workers must not store contaminated rags used to clean or wipe up flammable substances other than in a covered container, which has a label that clearly indicates it is to be used for the storage of contaminated rags;
- Flammable and combustible substances must be stored in areas away from substances that may cause a reaction, such as an oxygen tank;
- A Class B (or ABC) fire extinguisher will be provided and must be readily available when working with or near flammable and combustible liquids;
- Flammable and combustible substances must be stored in approved containers. Flammable and combustible chemicals must be stored in fire resistant cabinets or a designated storage room or building. Flammable liquids must be stored in a flammable storage cabinet with adequate ventilation;
- When transferring flammable and combustible liquids from one conductive container to another, grounding and bonding must be used to prevent the build-up of static electricity;
- Waste material contaminated with solvent, oil, grease, paint, or other flammable substance shall be placed in approved covered metal containers with the lids or covers kept closed before disposal and shall not be stored in work areas;
- If a worker's clothing is contaminated with a flammable or combustible liquid, the worker must:
    - Avoid any activity where a spark or open flame may be created or may exist;
    - Remove the contaminated clothing at the earliest possible time; and
    - Ensure that the clothing is decontaminated before it is used again; and
- If the worker's skin is contaminated with a flammable or combustible liquid, the worker must wash the skin at the earliest possible time.

4.0 Precautions to be used According to Work Area Classification

4.1 Classification of Work Sites

A “Hazardous Location” under the AB OHS Code refers to a place where fire or explosion hazards may exist due to flammable gases and vapours or combustible liquids and dusts, as defined under the Canadian Electrical Code (CEC).

If a hazard assessment determines that a work area is a hazardous location as described above Richardson's Bulk Sales Ltd will ensure that:

- A professional engineer divides and classifies the work area in accordance with section 18 of the (CEC);
- For any work area falling under the Code for Electrical Installations at Oil and Gas Facilities, the area is divided and classified according to the rules of that section;
- For any work area consisting of facilities described in section 20 of the Canadian Electrical Code, the area is divided and classified according to the rules of that section; and
- Adequate documentation is prepared and maintained by a competent person, outlining the boundaries of the classified area and any specific measures to be taken to prevent the unintentional ignition of an explosive atmosphere.

4.2 Storage of Flammable Substances in Non-Hazardous Work Areas

If the hazard assessment determines that a work area is not a hazardous location, Richardson's Bulk Sales Ltd will ensure that flammable substances stored or used at the work area:

- Will not be in sufficient quantity to produce an explosive atmosphere if inadvertently released;
- Are not stored within 30 metres (100 feet) of an underground shaft;

- Are not stored in the immediate vicinity of the air intake of:
  - A ventilation supply system;
  - An internal combustion engine; or
  - The fire box of a fired heater or furnace.
- Are stored only in containers approved to:
  - CSA Standard B376-M1980 (R2008), Portable Containers for Gasoline and Other Petroleum Fuels;
  - NFPA Standard 30, Flammable and Combustible Liquids Code, 2008 Edition; or
  - ULC Standard C30-1995, Containers, Safety, if manufactured on or after July 1, 2014.

If the work requires that the contents of metallic or conductive containers be transferred from one container to another workers must ensure that static electricity is controlled while the contents are being transferred.

4.3 Protective Procedures and Precautions in Hazardous Location

Richardson's Bulk Sales Ltd will ensure that in a hazardous location:

- Equipment used will not ignite a flammable substance, and
- Static electricity is controlled:
  - In the case of conductive containers for flammable or combustible liquids while the contents are being transferred, by electrically bonding the containers to one another and electrically grounding them, and
  - In other cases, by some other effective means.

Richardson's Bulk Sales Ltd will ensure that, if a work area is determined to be a hazardous location, the boundaries of the hazardous location are:

- Clearly identified to warn workers of the nature of the hazards associated with the presence of the flammable substance in that work area, and
- Fenced off to prevent workers or equipment entering the area without authorization.

If reasonably practicable, Richardson's Bulk Sales Ltd will ensure that procedures and precautionary measures are developed for a hazardous location, which will prevent the inadvertent release of a flammable substance, and oxygen gas, if it can contact a flammable substance. If these procedures cannot be developed Richardson's Bulk Sales Ltd will develop measures that will prevent an explosive atmosphere from igniting in a hazardous location.

4.4 Internal Combustion Engines in Hazardous Locations

Richardson's Bulk Sales Ltd will ensure that an internal combustion engine in a hazardous location has a combustion air intake and exhaust discharge, which are:

- Equipped with a flame arresting device, or
- Located outside the hazardous location.

Richardson's Bulk Sales Ltd will ensure that all the surfaces of an internal combustion engine that are exposed to the atmosphere in a hazardous location are:

- At a temperature lower than the temperature that would ignite a flammable substance present in the hazardous location, or
- Shielded or blanketed in such a way as to prevent a flammable substance present in the hazardous location from contacting the surface.

4.5 Flare Stacks, Flare Pits, and Flares in Hazardous Locations

Richardson's Bulk Sales Ltd will ensure that open flames from flare stacks, flare pits, or flares are not less than 25 metres (80 feet) beyond the boundary of a hazardous location.

5.0 Compressed and Liquefied Gas Storage – Fire and Explosion Considerations

1. Richardson's Bulk Sales Ltd will ensure that:
    - Compressed or liquefied gas containers are used, handled, stored, and transported in accordance with the manufacturer's specifications;
    - A cylinder of compressed flammable gas is not stored in the same room as a cylinder of compressed oxygen unless the storage arrangements are in accordance with the applicable regional Fire Code;
    - Compressed or liquefied gas cylinders, piping, and fittings are protected from damage during handling, filling, transportation, and storage;
    - Compressed or liquefied gas cylinders are equipped with a valve protection cap (if manufactured with a means of attachment); and
    - Oxygen cylinders or valves, regulators, or other fittings of the oxygen-using apparatus or oxygen distributing system are kept free of oil and grease.

2. Richardson's Bulk Sales Ltd will ensure that a compressed or liquefied gas system is not exposed to heat sources that generate temperatures that may:
    - Result in the failure or explosion of the contents or the system, or
    - Exceed the maximum exposure temperatures specified by the manufacturer.
3. Richardson's Bulk Sales Ltd will ensure that a compressed or liquefied gas system is kept clean and free from oil, grease and other contaminants that may:
    - Cause the system to fail, or
    - Burn or explode if they come in contact with the contents of the system.
4. Richardson's Bulk Sales Ltd will ensure that on each hose of an oxygen-fuel system:
    - A flashback device is installed at either the torch end or the regulator end, and
    - A back-flow prevention device is installed at the torch end.
5. Richardson's Bulk Sales Ltd will ensure that compressed or liquefied gas cylinders are secured (preferably upright) and cannot fall or roll (unless a professional engineer certifies another method that protects against the hazards caused by dislodgment).
6. Richardson's Bulk Sales Ltd will ensure that a cylinder containing acetylene is secured and stored upright.
7. Workers must ensure that:
    - Compressed gas equipment designed to be used with a specific gas is only used with that gas;
    - The cylinder valve is shut off, and pressure in the hose is released when cutting or welding is not in progress; and
    - Sparks, flames, or other sources of ignition are not allowed to come in contact with the cylinders, regulators, or hoses of a compressed or liquefied gas system.

References

- Alberta Occupational Health and Safety Code, Part 10: Fire and Explosion Hazards.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Canadian Electrical Codehttps://store.csagroup.org
- Energy Safety Canada: Fire and Explosion Hazard Management Guideline. https://www.energysafetycanada.com/Attachments/DownloadResource?attachmentGuid=f858f46d-5925-4ec6-9b89-04f6d8bd8a03&open=True
- British Columbia Occupational Health and Safety Regulation – Part 5: Chemical and Biological Substances, 5.27 Flammable and Combustible Substances.https://www.worksafebc.com/en/law-policy/occupational-health-safety

Fires and Explosions – Welding, Cutting, and Allied Processes

Purpose

Welding and allied processes include any specific type of electric or oxy-fuel gas welding or cutting process. Richardson's Bulk Sales Ltd is involved in electric and gas welding and flame cutting activities. These processes produce heat, sparks, and slag and involve the use of high electric currents, flammable gases and oxygen. Fire and explosion hazards result from the hot work, flammable and oxidizing gases associated with these processes. This SWP provides the guidelines necessary to establish Company and site-specific safe work procedures as they relate to the fire and explosion hazards for these processes.

Scope

The conditions and requirements of this safe work practice will be applied to all workers and third-party service providers engaged in welding activities at any work site owned or operated by Richardson's Bulk Sales Ltd. This SWP will adhere to the requirements of the AB OHS Code Part 10 and CSA W.117.2-06 “Safety in welding, cutting and allied processes”. This SWP must be used in conjunction with Fire and Explosion Hazards and Fire Prevention and Fire Safety.

Procedure

1.0 Compressed Gas Safety Requirements

1. Richardson's Bulk Sales Ltd will ensure that:
    - Compressed or liquefied gas containers are used, handled, stored, and transported in accordance with the manufacturer’s specifications;

- A cylinder of compressed flammable gas is not stored in the same room as a cylinder of compressed oxygen, unless the storage arrangements are in accordance with Part 3 of the Alberta Fire Code (1997);
- Compressed or liquefied gas cylinders, piping, and fittings are protected from damage during handling, filling, transportation, and storage;
- Compressed or liquefied gas cylinders are equipped with a valve protection cap if manufactured with a means of attachment; and
- Oxygen cylinders or valves, regulators, or other fittings of the oxygen-using apparatus or oxygen-distributing system are kept free of oil and grease.

2. Richardson's Bulk Sales Ltd will ensure that a compressed or liquefied gas system is not exposed to heat sources that generate temperatures that may:
   - Result in the failure or explosion of the contents or the system, or
   - Exceed the maximum exposure temperatures specified by the manufacturer.
3. Richardson's Bulk Sales Ltd will ensure that a compressed or liquefied gas system is kept clean and free from oil, grease, and other contaminants, which may:
   - Cause the system to fail, or
   - Burn or explode if they come in contact with the contents of the system.
4. Richardson's Bulk Sales Ltd will ensure that on each hose of an oxygen-fuel system:
   - A flashback device is installed at either the torch end or the regulator end, and
   - A backflow prevention device is installed at the torch end.

5. Richardson's Bulk Sales Ltd will ensure that compressed or liquefied gas cylinders are secured, preferably upright, and cannot fall or roll unless a professional engineer certifies another method that protects against the hazards caused by dislodgment.

6. Despite subsection 5, Richardson's Bulk Sales Ltd will ensure that a cylinder containing acetylene is secured and stored upright.

7. A worker must ensure that:

    - Compressed gas equipment designed to be used with a specific gas is only used with that gas;
    - The cylinder valve is shut off and pressure in the hose is released when cutting or welding is not in progress;
    - Sparks, flames, or other sources of ignition are not allowed to come in contact with the cylinders, regulators, or hoses of a compressed or liquefied gas system; and
    - Compressed air is not used to blow dust or other substances from clothing.

8. Richardson's Bulk Sales Ltd will ensure that a regulator and its flexible connecting hose are tested immediately after connection to a gas cylinder to ensure that there is no leak of the gas supply.

9. Richardson's Bulk Sales Ltd will ensure that if a leak of the gas supply develops during gas welding or an allied process:

    - The supply of gas is immediately shut off by the worker performing the welding or allied process, and
    - The work is not resumed until the leak is repaired.

2.0 Storage of Cylinders (General)

If the hazard assessment indicates that a work area is not a hazardous location, Richardson's Bulk Sales Ltd will ensure that flammable substances stored or used at the work area:

- Will not be of insufficient quantity to produce an explosive atmosphere, if inadvertently released, and
- Are not stored in the immediate vicinity of the air intake of a ventilation supply system, an internal combustion engine or the fire box of a fired heater or furnace.

3.0 Electric Welding General Safety Requirements

1. Richardson's Bulk Sales Ltd will comply with the requirements of CSA Standard W117.2-06, Safety in Welding, Cutting, and Allied Processes.
2. Richardson's Bulk Sales Ltd will ensure that welding or allied process equipment is erected, installed, assembled, started, operated, used, handled, stored, stopped, inspected, serviced, tested, cleaned, adjusted, carried, maintained, repaired, and dismantled in accordance with the manufacturer's specifications.
3. Richardson's Bulk Sales Ltd will ensure that before a welding or allied process is commenced:
    - The area surrounding the operation is inspected;
    - All combustible, flammable, or explosive material, dust, gas, or vapour is removed; or
    - Alternate methods of rendering the area safe are implemented.
4. If a welding or allied process is performed above an area where a worker may be present, Richardson's Bulk Sales Ltd will ensure that adequate means are taken to protect a worker below the operation from sparks, debris, and other falling hazards.
5. Richardson's Bulk Sales Ltd will ensure that appropriate welding and ground leads are used to fasten the electric supply cable securely.
6. An operator of an electric welding machine must not leave the machine unattended without removing the electrode.
7. Richardson's Bulk Sales Ltd will ensure that hot work has not begun until a hot work permit is issued that indicates:

- The nature of the hazard;
- The type and frequency of atmospheric testing required;
- The safe work procedures and precautionary measures to be taken;
- The protective equipment required;
- The hot work location has been cleared of combustible materials, or suitably isolated from combustible materials; and
- Procedures will be implemented to ensure continuous safe performance of the hot work and testing shows that the atmosphere does not contain:
  - A flammable substance, in a mixture with air, in an amount exceeding 20 percent of that substance's lower explosive limit for gas or vapours, or
  - The minimum ignitable concentration for dust.

4.0 Welding Services from Vehicles – On-Board Gas Cylinders

4.1 Storage Compartments

Richardson's Bulk Sales Ltd and the operator will ensure that welding services provided from vehicles comply with CSA Standard W117.2-06, Safety in Welding, Cutting, and Allied Processes.

Richardson's Bulk Sales Ltd and operator will ensure that gases do not accumulate and reach their lower explosive limit by providing the storage compartments in which compressed gas cylinders are stored with vents that:

- Have a minimum of 0.18 square metres (two square feet) of free area for every 0.42 cubic metres (15 cubic feet) of compartment volume;
- Have the free area split evenly between the top surface and the bottom surface of the storage compartment; and

- Are unobstructed under all conditions.

Richardson's Bulk Sales Ltd and operator will ensure that solid-walled storage compartments in which compressed gas cylinders are stored are built so that gases or vapours cannot flow into adjoining compartments.

Richardson's Bulk Sales Ltd will ensure that solid-walled compartments in which compressed gas cylinders are stored use:

- Latching and locking hardware made of non-sparking materials, and
- Electrical components appropriate for use in an explosive atmosphere if electrical components are located within the compartment.

4.2 Horizontal Cylinder Storage

Richardson's Bulk Sales Ltd and the operator will ensure that a compressed gas cylinder that is horizontal when it is transported or used in a vehicle is:

- In a storage compartment that incorporates a structure of sufficient strength to prevent the cylinder from passing through it should the valve end of the cylinder be damaged and vent its contents in an uncontrolled manner;
- In a storage compartment that incorporates a means of securing the cylinder that stops the cylinder moving within the compartment and puts the bottom of the cylinder in direct contact with the structure in clause a); and
- Protected against scoring during insertion into and removal from the storage compartment.

Richardson's Bulk Sales Ltd and the owner-operator must ensure that the regulator on a compressed gas cylinder that is horizontal when it is transported or used in a vehicle is protected from damage by other equipment in the storage compartment.

Richardson's Bulk Sales Ltd and the owner-operator must ensure that a storage compartment on a vehicle from which welding services are provided is certified by a professional engineer as meeting

the requirements of subsections 1 and 2.

4.3 Handling Cylinders

A Richardson's Bulk Sales Ltd worker must not insert or remove a compressed gas cylinder from a storage compartment by holding the valve or valve protection cap.

If the cylinder is not secured and not connected to dispensing equipment, a worker must put on and secure to the valve outlet the valve protection cap or plug provided by the manufacturer of a compressed gas cylinder.

If a welding service vehicle is not in service for any reason, a worker must:

- Close compressed gas cylinder valves;
- Remove regulators if they are not integral to the cylinder; and
- Put on and secure the valve protection caps or plugs.

A Richardson's Bulk Sales Ltd worker must shut off the cylinder valve and release the pressure in the hose if a compressed gas cylinder on a welding service vehicle is not in use or the vehicle is left unattended.

References

- Alberta Occupational Health and Safety Code, Part 10: Fire and Explosion Hazards.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Energy Safety Canada: Fire and Explosion Hazard Management Guideline. https://www.energysafetycanada.com/Attachments/DownloadResource?attachmentGuid=f858f46d-5925-4ec6-9b89-04f6d8bd8a03&open=True
- Saskatchewan Occupational Health and Safety Regulations, Part 25: Fire and Explosion Hazards. http://www.publications.gov.sk.ca/details.cfm?p=4355

Hand Tools

Purpose

Richardson's Bulk Sales Ltd engages in work which involves the use of hand tools. Hand tools may contribute to several types of worker injuries. This SWP will establish the guidelines to be used by Richardson's Bulk Sales Ltd to control hazards when workers are using hand tools. These guidelines will be used to develop specific procedures for the hazards which might be encountered, the work performed, and the hand tools used by Richardson's Bulk Sales Ltd.

Scope

The conditions and requirements of this safe work practice will be applied to all workers and third-party service providers engaged at any work site owned or operated by Richardson's Bulk Sales Ltd.

Procedure

The following guidelines shall be considered when using, or intending to use, hand tools. These guidelines will be used to generate Safe Work Practices which are specific to the type of tool being used, the work being performed and the hazards identified:

- All hand and power tools must only be operated by workers who are competent to do so and have received on-the-job training by a responsible and competent person. In all cases equipment manufacturer recommendations for the safe inspection, use, care and maintenance must be followed;
- Keep tools safely stored on a tool bench, or in a tool chest;

- Inspect all tools and equipment before use. Do not use defective tools. If defects are identified, tag and remove the item from service. The item shall not be returned to service until the deficiency has been corrected;
- Never leave tools lying on moving machinery or equipment;
- Sharpen or replace dull cutting tools immediately;
- Store tools, such as crowbars, chain tongs, pipe cutters, and other similar tools, in their proper racks;
- Select the appropriate size wrench for the nut to be adjusted. Use care in applying force. Where possible, pull – do not push or jar the wrench;
- Adjust pipe and crescent type wrenches to take a full snug grip on a pipe or nut. Make the pull toward the hook jaw of the wrench so as to tighten the grip. Avoid undue strain on the tool;
- Never step or jump on wrenches or tongs when additional force is needed;
- When two people are using driving tools, ensure the worker holding the tool being struck uses a tool holder and stands to the side;
- Ensure handles of all hammers, axes, picks, and other similar tools are securely wedged into the head;
- Do not use files without appropriate handles covering the tang;
- Ensure chisels, sledgehammers, and other impact tools are kept free of mushrooming by proper filing of the head surface. Discard brass hammers after they have mushroomed beyond safe use. Weighted plastic hammers now appear to be the hammer of choice;
- Do not use extensions, “cheaters”, or “snipes” on wrench handles to make or break a connection;
- Use screwdrivers only for the purpose for which they were designed. Do not use a screwdriver as a pry tool, drift punch, or chisel;
- Use hand tools only for the work for which they were designed and intended. Do not use hand or power tools beyond their rated capacity;

- When moving from one level to another, whether on a ladder or scaffold, place and carry tools in a tool belt or tool bag. Do not carry them in your hand;
- When working on elevated platforms or machinery, ensure all tools are secured in such a manner that they do not become a falling hazard to other workers;
- An effective written or other permanent recording system or log must be immediately available to the operator, and to any other person involved with inspection and maintenance of a tool;
- Employees using hand and/or power tools and are exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dust, fumes, mists vapors, or gases shall be provided with particular PPE necessary to protect them from the hazard; and
- Select tools that are ergonomically correct for the appropriate task based on the nature of the job, the workplace layout, and the job design. Other factors to consider include (but are not limited to): Low-vibrating tools, lightweight tools, tools with vibration-absorbing handles, tools that are easier to manipulate and handle, etc.

References

- Alberta Occupational Health and Safety Code Part 12: General Safety Precautions, and Part 25: Tools, Equipment, and Machinery.https://www.alberta.ca/ohs-act-regulation-code.aspx
- British Columbia Occupational Health and Safety Regulation, Part 12: Tools, Machinery, and Equipment.https://www.worksafebc.com/en/law-policy/occupational-health-safety
- Saskatchewan Occupational Health and Safety Regulations 2020, Part 10: Machine Safety.http://www.publications.gov.sk.ca/details.cfm?p=4355

Hantavirus

Purpose

This SWP will establish the guidelines to be used by Richardson's Bulk Sales Ltd to control hazards when engaged in activities which may result in exposure to Hantavirus. These guidelines will be used to develop specific procedures to control Hantavirus hazards when likely to result from specific work and activities performed by Richardson's Bulk Sales Ltd.

Scope

The conditions and requirements of this safe work practice will be applied to all workers and third-party service providers engaged in any work which could result in Hantavirus exposure at any site owned or operated by Richardson's Bulk Sales Ltd.

Procedure

1.0 Background

A Hantavirus infection is caused by a virus found in deer mice. Deer mice are commonly found in Alberta. The virus is rarely transmitted to humans, but can cause severe illness and death. Symptoms include a flu-like illness one to five weeks after exposure followed by coughing and shortness of breath.

Hantavirus is found in the animal's saliva, urine, and droppings. The virus is usually spread to humans when particles of infected saliva, urine, or feces are inhaled. The virus can also be spread if infected materials contact broken skin or the membrane lining of the eyelids and eyeball.

2.0 Encountering Hantavirus

Deer mice are normally found in rural and semi-rural areas but can also be found in homes as well as commercial and industrial buildings in any location.

Cases of Hantavirus in North America have been associated with:

- Sweeping out barns and other farm buildings;
- Trapping and studying mice;
- Using compressed air and dry sweeping to clean up buildings;
- Handling grain contaminated with mouse droppings and urine; and
- Disturbing rodent-infested areas while hiking or camping.

3.0 Exposure Prevention

The best method of prevention is to minimize contact with rodents by controlling them around the work site.

Prevention strategies include:

- Regular inspections for rodents to determine if active rodent control is required;
- Sanitation – Reduce the number of locations inside the workplace and in the immediate vicinity where rodents may feed or find shelter. Clean up trash, open stores of papers, or other areas that may serve as nesting sites for rodents;
- Eliminate potential food sources or store food in rodent-proof containers with a tight fitting lid, and rodent-proof by closing openings where rodents gain entry;

- Cut grass, brush, and shrubbery within 30 metres (100 feet) of buildings; and
- Control rodent populations by trapping or poisoning with rodenticides. Kill traps which can be safely disposed of while wearing appropriate PPE minimizes infection risk through handling. Rodenticides are hazardous to humans and non-target species and should be dispensed by competent persons according to local regulations governing their safe use.

4.0 Work Procedures

The following safe work practices must be considered when developing work site-specific procedures to minimize worker exposure to Hantavirus:

- Workers should wear an approved half-face air-purifying respirator equipped with HEPA filters when removing rodents from traps or handling rodents. Normal low efficiency dust respirators are NOT adequate;
- When handling rodents or traps containing rodents, workers should wear rubber gloves, disposable coveralls, and goggles to prevent airborne particles from coming in contact with the mucous membranes of the eye;
- Traps contaminated by rodent urine or feces, or in which a rodent was captured, should be thrown out;
- Decontaminate and remove personal protective equipment and clothing when the work is completed;
- Thoroughly wet contaminated areas with an approved disinfectant or bleach solution to deactivate the virus and prevent material from becoming airborne;
- Once everything is wet, take up the contaminated materials with a damp towel, and mop or sponge the area with disinfectant while wearing approved PPE; and
- Workers must seek immediate medical attention immediately if symptoms appear.

References

- Respiratory Protective Equipment COP Guideline.https://open.alberta.ca/publications/ppe004-respiratory-protective-equipment
- Hantavirus: Information for Employers and Workers - Government of Alberta.https://open.alberta.ca/publications/bh015-biological-hazards
- WorkSafeBC – A Hantavirus Exposure Control Program for Employers and Workers.https://www.worksafebc.com/en/health-safety/injuries-diseases/infectious-diseases/types/hantavirus
- Canadian Centre for Occupational Health and Safety – Hantavirus.http://www.ccohs.ca/oshanswers/diseases/hantavir.html
- Government of Saskatchewan – Hantavirus. https://www.saskatchewan.ca/residents/health/diseases-and-conditions/hantavirus

Harassment Prevention and Resolution

Purpose

In support of the Richardson's Bulk Sales Ltd Harassment Policy, the Company has developed this harassment prevention and resolution Safe Work Practice which is designed to provide guidance along with a process to be used to recognize, assess, and resolve harassment issues. Harassment and violence are closely related and this SWP will be use in conjunction with Violence Prevention.

Scope

This policy applies to all Company employees, independent contractors, subcontractors, and consultants.

This SWP also applies to any worker who is subjected to harassment by customers, suppliers, or personnel from other individuals, companies or organizations doing business with Richardson's Bulk Sales Ltd.

The conditions of this procedure shall be applied and enforced at all work sites owned or operated by the Company.

Definition

Harassment: Harassment occurs when a person is subjected to objectionable or unwelcome conduct, comment, bullying, or action that will or would cause offence or humiliation to a worker or adversely affects the worker's health and safety. Harassment can take many forms. It may be, but is not limited to: words, signs, jokes, pranks, intimidation, physical contact, or violence.

Human Rights Violations: Harassment that is based on a protected ground (such as race, religious beliefs, colour, physical disability, mental disability, age, ancestry, place of origin, marital status,

source of income, family status, gender, gender identity, gender expression, and sexual orientation) is a form of discrimination and is prohibited by the Alberta Human Rights Act.

Sexual Harassment: Sexual Harassment is discrimination based on gender. Sexual harassment is any unwelcome behaviour that is sexual in nature. Unwanted sexual advances, sexual advances by persons in positions of authority over the target, comments or gestures of a sexual nature, written or electronically posted comments, pictures or drawings, and any other verbal or physical conduct of a sexual nature constitute sexual harassment. Sexual harassment is subject to Human Rights legislation.

In cases of harassment the behaviour giving rise to a complaint need not be intentional in order to be considered harassment. It is sufficient that the behaviour is unwelcome and that the complainant is acting reasonably.

Advisor: Person who has been appointed by Richardson's Bulk Sales Ltd who is responsible for managing this procedure. This person shall be trained and competent in harassment prevention and resolution.

Procedure for Harassment Prevention Plan

1.0 Responsibilities and Obligations

1.1 Richardson's Bulk Sales Ltd and Advisor

- Richardson's Bulk Sales Ltd will develop and implement this harassment prevention plan in consultation with the Joint Health and Safety Committee (JHSC), the Health and Safety Representative (HSR) or affected workers as the case may be.

- Richardson's Bulk Sales Ltd is committed to providing a work environment free from harassment. To this end, Richardson's Bulk Sales Ltd has appointed an Advisor who will manage the identified requirements and conditions of this procedure.
- In the event of that a violation is observed or reported the advisor will initiate the Richardson's Bulk Sales Ltd site-specific Harassment Prevention and Resolution procedures with the assistance of Richardson's Bulk Sales Ltd's Human Resources department and the appropriate manager.
- Richardson's Bulk Sales Ltd will ensure that none of its workers are subjected to, or participate in, harassment.
- Richardson's Bulk Sales Ltd will include harassment and violence when identifying existing and potential hazards to workers at a work site.
- Richardson's Bulk Sales Ltd will advise a worker reporting an injury or adverse symptom resulting from an incident of violence or harassment to consult a health professional of the worker's choice for treatment or referral.
- Richardson's Bulk Sales Ltd will provide training in this harassment prevention plan to all employees and the training will include:
    - How to recognize harassment;
    - The harassment prevention policy and procedures to be followed;
    - How to respond to harassment; and
    - How to report harassment.
- Richardson's Bulk Sales Ltd will review the harassment prevention plan in consultation with the JHSC, or HSR, or affected workers as the case may be, at the earliest of:
    - When an incident of harassment occurs;

- If the JHSC or the HSR, if applicable, recommends a review of the plan; and
- Every 3 years.

1.2 Supervisors

- Richardson's Bulk Sales Ltd supervisors will ensure that none of the workers under the supervisor's supervision are subjected to or participate in harassment or violence at the work site.
- Supervisors are responsible for understanding the program, recognizing signs of harassment and providing immediate assistance and protection to harassed employees when surmised, observed, or reported.
- Supervisors must contact the advisor for this program or the appropriate HR person or manager immediately when they become aware of harassment or receive a complaint of harassment.

1.3 Workers

Richardson's Bulk Sales Ltd workers must refrain from causing or participating in harassment or violence.Workers shall abide by the conditions of the Harassment Policy and report any experienced or observed harassment immediately to their respective supervisor or to his or her supervisor if the immediate supervisor is involved.

1.4 Training Program

Richardson's Bulk Sales Ltd shall provide information, instruction, and training on the factors that contribute to workplace harassment that are appropriate to the workplace of each employee exposed to workplace harassment or a risk of workplace harassment. Richardson's Bulk Sales Ltd shall provide information, instruction, and training:

- Before assigning to an employee any new activity or location;
- When new information on workplace harassment becomes available; and
- At least every three years.

The information, instruction, and training shall include the following:

- The nature and extent of workplace harassment and how employees may be exposed to it;
- The communication system established to inform employees about workplace harassment;
- Information on what constitutes workplace harassment and on the means of identifying the factors that contribute to workplace harassment;
- The workplace harassment prevention measures that have been developed; and
- The procedures for reporting on workplace harassment.

This SWP will be used as the basis for the training to be provided and the training will be recorded on the employee Orientation Checklist and refresher training on the On-The-Job Training form.

2.0 Connection with the Workplace

Work-related harassment can occur in places other than the workplace. It can also occur:

- At work-related social functions;
- At other work-related activities;
- On work-related conferences or travel; or
- Elsewhere that the individuals involved have a work-related relationship, especially where the harasser has a position of authority over the complainant.

3.0 Confidentiality

Reporting harassing behaviour may be difficult and Richardson's Bulk Sales Ltd will maintain confidentiality through the resolution process to the best of its ability. Intentional breaches of confidentiality by those involved will be treated as a disciplinary issue. Confidentiality will be maintained throughout the process, and information relating to the complaint will be kept confidential.

4.0 Reporting of Complaints

Richardson's Bulk Sales Ltd encourages reporting of all incidents of harassment regardless of the identity of the alleged harasser. Workers who have experienced harassment are encouraged to:

- Keep a record of the incident(s);
- If safe and reasonable to do so, advise the offender that the behaviour is unacceptable and unwelcome; and
- Promptly report the incident(s) to the Advisor. The complaint may need to be submitted formally, in writing, depending upon how the resolution process proceeds.

Any worker who observes or believes that a fellow worker has experienced harassment or retaliation is encouraged to immediately notify the Advisor.

The Harassment SWP is not intended to interfere with the rights of employees to report harassment complaints to the Human Rights Commission or, if the matter is perceived to be of a criminal nature, to the police.

5.0 Investigation and Resolution of Complaints

- The advisor will inform the complainant of their legal rights, the company policies and procedures for harassment, the process to be used in handling their complaint, and will encourage the complainant to consult with a health professional of their choice.

- The Advisor will discuss the harassment with the complainant, the alleged harasser, and any individuals who are able to provide relevant information.
- The investigation of harassment will follow the same method as used for violence (see Violence Prevention).
- Having investigated the matter, the Advisor will take the following action:
    - If the Advisor establishes that the behaviour did not constitute harassment the Advisor will attempt to resolve the complaint with the alleged harasser, the complainant, or both parties.
    - If the Advisor establishes that the behaviour did constitute harassment. The Advisor will recommend the discipline to be administered according to the Discipline Policy. Discipline will be administered by the harassers' supervisor, with the assistance of the Advisor.
    - The Advisor will inform the complainant of the disposition of the complaint and establish further steps to keep the complainant safe from harassment and provide any further health treatment.
    - Confidentiality will be maintained according to the Harassment Policy.
- If the harasser has been disciplined, the relevant documentation will be retained in his or her personnel file. If the investigation fails to disclose evidence to support the complaint, no record of the complaint shall be retained in the alleged harasser's file.
- If the complaint is filed in good faith, no documentation will be placed in the complainant's file regardless of the outcome. However, if the investigation reveals evidence of a complaint being made in bad faith, the complainant may be appropriately disciplined and the documentation retained in his or her file.

6.0 Protection against Retaliation

Richardson's Bulk Sales Ltd will not retaliate against an individual who reports harassment in good faith, nor permit any employee to do so.

7.0 Disciplinary Measures

Disciplinary actions for persons who have engaged in harassment, retaliated against a person who has filed a complaint, or filed a complaint in bad faith may include one or more of the following depending upon the severity of the harassment and the harassers past history:

- A written apology;
- A written reprimand delivered to the harasser and recorded in his/her personnel file;
- Referral to counselling;
- Withholding of promotion (subject to Richardson's Bulk Sales Ltd's HR policies);
- Demotion (subject to Richardson's Bulk Sales Ltd's HR policies);
- Suspension with or without pay; and/or
- Dismissal.

Forms

- Harassment Complaint Form

References

- Alberta Human Rights Act.https://www.albertahumanrights.ab.ca/about/Pages/legislation.aspx
- Harassment and Violence in the Workplace: OHS Requirements for Workers and Employers - Government of Alberta.https://open.alberta.ca/publications/9781460139240

- Alberta Occupational Health and Safety Act.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Canadian Labour Code, Division XV.1 Sexual Harassment.http://laws-lois.justice.gc.ca/eng/acts/L-2/page-47.html

Hot Work

Purpose

Due to the potential for fire and explosion when Richardson's Bulk Sales Ltd is conducting activities involving hot work in and around flammable substances and atmospheres, specific safe job procedures must be followed. The purpose of this hot work safe work practice is to provide guidelines for conducting work in potentially explosive or flammable atmospheres, where the activity or equipment may become a source of ignition. These guidelines are to be used to develop specific procedures to control hot work hazards encountered when engaging in the specific work and activities performed by Richardson's Bulk Sales Ltd.

Scope

This safe work practice will apply to work carried out near any fuel, combustible materials, or combustible atmospheres which has an ignition source, as identified in Fire and Explosion Hazards. The conditions and requirements of this safe work practice will be applied to all workers and third-party service providers engaged in any aspect of hot work at any site owned or operated by Richardson's Bulk Sales Ltd.

Procedure

1.0 Hazard Controls

Whenever reasonable and practicable hot work should be done in a designated “safe” hot work area.

2.0 Training Requirements

- Richardson's Bulk Sales Ltd will provide appropriate training to workers who must work under hot work permits to ensure that they have the necessary skills, knowledge, and understanding to work safely.
- Workers will be provided hot work training before performing welding, cutting, grinding, and/or other types of hot work.
- Workers who perform hot work will be trained on the hot work program, and be qualified to operate the equipment that is producing the hot work.
- Employees who authorize hot work and those who conduct fire watches will be trained on the hot work program, and on emergency response procedures.
- Field Supervisors will be trained in how this practice applies to the work performed in their areas of responsibility, and must ensure that all employees or contractors understand and are competent in the hot work permit practice before work starts.
- The work site supervisor must periodically check to ensure the requirements of the hot work permit are being met, and that the work is being performed in a safe and efficient manner.
- Employees and contractors must cease work and bring any questions and safety issues to the attention of the designated supervisor.

3.0 Safety and Personal Protective Equipment (PPE)

Safety and personal protective equipment (PPE) that may be required during hot work activities includes:

Safety Equipment

- Fire extinguisher(s) of the correct Class.
- Fire blanket.
- Fire retardant covers/tarpaulin.
- Welding barrier (to prevent worker exposure to slag/flash).
- Gas detection equipment.
- Eye wash solution and burn kit.

Specialized PPE (as determined by a job specific hazard assessment):

- Face, eye, ear, head, body, hand, and foot protection.
- Personal gas monitor.
- Appropriate respiratory protection.
- Exposed skin should be protected by appropriate fire/flame resistant clothing and aprons;
- Feet and hands should be protected by appropriate boots and gloves which protect against electric shock, heat, burns and fire;
- Eye and face protection should include appropriate welding helmets, face shields and/or goggles;
- Eye protection should be specifically designed to protect against radiation with appropriate filter shades, and against hot slag, sparks and foreign objects;
- Appropriate respiratory protection (respirators, positive pressure) should be worn to protect against fumes, oxides and particulates; and
- Personal gas monitor.

4.0 Hot Work Permit Issuance

A Safe Work Permit and Hot Work Permit shall be completed whenever it is necessary to use tools or equipment or perform tasks that have the potential to cause ignition within an explosive or flammable environment. A Safe Work Permit is typically the primary document controlling overall safety activities at the work site. The Hot Work Permit is more detailed in nature than most Safe Work Permits and addresses specific hazards associated with the hot work task.

The Hot Work Permit must include testing the atmosphere for flammable vapors, removing or covering all flammable and combustible substances in the area of work, and having fire extinguishing equipment readily available in case of a fire.

4.1 Pre-job and Permitting Meeting

A hazard evaluation is the initial step of the permitting process. Prior to any hot work activity, a pre-job safety meeting will be held between all parties directly involved and/or affected by the hot work activity. The following activities shall be performed and reviewed and the results noted on the Safe Work Permit/Hot Work Permit prior to initiating hot work:

- Specific description of anticipated activity;
- Impact on operations;
- Fire watch requirements (when hot work generates sparks and/or hot slag, a fire watch must be conducted while hot work is underway);
- Potential hazards and appropriate control measures from the hazard assessment;
- Emergency procedures, roles, and responsibilities;
- All relevant facility, equipment, location, and process issues;

- Air turnovers and ventilation requirements;
- Post work inspection requirements (Fire watch should be conducted for at least 30 minutes following work completion); and
- Availability of appropriate personal protective equipment available according to the results of the hazard assessment.

4.2 Equipment Preparation

When preparing equipment for hot work, employees shall consider the following:

- All equipment on which hot work is to be performed shall be properly isolated (including lockout and tag out where appropriate), cleaned, and purged;
- Isolation should be accomplished by either blinding or physically disconnecting all incoming and outgoing lines. Internal spaces that have contained hydrocarbons or other flammable liquids should be carefully cleaned using a wash solution or steam, and purged with inert gas or air to ensure they are non-hazardous and less than 10% of the lower explosive limit (LEL); and
- External surfaces, which may be within the heat affected zone of the hot work and may be coated with lead-containing coatings, should be stripped before any welding or burning.

Note: Richardson's Bulk Sales Ltd has adopted the highest regulatory standard in setting the maximum LEL of 10% that employees may be exposed to. Workers may not enter or remain in a work area if the LEL is greater than 10%. Entry or work in higher LELs will only be allowed where permitted by provincial or federal legislation, and then only after a formal risk assessment is completed and written approval from Management has been obtained. Legislated maximum LELs may be lower for hot work in confined spaces according to the jurisdiction. Consult the Confined Space SWP and refer to local legislation prior to establishing LELs for confined space entry or work.

4.3 Work Area Preparation

Preparation of the work area where hot work is to be performed is equally important as preparation of the equipment. Workers engaged in the activity must ensure the following precautions are taken prior to commencing the hot work task:

- Determine the need for partial isolation of work site fire detection systems;
- Ensure all workers are aware and understand the conditions for an emergency work site shut down;
- Ensure atmospheric monitoring has been conducted within the immediate and surrounding work area prior to the activity, and that it continues throughout the course of the hot work project;
- Ensure flammable, combustible, and/or explosive materials and residue have been effectively removed (10 metres (33 feet)) from the immediate work area;
- Ensure equipment and materials within a ten metre (33 feet) radius of a welding site is either removed or suitably protected against contact by welding or grinding slag;
- Ensure sumps, or any area in which flammable products may have accumulated, are suitably drained, cleaned, and covered in a manner that will prevent entry by sparks or slag;
- A fire extinguisher must be readily available to extinguish any fires that might occur during hot work activities;
- Close or secure open vessels, tanks, piping, and drains;
- Where electric arc welding or cutting operations are performed, erect suitable protective screen, barriers, and curtains to prevent unwanted access or to contain sparks, slag, and radiation, especially where in close proximity to other workers;
- Install forced air ventilation as established by the hazard assessment and permit;

- Replace covers on all open containers that cannot be relocated;
- Remove flammable and combustible materials to a minimum distance of 10 meters (33 feet) in all directions;
- If this is not practicable flammable liquids and combustible materials should be covered with a flame-resistant material;
- Compressed gas cylinders must not be stored near ignition sources or in high temperatures. The cylinders must be stored in a well-ventilated area, secured in an upright position protected from falling, and must have the protective cap in place when not in use. Full and empty containers must be kept in separate areas;
- Combustible floors should be dampened with water;
- If welding, cutting, or brazing is being conducted in an area near other workers, erect an appropriate curtain or barrier to protect workers from sparks, slag, and arcs;
- On welding equipment, there must be a flash back arrestor located between the torch and the gas and oxygen supply lines to prevent a flame from burning back from the torch to the supply lines;
- Workers performing hot work must wear appropriate protective equipment. Appropriate PPE may include, but is not limited to, leather gloves with arm protection, flame retardant work clothing, leather apron, and welder's helmet;
- The welding equipment must be inspected for gas leaks before use. If any leaks are found, the gas supply must be shut-off, and an out-of-service tag shall be placed on the equipment until the leak is repaired and/or defective parts are replaced; and
- Continuous monitoring and inspections of the hot work area are required. The monitoring devices must be able to warn all the workers of any changes to their safe work environment. Fire watch provisions after the work has been completed will be required.

Forms

- Hot Work Permit

References

- Alberta Occupational Health and Safety Code, Part 2, Part 10, Part 18. https://www.alberta.ca/ohs-act-regulation-code.aspx
- CCOHS Hot Work Permit. http://www.ccohs.ca/oshanswers/safety_haz/welding/hotwork.html
- British Columbia Occupational Health and Safety Regulation, Part 12.112 – 12.126.https://www.worksafebc.com/en/law-policy/occupational-health-safety
- Saskatchewan Occupational Health and Safety Regulations 2020, Part 25: Fires and Explosion Hazards. http://www.publications.gov.sk.ca/details.cfm?p=4355

Housekeeping

Purpose

Richardson's Bulk Sales Ltd believes that proper housekeeping including cleanliness and orderliness is indicative of the overall state of health and safety at the workplace. Good housekeeping initiatives can help prevent damage to equipment, loss of process, and physical injury resulting from tripping, slipping, and fires. Good housekeeping can also assist in the early detection of leaks, spills, and other potential problems and safety hazards. This SWP will provide the guidelines required to establish good housekeeping procedures specific to the work being performed at specific worksites.

Scope

The conditions and requirements of this safe work practice apply to all workers engaged in work-related activities at all work sites owned or operated by Richardson's Bulk Sales Ltd.

Procedure

1.0 Worksite Organization

Good housekeeping consists of having no unnecessary items out and all necessary items in their proper places. The following guidelines have been established to maintain good housekeeping standards:

- Ensure the work site and work surfaces are kept clean and free of all hazards including materials and equipment that could cause workers to slip, trip or fall;

- Keep all doorways and areas of access or escape clear at all times. Make sure emergency vehicles and equipment are not blocked by stored equipment;
- Keep your workplace neat and presentable. Store all loose tools and equipment in an approved location. Promptly gather up and dispose of any refuse or scrap;
- Ensure tools and equipment are returned to their proper location at completion of their use;
- Store hoses and electrical cords when not in use and ensure that they are placed so as not to create a tripping hazard when in use;
- Ensure there is no dangerous or untidy piling of materials in storage locations;
- Empty barrels should be returned to the supplier as soon as reasonably practicable:
    - Empty barrels should be stored in neat piles, on their sides with the bung removed;
    - Minimize barrel use with bulk storage tanks; and
    - Barrel storage areas and individual barrels should be placed in secondary containment;
- Store all refuse and dangerous oily waste in the appropriate and approved containers;
- Empty waste containers on a regular basis;
- Ensure all forms, publications, files, documents, and blue prints are suitably stored and secured;
- Ensure all gates, building doors, cabinets, tool chests, etc., are suitably secured against any unwanted entry;
- Pick up and properly store materials that could be hazardous;
- Change your work clothes on a regular basis, and wash your hands before eating, drinking, or smoking, and after using the rest room;

- Ensure items of food and/or drink are placed in suitable containers and located in a cool/cold environment until ready for consumption;
- Ensure domestic garbage is suitably contained and disposed of via an approved carrier or agency;
- Keep your work area free of unwanted oil, grease, mud, and slippery materials;
- Clean up spills immediately, and dispose of hazardous materials via an approved agency or system. Use an environmentally friendly absorbent for containing and recovering spilled oil (not wood shavings or sawdust);
- Place all oily rags and paper in metal containers outside of buildings, at least seven metres (23 feet) away from production buildings in case the material is subject to spontaneous combustion;
- Keep outdoor walkways and stairways clear of ice and snow or build-up of dirt;
- Housekeeping activities include vegetation control at well sites and all above-ground equipment installations;
- Special consideration should be given to areas where open flames are evident, such as flare pits and the ground below flare stacks;
- Ensure overhead and yard lights are in working order; and
- Clear ice build-up and icicles from the eaves of buildings.

References

- CCOSH: Workplace Housekeeping - Basic Guide. http://www.ccohs.ca/oshanswers/hsprograms/house.html
- AB OHS Code Part 12 General Safety Precautions

Hydrocarbons – Light Hydrocarbon Exposure

Purpose

Richardson's Bulk Sales Ltd is involved in the production, processing, storage, or transportation of methane, ethane, propane, and butane, which are referred to as light hydrocarbons (LHCs) for the purpose of this safe work practice.

Light hydrocarbon worker exposure or LHC accumulation in enclosed, still, or poorly ventilated areas may create health and safety hazards This SWP will establish the guidelines to be used by Richardson's Bulk Sales Ltd to control the LHCs which it might encounter.

These guidelines will be used to develop specific procedures for the hazards created by LHCs when engaging in specific work and activities performed by Richardson's Bulk Sales Ltd.

Scope

LHCs include Methane and “Aliphatic Hydrocarbon Gases, Alkane” (C2 – C4).

The conditions and requirements of this safe work practice shall be applied to all work sites owned or operated by Richardson's Bulk Sales Ltd where the potential for exposure to light hydrocarbons exists.

Procedure

1.0 Health and Safety Hazards of Light Hydrocarbons

1.1 Asphyxiants

Methane, Ethane, and Propane are classed as simple asphyxiants by the American Conference of Governmental Industrial Hygienists (ACGIH). A simple asphyxiant can displace the air and thereby reduce the amount of oxygen present for breathing.

1.2 Narcotic Effects

Butane is known to produce narcotic effects and methane, ethane, and propane may also cause narcotic effects. This narcotic effect may include dizziness, headaches, and errors in judgment. It may occur with short exposures of less than 15 minutes at concentrations below the levels at which asphyxiation occurs due to oxygen displacement. Consult relevant Safety Data Sheets (SDS) before working with LHCs.

1.3 Explosive Limits

Table 1 provides lower and upper explosive limits for LHCs by volume of gas in air.

Table 1 – Explosive Limits

	LEL (%)	UEL (%)
Methane	5.0	15.0
Ethane	3.0	12.5
Propane	2.3	9.5
Butane	1.9	8.5

LEL - Lower Explosive Limit in air

UEL - Upper Explosive Limit in air

1.4 Suggested Flammable Limits

10% LEL will be used as a set-point for combustible gas meter high alarm points, this set point may be lower depending upon the work being performed and the jurisdiction. Where no knowledge of the mixture of the gases is available, a lower LEL will be evaluated for a safe threshold as determined by a competent person for the specific gas system under consideration. Workers must be protected from explosions and fires when the source, cause, and or nature of a gas leak is unknown.

Note: Richardson's Bulk Sales Ltd will adopt the highest regulatory standard in setting the maximum LEL of 10%. Workers may not enter or remain in a work area if the LEL is greater than 10%. Entry or work in higher LELs will only be allowed where permitted by provincial or federal legislation, and then only after a formal risk assessment is completed and written approval from Management. Legislated maximum LELs may be lower for hot work in confined spaces according to the jurisdiction. Consult the Confined Space SWP and refer to local legislation prior to establishing LELs for confined space entry or work.

1.5 Burns (Frost Bite)

LHCs may be liquefied for storage and transport. Freezing burns may result from liquid LHC contact with unprotected tissue.

Table 2 summarizes regulatory light hydrocarbon exposure limits.

Table 2 – Regulated and Suggested Exposure Limits

Substance	Alberta (ppm)

8 hour 15 min	
Methane (ACGIH)	1000 *
Ethane	1000 *
Propane	1000 *
Butane	1000 *
LPG	1000 1500
Raw Gas	

1.6 Narcosis

Light hydrocarbon narcosis is not well understood. It may vary widely depending on both the concentration and nature of the gas mixture. Factors associated with the individual worker may also have an effect, including medications taken by the worker, the worker's level of fatigue, and whether the worker is on a day or night shift. Training on the symptoms and recognition of narcosis should be provided to workers who may suffer LHC exposure.

1.7 Light Hydrocarbon Sources

Exposures to light hydrocarbons may occur in all natural gas production, transmission, and refining. Propane is often used as a fuel and as a pneumatic fluid for pumps at work sites. Light hydrocarbon gases may also be used as control gas for instruments.

1.8 Examples of Sources and Solutions

- Gas driven pneumatic equipment should be vented outside buildings.
- Low pressure fuel gas lines to compressors may leak, thus compressor buildings should have gas detection equipment and proper ventilation.
- When depressurizing vessels and piping, and blowing down meters and gauges, discharge piping must be vented to the building exterior.
- Responding to an area combustible alarm requires response training.
- Entering a building which does not have a permanent combustible gas monitor should be preceded with a check using an approved gas detection device in a safe manner according to standard procedures, prior to the door being opened.
- Tank gauging, confined space entry (e.g., for tank cleaning, flare pit remediation), and spill clean-up may expose the worker to substances other than methane or ethane, such as benzene or other VOCs. LEL testing and required personal protective equipment must be used.

1.9 Detection (See Entry into Hazardous Location and/or Buildings)

- Measurement of combustible gas concentration should be performed before entry into any area where hydrocarbon gas or vapour concentrations are suspected. The most common method for light hydrocarbon detection and measurement is a combustible gas meter.
- The meter should be calibrated to the anticipated hydrocarbons present. Calibration against methane, then subsequent use in an ethane, propane, or butane atmosphere can lead to a serious underestimation of the LEL and explosion hazard.
- Remote fixed and personal combustible gas meters should be set to alarm at a level lower than 10% LEL according to prevailing legislation and Richardson's Bulk Sales Ltd practices and hazard control procedures.

2.0 Personal Protective Equipment

2.1 Respiratory Protection

Workers entering environments where the known concentration of hydrocarbons are above the maximum suggested limit as determined by a hazard assessment and or legislated OELs must take steps to reduce the known concentrations to less than the maximum suggested limit or wear self-contained breathing apparatus (SCBA) or supplied air breathing apparatus (SABA). This recommendation is made in order to prevent the onset of narcosis.

A person must not enter or work at a work area if more than 10% of the Lower Explosive Limit of a flammable or explosive substance is present in the atmosphere or the OEL may be exceeded.

2.2 Skin and Eye Protection

Workers handling cold light hydrocarbons should wear loose, insulated gloves that can be shaken off with one hand. If the potential for splashes is present, then workers should wear insulated aprons, face shields, and goggles to protect the body, face, and eyes.

PPE requirements should be determined through a hazard assessment and follow Safety Data Sheets (SDS) recommendations for the chemical and physical resistance of the materials to be used.

3.0 Training

Prior to entering an area where light hydrocarbons may be present or may be encountered, all workers shall:

- Receive orientation on the site rules and procedures;
- Receive training on rescue and evacuation procedures;
- Receive training on gas detection equipment and personal protective equipment; and

- Ensure that first-aid training is provided as per regulatory requirements.

All training must be provided by a competent person.

4.0 Signage and Product Labels

4.1 Signage

All work sites where light hydrocarbons are present should have suitable signs at the entrance to warn of the presence of flammable gases and liquids.

Signage can also describe the composition of the individual gases that make up the natural gas, natural gas liquids, or LPGs, etc. For example, if it can be shown that a stream contains sufficient butane to exceed the 15 minute OELs , then workers must be provided with adequate PPE, training on the hazardous substances to which they will be exposed and the site ERP.

4.2 Product Labels

Work site Hazardous Materials Information System (WHMIS) supplier and workplace labels for light hydrocarbon products shall meet the standards summarized in Table 3.

Table 3 – WHMIS Supplier and Workplace Label Specifications

Product	WHMIS Classification	PPE Symbols
Natural Gas	Class A: Compressed Gas Class B, Div. 1: Flammable Gas	SCBA/SABA*
Natural Gas		

Liquefied Ethane, Butane, and Propane	Class A: Compressed Gas	SCBA/SABA* Gloves
	Class B, Div. 1: Flammable Gas	Apron or skin protection Face shield
LPG	Class A: Compressed Gas	SCBA/SABA* Gloves
	Class B, Div. 1: Flammable Gas	Apron or skin protection Face shield

*SCBA/SABA: Self-contained Breathing Apparatus/Supplied Air Breathing Apparatus

References

- Alberta Occupational Health and Safety Code and Explanation Guide, Part 2: Hazard Assessment, Elimination, and Control; Part 4: Chemical Hazards, Biological Hazards, and Harmful Substances; Part 10: Fire and Explosion Hazards; Part 29: WHMIS; Schedule I Table 2.https://www.alberta.ca/ohs-act-regulation-code.aspx

- American Conference of Governmental Industrial Hygienists (ACGIH).
- British Columbia Occupational Health and Safety Regulations, Part 5: Chemical and Biological Substances; Part 6: Substance Specific Requirements; and Part 23: Oil and Gas.https://www.worksafebc.com/en/law-policy/occupational-health-safety
- Saskatchewan Occupational Health and Safety Regulations 2020, Part 6: General Health Requirements; Part 7: PPE; Part 21: Chemical and Biological Substances; Part 22: WHMIS; Part 25: Fire and Explosion Hazards; Part 29: Oil and Gas. http://www.publications.gov.sk.ca/details.cfm?p=4355

Illumination

Purpose

Richardson's Bulk Sales Ltd requires that the illumination of any work site is sufficient to allow work to be carried out safely. This SWP will provide guidelines for carrying out an assessment of the work site and work activities to determine the types and quantity of lighting that are required to safely allow work to be conducted. This SWP will be used to determine site-specific requirements for emergency lighting and general work site lighting.

Scope

The conditions and requirements of this safe work practice shall be applied to all work sites owned or operated by Richardson's Bulk Sales Ltd where temporary or permanent lighting is required to safely perform the task during low light or night conditions.

Procedure

1.0 Work Site Lighting

Richardson's Bulk Sales Ltd will ensure that lighting at a work site is sufficient to be able to be done safely:

- Various types of work site lighting and mounting systems are available;
- The type of lighting element may be incandescent, fluorescent, LED, or high-pressure sodium;

- The lighting fixture may be mounted on the building or structure interior/exterior wall, or possibly on a tower or pedestal. Typically, these types of systems are reserved for permanent work site locations;
- For work sites under construction, or where high intensity temporary illumination is required, self-contained portable lighting units powered by a diesel/electric generator are will be provided by Richardson's Bulk Sales Ltd as required;
- Richardson's Bulk Sales Ltd will determine the type of lighting system that best serves its specific purpose in terms of the illumination provided, the quality or intensity of illumination, and the application in terms of the electrical Class and Division it is to be installed in;
- Each work site location must be individually assessed to determine what type of lighting system best meets the specific need; and
- Where lighting fixtures are installed on building walls, above a work area, above or below a walking surface, or on a pedestal or tower, these fixtures or lighting systems will be appropriately protected from damage, and suitably protected from the elements.

2.0 Emergency Lighting

Where failure of the normal lighting system would endanger any worker, Richardson's Bulk Sales Ltd will ensure emergency lighting is available that will generate sufficient and dependable light to enable workers to:

- Evacuate the premises safely;
- Initiate emergency shutdown procedures; and
- Restore normal lighting.

Regularly scheduled tests will be conducted to ensure that emergency lighting will work as intended or as required by legislation.

References

- Alberta Occupational Health and Safety Code, Part 2: Hazard Assessment, Elimination, and Control, and Part 12: General Safety Precautions.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Saskatchewan Occupational Health and Safety Regulations 2020, Part 6: General Safety Requirements – Lighting.http://www.publications.gov.sk.ca/details.cfm?p=4355

Job Competency

Purpose

This safe work practice establishes the guidelines including skills, knowledge, and abilities to be considered to in order to generate job-specific competency requirements for all Richardson's Bulk Sales Ltd positions. Job competency requirements are established in order to enable people to successfully and safely perform their jobs.

Scope

This practice will be applied to all job functions within Richardson's Bulk Sales Ltd.

Procedure

1.0 Hiring

Will be carried out according to the requirements of Training section in this Health and safety program.

2.0 Job Competency

The term Job Competency, for the purposes of this safe work practice, is primarily related to education, work experience, documentation, training, and verification leading to a competent employee capable of working independently. Job Competency also deals with behavioural characteristics which will be evaluated according to the following table:

Competencies

Personal Effectiveness	Academic	Workplace	Managerial
Interpersonal Skills	Reading	Teamwork	Staffing
Integrity	Writing	Adaptability / Flexibility	Delegating
Professionalism	Mathematics	Customer Focus	Networking
Initiative	Science / Technology	Planning / Organizing	Monitoring Work
Dependability	Communication Skills	Creative Thinking	Entrepreneurship
Reliability	Critical Thinking	Problem Solving	Motivating
Willingness to Learn	Active Learning	Decision Making	Strategic Planning
	Basic Computer Skills	Scheduling / Coordinating	Budgeting
		Business Fundamentals	Managing Conflict

3.0 Established Program Elements In-Place

1. The Richardson's Bulk Sales Ltd organizational chart is established and in-place as well as a list of the job titles/roles within the Company is also established and in-place. This list and the organizational chart resides in the head office administration offices and changes are approved by the President or his or her designate. The list is used and included as part of the Formal Hazard Assessments contained in the Hazard Assessment section of this Health and Safety program.

2. Richardson's Bulk Sales Ltd has identified the minimum qualifications required to perform each role identified in (1.) above. This minimum qualification list has been established and is in-place, residing in the head office administration offices. Changes are approved by the President or his or her designate. Applicants and transferees must satisfy these minimum requirements that consist of a combination of education and work experience.

3. Richardson's Bulk Sales Ltd program has established and has in-place a standard verification and tracking procedure to ensure that documentation is acquired from employees as proof that they are qualified to perform their job duties.

4. Job-specific training is provided for new or transferred employees using the standard on-the-job training form. All employees are trained on the tasks they perform on a regular basis.

5. A competent person (Supervisor, Lead Hand, etc.) verifies that an employee is competent to perform their roles and responsibilities before being allowed to work independently.

6. Richardson's Bulk Sales Ltd verifies that workers are trained on Richardson's Bulk Sales Ltd's Fit for Duty policies and procedures.

7. Richardson's Bulk Sales Ltd verifies that workers have the necessary education, experience, and training to safely perform their job tasks. Worker's must be physically capable of performing their job tasks. A Physical Demands Analysis (PDA) may be required for certain job duties to ensure workers are placed accordingly.

4.0 Minimum Qualifications

1. To establish minimum qualifications for the positions in the standard Richardson's Bulk Sales Ltd organization chart the HR Department, along with the supervisors who are directly responsible for the jobs in question, will compile a list of the required education and work experience required for each job position. Behavioural attributes may also be listed.
2. The list of competencies will be reviewed in consultation with competent employees for new positions or when position responsibilities change.
3. The list of competencies should be reviewed annually.
4. When the list of competencies is established for a position, the forms of supporting documentation, either a course ticket, course diploma, on-the-job training form, documented time on the job, or completed test(s) will be established.
5. The documentation will be entered onto the training matrix and filed indefinitely (for at least the term of employment for the employee).
6. Documentation provided during the hiring process will be collected, copied and filed prior to work commencing. Thereafter, competencies acquired on the job will become part of a formal training program.
7. The HR Department, in conjunction with the respective supervisor, will oversee the timely completion of training requirements in order to satisfy the full competency requirements.

5.0 Verification and Retraining

The final stage in the training process will be certification from the employee's supervisor or senior co-worker who confirms that the employee has achieved both the "hard" (courses, education, training) and "soft" (attitude, safety awareness, team player) requirements of the job.

Maintenance of the competency qualification will include:

- Keeping courses up-to-date as they come due;

- Annual performance review by supervisors;
- Regular review of key safe work practices as part of the health and safety program; and
- Job observation of critical tasks and/or on-the-job retraining by senior employees or supervisors on an as required basis to confirm that existing tasks are being performed in an acceptable manner.

Timing of this function will be the lesser of: every three years, when the workplace changes sufficiently, or when the employee's performance of applicable tasks suggests that retraining is required.

Joint Health and Safety Committees and Representatives

Purpose

A Joint Health and Safety Committee (JHSC) is required for employers who regularly employs 20 or more workers. A Health and Safety Representative (HSR) is required for employers who regularly employs 5 to 19 workers. A JHSC brings workers and management together in a non-adversarial, cooperative effort to promote health and safety in the workplace. This SWP outlines how, when required, the Richardson's Bulk Sales Ltd JHSC is to be constituted, the responsibilities of the parties involved in a JHSC and the duties of a JHSC or a HSR. This SWP will adhere to all of the requirements of Part 2 of the AB OHS Act and Part 13 of the OHS Code.

Scope

This SWP applies to all Richardson's Bulk Sales Ltd worksites that are required to have either a JHSC or a HSR as described under Part 2 of the AB OHS Act.

Procedure

1.0 Establishing a Committee

Richardson's Bulk Sales Ltd shall establish a Joint Health and Safety Committee (JHSC):

- When Richardson's Bulk Sales Ltd regularly employs 20 or more workers, or
- If there are 20 or more regularly employed workers in total from 2 or more employers at a work site, all employers shall, after consultation with any union that is a certified bargaining agent or has acquired bargaining rights on behalf of the employer's workers, coordinate the establishment of a Joint Health and Safety Committee for that work site.
- If a prime contractor has been designated, the multi-employer provision above does not apply.

2.0 Designation of a Representative

Richardson's Bulk Sales Ltd shall designate a worker to be appointed as required by any union agreement or selected by the workers if no union or certified bargaining agent exists:

- If Richardson's Bulk Sales Ltd regularly employs 5 to 19 workers, or
- If there are 5 to 19 workers in total from 2 or more employers regularly employed at a work site, all employers shall coordinate the designation of a Health and Safety Representative for that work site.
- If a prime contractor has been designated, the multi-employer provision above does not apply.

An employer that is required to designate a Health and Safety Representative may establish a Joint Health and Safety Committee instead of designating a Health and Safety Representative.

3.0 Duties and Functions of the JHSC and HSR

The primary function of the JHSC is to provide workers with a voice and physical involvement in the functioning of the health and safety program. The Health and Safety Representative shall, in cooperation with a representative of Richardson's Bulk Sales Ltd, perform the same duties, with any necessary modifications, as set out for the Joint Health and Safety Committees in the Act. The JHSC has the following duties:

- Participation in Richardson's Bulk Sales Ltd's hazard assessments;

- The making of recommendations to the employer respecting the health and safety of workers; and
- Review of Richardson's Bulk Sales Ltd's work site inspection documentation.

4.0 Employer Responsibilities

Richardson's Bulk Sales Ltd will:

- Consult and cooperate with all JHSCs and all HSRs;
- Provide members of all JHSCs and all HSRs for their work sites with reasonable opportunity to inform workers on matters affecting occupational health and safety;
- Keep readily available information related to work site hazards, controls, work practices, and procedures and provide that information to the Joint Health and Safety Committee, if there is one, or Health and Safety Representative, if there is one, at the work site;
- Distribute to all JHSCs and all HSRs for their work sites any information or documents addressed to the committee or representative as soon as reasonably practicable after the information or document is received by the employer, contractor or prime contractor, if there is one; and
- When an officer inspects a work site, the officer may request any member of the Joint Health and Safety Committee, their designates, or a Health and Safety Representative to be present at that inspection.

5.0 Training to be Provided to Committee Members and Representatives

- JHSC Co-chairs and HSRs may receive provincial training (6-8 hours) delivered by an Alberta Labour approved training agency listed at https://ohs-pubstore.labour.alberta.ca/edu009.
- All training will be recorded on the On-The-Job Training Form and records of JHSC member and HSR training will be retained.
- Training will include:
  - Alberta OHS legislation;
  - JHSC or HSR member duties;
  - The hazard control process including identification and assessment;
  - Incident investigation process and root cause determination;
  - Inspections carried out by the JHSC and other inspections;
  - Communication activities by the JHSC or HSR; and
  - Other relevant training.

6.0 Information to be Provided to Employees

- Employees will be provided with information on the function and role of the Richardson's Bulk Sales Ltd JHSC or the HSR.
- Richardson's Bulk Sales Ltd information will include how to contact a JHSC member or HSR with a health and safety concern and how those concerns will be dealt with.

7.0 Committee Membership, Structure, and Meetings

- The number of persons on a Joint Health and Safety Committee who represent Richardson's Bulk Sales Ltd shall not exceed in total the number of worker representatives on the committee.
- The Joint Health and Safety Committee shall hold its meetings and carry out its duties and functions during normal working hours.
- A JHSC member or the HSR will immediately report to company management, supplying all available information and records:
    - Any urgent issue that may affect the health and safety of any person;
    - Any new information concerning a safety incident;
    - The minutes of all meetings held;
    - Any safety related complaints that it has received, while maintaining confidentiality where appropriate; and
    - Any reports of harassment, discrimination and/or violence.

8.0 Committee Operation

1. Committee meetings may be chaired alternately by an employer representative and a worker representative. Members are free to request items be added to the agenda. A prepared agenda should be issued a week prior to the meeting in order to:
    - Keep discussions on track;
    - Allow members to prepare for the meeting;
    - Serve as written documentation of on-going health and safety issues and initiatives (Note: All agreed-upon action items will be added to the Corrective Action Register or the Company Work Order system, if they cannot be immediately addressed); and
    - Assist departments to plan for the absence of committee members for that particular day.
2. Richardson's Bulk Sales Ltd will provide the JHSC with the equipment, premises, and clerical personnel necessary for carrying out its duties and functions. On request of the JHSC, Richardson's Bulk Sales Ltd will provide the committee with information respecting:
    - The identification of known or reasonably foreseeable health or safety hazards to which workers at the workplace are likely to be exposed;
    - Health and safety experience and work practices and standards in similar or other industries of which Richardson's Bulk Sales Ltd has knowledge;
    - The conducting or taking of tests of any equipment, machine, device, article, thing, material, or biological, chemical, or physical agent in or about a workplace for the purpose of occupational health and safety;
    - Orders, penalties, and prosecutions against Richardson's Bulk Sales Ltd;
    - Any audit reports on Richardson's Bulk Sales Ltd's Health and Safety Program;
    - The regulations relating to health and safety at the workplace; and
    - Information related to any lost time accidents.

3. After each JHSC meeting, the committee must prepare minutes of the meeting using the JHSC Meeting Minutes Form and must provide a copy to Richardson's Bulk Sales Ltd and the union, if applicable, within seven (7) days of the meeting. The minutes will be accessible to all committee members and all workers. Minutes should include the following:
    - Written summary of efforts;
    - Names of attendees;
    - Number of absentees;
    - Responsibilities for implementations assigned;
    - Timing of implementations assigned;
    - Cost of implementations;
    - Any approvals required;
    - Completed recommendations and incomplete recommendations;
    - Accident reviews; and
    - Safety training activities.
4. Richardson's Bulk Sales Ltd will post in a conspicuous location:
    - The names, work locations, and contact phone numbers of the JHSC members, and
    - The reports of the three most recent JHSC meetings.

9.0 Terms of Reference (see Terms of Reference Form)

The Richardson's Bulk Sales Ltd Joint Health and Safety Committee will establish written terms of reference:

- That ensure, that the committee's membership provides appropriate representation of all relevant occupational health and safety concerns at the work sites that the committee relates to;
- That establish a process for replacing a member of the committee during the member's term of office;
- That establish a dispute resolution process to be used in cases where the committee has failed to reach consensus about making a recommendation under section 19(f) of the Act;
- That establish a process for coordinating with other Joint Health and Safety Committees established by the same employer or prime contractor, if there is one; and
- The terms of reference will be established by the JHSC according to the completed Terms of Reference Form. When the terms of reference are amended this will be entered on the same form.

Forms

- JHSC Meeting Minutes
- JHSC and HSR Terms of Reference

References

- Alberta Occupational Health and Safety Act, Part 2 Health and Safety Committees, Representatives and Programs.

- Alberta OHS Code Part 13 Joint Health and Safety Committees and Health and Safety Representatives. https://www.alberta.ca/ohs-act-regulation-code.aspx
- Health and Safety Committees and Representatives – Government of Alberta.https://ohs-pubstore.labour.alberta.ca/li060

Journey Management

Purpose

Driving is one of the most hazardous tasks undertaken by employees. A journey management system can be used to control driving hazards and minimize risk exposure. This SWP will provide the guidelines required to establish the specific Safe Job Procedures required for an effective Journey Management program.

Scope

This SWP will apply at all work sites and for all employees who are driving on Company business, driving to off-site work locations, and driving Company vehicles.

Definitions

Company Driver

- Any Company employee who has access to a Company vehicle or who is reimbursed for mileage/kilometres driven while using a private vehicle; any Company employee who may be required to drive a Company vehicle as part of his or her duty; or any Company employee who drives a private motor vehicle to and/or from work. Service providers who transport personnel will be considered Company drivers under this SWP.

Company Vehicle

- Any motor vehicle owned, leased, rented, or contracted by Richardson's Bulk Sales Ltd for use on a roadway. Exceptions include forklifts and mobile yard cranes

Journey Management Plan

- A site-specific plan developed using the guidelines of this Journey Management Procedure to address specific local conditions and provide specific driving procedures. The site-specific Journey Management Plan will address:
    - Local hazards;
    - Local regulations, policies and procedures;
    - Driving conditions and driving routes;
    - Convoy policy;
    - Client policies and procedures; and
    - Completing the Journey Management Form to assess risk.

Procedure

1.0 Determining if Driving is Necessary

Employees should always ask themselves whether or not the trip is necessary; if the answer is “yes”, then time should be taken to establish or review journey management plan before and during every trip.

- Try to complete multiple tasks in single trips to reduce the amount of driving for improved safety and efficiency.
- If the trip is being taken to meet with someone, determine if the meeting can be done over the phone instead.
- Consider safer methods of travel where practicable.

2.0 Responsibilities

2.1 Managers and HSE Staff

All managers and HSE staff shall demonstrate active, visible leadership and personal participation in all aspects of journey management by:

- Actively and visibly complying with, enforcing, and promoting Richardson's Bulk Sales Ltd Driving Policy, locally developed procedures, and local laws;
- Emphasizing driving risks in all appropriate meetings;
- Ensuring that each location has a written, site-specific Journey Management Plan in place and that there is documented proof that each employee has been trained on the specifics of the Journey Management Plan;
- Promoting driving awareness and related Company initiatives;
- Reviewing all driver improvement information and monitoring data on all drivers;
- Conducting informal commentary drives with their employees on a frequent basis;
- Minimizing driving during the hours of darkness (night driving/low visibility conditions) and minimizing the total number of miles/kilometres driven;
- Reviewing the Journey Management Plan with road travelers before they perform any driving on Company business. A copy of the plan must be readily available at the workplace. Road travelers should carry a copy of the plan;
- Ensuring that all Company vehicles are suitable for the task, technically sound, properly maintained, and equipped with the required safety equipment;
- Ensuring that driving be done during daylight hours rather than after dark whenever possible, as well as ensuring that employees are aware of night driving cautions (reducing speed when driving at night and being aware of the potential for wildlife to be on the road); and

- Ensuring that a risk assessment is conducted on all third-party contractors, including vendors who provide transport for Company employees, equipment, and products.

2.2 Company Employees

All Company drivers are responsible for:

- Complying with and following Richardson's Bulk Sales Ltd driving procedures, locally developed procedures, and local laws;
- As a condition of employment, all Company drivers must wear seat belts at all times when driving a vehicle, and they must ensure that all other vehicle occupants are also wearing seat belts;
- Fleet vehicles must always be operated in accordance with applicable laws, bylaws, and regulations. Drivers must ensure that speed limits, weight limitations, and clearances are obeyed and Transportation of Dangerous Goods regulations are followed. Drivers are personally responsible for moving violations and fines;
- Using the driver training that has been given;
- Actively participating in pre-trip briefings and complying with pre-trip plans and all other procedures detailed in this procedure; and
- Being familiar with the requirements of the location's site-specific Journey Management Plan.

Any employee who drives any vehicle, including personal vehicles on personal time, should practice defensive driving techniques at all times.

3.0 Motor Vehicle Abstracts

Drivers with accidents and violations are more likely to be involved in future accidents when compared to drivers with clean driving records.

Richardson's Bulk Sales Ltd will use Motor Vehicle Abstracts to verify that a prospective or current employee has a current and valid operators' licence and to verify the driver's record of infractions.

Driver qualifications must be maintained. An immediate loss of Company driving privileges may occur when an employee has been:

- Charged with driving while impaired, or
- Charged with a serious or criminal infraction of the Highway Safety Act.

Driver performance will be evaluated and disciplinary action will be taken against drivers with poor records.

4.0 Monitoring Driver Skills

Monitoring the skill levels of drivers is an important part of Richardson's Bulk Sales Ltd's safety program. This system is intended to detect problems and concerns and rectify them before they result in an incident. The monitoring tools to be used will include:

4.1 Annual Company Driver Review

Management or a designate reviews accidents, violations, and motor vehicle records.

4.2 Periodic Observation Trip

Conducting random ride-alongs with drivers to identify both good and poor driving habits. This ride along will cover traffic conditions and types of roadways normally driven by the employee.

4.3 Monitoring the Vehicle

As part of Richardson's Bulk Sales Ltd's driver supervision plan, management will monitor the kilometers driven and maintenance performed on each vehicle. Monitoring may include the use of

GPS tracking devices to record speed and deceleration events. Data generated will be used to review performance per kilometre and look for trends which may indicate unsafe driving practices.

5.0 Journey Management Process

5.1 Management Review of Trip Necessity

Managers at every level shall review the need for all journeys and search for a way to eliminate the journey or find an alternative means of achieving the trip objective. Where driving is unavoidable, alternatives such as combining trips and using approved transportation contractors, especially for "hotshot" trips (unplanned/non-routine transportation of Company equipment or personnel), shall always be explored.

5.2 Assignment of Equipment and Personnel

Appropriate equipment and qualified personnel shall be assigned for the journey. The selection is not only a function of technical specifications for the requested service but shall also take into account any special considerations for the journey (terrain, weather, etc.).

5.3 Trip Planning and Execution

Once it is determined that a trip is required, managers shall ensure that:

- A formal pre-trip briefing is held that involves everyone involved in the journey, including supervisors and the dispatcher. This pre-trip briefing should be documented;

- The route is clearly defined and mapped. Before taking a trip to an unfamiliar location ensure that you have printed driving directions available. Do not read directions from an electronic device while driving. A GPS device may not be adjusted or operated by hand while driving. Printed directions should be kept as a back-up;
- Before leaving on a trip, particularly during winter, verify that weather conditions are safe for driving. Ensure the vehicle being used is adequate for the weather conditions. Make sure emergency supplies are in the vehicle, and the driver has a cell phone in case of emergency. In poor weather conditions, consider canceling or rescheduling the trip;
- Potential driving hazards, especially dangerous intersections, are identified in advance, taking into consideration the terrain, weather, known dangerous routes, speed limits, holidays, etc.;
- Appropriate vehicles are assigned to the journey based on the identified hazards;
- Only qualified drivers with current certification for the type of vehicles to be used are assigned;
- Drivers are physically and mentally fit, and particular attention has been given to past hours worked, past amounts of sleep, time of day, position in the natural alertness cycle, food intake, etc.;
- Drivers and passengers are fully briefed on the journey route, hazards, planned stops, etc.;
- Drivers should notify their supervisor or another individual who is not traveling with them of their travel plans. This includes where they are going, when they should be getting there, and when they plan to return;
- Vehicles are inspected using an appropriate checklist before the journey begins;
- An estimate of the expected arrival time at the destination shall be made. Persons at the destination must take necessary action to initiate a contingency plan that may be enacted in the event that the traveller does not arrive at the set time; and
- Company vehicles are driven with their lights illuminated at all times. To ensure that vehicles are visible from all directions, this includes headlights, side marker lights, and taillights.

Standard Safe Job Procedures should be developed using a risk assessment for the normal driving tasks conducted around the immediate area (e.g., a 50-kilometre (30 mile) radius of the office). This risk assessment should be reviewed annually. Any journeys outside of this radius may require a specific risk assessment for that drive.

5.4 Convoying

Properly implemented convoys reduce accidents, help to control speeds, and ensure that help is readily available in case of need. Whenever more than one Richardson's Bulk Sales Ltd vehicle is traveling to the same destination at the same time, they shall travel in a convoy. Single vehicle trips should be minimized and such trips should be treated as a single vehicle convoy with all the convoying procedures still followed.

- All convoys have a designated convoy leader. All vehicles must have designated spots in the convoy;
- All drivers must follow the regulated hours of service;
- Adequate drivers are provided for the trip and the estimated driving, working, and return driving time has been taken into account;
- The speed of the convoy is defined before the start of the trip and is normally controlled by the first vehicle. The speed shall be adjusted to match vehicle type, driver experience, road and weather conditions, traffic conditions, etc. At no time should the convoy lose vehicles or cause any vehicle to drive faster than prudent; and
- Two-way radios or CB radios shall be the preferred method for vehicle-to-vehicle communication.

The Convoy Leader shall ensure that:

- No convoy vehicle passes another vehicle in the convoy and the correct distance to follow a vehicle is reviewed by all drivers. This minimum distance is one second for every three metres (10 feet) of vehicle length plus two seconds for think/act time under ideal conditions. Vehicles should never lose sight of each other;

- Visual contact is maintained with the vehicle behind at all times. If contact is lost, speed shall be reduced immediately to permit the following vehicle to catch up. Following vehicles must not increase speed in order to catch up. If one vehicle stops then preferably, depending on the risk and situation, the whole convoy should stop; and
- Company vehicles drive with their lights illuminated at all times. This includes headlights, side marker lights, and taillights to ensure that vehicles are visible from all directions.

5.5 Night Driving/Low Visibility Conditions

All trips during the hours of darkness or during times of reduced visibility (e.g., blowing snow, dust, smoke, fog, heavy rains, etc.) may be systematically reviewed for risk and are subject to formal management approval before they begin.

Wherever night driving occurs, locations must assess night driving risks based on their local conditions and must include mitigating measures in their site-specific journey management plan.

5.6 Vehicle Safety Equipment

- The driver and all passengers of any Company vehicle shall be properly seated and wear adequate seatbelts. This includes vans, buses, and crane trucks. Non-Company vehicles, such as forklifts, are required to have seat belts, which must be used whenever the equipment is in operation. All vehicles must be equipped with a road side emergency kit. Each kit shall include the following equipment to assist in a roadside emergency:
    - Water;
    - Booster cables;
    - Blankets;
    - Fire extinguisher;

- First-aid kit;
- Spare tire;
- Flashlight;
- Disabled vehicle marker(s); and
- Sandbags and a shovel in winter months.

- In trucks equipped with sleeper berths, if the berth is to be used while the vehicle is in motion, some form of approved restraint must be provided. Personal vehicles used on Company business must be equipped with adequate seatbelts for all occupants.
- Any child who is unable to wear a three-point seatbelt properly may not ride in the front seat of a Company vehicle. Any child who is too small to utilize normal seatbelts must be restrained in an industry-approved child seat in the rear of a Company vehicle.
- Loose items are prohibited from being carried in the passenger compartment of a Company vehicle. Any van or sport utility vehicle (SUV) must be equipped with a means to safely secure items in the storage area. Any heavy article carried inside a vehicle such as jacks, fire extinguishers, etc., must be firmly secured in such a way that they will not become a hazard in a crash (e.g., clamped behind the seat).
- Flammable substances shall not be carried in the passenger compartment of any Company vehicle. In addition, flammable liquids (specifically gasoline) shall not be transported in the trunk of any passenger vehicle.
- All heavy vehicles and all trailers must be equipped with chock blocks. The chock blocks must be in place whenever the units are parked and should be positioned at the passenger rear wheels of the units.
- All Company Vehicles must contain the appropriate safety equipment.

5.7 Alcohol and Drug Abuse

Driving a vehicle while under the influence of alcohol or any drugs or narcotics is strictly prohibited, and the driver will be subject to disciplinary action, including termination of employment. The use of prescription drugs will be subject to Richardson's Bulk Sales Ltd's Fit for Duty and Substance Abuse policies.

5.8 Mobile (Cellular) Telephones

Drivers should always carry a cellphone, especially when traveling in rural areas. Other satellite-based communication devices should be considered for remote location travel.

Should the use of a cellphone be necessary pull over when safe to do so and make the phone call.

5.9 Unauthorized Passengers

Unauthorized passengers shall not be carried in Company vehicles, except in case of emergency. At no time shall drivers stop for a hitchhiker.

5.10 Fatigue Management

When driving long distances, sufficient breaks should be taken to prevent fatigue. When driving alone and having trouble staying awake, pull off the road and rest or sleep. Consider getting a hotel room and starting fresh the next day. If two licensed drivers are in the vehicle, take turns driving. Get plenty of rest before beginning your journey.

5.11 Journey Management Assessment

The Journey Management tool will be completed by the individual who will be driving prior to the trip. The score achieved when completing the Journey Management tool will be recorded in the log

book or on a timesheet provide by the Company.

6.0 Training

Employees who are required to drive as a part of their job responsibilities will receive the following training, some of which will be provided in-house from Company policies and procedures:

- Fatigue management training, that must include:
    - Fatigue and the human body;
    - Natural circadian rhythm of the human body;
    - Recognizing fatigue;
    - Eating to reduce fatigue;
    - Scheduling and dispatching;
    - Review of Company driving policies; and
    - Internal monitoring.
- In addition, those employees required to drive commercial vehicles will be given the following training:
    - Hours of Service and fatigue management training, and
    - ESC ODA or equivalent as required.

7.0 Trip Assessment

	Criteria	Permitted Response	Points Allocations			Score Here
1	Is this trip essential?	Yes or No	No 10		Yes 0	
2	Hours of Sleep in last 24hrs?	<4 or 5-7 or >8	<4 100	5 to 7 5	>8 0	
3	Are you taking medication?	Yes or No	No 0		Yes 10	
4	Visibility	Good or Poor or Extremely Poor	Good 0	Poor 5	Ext. Poor 50	
5	Road Surface Condition	Good o Deteriorated or Extremely Poor	Good 0	Poor 5	Ext. Poor 50	
6	Is the MAJORITY of the trip in daylight or darkness?	Daylight or Darkness	Daylight 0		Darkness 10	
7	Anticipated Driving Time	<2 / 3 to 6 / >6 Hours	<2 -10	3 to 6 5	>6 10	
8	Co-Driver is available in:	<2 / 3 to 6 / >6 Hours	<2 -10	3 to 6 5	>6 10	
9	Trip Type (Inbound or Personal) or (Outbound)	Inbound, Personal or Outbound Hours	Inbound 10		Outbound 0	
10	Are you in convoy with other(s)?	Yes or No	No 10		Yes 0	
11	Is this trip to a place of rest? If yes, how long is the drive?	Yes and <1 Hour / Yes and <2 Hours / No, or Yes but >2 Hours	<1 Hour -50	<2 Hours -25	>2 Hours 0	

Definitions

1. An **essential** trip is one that is requested by or required to serve a customer, and cannot be achieved by another means of transport and cannot be postponed until another time or day.
2. **Does not** include other "off duty hours", only includes actual hours of sleep.
3. Respond **yes** if you are taking any prescription or nonprescription mediation that is **known or likely** to cause side effects that could impact your driving ability (drowsiness, dizziness, aggressiveness, slowed reaction time, hallucinations, etc.)
4. Guide: "Visibility is unrestricted" or "Visibility is hampered by weather conditions" and or "Visibility is poor, **extreme caution** is advised".
5. Guide: "Road condition is good" or "Road condition has deteriorated, caution is advised" or "Road condition is poor, extreme caution is advised".
6. To satisfy a "yes" answer, over 50% of the planned journey must be completed 30 minutes after sunset.
7. Ask "how many hours will the total trip to your destination take?". Including all planned stops, delays, etc.) How much of the total journey time will be during daylight hours and how many hours will be in darkness.
8. Do you have a co-driver? Does the co-driver need to be in the sleeper or resting? If so, how many hours before the co-driver is available to drive?
9. Inbound means returning from any customer location and returning to home station. Personal use of a company vehicle shall be given the same scoring as an inbound trip (10 points).
10. When 2 or more TSG units are traveling to the same location and scheduled to arrive within 2 hours of each other, they shall travel in a convoy.

THIS TRIP CARD RISK ASSESSMENT IS ONLY ONE PART OF THE TOTAL JOURNEY MANAGEMENT STRATEGY. COMPLIANCE WITH OTHER PROCEDURES INCLUDING JOURNEY PLANNING AND CONVOY PROCEDURES ARE EXPECTED.

Total Points	0
Total Credits	
Final Score	0

Decision Grid

25 or less points Proceed and reevaluate in 4 hours OR as soon as weather or road conditions change	**25 to 60 points** Proceed with caution and reevaluate in 2 hours OR as soon as weather or road conditions change.
70 to 110 points Do not proceed until you have contacted the Field Operations Manager and developed and agreed on a new trip plan to mitigate the identified risks.	**>110 points** Do not proceed! Conference with Field Ops Manager and Division Manager. The trip should only be authorized after the complete assessment of the need, the hazards and the fitness of the crew. Normally authorization will only be issued when there are no other available options and complete trip plan has been prepared.

Forms

- Driver Evaluation for Journey Management
- Driver Safety Acknowledgement

References

- Federal Hours of Service Regulation.http://laws-lois.justice.gc.ca/eng/regulations/SOR-2005-313

- ESC, Journey Management: A Program Development Guide.https://www.energysafetycanada.com/_Resources/Guidelines-Reports/JOURNEY-MANAGEMENT-A-PROGRAM-DEVELOPMENT-GUIDE

Ladders

Purpose

Ladders are commonly used to reach or to gain access to higher areas/levels. Ladder use and misuse cause frequent injury accidents. This SWP will provide the guidelines required to establish specific Safe Job Procedures for any ladder use required at Richardson's Bulk Sales Ltd.

Scope

The conditions and requirements of this safe work practice shall be applied to all work sites owned or operated by Richardson's Bulk Sales Ltd where workers are required to utilize ladders of any description to gain access to higher or lower levels of elevation.

Procedure

Portable and fixed ladders are used to reach or to gain access to higher areas/levels, to conduct inspections and for brief work. There are a number of hazards associated with ladder use that can cause accidents resulting in serious injuries. These potential injuries include:

- Falling from ladders (especially when getting on/off or contact with electricity);
- Struck by objects or by ladder (falling ladder or when carrying ladders);
- Tripping over ladders; and
- Muscle strain from carrying heavy ladders.

Causes of ladder accidents include:

- Ladder not secured in place;
- Slippery surfaces (feet, rungs, footwear);
- Improper angle;
- Improper set-up – not spreading ladder legs and spreader bars;
- Poor grip;
- Unsafe position on ladder (reaching, climbing too high);
- Defective/damaged ladder;
- Ladder positioned too close to electrical lines; and
- Using ladder in high winds.

Working from ladders is hazardous and should only be done for a brief period of time, when there is no other reasonable alternative and under strictly controlled working conditions. Safer alternate methods such as performing work from stairs, scaffolding, or elevating platforms must normally be used.

1.0 General Requirements

The following ladder use requirements will be adhered to:

- Richardson's Bulk Sales Ltd will ensure that workers do not use a ladder to enter or to leave an elevated or sub-level work area if the area has another safe and recognizable way to enter or leave it;
- Ensure every ladder is designed, constructed, used, and maintained to perform its function safely;

- Ladders must be visually inspected for defects prior to each use. Look for missing, damaged, or loose parts;
- The ladder must be removed from service permanently, or until it is repaired, if it is broken or any defects are found. A tag indicating the ladder is defective should be affixed to the ladder;
- Workers must be provided training on ladder safety before using a ladder;
- When climbing or descending a ladder, the worker must face the ladder and have at least three points of contact between the hands/feet and the ladder at all times. While working on a ladder, a worker must, at minimum, have two feet on the ladder and his/her body leaning into the ladder. If three points of contact cannot be maintained, a fall arrest system must be used;
- Wooden ladders or stepladders must not be painted other than by being preserved with transparent protective coating;
- Within the construction industry, and as identified within the Alberta Occupational Health and Safety Code, a worker must not perform work from either of the top two rungs, steps, or cleats of a portable ladder unless the manufacturer's specifications allow the worker to do so;
- When working on or near energized electrical equipment, or equipment that could become energized such as conduit, non-conductive ladders must be used;
- If a ladder is a permanent part of an extending boom on powered mobile equipment, then no worker shall be on the ladder during the articulation, extension, or retraction of the boom; and
- If outriggers are incorporated in the equipment to provide stability, then no worker shall climb the ladder until the outriggers are deployed.

2.0 Constructed Portable Ladders

Constructed portable ladders are typically built at the work site. Regardless of purpose or time that the ladder is to be in service, the following requirements are to be observed:

- Ladders must not be constructed by fastening cleats across a single rail or post;
- The ladder is constructed of lumber that is free of loose knots or knot holes;
- With a length of five metres (16.5 feet) or less, the ladder has side rails constructed of lumber measuring not less than 38 millimetres by 89 millimetres (1.5 inches by 3.5 inches);
- With a length of more than five metres (16.5 feet), the ladder has side rails constructed of lumber measuring not less than 38 millimetres by 140 millimetres (1.5 inches by 5.5 inches); and
- The ladder must have side rails that are parallel, not notched, and rungs that are:
    - Constructed of lumber measuring not less than 21 millimetres by 89 millimetres (0.8 inches by 3.5 inches);
    - Held by filler blocks or secured by a single continuous wire; and
    - Uniformly spaced at a centre to centre distance of 250 millimetres to 300 millimetres (9.8 inches by 12 inches).

3.0 Manufactured Portable Ladders

Manufactured portable ladders must be CSA certified. They should have a CSA label affixed to them and must meet the following applicable CSA and ANSI standards:

- CSA Standard CAN3-Z11-M81 (R2005), Portable Ladders; ANSI Standard A14.1, A14.2, A14.5 (2007).

4.0 Fixed Ladders

Fixed ladders are those that typically are attached to buildings, structures and storage tanks, vessels and equipment in a vertical position or at an angle between vertical to 25 degrees from the vertical. In constructing and using fixed ladders, the following requirements must be observed:

- Cages are required on fixed ladders of more than six metres (20 feet) to a maximum unbroken length of nine metres (30 feet), where the length of ladder refers to the vertical distance between landings;
- Cages are also required on fixed ladders less than six metres (20 feet) in length where the ladder is located at an elevated platform that does not provide adequate fall protection. Ladder Safety devices may be used in lieu of the required cage protection;
- If a fixed ladder is made of a material other than steel, then Richardson's Bulk Sales Ltd will ensure that the design is certified by a professional engineer as being as strong as or stronger than that required by PIP Standard STF05501; and
- Richardson's Bulk Sales Ltd will ensure a self-locking double bar safety gate, or equally effective means, is provided at ladder way floor openings and platforms of fixed ladders.

5.0 Portable Ladders

A portable ladder is any ladder that is not permanently secured in place at the time of use. When using a portable ladder, workers will observe the following requirements:

1. Employees must not perform work from the top two rungs of a portable stepladder, or the top three rungs of a portable extension ladder. Despite the aforementioned, a worker may work from either of the top two rungs, steps, or treads of a stepladder:
    - If the step ladder has a raised platform at the top, or
    - If the manufacturer's specifications for the stepladder permit it.
2. Portable ladders must be secured against movement and placed on a base that is level and stable. Physically secure the ladder or have it held by another person so that it does not move, slip, or fall;

3. Portable ladders used to access an elevated surface from level to another must extend at least one metre above the elevated surface and the upper supports must extend a minimum of three rungs above the elevated surface;

4. When using portable ladders to access an elevated surface, the 4:1 rule should be followed: for every four feet of height, the ladder must be one foot away from the vertical structure;

5. When climbing or descending a ladder, workers must face the ladder and have free use of both hands. In addition, the worker must have at least three points of contact between the hands/feet and the ladder at all times. While working on a ladder, a worker must, at minimum, have two feet on the ladder and his/her body leaning into the ladder. If three points of contact cannot be maintained, a fall arrest system must be used;

6. A hand-line shall be used to raise or lower objects;

7. While working on a ladder, workers are required to use a tool belt and pouch for holding small tools;

8. Unless designed and constructed for the purpose, no more than one worker should use a portable ladder at one time; and

9. Richardson's Bulk Sales Ltd will ensure that when a worker is working from a portable ladder from which the worker may fall three metres (10 feet) or more, the worker uses a personal fall arrest system:

    - The above does not apply while the worker is moving up or down the ladder, and

- Despite the above, if it is not reasonably practical to use a personal fall arrest system, a worker may work from a portable ladder without fall protection if:
  - The work is a light duty task of short duration at each location;
  - The worker's centre of balance is at the centre of the ladder at all times even with an arm extended beyond the side rails of the ladder; and
  - The worker generally has one hand available to hold on to the ladder or other support.
- Portable ladders must be secured against movement and placed on a base that is level and stable. Physically secure the ladder or have it held by another person so that it does not move, slip, or fall;
- Portable ladders used to access an elevated surface from level to another must extend at least one metre above the elevated surface, be sufficiently secured in place to ensure the stability of the ladder during access and egress and the upper supports must extend a minimum of three rungs above the elevated surface;
- Portable ladders must be positioned so that the ladder is leaning against the vertical plane of support at an approximate angle of 75° when measured from the horizontal plane of support;

References

- Alberta Occupational Health & Safety Act, Regulation, and Code, Part 23: Scaffolds and Temporary Work Platforms, Sections 327(1) & 328.https://www.alberta.ca/ohs-act-regulation-code.aspx
- PIP Standard STF05501 – Fixed Ladders and Cages, published by the Construction Industry Institute.
- WorkSafeBC OHS Regulations, Part 13, Ladders, Scaffolds, and Temporary Work Platforms.https://www.worksafebc.com/en/law-policy/occupational-health-safety/searchable-ohs-regulation/ohs-regulation/part-13-ladders-scaffolds-and-temporary-work-platforms

Lifting and Handling Loads

Purpose

Heavy manual labour, awkward postures, manual material handling, and previous or existing injury are all risk factors implicated in the development of musculoskeletal disorders (MSDs). This safe work practice has been developed by Richardson's Bulk Sales Ltd to identify the hazards associated with manual lifting and handling loads and to provide guidelines and references to industry best practices to control these hazards. The guidelines in this SWP may be used to develop safe job procedures specific to the work regularly undertaken by Richardson's Bulk Sales Ltd.

Scope

The guidelines identified in this safe work practice should be applied and enforced by all employees and workers who have occasion to lift and handle loads, regardless of size, weight, or mass, during the course of conducting work at any work site owned or operated by Richardson's Bulk Sales Ltd.

Procedure

1.0 Hazard Assessments

1. Perform a hazard assessment that considers the Richardson's Bulk Sales Ltd worker's physical and mental capabilities to perform the work and assess the risk of injury from any hazardous manual handling that cannot be avoided before the worker performs any manual handling activities. The hazard assessment must consider:
    - The weight of the load;

- The size of the load;
- The shape of the load;
- The number of times a load must be moved; and
- The manner in which the load will be moved.

2. If the hazard assessment determines that there is a potential for musculoskeletal injury, Richardson's Bulk Sales Ltd will ensure that all reasonably practicable measures are used to eliminate or reduce that potential.
3. A general hazard assessment that is common to several employees or to more than one site or type of work may be acceptable:
    - This should only be done if there are no individual or local factors that need to be taken into account, such as differences in stature, competence, etc., and
    - Review any generic risk assessment if individual employees report adverse symptoms, become ill, injured, or disabled, or return following a long period of sickness, as they may have become vulnerable to risk.
4. Richardson's Bulk Sales Ltd Workers should refer to the assessments and use the control methods identified. The assessment must be updated when significant changes are made to the workplace. All employees covered by a risk assessment, including generic assessments, shall be told about the risks that it identifies.
5. A suitable Lifting and Assessment form has been provided in the Forms section of the Corporate Health and Safety Manual and includes the items to be considered when conducting the assessment.

2.0 Responsibilities

2.1 Employee Responsibilities

Employee's must:

- Follow appropriate systems of work laid out for their safety;
- Make proper use of equipment provided for their safety;
- Inform Richardson's Bulk Sales Ltd if they identify hazardous handling activities; and
- Take care to ensure that their activities do not put others at risk.

Richardson's Bulk Sales Ltd will provide mechanical aids if it is reasonably practicable to do so for lifting, lowering, pushing, pulling, carrying, handling, or transporting heavy or awkward loads, and if the risks identified in the risk assessment can be reduced or eliminated by this means.

3.0 Avoiding Manual Handling

Manual handling can be minimized by determining whether the load needs to be moved at all. For example:

- Does a large work piece really need to be moved, or can the activity safely be done where the item is already located?

Can raw materials be piped or bulk stored at their point of use? Consider using machines and automation, such as:

- A conveyor;
- A pallet truck;
- A barrel trolley;

- An electric or hand-powered hoist; or
- A lift truck.

4.0 Training

4.1 Awareness Training

Richardson's Bulk Sales Ltd will ensure that a worker who may be exposed to the possibility of musculoskeletal injury is trained in specific measures to eliminate or reduce that possibility.

Richardson's Bulk Sales Ltd will ensure that the training includes:

- Identification of factors that could lead to a musculoskeletal injury;
- The early signs and symptoms of musculoskeletal injury and their potential health effects; and
- Preventive measures including, where applicable, the use of altered work procedures, mechanical aids, and personal protective equipment.

4.2 Job Specific Training

Job specific training will be provided to employees who are required to move or lift loads and will include:

- Manual handling risk factors and how injuries can occur;
- How to carry out safe manual handling, including good handling technique (ergonomics);
- Appropriate systems of work for the individual's tasks and environment;
- Use of mechanical aids; and
- Work observation to allow the trainer to identify any problems and provide proper procedures.

5.0 Forms

- Lifting & Handling Task Assessment

References

- Alberta Occupational Health and Safety Code, Part 14: Lifting and Handling Loads.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Occupational Health and Safety Bulletin – You Want Me to Lift How Much? – Government of Alberta.https://open.alberta.ca/publications/erg042-ergonomics
- Occupational Health and Safety Bulletin – Lifting and Handling Loads, Part 1 – Government of Alberta. https://open.alberta.ca/publications/bcl001-back-care-lifting
- Occupational Health and Safety Bulletin – Lifting and Handling Loads, Part 2 – Government of Alberta. https://open.alberta.ca/publications/bcl002-back-care-lifting
- Occupational Health and Safety Bulletin – Lifting and Handling Loads, Part 3 – Government of Alberta. https://open.alberta.ca/publications/bcl003-back-care-lifting
- CCOHS Preventing Back Injury in Manual Materials Handling.https://www.ccohs.ca/headlines/text61.html
- Saskatchewan Occupational Health and Safety Regulations 2020, Part 6: General Health Requirements, Section 6-15 Lifting and Handling Loads.http://www.publications.gov.sk.ca/details.cfm?p=4355

Lockout/Tag Out (Managing the Control of Hazardous Energy)

Purpose

Lockout/Tag Out (LOTO) is a system for isolating a worker from hazardous energy, such that normally only the worker may allow re-energization, when they are repairing, maintaining, or inspecting machinery, equipment, or processes. LOTO is a legislated requirement which requires very specific implementation to be effective. Failure to properly implement LOTO may result in serious injury or death. The purpose of this safe work practice is to provide the necessary guidance and direction to employees engaged in LOTO activities so that they can implement site and work specific LOTO or other energy isolation plans.

Scope

The conditions of this safe work practice shall be applied at all work sites owned or operated by Richardson's Bulk Sales Ltd where workers are required to isolate an energy source in order to work safely. Richardson's Bulk Sales Ltd and supervisors of work sites shall apply and enforce the requirements of this safe work practice.

Procedure

1.0 Responsibilities

1.1 Management's Responsibility

It is the responsibility of management to ensure that a Lockout/Tag Out Site-Specific Procedure (SSP) is developed for all work locations and that it is read and understood by all supervisors,

employees, and contractors who may be affected by it. It is also the responsibility of management to provide the resources necessary for all work locations to effectively implement this safe work practice.

Auditing of LOTO Procedures

- Where LOTO procedures have been established to control hazardous energy Richardson's Bulk Sales Ltd management will audit these procedures:
    - Annually to ensure compliance with this SWP and legislation, and
    - Any time that there is a safety incident related to LOTO or a hazard report or hazard observation related to LOTO.
- The audit will review compliance with this SWP and legislation. Any non-compliance will be recorded in the Corrective Action Register and resolved before the affected LOTO procedure can be used.

1.2 Supervisors' Responsibility

It is the responsibility of supervisors to apply and enforce this safe work practice. To do this, supervisors must ensure that employees and contractors have been thoroughly familiarized with the program and associated procedures and that management has been made aware of any deficiencies. Supervisors are also responsible for developing equipment-specific lockout procedures as detailed in this program.

Inspections

- A supervisor will inspect LOTO activities to ensure that they are being carried out according to this SWP and the hazard assessments performed to establish the LOTO procedure. This inspection will be carried out in addition to all approvals and LOTO logs that are prepared under this SWP.

1.3 Workers' Responsibilities

At all times, it is the responsibility of workers to apply the conditions and requirements of this Lockout/Tag Out safe work practice and any associated site-specific procedures, and to inform supervisors of any problems or deficiencies in its application.

Note: Only authorized personnel are allowed to attach or remove Lockout and Tag Out devices. Personnel must at no time attempt to remove, bypass, or disable these devices.

2.0 Training

2.1 General Training requirement - Hazardous Work

If work is to be done that may endanger a worker, Richardson's Bulk Sales Ltd will ensure that the work is done by a worker who is competent to do the work. Richardson's Bulk Sales Ltd will ensure that workers who may be required to use safety equipment are competent in the application, care, use, maintenance, and limitations of that equipment.

2.2 Service and Maintenance Employees or Contractors

Workers who perform maintenance activities on equipment will be provided training on the Lockout/Tag Out program related to the site-specific Lockout/Tag Out procedures and the equipment-specific LOTO procedures that apply to their work. Workers must be competent to apply LOTO and de-energize/isolate the equipment they will be working on.

2.3 Affected Employees or Contractors

Employees, who work in areas where Lockout/Tag Out may be performed, shall be provided awareness training, particularly on the meaning of locks and tags on operational controls. These personnel are referred to as affected employees.

3.0 Resources and Equipment – Isolation Devices

Isolation devices must ensure appropriate securement and identification. Secure, means ensuring that an energy-isolating device cannot be released or activated.

Specialized Lockout/Tag Out materials are commercially available and cover a wide range of products suited to most types of isolation devices.

3.1 Locks

- Locks are to be high quality pin type (combination locks are not acceptable) and each lock is to be keyed differently;
- Master keys are prohibited. The lock holder should be the only person in possession of the unique key to the specific lock;
- Each lock should be permanently marked with a number, colour code, or name to allow for quick identification of the lock holder; and
- Locks should be stored on a lock station.

3.2 Scissors and Lock Boxes

Where more than one worker will be participating in the work to be performed, each will apply their own individually keyed lock to the isolation point (more on multi locks in the locking and tagging section in this guideline).

In some cases, it will not be possible to apply multiple locks to the isolation point. In these cases, devices such as scissors and lock boxes are used.

1. Scissors

   Scissors can be applied to most hasps and other devices that can be secured with a padlock. The scissors allow more than one lock to be placed on a lockout, as would be the case if two or more workers were performing maintenance on the locked out equipment.

2. Lock Boxes (Group Lockout)

   Lock boxes enable several workers to lockout a piece of equipment with one lock, place the key to that lock into the lock box, and then secure the lock box with multiple locks.

3. V-SAFE Valve Locks

   Valve locks are used to lockout hand-wheel type valves and come in a large variety of sizes. Valve locks are occasionally colour-coded to denote the product being locked out.

4. Circuit Breaker Lockouts

   Each work location shall have at its disposal lockout supplies which are most suited to the types of equipment and energy sources that may need to be locked out at that work site.

3.3 Control Mechanism

A control mechanism must be devised and implemented that will ensure isolation devices, locks, and tags are accounted for on completion of the work activity. The control mechanism is typically in the form of a master control board and a log sheet/book.

4.0 Notification

4.1 Advance Notice

Prior to taking any piece of equipment offline, all workers who may be affected by the shutdown shall be notified in advance by the worker responsible for the Lockout/Tag Out. Notification should

include the equipment and energy sources involved in the shutdown, length of time off-line, and the fact that locks and tags will be applied.

All Lockout/Tag Out activities shall be administered via the Safe Work Permit system.

4.2 Pre-Job Safety Meeting

For lockout jobs involving high hazard work or unusual circumstances, a pre-job safety meeting shall be conducted for all affected workers before shutting down and prior to Lockout/Tag Out of affected equipment.

5.0 Withdrawal from Service

Only workers who are authorized may shut down equipment and apply LOTO.

Authorized workers shall be specifically trained in the shutdown of that particular piece of equipment according to the manufacturer's specification and/or Richardson's Bulk Sales Ltd's safe work practices.

6.0 Isolation of Energy Sources

A key component of LOTO is the isolation and/or zeroing of all energy sources associated with a particular piece of equipment. It is imperative that all energy sources are considered and blocked, isolated, or de-energized.

Regulatory Requirements – Isolation

If machinery, equipment, or powered mobile equipment is to be serviced, repaired, tested, adjusted, or inspected, Richardson's Bulk Sales Ltd will ensure that no worker performs such work on the machinery, equipment, or powered mobile equipment until it has come to a complete stop, and:

1. All hazardous energy at the location at which the work is to be carried out is isolated by activation of an energy-isolating device and the energy-isolating device is secured in accordance with the AB OHS Code as designated by Richardson's Bulk Sales Ltd, or

2. The machinery, equipment, or powered mobile equipment is otherwise rendered inoperative in a manner that prevents its accidental activation and provides equal or greater protection than the protection afforded under (1).

Richardson's Bulk Sales Ltd will develop and implement procedures and controls that ensure the machinery, equipment, or powered mobile equipment is serviced, repaired, tested, adjusted, or inspected safely if:

1. The manufacturer's specifications require the machinery, equipment, or powered mobile equipment to remain operative while it is being serviced, repaired, tested, adjusted, or inspected, or

2. There are no manufacturer's specifications and it is not reasonably practicable to stop or render the machinery, equipment, or powered mobile equipment inoperative.

Sources of Energy which must be isolated are as follows:

6.1 Electricity

Electricity is a common energy source and can be isolated in a number of ways:

- Shut off and lock the breaker;
- Pull and lock the plug;
- Shut off and lock the generator;
- Pull and lock all fuses; or
- Ground/discharge capacitors.

6.2 Hydraulic Energy

Hydraulic energy (fluid under pressure) is another energy source that may need to be isolated. Hydraulic energy can be isolated in the following ways:

- Lower moving parts to lowest energy position (if work to be done requires parts to remain in a raised position, then the parts must be securely blocked);
- Shut down and lock out the prime mover for the pump;
- Open pressure bleed lines and lock them open;
- Blind/block pipe ends or flanges upstream of work to be done; or
- Close and lock hand wheels, butterfly valves, or ball valves upstream of the work.

6.3 Pneumatic Energy

- Pneumatic energy is air (or other gas) under pressure. Compressed air can be a hazardous source of energy. Compressed air systems can be isolated in the same way that hydraulic systems are. Care must be taken to ensure that all residual compressed air is bled from the system after isolation is in place and prior to maintenance work commencing;
- In the event that a pipeline or process system containing any substances under pressure is to be serviced, repaired, tested, adjusted, or inspected, the flow must be stopped or regulated to a safe level, and the location at which the work is to be carried out must be isolated and secured;
- All hazardous, flammable, or toxic products and inert non-hazardous products over 350 kPa pressure must have:
    - Installation of clearly marked and identified blinds/blanks, or
    - Double block and bleed system of isolation between the work and any source of pressure or source of hazardous products. The isolation valve system must provide a double set of seals with a bleed-off between the seals. All sealing units must be secured in the closed position, and the bleed-off systems must be secured in the open position. All bleed-off systems must be monitored for flow and piped to a safe location that will not endanger the workers; and
- Inert non-hazardous products under 350 kPa pressure must have:
    - Installation of clearly marked and identified blinds/blanks, or

- Single block and bleed system of isolation from all sources of pressure.

6.4 Potential Energy

Potential energy is the energy stored in an elevated object. The only way to isolate potential energy is to either lower the object to ground level, or block or brace the object in its elevated position.

6.5 Kinetic Energy

This is the energy stored in an object in motion such as a rotating fan, electric motor, or flywheel. The object may continue to move several minutes after shut down until all kinetic energy has dissipated. Some equipment may have a brake that can be applied to kinetic energy sources; however, in most cases, work must be delayed until all kinetic energy has dissipated.

6.6 Thermal Energy

Thermal energy is the transference of heat, whether by conduction, convection, or radiation. It is a stored form of energy that must be guarded against. The two methods for dealing with thermal energy are direct cooling and natural dissipation over time.

6.7 Chemical Energy

Chemical energy often refers to the reaction of one substance with another. Care must be taken to ensure that if a chemical is to be used in the maintenance routine, then the Safety Data Sheet (SDS) is consulted first for information pertaining to reactivity and safe handling.

6.8 Stored Energy Considerations

Turn off and/or disconnect energy control points, such as electrical plugs, switches, valves, and circuit breakers. Restrain or dissipate all stored energy. This includes, but is not limited to, the

following:

- Compressed springs – block springs from releasing;
- Parts of a machine held up by hydraulic or pneumatic power – block to prevent parts from falling;
- Pressurized lines – Bleed the pressure from the lines;
- Components that are hot – Allow sufficient time for cooling before work begins;
- Capacitors that may store electrical energy – Discharge the energy from the capacitor; and
- Electrical equipment that might be fed by more than one source should be tested with a voltage meter to verify the absence of electrical energy.

7.0 Locking and Tagging

7.1 Signs

All lockout points should be appropriately identified so that workers are familiar with their position and condition. Signage should be provided on both the equipment and the switchgear clearly stating which switchgear serves which equipment.

7.2 Locking Out Power Supply

- Each worker who will be involved in the maintenance activity, must place his/her own lock on the energy control point. The key to the lock must be kept under the control of the owner of the lock at all times.
- The supervisor or person in charge of the work shall put their lock on first.
-

When locking out the power supply is the best method of isolation, the following procedure shall be applied:

- It is imperative the equipment to be locked out is first shut down at its controls. If the machine is still running when the power supply is turned off, an electric arc produced at the electrical junction box can result in serious injury;
- Once the equipment is shut off, don safety glasses and/or full face shield, ensure the correct switch is in hand, stand back from the electrical panel (power box), and turn head away before throwing the switch; and
- Lock and tag the switch in the off position.

7.3 Applying Locks

- Once all energy-isolating devices have been activated to control hazardous energy, Richardson's Bulk Sales Ltd will ensure that a worker involved in work at each location requiring control of hazardous energy secures each energy-isolating device with a personal lock.
- If more than one worker is working at each location requiring hazardous energy to be controlled then each worker must attach a personal lock to each energy-isolating device.
- Richardson's Bulk Sales Ltd will ensure that each personal lock used has a unique mark or identification tag on it to identify it as belonging to the worker to whom it is assigned.
- Richardson's Bulk Sales Ltd will ensure that the name of the worker to whom a personal lock or identification tag is assigned is readily available during the time a hazardous energy source is isolated.

7.4 Motor Vehicle Ignition Keys

- Mobile equipment can be locked out by removing the key from the ignition, pocketing it, and detaching the negative battery cable.
- If more than one person will work on the equipment, the ignition key shall be placed in a lock box, and each worker will place an individual lock on the lock box. In addition to isolating the ignition, the brake shall be applied and the wheels blocked to prevent the release of potential energy. If the equipment is to be jacked up, it will be blocked in the elevated position to prevent the release of potential energy.
- If the vehicle or mobile equipment is to be locked out for an extended period, arrangements for moving that equipment in the event of an emergency shall be made.

7.5 Valve Locks and Blinding Methods

When the equipment to be locked out requires the isolation of hydraulic or pneumatic energy, appropriate valve locks and blinding methods shall be used. If more than one person will be working on the equipment, then the valve lock key shall be placed in a lock box, and each worker shall place their individual padlock on the lock box according to 7.7 Group Lockout.

7.6 Tagging

Each lock owner must write the particulars of the lockout on a tag and attach it to the energy control point(s).

Tags shall be applied at the point of lockout. In addition, a tag shall be placed on the equipment operating controls if they are located separately from the energy isolation point.

Tags shall:

- Have the time the lock was placed, the name and signature of the worker installing the lockout and performing the work written on them. In the case of a group lockout, the supervisor will sign the tag;
- Show the date of the lockout and estimated completion time;

- Include the name of the equipment being serviced;
- Be legible and understandable; and
- Be securely attached.

Tags and/or plastic tie straps shall never be used as a lockout device.

7.7 Group Lockout (Securing by a Group)

If a large number of workers is working on machinery, equipment or powered mobile equipment, or a number of energy-isolating devices must be secured, Richardson's Bulk Sales Ltd may use a group procedure.

The group procedure must afford the group of workers a level of protection equal to that provided by a personal lockout or tag out device in accordance with all of the provisions of this SWP and Part 15 of the OHS Code

The group lock out will adhere to the following requirements:

- Richardson's Bulk Sales Ltd must ensure that the group procedure referred to is readily available to workers at the work site where the group procedure is used;

- Once all required energy-isolating devices have been activated in accordance with this SWP and OHS Code Part 15 requirements, by a worker designated by Richardson's Bulk Sales Ltd, Richardson's Bulk Sales Ltd must ensure that a designated worker has:
    - Secured all energy-isolating devices;
    - Secured any keys for the devices to a key securing system such as a lock box;
    - Completed, signed and posted a checklist that identifies the machinery or equipment covered by the hazardous energy control procedure; and
    - Verified and documented that all sources of hazardous energy are effectively isolated;
- Each worker working at each location requiring control of hazardous energy must apply a personal lock to the key securing system working on the machinery, equipment or powered mobile equipment;
- If a worker who has placed a personal lock is reassigned before the work is completed, or the work is extended from one shift to another, Richardson's Bulk Sales Ltd will ensure that there is an effective and orderly transfer of control of the reassigned or departing worker's personal lock; and
- Upon completing the work requiring isolation of hazardous energy, a worker must remove his or her personal lock from the key securing system.

8.0 Test Start – Verification of Isolation

Once equipment has been locked out and tagged, the "authorized worker" shall ensure all personnel and tools are clear, then attempt to re-start the equipment to verify that the energy sources have been de-energized. Turn on switches, open valves, push start buttons, etc. If an energy release occurs during this verification, work cannot proceed until this source is located, isolated, and verified as de-energized. Turn switches off and close valves once de-energized state is verified.

A Richardson's Bulk Sales Ltd worker will not perform work on machinery, equipment, or powered mobile equipment to be serviced, repaired, tested, adjusted, or inspected until:

- The machinery, equipment, or powered mobile equipment is tested to verify that it is inoperative, and
- The worker is satisfied that it is inoperative.

9.0 Lock Removal and Restoration to Service

Upon completing the work requiring isolation of hazardous energy, Richardson's Bulk Sales Ltd will ensure that the machinery, equipment or powered mobile equipment is safely returned to operation.

The process for returning equipment to service is just as important as the lockout process. Once maintenance activities are complete, a supervisor shall ensure the following steps are applied when returning equipment to service:

1. Check that all work has been completed. This is particularly important in the case of a group lockout.
2. Ensure all tools, parts, equipment, debris, and personnel are clear of the work area.
3. Close any open pressure relief valves or bleed lines, and ensure the integrity of any impacted fitting or piping connection.
4. Where possible, remove blocking. In some cases, removal of blocking may have to wait until power is restored.
5. Remove blanks and blinds from lines.
6. Replace guards and shields.
7. Ensure that the controls are off and stay off while locks are removed. Use a second worker to assist in this process, if necessary.
8. Allow each worker to remove their individual locks in reverse order of placement time such that the last lock placed is removed first and the first lock placed is removed last (first on last off).

   A person must not remove a personal lock or other securing device unless the person is the worker who installed it. In an emergency, or if the worker who installed a lock or other securing device is not available, a worker designated by the employer may remove the lock or other securing device in accordance with a procedure that includes verifying that no worker will be in danger due to the removal. Richardson's Bulk Sales Ltd will ensure that securing devices are not removed until:

   - Each involved worker is accounted for;
   - Any personal locks placed by workers are removed; and
   - Procedures are implemented to verify that no worker is in danger before a worker removes the securing devices and the machinery, equipment, powered mobile equipment, piping, pipeline, or process system is returned to operation.

9. Replace electrical fuse or reset breaker.
10. Warn all affected workers, don safety glasses and/or face shield, stand clear, turn face away, and turn power on.
11. Warn all affected workers prior to function testing. Test operator controls and equipment operation.
12. Remove all lockout tags from the system.

    The equipment is now considered in-service and the lockout concluded.

10.0 Extraordinary Circumstances

10.1 Shift Change

A lockout may be in place during a shift change. If this is the case, the workers going off-shift shall remove their personal locks, and the workers going on-shift will apply their personal locks. A thorough shift change briefing and new Safe Work Permit is required so that on-coming supervisors, authorized workers, and affected workers are fully aware of the lockout in place.

10.2 Reassigned Worker

If a worker who has placed a personal lock is reassigned before the work is completed, or the work is extended from one shift to another, Richardson's Bulk Sales Ltd will ensure that:

- Another worker, authorized by Richardson's Bulk Sales Ltd to do so, attaches a personal lock to the energy-isolating device prior to removal of the reassigned or departing worker's lock, or there is an effective and orderly transfer of control of the reassigned or departing worker's lock.

10.3 Authorized Worker has Left the Work Site

If a lock is left on a machine and it appears that it was left there inadvertently, determine who the lock is assigned to. If that worker is unavailable, or cannot be contacted, a supervisor shall determine if it is safe to remove the lock. He/she must clear the area, ensure guards are in place, remove tools and debris, and make sure personnel are out of harm's way and follow all of the requirements of Section 1.4 of this SWP The lock may then be removed.

The worker whose lock was removed shall be so informed at the earliest possible opportunity.

10.4 Recording Extraordinary Activities

All extraordinary activities shall be recorded in the work site operations log or other suitable record.

11.0 Regulatory Requirements

LOTO must be performed according to the requirements of the AB OHS Code Part 15 Managing the Control of Hazardous Energy.

References

- Alberta Occupational Health & Safety Act, Regulation, and Code, Part 15: Locking Out.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Saskatchewan Occupational Health and Safety Regulation 2020, Part 10 (Section 10-6): Machine Safety - Locking Out. https://publications.saskatchewan.ca/#/products/677

Management of Change Program

Purpose

Changes made to work systems, processes or equipment may have unintended consequences leading to losses. Changes should be evaluated prior to implementation to ensure that all potential negative consequences have been considered. Management of Change (MOC) is a documented process where changes to work sites, processes, equipment, machinery, methodology, documents, etc., are properly identified, evaluated, and controlled prior to implementation.

Scope

The MOC process ensures that hazards and potential losses have been addressed before changes are made and that appropriate notification and training is provided to all personnel involved in or impacted by the change. These controls also ensure that all required information and approvals are appropriately documented.

The MOC process will be used for all permanent and temporary changes to the organization's work processes, equipment, and facilities.

Procedure

1.0 Technical MOC

The Technical MOC is applicable when modifications are made to a system or work site, or when changes are made to the operation of a system or work site.

The appropriate level of expertise and management must authorize the change before the change is implemented.

"Replacement in kind" (e.g., replacement of a valve with a different manufacturer's product with equal or better specifications than the original) does not require a Technical MOC.

Emergency replacement or installation of equipment to safeguard life, environment, or property will be acceptable until the situation is under control. This action should only be taken if approved during consultation with an area supervisor or an engineer.

The Technical MOC addresses:

- Technical basis for the proposed change;
- Impact of change on health and safety; and
- Modifications to operating and maintenance procedures.

Examples requiring Technical MOCs include:

- Replacing original equipment using a different manufacturer who may use different material or design specifications;
- Changing Pressure Safety Valve settings or configuration;
- Changing piping metallurgy or design;
- Piping changes including adding block valves, replacing valves with a different type, new flow paths, etc.;
- Changing the control range of temperature and pressure control instruments to exceed defined operating limits;
- Changing the method or control of an instrument loop;
- Changing or bypassing ("jumping") alarms or permissive switches within an interlock system without proper work permits;
- Changing the content of written operating procedures; and
- Installing temporary piping.

2.0 Organizational MOC

The Organizational MOC is applicable to changes of roles, responsibilities, or key contact numbers. Examples requiring Organizational MOCs include:

- ERP contact number changes or communication protocol changes;
- Changing of organizational structure or reporting relationships; and
- Creating a new job position.

3.0 Administrative MOC

The Administrative MOC is applicable when Corporate Policies, Safe Work Practices, Site-Specific Procedures, or training programs are changed. These MOCs are approved by upper management and will be communicated to all Company employees, workers, and contractors. Examples requiring Administrative MOCs include:

- Policies;
- Standards;
- Procedures;
- Work practices; and
- Reporting requirements.

4.0 Document Control

The Document Custodian is responsible for the administration of the MOC activities and, in particular:

- To ensure that all MOC documentation is filled out and approved prior to implementing changes, and
- To ensure that all necessary parties are informed of changes.

5.0 Training

As part of the MOC process, additional employee training requirements must be established. Required training arising from the changes to be made must be documented and tracked. If the training is not immediately provided, it must be recorded on the Corrective Action Register in order to avoid forgetting to perform this training.

6.0 Projects

During the planning and development stages of a project, any changes to facilities, equipment, or work processes will be reviewed to ensure that health, safety, environmental, and quality standards are maintained and that the project budget accounts for any of these expenses.

Prior to new facilities, equipment, or work process start-up, a pre-start-up review must be completed according to the MOC process to ensure that all requirements outlined in the pre-project review have been addressed, and to ensure that any other possible hazardous conditions are assessed.

The pre-project and pre-start-up reviews should include, but not be limited to, the following parties:

- Operations;
- Engineering;
- Information Technology;

- Sales and Marketing;
- Quality Assurance;
- Human Resources; and
- Environmental, Health, and Safety.

Forms

- MOC (Management of Change)

Medical Emergency Response Plan (First Aid)

Purpose

Richardson's Bulk Sales Ltd first-aid requirements and medical emergency planning are based on how hazardous the work is, the time to get an injured worker from the work site to a health care centre, and the number of workers on each shift. Richardson's Bulk Sales Ltd has developed this SWP to provide the necessary guidance and direction to managers, supervisors, and workers concerning the first-aid measures which must be in place at every worksite and how to establish plans to respond to medical emergencies. These requirements will be incorporated into Company specific and site-specific Medical Emergency Response Plans.

Scope

These guidelines will be used to establish specific site procedures which will be enforced at all Richardson's Bulk Sales Ltd properties and worksites. First Aid requirements and Medical Emergency Plans must be in place, and employees trained in their use, prior to beginning any work at Company owned properties and worksites.

Procedure

1.0 General Requirements

A Medical Emergency Response Plan (MERP) will:

- Be created by the site supervisor or a person designated by the supervisor prior to any work site activity;
- Be communicated to all the workers, be posted for easy access at the work site, and be carried in all employee or contractor vehicles and in any equipment containing a communication device;

- Contain emergency phone numbers and/or radio frequencies for key Richardson's Bulk Sales Ltd and contractor personnel, the appropriate provincial regulatory agencies, and medical service providers;
- Identify the site supervisor and his or her alternate or designate;
- Contain the site call back number;
- Identify the Medical Response Procedures, and ascertain who will do what;
- Designate the First Aider and his or her name and keep a record;
- Define the location of the work site (LSD, latitude and longitude, or Range Road, and Township Road);
- Ensure that signs are posted in a conspicuous location to indicate the location of first-aid facilities and/or kits, eye wash stations, and other first-aid equipment. If posting is not practical, each worker must be informed verbally of the location(s) of the equipment;
- Provide a map of the area showing access routes, mileage, and work sites; and
- Identify medical evacuation contact numbers and reference numbers supplied by evacuation services.

2.0 Requirements for First Aiders

The required number of competent first-aid responders and related equipment on site will be determined before beginning work at a new worksite.

Richardson's Bulk Sales Ltd will ensure that a worker who successfully completes the training of an approved training agency meets the standards for a certificate in emergency first aid, standard first aid, or advanced first aid that are adopted by the Director of Medical Services in consultation with the Joint First Aid Training Standards Board.

On federally regulated sites, Richardson's Bulk Sales Ltd and its contractors will meet or exceed:

- Oil and Gas Occupational Safety and Health Regulations, under Part II of the Canada Labour Code, Part XVII: First Aid, Schedules I, III, VI, and V. (Schedule II relates to Off-Shore Workplaces).

On respective provincial and territorially regulated sites, Richardson's Bulk Sales Ltd and its contractors will meet or exceed:

- British Columbia Occupational Health & Safety Regulation, 296/97, Part 33: Occupational First Aid;
- Alberta Occupational Health & Safety Act, Regulation, and Code Part 11: First Aid;
- Alberta Emergency Medical Aid Act, which provides legal liability protection to persons providing voluntary first aid services rendered at a work site; and
- The Saskatchewan Occupational Health & Safety 1996, Section 60-63, Part 5: First Aid.

3.0 First-Aid Requirements: Kits, Equipment, and Rooms

The following first-aid requirements must be met:

- An employer must provide first aid services, supplies, and equipment and provide a first aid room or area according to the requirements of the OHS Code Schedule 2, Tables 3 to 7 or an acceptance from a Director of Medical Services;
- If a nurse, advanced first aider, or Advanced Care paramedic (ACP) is required at a work site, that person must be based at or near the first aid room, and when not in the first aid room, be easy to contact or notify if first aid services are required;
- Richardson's Bulk Sales Ltd will ensure that the number of first aiders at a work site and their qualifications and training comply with the Alberta OHS Code Schedule 2, Tables 5, 6 or 7;
- Detailed first-aid requirements are available in the Alberta Occupational Health & Safety Code Schedule 2 - First Aid;

- First-aid kits will be available at all work locations and in Company vehicles. First-aid kits in remote locations will be appropriate to the hazards of the work site and the possibility of delay in arrival of medical assistance or transport;
- Eyewash stations shall be available at all locations where chemicals and other hazardous materials are handled, stored, or transported. They will be checked at least monthly and their condition will be documented. If necessary, portable eyewash stations may be transported in workers' trucks to remote locations;
- All first aid administered must be recorded on the First-Aid Report form. Entries to the log book must be removed and placed in confidential file to preserve privacy and shall be maintained for a period not less than three years from the date on which the incident occurred;
- Anyone using oxygen equipment must be competent and trained to do so. The Alberta Advanced First Aid Certificate (AFA) includes training on the use of oxygen equipment; and
- Routine inclusion of over-the-counter and other medication in first aid kits is not recommended as there are potential adverse outcomes. If medication is included in a first aid kit a physician should write policy and procedures for its use and they should be administered by a health care professional.

4.0 Medical Evacuation

4.1 Emergency Transportation

Before workers are sent to a work site, Richardson's Bulk Sales Ltd will ensure that arrangements are in place to transport injured or ill workers from the work site to the nearest health care facility. Richardson's Bulk Sales Ltd will ensure that an ambulance service is readily available to the work site when travel conditions are normal. The plan must be in writing and available for inspection.

If an ambulance service is not readily available to the work site, or if travel conditions are not normal, Richardson's Bulk Sales Ltd will ensure that other transportation is available that:

- Is suitable, considering the distance to be travelled and the types of acute illnesses or injuries that may occur at the work site;
- Protects occupants from the weather;
- Has systems that allow the occupants to communicate with the health care facility to which the injured or ill worker is being taken; and
- Can accommodate a stretcher and an accompanying person, if required.

Richardson's Bulk Sales Ltd will provide a means of communication at the work site to summon an ambulance service licensed in accordance with the Ambulance Services Act.

- If a local ambulance service is not readily available or Richardson's Bulk Sales Ltd otherwise determines through a hazard assessment to have its own means of emergency medical transportation, then it will meet the following requirements:
    - Must suit distance to be traveled;
    - Must be safe and comfortable for the injured;
    - Must be clean and able to accommodate a seriously injured worker so that additional injuries are prevented;
    - Must offer protection from weather conditions;
    - Must have sufficient heat to keep injured worker warm;
    - Must have a means of communication; and
    - Must be large enough to accommodate a stretcher.

4.2 Accompaniment

If a worker is acutely injured or ill, or needs to be accompanied during transport, the worker must be accompanied by at least one first aider other than the driver of the conveyance.

Employees will always call the nearest medical aid station and provide all of the necessary details concerning the medical emergency.

If required and available an air ambulance service may be requested according to the nature of the medical emergency. If a helicopter or fixed wing aircraft is available for evacuation purposes a transfer site close to the incident scene must be identified. Workers will stand by to assist the emergency service personnel in any way required or directed.

5.0 Responsibilities

5.1 Company Responsibilities

Richardson's Bulk Sales Ltd and prime contractor will:

1. Ensure that first-aid services, first-aid equipment, supplies, and the first-aid room meet legislated requirements in the OHS Code (Schedule 2) and are:
    - Located at or near the work site that they are intended to serve; and
    - Available and accessible during all working hours.

2. Ensure that first-aid equipment and supplies are:
    - Maintained in a clean, dry, and serviceable condition;
    - Contained in a material that protects the contents from the environment; and
    - Clearly identified as first-aid equipment and supplies.
3. Post at conspicuous places at the work site, signs indicating the location of first-aid services, equipment, and supplies; and
4. Ensure that an emergency communication system is in place for the workers to summon first-aid services.

5.2 Supervisor Responsibilities

It is the responsibility of the Site Supervisor in charge to ensure that:

- First-aid requirements are determined;
- First-aid personnel, equipment, and transportation are provided;
- First-aid personnel are suitably trained and experienced;
- The emergency evacuation guide is completed:
    - Reviewed with all affected workers; and
    - Posted and available in required locations.
- Prior arrangements have been made with the providers of air evacuation services (helicopter or fixed wing); and
- Air evacuation providers are aware of the specific work locations or designated transfer points.

5.3 Provincial Reporting Requirements

The following types of incidents must be reported to the Director of Inspection as soon as possible:

- Any fatality;
- Injury requiring the worker to be hospitalized more than 2 days;
- Unplanned, uncontrolled fire, explosion, or flood that causes serious injury or has the potential to;
- Collapse of or upset of a derrick, crane, or hoist; and
- Collapse or failure of a component of a building that is necessary to the structural integrity of the building.

According to the Alberta OHS Act if one of the above occurs on a work site, there must be an investigation conducted and a report prepared. Except as otherwise directed by an Occupational Health and Safety Officer or a peace officer, a person shall not disturb the scene of an incident except as necessary in:

- Attending to persons injured or killed;
- Preventing further injuries; and
- Protecting property that is endangered as a result of the incident.

6.0 Medical Incident Reporting

Initial report to be provided to The Hospital or Medical Centre

When you contact the hospital, medical aid station, or other medical provider, be prepared to provide the following information:

- Contact name;

- Contact number, alternate number, and/or radio frequency;
- Location, physical description, longitude and latitude, and directions to location;
- Number of patients requiring transport;
- Age of patient(s);
- Condition and type of injury;
- Treatment already provided;
- Type of first aid/medical aid available on site;
- Type of transport requested;
- Location of transfer point;
- A listing of any harmful substances related to the casualty's injuries; and
- Provide the Safety Data Sheets (SDS) if possible.

6.1 Company Injury Reports and First Aid Records

Richardson's Bulk Sales Ltd will record every acute illness or injury that occurs at the work site in a record kept for the purpose as soon as is practicable after the illness or injury is reported to Richardson's Bulk Sales Ltd.

Workers must report injuries and illnesses immediately after they occur to Richardson's Bulk Sales Ltd.

A record must include the following:

- The name of the worker;
- The name and qualifications of the person giving first aid;
- A description of the illness or injury;

- The first aid given to the worker;
- The date and time of the illness or injury;
- The date and time the illness or injury was reported;
- Where at the work site the incident occurred; and
- The work-related cause of the incident, if any.

Richardson's Bulk Sales Ltd will retain the records for three years from the date the incident is recorded. Richardson's Bulk Sales Ltd will ensure that all first-aid records are afforded the necessary security and confidentiality as required under the respective provincial occupational health and safety regulation.

Access, use, and disclosure of the information by a person who has custody of the records shall be in accordance with an enactment of the Province of Alberta or Canada that authorises or requires the disclosure. The person who has custody of the records will ensure that no person has access to the worker's records unless they have been given permission or the record does not identify the worker.

7.0 Medical Responder – Competent First Aider General Procedure

1. Assess the situation and note the time of incident:
    - Is the scene safe to approach?
    - What happened? How did it happen?
    - How many ill or injured people are there?
    - Is there someone to help?
    - Is there someone who looks to be unconscious?
2. First Person on scene should contact, or direct someone to contact, the Supervisor/Advanced First Aider (e.g., EMT-A), and:

- Provide information about location of the incident; and
- Provide information on the nature of injuries.

3. Check victim(s) and assess Level of Consciousness (LOC):
    - Talk to the person – If unconscious, proceed to step 4; and
    - If conscious, perform secondary survey to determine what, if any, injuries have occurred.
4. Perform critical interventions:
    - Check airway – head-tilt /chin-lift;
    - Check breathing – look, listen, and feel;
    - Check circulation;
    - Look for deadly bleeding; and
    - Look for signs of shock.
5. If the victim is not breathing, give two rescue breaths and recheck for breathing. If still not breathing, re-check airway and give two more rescue breaths. If still not breathing, start CPR – 30 compressions and two breaths (For details, refer to appropriate Red Cross or St. John Ambulance procedures.).
6. Treat injuries to the best standard that is available, as training and equipment allows.
7. If the patient can be moved, begin moving to more advanced medical aid (consideration for the handling of the patient is very important).
8. If the patient cannot be moved, wait for help to arrive.
9. Monitor and record vital signs (including the time when the vital signs are taken) every five to 10 minutes:
    - Level of consciousness;

- Breathing – Normal = 10-20 per minute; and
- Skin – wet/dry, colour, temperature.

10. Do not leave the patient unless relieved by someone with more advanced training.
11. The Supervisor/Advanced First Aider will make the decision to call (or to not call) for helicopter or surface medivac.
12. The Advanced First Aider travels to incident location (or meets patient in transit), takes over medical treatment, and prepares patient for transport.
13. The Advanced First Aider, after assessing the nature and severity of injuries, can call for the medical evacuation (medivac), if needed, or cancel the medivac if it has already been called.
14. Move the patient to transfer area (consideration for the handling of the patient is very important). If transporting the patient by helicopter, it may be necessary to move the patient onto the helicopter's spineboard or stretcher (unless the one being used is compatible with the mounting system aboard the helicopter).
15. Load patient into the medivac and transport to nearest appropriate medical centre.

Forms

- Emergency Medical Response Procedure Form
- First-Aid Report Form
- First-Aid Sharing of Resources Agreement

References

- Canadian Occupational Health and Safety Regulations. http://laws.justice.gc.ca/eng/regulations/SOR-86-304/index.html
- AB OHS Code Part 11 First Aid.

Noise Management

Purpose

Richardson's Bulk Sales Ltd workers may be exposed to excess noise as defined by the AB OHS Code Part 16. Where workers may be exposed to excess noise this SWP will serve to provide the guidelines required to develop a work site-specific noise management program.

Scope

The conditions and requirements of this safe work practice shall be applied and enforced at all work sites owned or operated by Richardson's Bulk Sales Ltd where workers may be exposed to excess noise sources greater than the provincial Occupational Exposure Level (OEL) thresholds.

Procedure

1.0 Noise Management Program - General Requirements

Under the Alberta OHS Code (Part 16), Richardson's Bulk Sales Ltd will ensure that employees, contractors, and visitors to the work site are protected from the effects of hazardous industrial noise in excess of the Occupational Exposure Limit (OEL). If workers may be exposed to noise at a work site in excess of 85 dBA Lex and the noise exposure limits in the OHS Code Schedule 3 table 1 then Richardson's Bulk Sales Ltd will do a noise exposure assessment according to Part 16 of the OHS Code and use the results obtained to develop the noise management program.

If workers are exposed to excess noise, Richardson's Bulk Sales Ltd will develop and implement a noise management program that includes policies and procedures. Richardson's Bulk Sales Ltd will ensure that the noise management program includes the following:

- A plan to educate workers in the hazards of exposure to excess noise and to train workers in the correct use of control measures and hearing protection;
- The methods and procedures to be used when measuring or monitoring worker exposure to noise;
- The posting of suitable warning signs in any work area where the noise level exceeds 85 dBA:
    - The exteriors of all areas where industrial noise exposure (greater than the prescribed limits) may occur will have noise hazard signs strategically located;
    - In addition, mobile equipment where workers could be exposed to industrial noise will be posted with appropriate signs; and
    - Signs must be inspected for accuracy and serviceability on a routine basis as part of the regular workplace inspection program. Any deficiencies must be corrected as soon as reasonably practicable;
- The methods of noise control to be used;
- The selection, use, and maintenance of hearing protection devices to be worn by workers;
- The requirements for audiometric testing and the maintenance of test records; and
- An annual review of the policies and procedures to address:
    - The effectiveness of the education and training plan;
    - The need for further noise measurement; and
    - The adequacy of noise control measures.

The Richardson's Bulk Sales Ltd noise management safe work practice by the will be based on a three-step approach:

- Elimination of noise at source, re-engineering of equipment generating hazardous noise, and the purchase of equipment that presents a lower hazard where practical;
- Control of generated noise, through the installation of effective sound suppression methods when practicable; and
- Protecting, equipping, and training workers in the proper use of hearing protection and the requirements of the noise management program.

Where feasible, Richardson's Bulk Sales Ltd will purchase or rent equipment considering the type and level of noise generated. Where noise levels are in excess of the regulated levels, Richardson's Bulk Sales Ltd will attempt to reduce the hazard by modifying the design, upgrading sound suppression systems, or limiting worker exposure. As a last resort, suitable hearing protection devices will be provided and worn.

Insofar as is reasonably practicable, Richardson's Bulk Sales Ltd shall, by engineering controls or other physical means other than hearing protectors, reduce the exposure to sound of employees to a level that does not exceed the Occupational Exposure Limits.

Richardson's Bulk Sales Ltd will ensure that a worker's exposure to noise does not exceed:

- The noise exposure limits identified in Schedule 3, Table 1 of OHS Code, Part 16, and
- 85 dBA L_{ex} (average noise exposure adjusted to an eight-hour work day).

Richardson's Bulk Sales Ltd will report any noise induced hearing loss experienced by a worker according to section 47 of the OHS Act, as a notifiable disease to a Medical Services Director.

2.0 Hearing Protection

1. Factors influencing the selection of protection that are to be considered will include:
    - The daily noise exposure of the worker;

- The worker's hearing ability;
- Communication demands of the worker;
- Use of other personal protective equipment;
- Temperature and climate; and
- Physical constraints of the worker or work activity.

2. Richardson's Bulk Sales Ltd will ensure that hearing protection equipment provided to workers exposed to excess noise:
    - Meets the requirements of CSA Standard Z94.2-02, Hearing Protection Devices: Performance, Selection, Care, and Use (or current version), and
    - Is of the appropriate class and grade as described in Schedule 3, Table 2.

Table 2 – Selection of Hearing Protection Devices

Maximum Equivalent Noise Level (dBA Lex)	CSA Class of Hearing Protection	CSA Grade of Hearing Protection
≤ 90	C, B, or A	1, 2, 3, or 4
≤ 95	B or A	2, 3, or 4
≤ 100	A	3 or 4
≤ 105	A	4

≤ 110	A earplug + A or B earmuff	3 or 4 earplug + 2, 3, or 4 earmuff
> 110	A plug + A or B earmuff and limited exposure time to keep sound reaching the worker's ear drum below 85 dBA L_{ex}	3 or 4 earplug + 2, 3, or 4 earmuff and limited exposure time to keep sound reaching the worker's ear drum below 85 dBA L_{ex}

1. Hearing protection devices will be made available to all workers and visitors where the potential for excess noise exposure exists. Richardson's Bulk Sales Ltd will provide a selection of earmuffs and earplugs to ensure comfortable and appropriate protection for all noise exposed workers.
2. When earmuffs are issued, a record of type and class of earmuff will be maintained. The worker should present their selected hearing protection to audiometric technicians during annual audiometric testing to ensure correct type, class, fit, and serviceability.

3.0 Noise Exposure Assessment

If Richardson's Bulk Sales Ltd workers are, or may be, exposed to noise at a work site in excess of 85 dBA L_{ex} or the noise exposure limits identified in Schedule 3, Table 1 of the AB OHS Code Richardson's Bulk Sales Ltd will perform a noise exposure assessment.

Richardson's Bulk Sales Ltd will establish representative noise exposures for various occupational groups through the noise level surveys. Any noise assessment survey information must be posted at strategic locations.

Any person engaged by Richardson's Bulk Sales Ltd to assess noise exposure at a work site will measure the noise in accordance with CSA Standard Z107.56-06, Procedures for the Measurement of Occupational Noise Exposure.

“Audiometers” used to assess noise levels will meet the specifications described in ANSI Standard S3.6-2004, Specification for Audiometers.

4.0 Education and Training

Richardson's Bulk Sales Ltd will provide education for all employees and dedicated contractors who are exposed to noise sources greater than 85 dBA L_{ex}. The education may be provided via in-house training programs or during the course of conducting the annual hearing test program (audiometric testing).

If Richardson's Bulk Sales Ltd workers are exposed to excess noise, education and training will be provided which covers the effects of noise on hearing and the selection, fit, use, care, and maintenance of the hearing protection equipment that is required to be used at the work site according to the manufacturer's specifications.

Information regarding hearing protection devices and local noise hazards will be provided during employee or worker orientations. This initial training will be documented and filed in the employee files.

5.0 Audiometric Testing

1. Richardson's Bulk Sales Ltd will provide, at their expense, the following to noise exposed workers:
    - An initial baseline test as soon as practicable, but not later than six months after the worker is employed, or within six months after a worker is exposed to excess noise because of a change in the worker's duties or process condition;
    - Not more than 12 months after the initial baseline test; and
    - At least every second year after the above (12 month) test.

2. Richardson's Bulk Sales Ltd will ensure that the audiometric testing is administered by a qualified person.
3. If the results of the audiogram are "abnormal" as defined by the AB OHS Code then the audiologist must take appropriate action by forwarding the audiogram to a physician or audiologist designated by Richardson's Bulk Sales Ltd.
4. If a physician or audiologist designated by Richardson's Bulk Sales Ltd confirms the audiogram as abnormal or abnormal shift, the physician or audiologist must take appropriate action by advising the worker and the worker's physician (with the worker's approval).

    Richardson's Bulk Sales Ltd will not release records of audiometric tests conducted on a worker or medical history information received from a worker to any person without the worker's written permission.
5. If it is not reasonably practicable for a Richardson's Bulk Sales Ltd worker to undergo audiometric testing during the worker's normal working hours, then Richardson's Bulk Sales Ltd will ensure that the worker does not lose any pay or other benefits because the worker was tested.
6. On an annual basis, the audiometric service provider will supply Richardson's Bulk Sales Ltd with a statistical report on the results of the audiometric testing program and an evaluation of the effectiveness of the noise management program, including equipment use and worker satisfaction, along with any recommendations for change.
7. Richardson's Bulk Sales Ltd supervisors are responsible for monitoring the use of hearing protection devices in the workplace under their care and control. This should form part of their regular site inspections.

6.0 Prohibitions

The use of "electronic" type devices under hearing protection or other such devices are prohibited. Use of these devices may impede a worker from hearing warning announcements or other communication and are not typically intrinsically safe.

References

- Alberta Occupational Health & Safety Act, Regulation, and Code, Part 16: Noise Exposure.https://www.alberta.ca/ohs-act-regulation-code.aspx
- CSA Standard Z94.2 02, Hearing Protection Devices – Performance, Selection, Care, and Use.
- CSA Standard Z107.56-06, Procedures for the Measuring of Occupational Noise Exposure.

Office Safety

Purpose

Richardson's Bulk Sales Ltd recognizes that serious safety incidents can occur within office environments and Richardson's Bulk Sales Ltd wants to involve office workers in safety initiatives. This SWP will be used to establish the guidelines required to generate site-specific office safety job procedures.

Scope

This safe work practice shall be applied at all office locations (Field and Corporate) owned or operated by Richardson's Bulk Sales Ltd.

Procedure

1.0 Filing and Storage Cabinets

- Do not overload the top shelves or drawers.
- Open drawers one at a time and close them after use to avoid overbalancing the cabinet.
- Use handles for opening and closing the drawers to avoid pinch and crush injuries.
- Place heavier files or materials on the bottom shelf or drawer.
- Do allow material to be placed unsafely on top of shelves or in any way that might render lighting, ventilation, and/or fire suppressant systems ineffective.

2.0 Sharp Edges and Objects

- Do not dispose of glass or other sharp or dangerous objects in a waste baskets.
- Always close the blade after using a paper cutter.
- Ensure scissors or other cutting devices are suitably stored and secured.
- Operate paper shredders according to manufacturer safety guidelines and keep jewellery, ties, clothing or long hair away from the blades. Disconnect the power before cleaning a paper jam.
- Do not use any furniture as stepping stools or ladders.

3.0 Electrical Outlets/Cords

- Inspect and ensure that all electrical and extension cords are in good condition.
- Do not overload electrical plug outlets.
- Do not run electrical or telephone cords across aisles or walkways without approved protective hardware as they may become damaged or present a slipping or tripping hazard.
- Remove extension cords from the electrical outlet by pulling on the plug only – Never pull on the cord.
- Ensure that approved suitable grounding is provided on all extension cords and appliances according to their location.

4.0 Floors and Aisles

- Keep aisles clear of spills, debris, and storage boxes.

- Use handrails when climbing or descending stairways.
- Do not obstruct your view by carrying oversized loads.
- Ensure exit signs are suitably located and illuminated.
- Ensure access and egress doors and hardware are serviceable.
- Ensure emergency lighting is suitably located, serviced, and in operational condition.
- Correct any unsafe conditions and report them to a supervisor.

5.0 Fire Precautions and Safety

- Learn the location of fire extinguishers in your area.
- Familiarize yourself with the escape routes from your place of work.
- Ensure that employees are aware of local and Corporate Emergency Response Plan requirements, especially those employees who may have designated responsibilities within the plan.
- Conduct regularly scheduled fire and emergency evacuation drills.
- Never try to take an elevator to escape from a fire – Always use the stairs.
- Do not use flammable cleaning fluids unless they have been approved for use and you have been trained in their hazards and the control measures to be used.
- Keep flammable materials in approved capped and labelled containers within approved fireproof cabinets.
- Do not dispose of "hazardous products" (batteries, solvents, etc.) via the general disposal system.
- If you see any danger within an escape route, such as stored boxes or equipment blocking passage, clear the area immediately or notify your supervisor.

Forms

- Office Inspection Form

References

- Alberta Occupational Health and Safety Code, Part 8: Entrances, Walkways, Stairways, and Ladders; Part 12: General Safety Precautions; Part 14: Lifting and Handling Loads; Part 24: Toilets and Washing Facilities.https://www.alberta.ca/ohs-act-regulation-code.aspx
- British Columbia Occupational Health and Safety Regulation, Part 4: General Conditions Sections 4.32 – 4. 45.https://www.worksafebc.com/en/law-policy/occupational-health-safety/searchable-ohs-regulation/ohs-regulation/part-04-general-conditions
- Saskatchewan Occupational Health and Safety Regulations 2020, Part 6: General Health Requirements, and Part 16: Entrances, Exits, and Ladders. http://www.publications.gov.sk.ca/details.cfm?p=4355

Personal Protective Equipment

Purpose

The purpose of personal protective equipment (PPE) is to prevent worker exposure to hazards when administrative or engineering controls are ineffective or insufficient. PPE can also be considered as a last line of defense in case of a breakdown in hazard controls. This SWP will establish guidelines for how PPE is chosen, used and maintained and will be used to develop the PPE procedures required for Richardson's Bulk Sales Ltd site-specific applications.

Scope

This SWP will provide guidelines for the general and specialized PPE that must be worn by employees. All worksites must have PPE requirements determined through hazard assessments prior to beginning work. The standards outlined in this manual will apply to all workers and all worksites and shall be enforced by all levels of supervision at all Company work sites. If a worker must use or wear specific equipment to ensure their safety, Richardson's Bulk Sales Ltd and Richardson's Bulk Sales Ltd supervisors must ensure that they do so.

Procedure

The selection, use, care, inspection and maintenance of PPE will adhere to the requirements of the Alberta OHS Code, Part 18: Personal Protective Equipment.

1.0 PPE Selection, Fitting, and Limitations

1.1 Determining PPE Requirements

Hazard assessments will be performed by authorized Company personnel and where the hazard assessment indicates the need for personal protective equipment, Richardson's Bulk Sales Ltd will ensure that:

- Workers wear personal protective equipment that is correct for the hazard and protects workers;
- Workers properly use and wear their personal protective equipment; and
- The personal protective equipment is in a condition to perform the function for which it was designed.

When deciding on the PPE that should be used within Richardson's Bulk Sales Ltd's work sites, the following will be considered:

- Hazard identification;
- Safety incidents, statistics, and trends;
- Industry best practices;
- Company safety rules;
- Occupational, health, and safety legislation; and
- Safety Data Sheets (SDS) applicable PPE requirements.

1.2 PPE Fitting

PPE will be individually fitted to employees according to the criteria in this SWP and the relevant COPs. Employees will also be trained in fitting their PPE so that when they select PPE it can be used effectively.

Fitting will consist of:

- A review of manufacturer recommendations;
- Providing several size alternatives for employees to evaluate when applicable;
- Following manufacturer recommendations for testing proper fit; and
- Following legislated requirements for testing fit including any quantitative tests such as fit testing for Respiratory Protective Equipment (RPE).

1.3 Employee PPE Training and PPE Limitations

Richardson's Bulk Sales Ltd will ensure that workers are trained in the correct use, care, limitations, and assigned maintenance of the personal protective equipment. Prior to use, employees must demonstrate competence in the use of PPE and the maintenance and limitations of such equipment.

Employees will be trained in PPE fitting as described above.

Employees will be trained in the limitations of the PPE that they are using. The limitations are described in this SWP, the applicable COPs and other related PPE SWPs including:

- Noise Management;
- Fall Protection and Fall Protection Plans; and
- Respiratory Protective Equipment.

Manufacturer limitations will be reviewed when applicable.

2.0 Clothing

2.1 General

The following are examples of workplace hazards that could cause bodily injury, where protective clothing must be considered:

- Flash fire or explosions;
- Cuts;
- Exposure to radiation;
- Temperature extremes;
- Hot splashes from molten metals and other hot liquids;
- Potential impacts from tools, machinery and materials; and
- Hazardous chemicals.

The equipment must be selected for the hazard and must be properly fitted to each employee. Equipment that is beyond repair must be replaced.

2.2 Flame Resistant (FR) Clothing

- If a worker may be exposed to a flash fire or electrical equipment flashover, Richardson's Bulk Sales Ltd will ensure that the worker wears flame resistant outerwear and uses other protective equipment appropriate to the hazard.
- FR clothing is mandatory on any Company work site which carries, stores, or delivers hydrocarbons or other flammable substances.

- FR clothing will be worn by employees exposed to electric arc flash hazards;
- FR clothing will consist of long-sleeved shirts and long pants or coveralls. This clothing will be appropriate to the tasks performed by Richardson's Bulk Sales Ltd workers and the hazards associated with the tasks.
- Rolling up sleeves, modifying, or wearing of garments in a manner that exposes the body or extremities to flash fires is prohibited.
- Where FR clothing is required to be worn undergarments made of synthetic derivatives (such as nylon, polyester, or acrylic) must not be worn because of the flammable and melting characteristics of these materials. Garments worn next to the skin should be made of 100% cotton, wool, leather, linen, or other material that is certified or known to be resistant to flash fires or melting.
- Welders and helpers may wear specialized protective clothing appropriate to the hazards of the task they perform, as determined by a hazard assessment, if FR clothing is not appropriate.
- FR clothing must be washed, repaired and maintained as recommended by the manufacturer and in such a manner as its safety properties will not be compromised.
- Limitations of FR clothing:
    - Repeated washing, mechanical, or chemical damage can diminish the effectiveness of FR clothing;
    - Not all FR clothing is Arc Rated for arc flash protection;
    - FR clothing typically provides protection against a flash fire of limited duration and the grade of protection must be selected according to the hazards assessments performed; and
    - FR clothing does not typically cover the face and neck and must be worn properly to afford protection, closed at the collar and sleeves not rolled up.

3.0 Hard Hats and Helmets

3.1 General Considerations

Protecting employees from potential head injuries is a key element Richardson's Bulk Sales Ltd's safety program. A head injury can result in permanent impairment or death. Wearing a safety helmet is an important component in protecting an employee's head from injury. Hard hats can protect employees from impact and penetration hazards as well as from electrical shock and burn hazards.

1. Richardson's Bulk Sales Ltd will ensure that all employees wear head protection when:
    - Objects might fall from above and strike them on the head;
    - They might bump their heads against fixed objects, such as exposed pipes or beams; or
    - There is a possibility of accidental head contact with electrical hazards.
2. In general, protective helmets or hard hats should do the following:
    - Resist penetration by objects;
    - Absorb the shock of a blow;
    - Be water-resistant and slow burning; and
    - Have clear instructions explaining proper adjustment and replacement of the suspension and headband.
3. The following are some fit and selection considerations:
    - Head protection that is either too large or too small is inappropriate for use;

- Most protective headgear comes in a variety of sizes with adjustable headbands to ensure a proper fit;
- A proper fit should allow sufficient clearance between the shell and the suspension system for ventilation and distribution of an impact;
- The hat should not bind, slip, fall off, or irritate the skin;
- Some protective headgear allows for the use of various accessories to help employees deal with changing environmental conditions, such as slots for earmuffs, safety glasses, face shields and mounted lights; and
- Optional brims may provide additional protection from the sun and some hats have channels that guide rainwater away from the face.

4. The following are some care and use considerations:

- Periodic cleaning with approved cleaning agents and inspection will extend the useful life of protective headgear;
- A daily inspection of the hard hat shell, suspension system and other accessories for holes, cracks, tears, or other damage that might compromise the protective value of the hat is essential;
- Paints, paint thinners, and some cleaning agents can weaken the shells of hard hats and may eliminate electrical resistance;
- Never drill holes, paint, or apply labels to protective headgear as this may reduce the integrity of the protection; and
- Do not store protective headgear in direct sunlight, such as on the rear window shelf of a car, since sunlight and extreme heat can damage them.

5. Hard hats with any of the following defects should be removed from service and replaced:

- Perforation, cracking, or deformity of the brim or shell, and
- Indication of exposure of the brim or shell to heat, chemicals or ultraviolet light and other radiation (in addition to a loss of surface gloss, such signs include chalking or flaking).

Note: Always replace a hard hat if it sustains an impact, even if damage is not noticeable.

6. Limitations of Protective Headwear

- Protective headwear can be affected by the items mentioned in 4. and 5. above which will reduce the protection it affords.
- Protective headwear is not designed to protect against a high energy impact such as hitting a stationary object directly at high velocity or being struck by a heavy object at high velocity.
- Additional hazard controls are required beyond PPE if there is a risk of high energy impacts. Protective headwear will no be sufficient.

3.2 Protective Headwear Specifications

1. If there is a foreseeable danger of injury to a worker's head at a work site and there is a significant possibility of lateral impact to the head, Richardson's Bulk Sales Ltd will ensure that the worker wears industrial protective headwear that is appropriate to the hazards and meets the requirements of:
    - CSA Standard CAN/CSA-Z94.1-05, Industrial Protective Headwear, or
    - ANSI Standard Z89.1-2003, American National Standard for Industrial Head Protection, for Type II head protection, if the protective headwear was manufactured on or after July 1, 2014.

2. If there is a foreseeable danger of injury to a worker's head at a work site and the possibility of lateral impact to the head is unlikely, Richardson's Bulk Sales Ltd will ensure that the worker wears industrial protective headwear that is appropriate to the hazard and meets the requirements of:
    - CSA Standard CAN/CSA-Z94.1-05, Industrial Protective Headwear;
    - ANSI Standard Z89.1-2009, American National Standard for Industrial Head Protection, if the protective headwear was manufactured on or after July 1, 2014;
    - Richardson's Bulk Sales Ltd may permit a worker to wear a bump hat at the work site if the danger of injury is limited to the worker's head striking a stationary object. Document this exemption on the Safe Work Permit and specify the conditions and duration of the exemption;
    - Company and contract personnel and any casual visitors to the work site must wear hard hats in all designated hard hat areas;
    - Hard hats should remain free of any materials that prevent close examination (for purposes of establishing shell integrity) of the exterior shell; and
    - Where workers are engaged in work around aircraft or helicopter, the hard hat will be equipped with a chinstrap. The chinstrap will be worn in an effective manner.

3.3 All-Terrain Vehicles, Snow Vehicles

Richardson's Bulk Sales Ltd will ensure that a worker riding an all-terrain vehicle or snow vehicle, or, a small utility vehicle at a work site wears a safety helmet approved to one of the following standards:

- U.S.A. Federal Motor Vehicle Safety Standard FMVSS218, Motorcycle Helmets 1993 OCT;
- BSI Standard BS 6658: 05, Specification for Protective Helmets for Vehicle Users; and
- Snell Memorial Foundation Standard M2005, 2005 Helmet Standard for Use in Motorcycling, if the safety helmet was manufactured on or after July 1, 2009.

3.4 Inspection, Maintenance and Repairs

- Replace headgear that is pitted, holed, cracked, or brittle.
- Replace headgear that has been subjected to a blow even though damage cannot be seen.
- Replace and service headgear and components according to the manufacturer's instructions.

Do not:

- Drill, remove peaks or alter the shell or suspension in any way;
- Use solvents or paints on the shells;
- Put chinstraps over the brims;
- Use any liner that contains any metal or conductive material; or
- Carry anything in the hard hat while wearing the hard hat.

4.0 Hearing Protection

1. Hearing protection must be worn wherever the noise level exceeds the Occupational Exposure Limits (OEL) as outlined in Schedule 3, Table 1 of the Alberta OHS Code.

2. If engineering and work practice controls do not lower employee exposure to workplace noise below the OEL, Richardson's Bulk Sales Ltd employees must wear appropriate hearing protection.

3. Manufacturers of hearing protection devices must display the device's NRR (noise reduction rating) on the product packaging in order to enable the user to determine whether the device is adequate or not.

4. Some types of hearing protection include:

    - Single-use earplugs are made of waxed cotton, foam, silicone rubber, or fiberglass wool. They are self-forming and, when properly inserted, they work as well as most molded earplugs;

    - Pre-formed or molded earplugs must be individually fitted by a professional and can be disposable or reusable. Reusable plugs should be cleaned after each use; and

    - Earmuffs require a perfect seal around the ear. Glasses, facial hair, long hair or facial movements such as chewing may reduce the protective value of earmuffs.

5. Considerations in regards to the care and use of hearing protection include the following:

    - Follow the manufacturer's instructions;

    - Check hearing protection regularly for wear and tear;

    - Replace ear cushions or plugs that are no longer pliable;

- Replace a unit when head bands are so stretched that they do not keep ear cushions snugly against the head;
- Disassemble ear muffs to clean;
- Wash ear muffs with a mild liquid detergent in warm water, and then rinse in clear warm water. Ensure that sound-attenuating material inside the ear cushions does not get wet;
- Use a soft brush to remove skin oil and dirt that can harden ear cushions; and
- Squeeze excess moisture from the plugs or cushions and then place them on a clean surface to air dry. (Check the manufacturer's recommendations first to find out if the ear plugs are washable).

6. All buildings or equipment with noise levels above 85 dBA must have signs strategically placed around the perimeter of the area identifying the dBA readings for that area and the type of hearing protection appropriate for that level of noise.
7. Richardson's Bulk Sales Ltd will provide the necessary hearing protection for its employees and for visitors to the work site. Contractors and subcontractors must provide hearing protection for their respective employees. Annual noise surveys will be conducted at all work sites and documented in the site safety files.
8. Workers who are exposed to noise in excess of the occupational exposure limits must have their hearing tested regularly. By testing the worker's hearing it can be determined if hearing protection methods are working.
9. Limitations of Hearing Protection
    - Hearing protective devices are subject to real world limitations from the fit and care requirements described above. The effectiveness of hearing protective devices depends greatly on the individuals face and ear morphology. Monitoring for effectiveness is essential.
    - Studies in workplace applications have found the effectiveness of hearing protection are less than predicted in the laboratory studies. Hearing protection and wearers must be monitored to ensure effectiveness.

- Hearing protection may be incompatible with other PPE such as safety eyewear which might limit its effectiveness.
- If noise levels are sufficiently high the noise may be transmitted directly to the inner ear by vibration. Protection against very high dBs may be very difficult due to damage from to the inner ear from conduction through the bones in the head.

Note: For further reference, see Noise Management Program.

5.0 Protective Eyewear and Face Protection

5.1 General Considerations

Employees can be exposed to a large number of hazards that pose danger to their eyes and face, such as exposure to flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapours, potentially infected material or potentially harmful light radiation. Where there is a danger of injury to, or irritation of a worker's eyes/face, Richardson's Bulk Sales Ltd will ensure the worker wears properly fitting eye/face protection, suitable to the task at hand.

Richardson's Bulk Sales Ltd will provide the necessary non-prescription personal protective eyewear for its employees and visitors before they enter the work site. Contractors and subcontractors must provide and maintain personal protective eyewear for their respective employees.

- Four general levels of eye protection are available:
  - Normal safety glasses;
  - Eye-cup goggles;
  - Mono-frame goggles; and
  - Face shields/helmet/hood.

5.2 Protective Eyewear Standards

1. If a worker's eyes may be injured or irritated at a work site, Richardson's Bulk Sales Ltd will ensure that the worker wears properly fitting eye protection equipment that:
    - Is approved to CSA Standard Z94.3-07, Eye and Face Protectors, and
    - Is appropriate to the work being done and the hazard involved.
2. Richardson's Bulk Sales Ltd approved safety eye protection must conform to CSA Standard CAN/CSA-Z94.3-07 Eye and Face Protectors, CSA Standard CAN/CSA-Z94.3-99 Industrial Eye and Face Protectors, or CAN/CSA-Z94.3-02 Eye and Face Protectors.
3. Employees will wear safety eyewear at all times while:
    - Working on or around any work site, pipeline, or well site;
    - Working on or around pressurized equipment, such as that with hydraulic/pneumatic air lines and hoses; and
    - Engaged in any activity that could cause flying particles of dust, pieces of metal, or other foreign objects to strike the eye.
4. All employees will wear an approved face shield whenever they are:
    - Scraping, grinding, or breaking any material from which debris could contact the eyes;
    - Handling liquid or powdered chemicals;
    - Working where solid particles or other foreign material may become airborne; and
    - Conducting welding, burning, grinding, buffing, or chipping activities.
5.

Limitations of Protective Eyewear

- Normal protective eyewear may not protect against mists or splashes of chemicals or cold or hot water.
- Goggles may not by themselves provide sufficient impact protection.
- Face shields may not by themselves provide sufficient impact protection.
- Protective eye and face wear may impede vision under a number of circumstances and its effectiveness in these conditions must be accounted for in hazard assessments.
- Protective eyewear fit and care considerations may reduce the effectiveness of the real world protection afforded.

5.3 CSA Classification of Eye and Face Protectors

The CSA Standards classifies eye and face protectors into seven classes as follows:

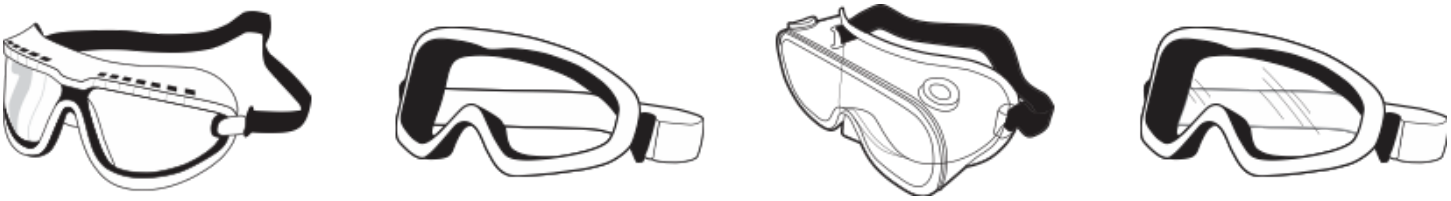
Class 1 – Spectacles:

- Class 1A spectacles for impact protection with side protection, and
- Class 1B spectacles for impact and radiation protection with side protection.

Class 2 – Goggles:

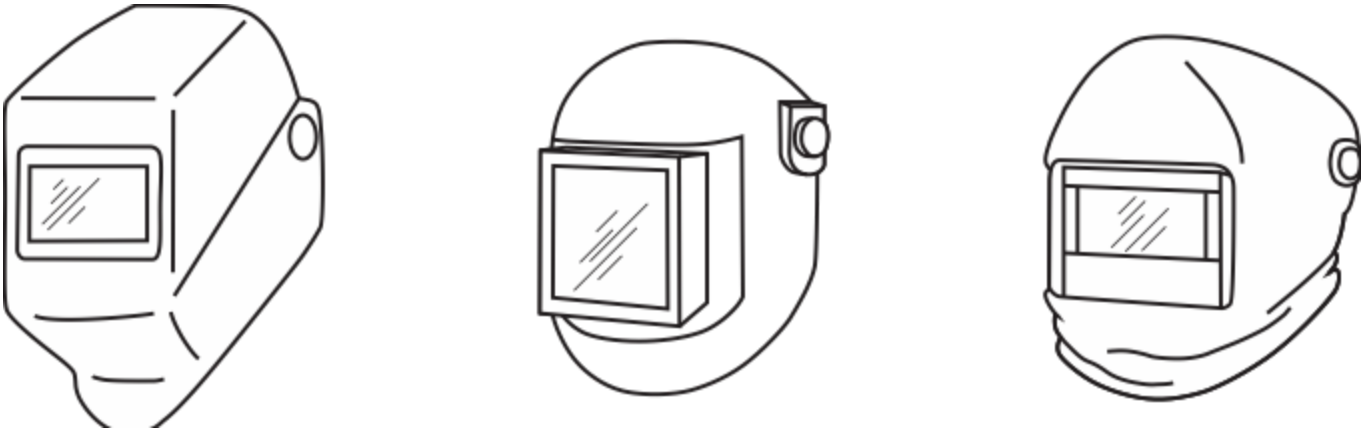
- Class 2A goggles for impact protection with direct ventilation;

- Class 2B goggles for impact, dust, and splash protection – non-ventilated and indirectly ventilated; and
- Class 2C goggles are Class 2A or 2B goggles with radiation protection.



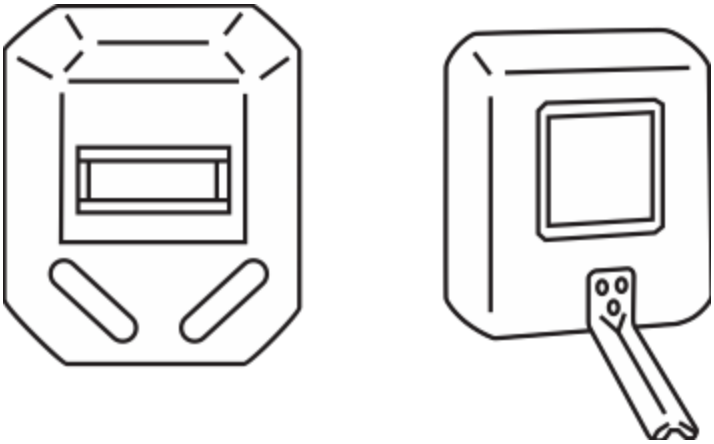
Class 3 – Welding helmets:

This class includes a variety of configurations.



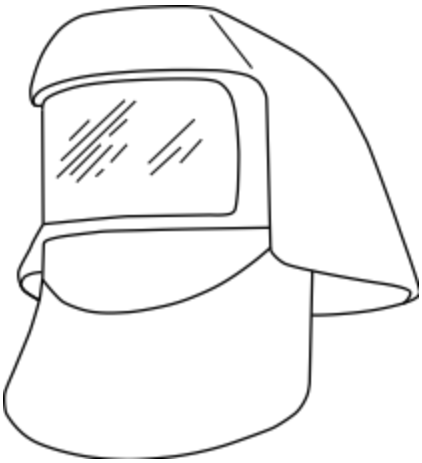
Class 4 – Welding hand shields:

This class includes a variety of configurations.



Class 5 – Non-rigid helmets (hoods):

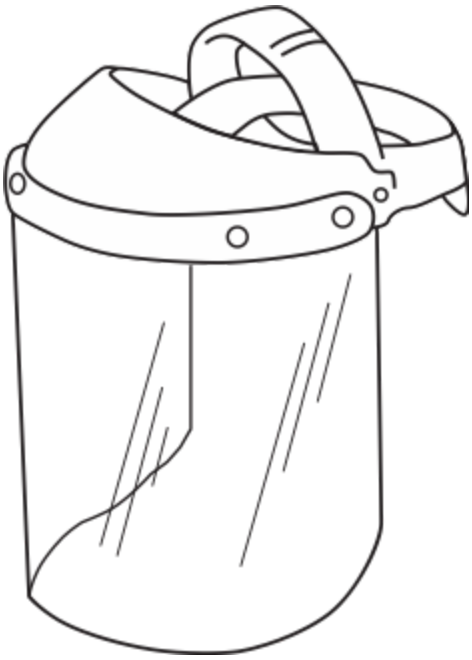
- Class 5A non-rigid helmets have an impact-resistant window;
- Class 5B non-rigid helmets are intended for dust, splash, and abrasive materials protection;
- Class 5C non-rigid helmets have radiation protection; and
- Class 5D non-rigid helmets are intended for high-heat applications.



Class 6 – Face Shields:

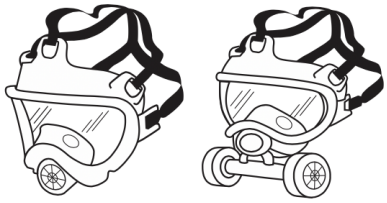
- Class 6A face shields offer impact and splash protection;

- Class 6B face shields have radiation protection; and
- Class 6C face shields are intended for high-heat applications.



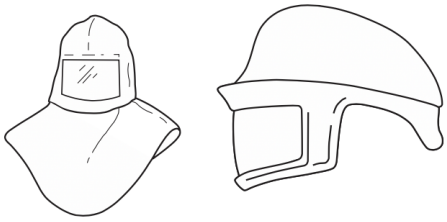
Class 7 - Respirator face pieces:

- Class 7A respirator face pieces offer impact and splash protection;
- Class 7B respirator face pieces are Class 7A respirator face pieces with radiation protection;
- Class 7C respiratory face pieces have loose-fitting hoods or helmets; and
- Class 7D respirator face pieces are Class 7C respirator face pieces with radiation protection.

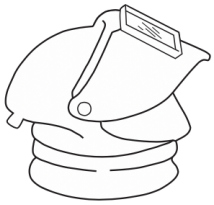


Class 7A

Class 7B



Class 7C



Class 7D

5.4 Prescription Eyewear

1. Corrective Lenses (Glasses)

   Prescription eyewear may be worn if it:

   - Is safety eyewear;
   - Meets the requirements of:

- CSA Standard Z94.3-07, Eye and Face Protectors;
- CSA Standard Z94.3-02, Eye and Face Protectors;
- CSA Standard Z94.3-99, Industrial Eye and Face Protectors; and
- Is appropriate to the work and the hazard involved.

- Prescription safety eyewear having glass lenses must not be used if there is danger of impact unless it is worn behind safety glasses that meet the standard;
- Side shields are required to be fitted to all prescription eyewear. Prescription eyewear must be maintained in a condition so as to provide the wearer with unrestricted or unobstructed vision;
- Workers may wear approved safety eyewear designed to be worn over prescription eyewear; and
- Various anti-fogging compounds for lenses are available on the market and should be used whenever the situation warrants their use.

2. Contact Lenses

Richardson's Bulk Sales Ltd will determine if wearing contact lenses poses a hazard to the worker's eyes during the work and determine if or how contact lenses may be worn while working.

If contact lenses may be worn Richardson's Bulk Sales Ltd will advise workers of the hazards and alternatives to wearing contact lenses.

Note: Contact lens wearers are advised that when wearing any form of face piece supplied by "breathing air", the positive and continuous supply of dry air within the face piece may have a drying effect on the contact lenses, which could create discomfort to the wearer, or worse, dislodge the lenses from their natural seating on the eye.

6.0 Protective Footwear

1. Employees who face possible foot or leg injuries from the following must wear protective footwear:
    - Falling or rolling objects;
    - Crushing or penetrating materials;
    - Exposure to hot substances or corrosive or poisonous materials; and
    - Exposure to electrical hazards, non-conductive footwear should be worn.

    Note: Workplace exposure to static electricity may necessitate the use of conductive footwear.
2. CSA Grade I (green triangle) approved steel-toed footwear shall be worn on all Company work sites where the hazard assessment has determined that safety footwear must be worn. In general, this will apply to all industrial work sites.
3. Visitors who will be escorted and kept away from potential foot hazards may be allowed access provided that a Safe Work Permit has been issued with this exception documented and approved by the site supervisor.
4. All safety footwear will:
    - Be maintained in good condition;
    - Have a sole with serviceable tread; and
    - Be worn with all laces or straps properly secured.

    Certain CSA approved footwear may not be acceptable on Richardson's Bulk Sales Ltd worksites – check with the site supervisor.
5.

Safety Footwear Considerations:

- Choose footwear according to the job hazard and CSA Standards;
- Lace up boot and tie laces securely;
- Use a protective boot dressing to help the boot last longer and provide greater water resistance;
- Choose a high boot to provide ankle support (fewer injuries);
- Do not wear defective safety footwear (e.g., exposed steel toe caps); and
- Do not modify safety footwear.

6. Specialized Safety Footwear

If a hazard assessment identifies that protective footwear needs to have toe protection, a puncture resistant sole, metatarsal protection, electrical protection, chainsaw protection, or any combination of these, Richardson's Bulk Sales Ltd will ensure that the worker wears protective footwear that is approved to:

- CSA Standard Z195-02, Protective Footwear, or
- ASTM Standard F2413-05, Specification for Performance Requirements for Protective Footwear, if the protective footwear was manufactured on or after July 1, 2014.

7. Limitations of Safety Footwear

- The effectiveness of safety footwear protection may be reduced due to fit and care issues in real world applications.

- Feet may suffer trauma from energy transmission through the boot in high energy impacts. PPE should not be relied upon as primary protection if high energy impacts are considered likely.
- Safety footwear may introduce other hazards such as slipping hazards from chemically resistant soles. Hazards must be assessed to determine the optimum protective footwear and to advise workers of any hazards created by the footwear.
- Safety footwear may not protect the instep or metatarsal area adequately.

7.0 Protective Handwear

1. Appropriate safety handwear (gloves, gauntlets, mitts, wristlets, etc.) can often minimize the effects of contact with external energy sources that cause injury.
2. A hazard assessment must be used to determine the most appropriate handwear PPE.
3. There are many types of gloves available to protect against a wide variety of hazards. The nature of the hazard and the operation involved will affect the selection of gloves.
4. Richardson's Bulk Sales Ltd will instruct employees on the selection and use of gloves specifically designed for the hazards and tasks found in their workplace.
5. The following are examples of some factors that may influence the selection of protective gloves for a workplace:
    - Type of chemicals handled;
    - Nature of contact (total immersion, splash, etc.);
    - Duration of contact;
    - Area requiring protection (hand only, forearm, arm);
    - Grip requirements (dry, wet, oily);
    - Thermal protection;

- Size and comfort; and
- Abrasion/resistance requirements.

6. Glove materials of construction will be chosen according to the hazard they are protecting against and the task being performed. Gloves will be selected from these four general groups:
   - Gloves made of leather, canvas or metal mesh;
   - Fabric and coated fabric gloves;
   - Chemical- and liquid-resistant gloves; and
   - Insulating rubber gloves.
7. The following are some guidelines for the use of handwear on the job:
   - Gloves shall be worn for the specific use for which they were intended;
   - Gloves should not be used when working on moving machinery such as drills, saws, or other rotating machinery where the glove could catch on the moving machinery and pull the hand in;
   - When handling chemicals or corrosive materials, use chemically resistant gloves according to the hazard assessment conducted and the Safety Data Sheets (SDS); and
   - Electric work requires the use of specially made and approved insulating gloves.
8. Handwear should be cared for the same way as other PPE. Regular cleaning is required and replacement is mandatory when the product is beyond safe use.
9. Protective gloves should be inspected before each use to ensure that they are not torn, punctured or made ineffective in any way. Gloves that are discolored or stiff may also indicate deficiencies caused by excessive use or degradation from chemical exposure.
10.

Limitations

- Complete chemical resistance for handwear is difficult to achieve and different glove materials are required to protect against individual chemicals.
- Protective handwear is subject to the limitations resulting from proper care and use as described above.
- Protective handwear will not provide adequate protection against high energy impacts, cutting impacts, and sawing or tearing impacts. PPE cannot be the primary hazard control against such hazards.

8.0 Limb and Body Protection

If there is a danger that a worker's hand, arm, leg, or torso may be injured, Richardson's Bulk Sales Ltd will ensure that the worker wears properly fitting hand, arm, leg, or body protective equipment that is appropriate to the work, the work site, and the hazards identified.

Richardson's Bulk Sales Ltd will conduct appropriate risk assessments to determine the need for specialized PPE, such as hand, arm, boot, leg, and torso protective equipment.

9.0 Respiratory Protective Equipment

1. Compliance with Standards

   If a worker must wear a full-face piece respirator and the face piece is intended to prevent materials striking the eyes, Richardson's Bulk Sales Ltd will ensure that the face piece:

   - Meets the requirements of:
     - CSA Standard Z94.3-07, Eye and Face Protectors, or
     - CSA Standard Z94.3-02, Eye and Face Protectors.
   - Meets the impact and penetration test requirements of section 9 of:

- ANSI Standard Z87.1-2003, Occupational and Educational Personal Eye and Face Protection Devices, or
- ANSI Standard Z87.1-1989, Practice for Occupational and Educational Eye and Face Protection.

All workers and visitors to a work site that may require respiratory protective equipment for work or rescue activities must be clean-shaven where the respirator facepiece seals with the face.

All personnel who may be required to use respiratory protective equipment shall be properly trained in the selection, use, and care of all of the types of respiratory protective equipment that they may be expected to use in their work activities.

All personnel working at a sour (H_2S) Company work site must maintain current certification in the H_2S Alive Certificate program.

2. Limitations of Respiratory Protective Equipment

   Respiratory protective equipment limitations are discussed in COP Respiratory Protective Equipment.

   Fit use and care as described in the COP can affect the real world performance of respiratory protective equipment.

   Performance of RPE in the field may not match laboratory performance and its effectiveness must be monitored.

   Proper fit is critical for RPE and variations may occur in the suitability of RPE brands and models.

Note: For further details see Respiratory Protective Equipment.

10.0 Personal Gas Detectors/Monitors

Personal gas detectors and monitors will be used by Richardson's Bulk Sales Ltd employees, contractors, and workers where the possibility of exposure to a toxic, explosive, or oxygen-deficient atmosphere may exist as identified through hazard assessments.

Function testing (Bump) testing before each shift or use will be required.

Training in the use and maintenance of personal gas detectors is mandatory and proof of such training shall be documented.

Note: For further details regarding selection and maintenance, refer to Gas Detectors and Monitors.

11.0 Skin Protection

Richardson's Bulk Sales Ltd will take every reasonable measure to identify and to ensure that a worker's skin is protected from harmful substances that may injure the skin on contact or that may adversely affect a worker's health if absorbed through the skin. Skin protection may be achieved by:

- Full body biological and chemical suits;
- Pressurised and non-pressurized isolation hoods;
- Various types of foot protection;
- Various types of hand protection; and
- Skin protection barriers/creams.

Hazard assessments and Safety Data Sheets will be used to obtain health hazard information and determine the control measures to be used for any substance or product that may injure the skin or that may be absorbed through the skin.

12.0 Fall Protection Equipment

Refer to Fall Protection and Fall Protection Plans for detailed instructions on the use, care and maintenance of personal fall protection equipment. In general:

- Inspect equipment daily;
- Clean and care for equipment as required and according to equipment manufacturer instructions;
- Ensure equipment is stored under manufacturer approved conditions in a location that will not result in deterioration due to contamination or exposure to the elements;
- Replace defective equipment. If there is any doubt about the safety of the equipment, do not use it and refer questionable defects to your supervisor;
- Replace any equipment, including ropes, involved in a fall. Refer any questionable defects to your supervisor;
- Every component of a personal fall arrest system should be inspected before each use and certified yearly by a competent person; and
- When selecting equipment refer to CSA Standard Z259.1-95 "Safety Belts and Lanyards" or Z259.10-06 "Full Body Harnesses".

Limitations of fall equipment are discussed in SWP Fall Protection Plans.

Forms

- Personal Protective Equipment Training Form

References

- Alberta Occupational Health and Safety Act, Regulation, and Code, Part 18. https://www.alberta.ca/ohs-act-regulation-code.aspx
- Consumer Guidelines for the Selection of Fire Resistant Workwear for Protection against Hydrocarbon Flash Fires – CAPP.
- Canadian Occupational Health and Safety Regulations.http://laws.justice.gc.ca/eng/regulations/SOR-86-304/index.html

Power Tools

Purpose

Power tools are used by Richardson's Bulk Sales Ltd workers on a regular basis and may present safety hazards when not used properly. Powered tools include those that are pneumatically powered. Richardson's Bulk Sales Ltd has developed this safe work practice to provide general guidelines and requirements that may be used to establish power tool safe job procedures specific to the work being done by Richardson's Bulk Sales Ltd.

Scope

The conditions and requirements of this safe work practice shall be applied at all work sites owned or operated by Richardson's Bulk Sales Ltd where workers are required to use power tools.

Procedure

When performing activities that require the use of power tools, the following safety requirements must be followed:

- Inspect all power tools, electrical extension cords, or high pressure hoses before use. Power tools must have appropriate guards in place at all times;
- Do not operate power tools and equipment unless the constant hand or finger pressure control is operative;
- Ensure you have been trained in the safety hazards of the power tool prior to using it;

- Ensure all electrical tools are grounded by means of a third wire or are CSA listed as a double-insulated tool;
- Remove electric power tools, extension cords, and equipment showing worn, deteriorated, or inadequate insulation from service until suitably repaired;
- Never use electric tools on storage or volume tanks, high pressure lines, etc., until the tanks or lines are depressurized and confirmed to be free of explosive, toxic, or hazardous materials, or other suitable safety measures have been taken;
- Pay particular attention to the following abrasive wheel recommendations:
    - Use safety locking washers on all power tool abrasive wheels;
    - Before work is started, ensure abrasive wheels have a protective shield;
    - For a bench mounted tool incorporating an abrasive or buffing wheel, a rest should be in place and adjusted to maintain a clearance from the wheel no greater than three millimetres (1/8 inch);
    - Do not mount grinding wheels on any grinding appliance where the spindle speed is greater than the wheel's rated speed capacity;
    - The operator must wear appropriate eye protection and stand to one side of the plane of rotation whenever possible; and
    - Never connect a wheel grinder to a power source without ensuring that the power tool switch is in the "off" position. Never use a wheel grinder without a serviceable safety guard and tool rest.
- Ensure that all electrical outlets are equipped with ground fault interruption protection;
- Remove pneumatic driven tools, high pressure hose, and equipment showing worn, deteriorated, or unserviceable connections from service until suitably repaired;

- Where there is a danger of explosion or fire, the use of non-sparking or intrinsically safe power tools may be required. Hot work permit procedures must be followed;
- Personnel using pneumatic tools must ensure that the source of air supply pressure does not exceed the working pressure or operating capacity of the respective tool;
- Ensure adequate air supply requirements (dryness, lubrication) to effectively operate the tool are available;
- Compressed air shall not be used for cleaning purposes except where reduced to less than 30 psi and then only with effective chip guarding and personal protective equipment as determined by a hazard and risk assessment;
- Compressed air shall not be used by employees to clean themselves or any other person;
- Ensure that power tools are not left around the immediate work area where they can become a hazard to the user, or where they may be inadvertently damaged;
- Ensure power tools are suitably protected from excessive heat, extreme cold, or moisture, or any environmental condition identified by the manufacturer;
- Only use power tools for the purpose for which they were designed;
- Ensure all appropriate safety equipment and PPE is being worn with respect to the tool being used;
- A power tool may only be operated by a competent person. A person must not be authorized to operate a power tool until the person has been adequately instructed and trained, and has demonstrated an ability to safely operate it;

- Employees using hand and/or power tools and are exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dust, fumes, mists vapors, or gases shall be provided with particular PPE necessary to protect them from the hazard; and
- Select tools that are ergonomically correct for the appropriate task based on the nature of the job, the workplace layout, and the job design. Other factors to consider include (but are not limited to): Low-vibrating tools, lightweight tools, tools with vibration-absorbing handles, tools that are easier to manipulate and handle, etc.

References

- Alberta Occupational Health and Safety Code, Part 3: Specifications and Certifications; Part 18: PPE; Part 22: Safeguards; and Part 25: Tools, Equipment, and Machinery.https://www.alberta.ca/ohs-act-regulation-code.aspx
- British Columbia Occupational Health and Safety Regulations, Part 12: Tools, Equipment, and Machinery Sections 12.1 – 12.141.https://www.worksafebc.com/en/law-policy/occupational-health-safety
- Common Safety Orientation (CSO) Guidelines for the Oil and Gas Industryhttps://www.energysafetycanada.com/Standards/Industry_Standards/Common-Safety-Orientation

Preventative Maintenance

Purpose

Preventative maintenance is regularly scheduled maintenance designed to ensure that equipment and systems do not fail or require repairs in an uncontrolled manner. This safe work practice establishes the requirements to be followed when developing preventative maintenance procedures for specific pieces of equipment, machinery, and facilities.

Scope

This SWP will be applied to all key Company assets which are owned, leased, rented, or operated.

Definitions

Preventative Maintenance: Preventative maintenance can be described as the maintenance of equipment or systems before fault occurs.

Planned (scheduled) Maintenance: Planned maintenance is created for every item separately according to manufacturers' recommendation or legislation. Planned maintenance such as oil changes can be based on equipment running hours, date based (daily, weekly, monthly), or for vehicles' distance travelled.

Condition-based Maintenance: Maintenance undertaken when the need arises. This maintenance is performed after one or more indicators show that equipment is going to fail or that equipment performance is deteriorating. For example, when oil samples become dirty, fan vibration becomes too high, bearing clearances are exceeded, or when process efficiency drops below standard.

Corrective (breakdown) Maintenance: Maintenance that is required when an item has failed or worn out. This type of maintenance is required to bring it back to working order.

Richardson's Bulk Sales Ltd will conduct preventative maintenance in order to minimize corrective maintenance.

Procedure

Richardson's Bulk Sales Ltd will ensure that all equipment used at a work site:

1. Is maintained in a condition that will not compromise the health or safety of workers using or transporting it;
2. Will safely perform the function for which it is intended or was designed;
3. Is of adequate strength for its purpose; and
4. Is free from obvious defects.

1.0 Policy

- Richardson's Bulk Sales Ltd will compile an inventory of Richardson's Bulk Sales Ltd's machinery, equipment, and facilities and will keep the list current. When new key assets are acquired, they will be added to the inventory. Equipment requiring maintenance will be tagged in the asset list and the maintenance department will maintain an Equipment Inventory Log of the tagged asset.
- Richardson's Bulk Sales Ltd shall establish a preventative maintenance schedule to be followed for all safety sensitive assets. The preventative maintenance schedule is based on legislated requirements, manufacturer requirements and recommendations, industry standards and best practices, and asset history for all equipment.
- All maintenance, and in particular, preventative maintenance, performed on machinery, equipment, and facilities will be documented and retained for the life of the asset on the Equipment Inventory Log.
- Defects observed in machinery, equipment, or facilities shall be reported to a supervisor, and, if deemed to be a safety hazard or a risk to the life of the asset, it must be repaired or replaced before being used again.

2.0 Asset Inventory – Equipment Inventory Log

Richardson's Bulk Sales Ltd has established an Asset Inventory system which includes an Equipment Inventory Log. The equipment Inventory log is used for tracking maintenance and repairs. The process for generating the Equipment Inventory Log is described below. The Equipment Inventory Log is current and available through the maintenance department for reference. Updating, additions and changes to the log must be made by approved technicians or trained employees and approved by the Maintenance Manager.

- Each piece of equipment on which maintenance will be performed and tracked is identified as a distinct item on the Equipment Inventory Log which is part of the Central Asset Inventory.
- From the first day of ownership, equipment will have a file created in the Asset Inventory system tagged as “Equipment”. The Equipment Inventory Log for the tagged piece of equipment will collect the history of maintenance on that item going forward.
- Richardson's Bulk Sales Ltd will use the maintenance history to analyze the asset’s performance in terms of production, maintenance, and availability in order to evaluate performance and establish best operating practices.
- The equipment listing will be complete and be kept current as new equipment is acquired and old assets are retired.

3.0 Preventative Maintenance Process – New Equipment Assets

3.1 Preventative Maintenance Schedule

- Before a new asset is put to work, the Maintenance Department will prepare a preventative maintenance program for the asset.
- This program will be based on manufacturers’ requirements and recommendations, legislated requirements, industry best practices, and the Richardson's Bulk Sales Ltd’s asset history for similar assets.

- The program will establish who will be responsible for overseeing the maintenance of the assets.
- The system will track key performance data, such as days, kilometres, hours, vibration, amperage, etc.

3.2 Maintenance Record Keeping

- All work on an asset must be documented. This may be achieved through the use of work orders or invoices when the work is contracted out.
- This documentation will be entered into the PM system so that it can be easily retrieved and analyzed and used for future maintenance planning.
- Documentation must be filed in an orderly filing system.
- Monthly reports should be generated on all key assets so that performance issues be spotted quickly and resolved.

3.3 Reporting of Deficiencies

- The preventative maintenance program will include an inspection program that starts with pre- and post- usage inspections by the operators of the equipment.
- Deficiencies should be immediately reported and must be promptly repaired before the equipment is used.
- Further inspections should be part of the planned maintenance process and be performed by competent persons.
- Consideration will be given to the use of sensing devices that allow for equipment condition to be reported in real time.

Prime Contractor

Purpose

A “Prime Contractor” must be identified at every construction work site, oil and gas work site, or a work site or class of work sites designated by a Director if there are two or more employers involved in work at the work site. The person in control of the work site is the Prime Contractor unless there is a written agreement in place designating a prime contractor. This SWP provides the requirements to be followed when Richardson's Bulk Sales Ltd is designated as the prime contractor for a work site and for establishing procedures to select and manage Richardson's Bulk Sales Ltd prime contractors.

Scope

The conditions and requirements of this Prime Contractor Safe Work Practice shall be applied and enforced at all work sites owned, controlled, or operated by Richardson's Bulk Sales Ltd, where a written prime contractor agreement has been entered into with another party or when Richardson's Bulk Sales Ltd has been designated as the prime contractor for a work site it does not own or control.

Procedure

1.0 Responsibilities

1.1 Responsibilities – Person in Control of a Work Site

The owner or person in control of a work site outside of a construction or oil and gas work site may enter into an agreement to designate a prime contractor even if one is not required by the Act.

When a contractor, employer, or other person assumes the responsibilities of “Prime Contractor”, the person in control of a work site must ensure that:

- There is a written, signed, and acknowledged agreement between the person in control of a work site and the prime contractor what the responsibilities of the "Prime Contractor" are;
- If the person in control of the work site fails to designate a person as the prime contractor as required in the AB OHS Act 10(2)(1) then the person in control of the work site is deemed to be the prime contractor; and
- Only one contractor, employer, or other person for the work site is the "Prime Contractor".

If these practices are not followed, there may not be sufficient evidence that a transfer of "Prime Contractor" responsibility has occurred.

1.2 "Prime Contractor" Obligations

The prime contractor must establish processes to ensure, as far as reasonably practicable, compliance with legislated standards at the work site. There are two ways to meet this obligation:

- The prime contractor directly manages the employers' Health and Safety systems (e.g., training, competencies, hazard identification) so that legislated standards are met, or
- The prime contractor establishes a system or processes to ensure compliance with the legislated standards (e.g., ensuring each employer's Health and Safety program can meet the minimum legislated standards).

The prime contractor is obligated to:

1. Establish, as far as it is reasonably practicable to do so, a system or process that will ensure compliance with the Act, the Regulations, and the OHS Code in respect of the work site, including a system or process to ensure cooperation between the employer and workers in respect to health and safety;

2. Designate a person in writing for the purposes of ensuring cooperation between the employer and workers in respect to health and safety and implementing a system to address the responsibilities of a Joint Health and Safety Committee as set out in section 13(6) of the Act.2;
3. Obtain the names of all worker supervisors;
4. Obtain the names of all employers whose work is directed by the contractor;
5. Inform all workers, employers, owners, service providers, and suppliers at the work site of any existing or potential work site hazards;
6. Coordinate, organize and oversee the performance of all work at the work site to ensure, as far as it is reasonably practicable to do so, that no person is exposed to hazards arising out of, or in connection with, activities at the work site;
7. Post all orders and notices made under the AB OHS Act or by an OHS Director;
8. Conduct the prime contractor's own activities in such a way as to ensure, as far as it is reasonably practicable to do so, that no person is exposed to hazards arising out of, or in connection with, activities at the work site;
9. Consult and cooperate with the designated person from (2.) to attempt to resolve any health and safety issues;
10. Establish Codes of Practice as required by 62(1) of the AB OHS Act;
11. Coordinate the health and safety programs of employers and self-employed persons on the work site;
12. Cooperate with any other person exercising a duty imposed by the OHS Act, the Regulations and the OHS Code;
13. Comply with the OHS Act, the Regulations and the OHS Code; and
14. Post the name of the prime contractor in a conspicuous place at the work site.

2.0 Reportable Serious Injuries and Incidents

The prime contractor must report all serious injuries and incidents to a Director of Inspection as described in the Incident Reporting and Investigation section of this Health and Safety Program and according to the requirements of the AB OHS Act Part 7. The Prime Contractor must investigate serious incidents and potentially serious incidents as described in the same section of the program.

1. Employers must report all incidents to the “Prime Contractor”.
2. If required the prime contractor must inform: WCB, an OHS Director of Inspection, the person who has control of the work site and the local police force or RCMP if required.
3. The “Prime Contractor” must ensure that incidents are reported and investigated in a timely manner and as required by the OHS Act.
    - “Prime Contractor” may delegate the investigation and reporting to the employer provided that the employer has the ability to conduct a thorough investigation;
    - The “Prime Contractor” reviews and signs the investigation report; and
    - The “Prime Contractor” retains a copy of the report for two years.

3.0 Other Requirements and Recommendations

If a requirement in the OHS Act, the Regulations or the OHS code imposes a duty on an employer with respect to equipment, work site infrastructure or an excavation and the equipment or infrastructure is designed, constructed, erected or installed, or the excavation is conducted by or on behalf of a prime contractor, the prime contractor shall comply with the requirement as if the requirement were directly imposed on the prime contractor.

When designating a prime contractor as the person in control of a work site:

- Ensure that the contractor, employer, or other person is able and competent to perform “Prime Contractor” responsibilities;
- Inform all employers at the work site who the “Prime Contractor” is; and
- Do not independently provide direction or exercise control.

Forms

- Designation of “Prime Contractor”

References

- Alberta Occupational Health and Safety Act, Part 1, Section 10 - Prime Contractors, and Code, First Aid, Part 11: Oil and Gas Well Servicing and Drilling, Part 37.https://www.alberta.ca/ohs-act-regulation-code.aspx

Respiratory Protective Equipment (RPE)

Purpose

Respiratory protective equipment like all PPE is used as a last line of defense in case engineering and administrative controls fail or are impractical. This code of practice contains information and guidance on the selection and use of respiratory protective equipment used at Richardson's Bulk Sales Ltd work sites.

This COP will be used by Richardson's Bulk Sales Ltd to establish the site-specific procedures required for the selection, use, and care of respiratory protective equipment to be used at worksites for job specific applications.

Scope

This code of practice is applicable to all Richardson's Bulk Sales Ltd work sites where respiratory protection is required due to:

- Airborne contaminants in amounts that may exceed occupational exposure limits;
- The potential for harmful or oxygen-deficient atmospheres; and
- Efforts to ensure that worker exposure to harmful substances and atmospheres are kept As Low as Reasonably Achievable (ALARA).

Each operating work site shall conduct site and job specific hazard assessments to determine the requirements for respiratory protection use. Those activities requiring such protection shall be included in a site-specific safe operating procedure based on the requirements of this COP. The COP will be readily available for workers to refer to. Where respiratory protective equipment use is mandatory it shall be clearly communicated to all workers.

Procedure

1.0 Code of Practice Requirements

- If respiratory protective equipment is used at a work site, Richardson's Bulk Sales Ltd will prepare a code of practice governing the selection, maintenance, and use of respiratory protective equipment.
- In the case of a health care worker who may be exposed to airborne biohazardous material, Richardson's Bulk Sales Ltd will ensure that the required code of practice includes training on at least an annual basis.
- Respiratory protective equipment must be approved by NIOSH or by another accepted and approved standards organization.
- The type of respirator to be worn for each task requiring respiratory protective equipment will be specified.
- The selection of respiratory protective equipment will be based on the hazard of contaminant exposure and the protection factor assigned to the respirator.

2.0 Types of Respiratory Protective Equipment

2.1 Control of Breathing Atmosphere Hazards

Respiratory protection is required when the breathing atmosphere:

- Is deficient in oxygen;
- Is toxic due to the presence of toxic or hazardous substances; and
- Has a respiratory irritant.

1. Engineering Controls

- The potential for worker exposure to airborne hazardous substances should be either eliminated or controlled using engineering controls such as a ventilation system.
- Any ventilation system installed to control the concentration of an airborne hazardous substance shall be so designed, constructed, installed, operated, and maintained that the concentration of the airborne hazardous substance does not exceed the exposure limits.

2. Respiratory Protective Equipment - PPE

- Hazard control using PPE is a last line of defense in the event that engineering controls and administrative controls fail or are impractical. PPE should not be relied upon as a sole hazard control method.
- Where there is a hazard of an airborne hazardous substance or an oxygen deficient atmosphere in a workplace, the Company shall provide a respiratory protective device that protects against the hazardous substance or oxygen deficiency, as the case may be.

2.2 Respiratory Protective Equipment (RPE)

1. General Types of RPE

- Breathing protection is required equipment for all work sites where a hazard assessment has determined the need and is generally available in the form of supplied air respirators (SCBA, SABA) and as air purifying (cartridge type) respirators.

2. Supplied Air Respirator Systems (SCBA, SABA)

- Self-Contained Breathing Apparatus (SCBA) or Supplied Air Breathing Apparatus (SABA) must be used in work tasks or in emergency situations when the breathing atmosphere is or may become hazardous as a result of:

- The presence of a hazardous or toxic substance, and
- A concentration of oxygen less than 19.5% by volume.
- SCBAs differ from SABAs in that SCBA users carry their air supply within a cylinder worn on the back; whereas SABA users draw air from a remote source of breathing air via a breathing air hose line.
- Both SABA and SCBA systems use the same style of full facepiece breathing air mask.
- The SABA system includes a reserve or separate source of air (contained within a small 5 minute escape bottle, worn on the hip) to allow egress from the area if there is a problem with the supplied air. This egress air supply is intended for evacuation only and shall never be used as a source of breathing air for work purposes.

- **Note:** Training records must confirm that workers have been trained in the use of the type of equipment (SCBA, SABA) that is provided.

3. Regulatory Equipment Requirements for Immediate Danger

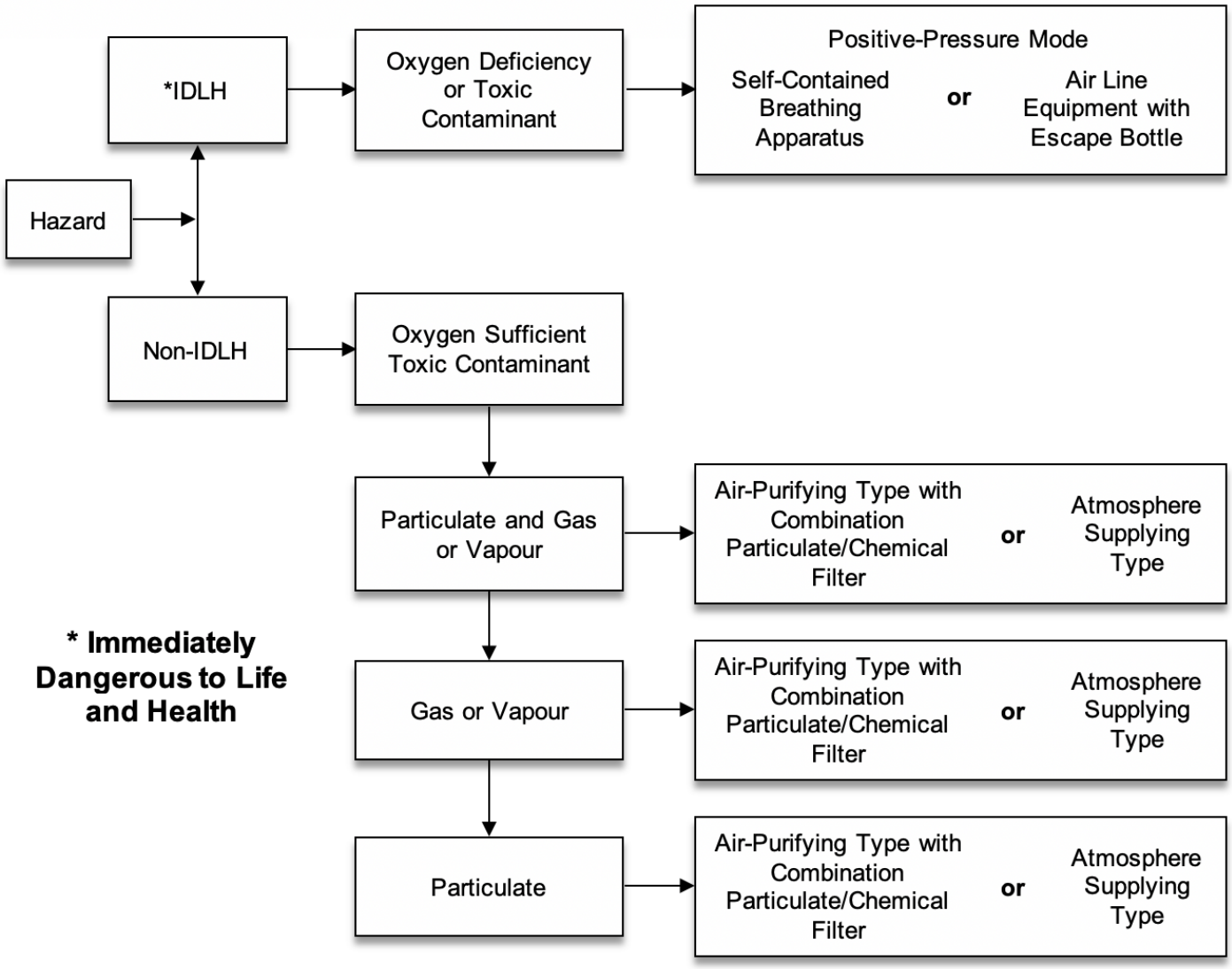
- If Richardson's Bulk Sales Ltd determines that breathing conditions at a work site are or may become immediately dangerous to life or health (IDLH), Richardson's Bulk Sales Ltd will ensure that a worker wears self-contained breathing apparatus or an air line respirator that:
  - Is of a type that will maintain positive pressure in the facepiece;
  - Has a capacity of at least 30 minutes unless Richardson's Bulk Sales Ltd's hazard assessment indicates the need for a greater capacity;
  - Provides full face protection in situations where contaminants may irritate or damage the eyes;

- In the case of an air line respirator, is fitted with an auxiliary supply of respirable air of sufficient quantity to enable the worker to escape from the area in an emergency; and
- In the case of a self-contained breathing apparatus, has an alarm warning of low pressure.

4. Air Purifying Respirators

- Air purifying respirators work on the principle of removing toxic contaminants from the air. They cannot be used:
  - When the breathing atmosphere contains less than 19.5% oxygen, and
  - When the toxicity of the breathing space exceeds the protection factor of the respirator.
  - The correct respirator cartridge be selected and specified for the atmospheric hazard present or suspected. Not all cartridges are effective for all situations. The required make and model of the respirator and cartridge will be specified for workers.
  - Respiratory protective equipment provided by Richardson's Bulk Sales Ltd shall:
  - Be maintained, inspected, and tested by a qualified person, and
  - Where necessary to prevent a health hazard, be maintained in a clean and sanitary condition by a qualified person.

Chart 1 - Respiratory Equipment Selection



3.0 Respiratory Hazards

Refer to the following table for common respiratory hazards that may be present at the work site. Selecting the appropriate respirator depends on the type, toxicity, and particle size of the particulate matter.

Table 1 – Respiratory Hazards

Hazards	Minimum Respiratory Protection Required
Oxygen deficiency 19.5% O_2 or less	SCBA, positive pressure, 30 minute with alarms or SABA with auxiliary air supply
Hydrogen sulphide (greater than 15 ppm)	SCBA, positive pressure, full face, 30 minute with alarms or SABA with auxiliary air supply
Natural gas – sweet (Methane, Ethane, Propane above 1,000 ppm)	SCBA, positive pressure, 30 minute with alarms or SABA with auxiliary air supply
Other hydrocarbons	See SDS for hydrocarbon and type of respirators
Paint vapours	Half face mask with Organic Vapour cartridge with a mechanical prefilter
Solvent vapours (OEL to 10 x OEL) (10 x 50 x OEL) (above 50 x OEL)	Check SDS for occupational exposure limit (OEL): • Half face mask with organic vapour cartridge; • Full face mask with organic vapour cartridge; and • SCBA or SABA.
Asbestos	Half face mask with High Efficiency Particulate Air (HEPA) filter
Welding fumes	Half face mask with filter capable of removing metal fumes

Nuisance dusts	NIOSH/MHSA approved particulate filter
Sand blasting	SABA with egress bottle

Note: This is not a complete list of all the respiratory hazards that may be encountered at a work site. Refer to the hazard assessment and SDSs for the correct respiratory protection.

3.1 Contaminant Warning

- Atmospheric testing shall be carried out on all work areas suspected of containing a toxic, contaminated, or oxygen-deficient atmosphere.
- All atmospheric (gas) testing shall be conducted by trained, designated personnel using approved equipment and procedures.

3.2 Toxicity Limits

- Cartridge type respirators may only be used for protection against substances not exceeding the protection factor of the mask and where there is a minimum oxygen concentration of 19.5% by volume.
- Subject to a hazard assessment and the breathing atmosphere not being IDLH; If the concentration of the contaminant in the breathing atmosphere is not greater than 10 times the occupational exposure limit for that substance, a half facepiece cartridge type mask may be used.

- Subject to a hazard assessment and the breathing atmosphere not being IDLH; for concentrations greater than 10 and less than 100 times the acceptable exposure limit, a full facepiece cartridge type respirator may be used.
- For concentrations above 100 and less than 1,000 times the acceptable exposure limit, a positive pressure air line supplied full facepiece respirator shall be used.
- For concentrations above 1,000 and less than 10,000 times the acceptable exposure limit:
  - A positive pressure air line supplied-air respirator with an egress bottle attached, or
  - A SCBA unit shall be used.
- At any time, if any suspected atmospheric contaminant may affect the eyes, a full facepiece respirator shall be used.

3.3 Assessing Respiratory Dangers – Alberta OHS Code Part 18 Regulatory Requirements

1. Richardson's Bulk Sales Ltd will determine the degree of danger to a worker at a work site and whether the worker needs to wear respiratory protective equipment if:
   - A worker is or may be exposed to an airborne contaminant or a mixture of airborne contaminants in a concentration exceeding their occupational exposure limits; or
   - The atmosphere has or may have an oxygen concentration of less than 19.5% by volume; or
   - A worker is or may be exposed to an airborne biohazardous material.
2. In making a determination of the degree of danger, the Company will consider:
   - The nature and exposure circumstances of any contaminants or biohazardous material;
   - The concentration or likely concentration of any airborne contaminants;
   - The duration or likely duration of the worker's exposure;

- The toxicity of the contaminants;
- The concentration of oxygen;
- The warning properties of the contaminants; and
- The need for emergency escape.

3. Based on the determination under (1) above, Richardson's Bulk Sales Ltd will:
    - Provide and ensure the availability of the appropriate respiratory protective equipment to the worker at the work site, and
    - When the effects of airborne biohazardous materials are unknown, provide and ensure the availability of respiratory protective equipment appropriate to the worker's known exposure circumstances.

A worker must use the appropriate respiratory equipment provided by the Company as identified under section 3.

4.0 Maintenance, Cleaning, and Storage of Respiratory Protective Equipment

4.1 Regulatory requirements

Alberta OHS Code, Part 18, Section 248, states:

Richardson's Bulk Sales Ltd will ensure that respiratory protective equipment kept ready to protect a worker is:

a) Stored in a readily accessible location;

b) Stored in a manner that prevents its contamination;

c) Maintained in a clean and sanitary condition;

d) Inspected before and after each use to ensure it is in satisfactory working condition; and

e) Serviced and used in accordance with the manufacturer's specifications.

4.2 Cleaning

- Immediately after use, respiratory protective equipment must be cleaned, facepieces sanitized, and the equipment stored in the proper location.
- Cleaning of masks/facepieces should be performed according to the equipment manufacturer's recommendations and must be performed by a competent person using approved cleaning agents and methods that sanitize and protect the equipment.
- Cleaning procedures and training must be equipment specific.

4.3 Inspection and Maintenance Program

- Equipment that is not used on a regular basis (e.g., rescue equipment and stock) must be inspected by a trained worker at least monthly or according to the requirements of the equipment manufacturer.
- The inspector must ensure that the equipment is in satisfactory working condition, clean, and in its proper location.
- Written documentation of this inspection must be retained at the work site and must include the name of the inspector and the date that the inspection was performed.
- The supervisor in charge of the work location must designate a trained worker competent in the specific model to be inspected to complete these inspections.
- All equipment must be field inspected by the user prior to donning equipment and exposure to the hazard.

4.4 Records

A Program Administrator or equivalent competent person will be appointed by Richardson's Bulk Sales Ltd to maintain administrative records for:

- Each SCBA or SABA unit;
- Each breathing air cylinder (bottle);
- Any repair work, modification, or inspection of respiratory protective equipment;
- Training of workers in the proper use and maintenance of respiratory protective equipment; and
- Respirator facepiece fit testing of workers.
- This program will be reviewed annually, and all changes will be documented.

4.5 Breathing Air Quality and Cylinder Integrity

- Richardson's Bulk Sales Ltd will ensure that air used in a self-contained breathing apparatus or an air-line respirator:
    - Is of a quality that meets the latest requirements of Table 1 of CSA Standard Z180.1 Compressed Breathing Air and Systems, and
    - Does not contain a substance in a concentration that exceeds 10% of its occupational exposure limit.
- To ensure the breathing air quality conforms to CSA Standard Z180.1 “Compressed Breathing Air and Systems”, an analysis of air at the outlet of the compressor must be completed at six-month intervals.

- Bottles and cylinders shall be rotated to ensure that the air supply is maintained in a fresh condition (not greater than six months old).
- Hydrostatic testing and re-certification shall be completed as follows:
  - All steel and aluminum bottles- every 5 years;
  - Fibreglass - wrapped aluminum breathing air cylinders - every 3 years; and
  - Kevlar breathing air cylinders - every 3 years.

5.0 Work Site SCBA/SABA Required Quantities & Locations

In all situations the quantity, type and location of respiratory protective equipment must be determined by risk/hazard assessments.

5.1 Number of SCBA at Work Locations

If there is a danger of a breathing atmosphere could become hazardous there shall be one SCBA unit available for each full time operating position for the purpose of rescue in the event of a respiratory emergency.

5.2 Location of SCBA

- SCBAs shall be located in a dry place that is not subject to vibration nor temperatures below 0°C or above 30°C or as determined by the equipment manufacturer specifications for safe storage.
- SCBAs shall be placed in non-hazardous, easily accessible areas (away from potential fire hazards and potentially toxic atmospheres).

- Storage areas shall be well identified and distributed throughout the complex according to risk assessments.
- SCBAs shall be mounted (preferably on stands complete with protective covering over the unit) in a manner that an individual can put it on (don the unit) quickly in an emergency (e.g., straps fully extended).

5.3 SABA

- For routine work situations that require respiratory protection to be worn a SABA mask complete with egress bottle attached to a reliable central or portable source of approved breathing air may be preferred over SCBA.
- There should be enough SABA and air lines at the work site to accommodate normal or planned work activities at that location.

5.4 Spare SCBA Bottles

Each work site shall keep a fully charged spare SCBA bottle for every two complete units at the work site, or as determined by risk and hazard assessments for the contingencies which might be faced.

Spare bottle requirements should allow for SCBA donning/use practice without the risk of running out of fully-charged SCBA air cylinders when required for specific work activities or emergency use.

6.0 Respirator Fit Testing and Medical Surveillance

Richardson's Bulk Sales Ltd will ensure that respiratory protective equipment that depends on an effective facial seal for its safe use is correctly fit tested and tested in accordance with the latest revision to CSA Standard Z94.4, Selection, Use and Care of Respirators (or current version).

Richardson's Bulk Sales Ltd will ensure that, if a worker is or may be required to wear respiratory protective equipment and the effectiveness of the equipment depends on an effective facial seal, the

worker is clean shaven where the facepiece of the equipment seals to the skin of the face.

All employees, contract employees, and visitors to a sour gas work site, field location, or any area that may be subject to airborne contaminants must be clean-shaven where the respirator facepiece seals with the face.

Work sites included are where:

- Airborne contaminants may exceed their Occupational Exposure Limits (OELs);
- Where the presence of H_2S exceeds 10 ppm; or
- Where there is the potential for a reduced oxygen atmosphere (less than 19.5% by volume).

The requirement for a close fit is especially important. The presence of a moustache, excessive facial hair, unusual face contours, scars, skin eruptions, eyeglasses, or missing dentures could interfere with the seal.

6.1 Pre-Use Respirator Facepiece-to-Face Seal: Field Testing

The respirator facepiece-to-face seal must be tested, and a satisfactory fit must be obtained prior to each use.

The respirator facepiece-to-face seal can be field tested as a final verification:

- On a SCBA or SABA, by disconnecting the air supply hose and cupping the open palm of the hand over the air supply inlet and breathing in, and
- On a cartridge type respirator, by covering the inlet surface of the respirator cartridge and by breathing in.

The vacuum created in the facepiece should pull the facepiece against the face and remain in this position until the palm of the hand is removed from the air supply hose inlet end, or from the cartridge surface.

- Field fit test checks must be performed each time a face seal dependent respirator is worn, and
- Most manufacturers provide instructions for field testing; if these are unavailable, CSA Standard, CAN/CSA-Z94.4 Selection, Use, and Care of Respirators should be followed.

6.2 Qualitative Respirator Fit Testing

All workers on Company work sites who may be expected to wear a SCBA, SABA, or cartridge type respirator must be fit tested using an acceptable protocol to determine the appropriate make and model of facepiece they are authorized to use.

The technician conducting the fit test must be trained in the fit testing protocol and the application of the protocol to the specific equipment and facepieces being tested.

The fit test is conducted annually.

During the fit test, workers are provided training on the:

- Limitations of a face seal dependent respirator, and
- Use and care of the respirator.

6.3 Medical Surveillance

- No personnel should be assigned a task that requires the use of respirators unless the individual is physically capable of doing the work while wearing the respirator. Health surveillance will be conducted prior to a worker wearing a respirator.
- Health surveillance may include completing a questionnaire and/or pre-placement medical examinations to screen out those who are physically or psychologically unfit to wear respirators.

- Medical tests pertinent to the respiratory hazards that workers may encounter may be required to get baseline data against which to assess physiological changes in the respirator wearer. The worker's previous medical and employment history should also be considered.
- Workers health information collected under respiratory protective equipment medical surveillance will be kept confidential.

7.0 Worker Training

Every employee who uses respiratory protective equipment shall be instructed and trained in the use, operation, care, maintenance, and storage of all the types and models of respiratory protective equipment that they may be expected to use in their work activities.

All employees working at a sour (H_2S) work site must attend and maintain current certification in the H_2S Alive Certificate (or equivalent) program.

All respiratory protective equipment training shall be supplemented by onsite refresher training.

On-site update training shall include, but is not limited to:

- The opportunity to handle (work with) the specific apparatus in a practice session;
- The proper method of donning and wearing a SCBA, SABA, or cartridge-type respirator must be demonstrated by a competent person and practiced by all personnel;
- When personnel are wearing respiratory protective equipment, they should be evaluated to confirm that they are competent to use the equipment and physically and physiologically able to do so; and
- Employees must be trained in the proper method of conducting a facepiece-to-face field test of all respiratory protective equipment devices that they may be required to use in their work activities.

ACCEPTABLE

The shaded portions are your respirator seal areas. Facial hair IS NOT PERMITTED on these portions of the face

Clean Shaven

Narrow Moustache

UNACCEPTABLE

Full Beard

Goatee and Narrow Moustache

Goatee and Wide Moustache

Extended Side Burns

Fu Manchu Moustache

Wide Moustache

References

- Alberta Occupational Health and Safety Act, Regulation, and Code Part 18: Personal Protective Equipment, Alberta OHS Code Part 5: Confined Spaces. https://www.alberta.ca/ohs-act-regulation-code.aspx
- Oil and Gas Occupational Safety and Health Regulations, under Part II of the Canada Labour Code, Part XII: Confined Spaces; Part XIII: Safety Materials, Equipment, Devices and Clothing, Respiratory Protection, Section 13.7 and 13.8. http://laws.justice.gc.ca/eng/regulations/SOR-86-304/FullText.html
- Worksafe Alberta – Employer's Guide to Respiratory Protective Equipment. https://open.alberta.ca/publications/ppe001-breathing-apparatus

Return to Work (RTW) Program

Purpose

Injury management and Return to Work (RTW) programs are based on the ability of many injured workers to safely perform productive work during the process of recovery. Research has shown that the sooner ill and injured employees return to the workplace the more likely they are to remain at work long term and the lower the overall costs related to disability will be. The purpose of this program is to provide opportunities for the early RTW of injured employees by providing alternate or modified job duties when appropriate.

Scope

This RTW safe work practice will be applied at all Richardson's Bulk Sales Ltd work locations. Richardson's Bulk Sales Ltd will adhere to the requirements of the Workers' Compensation Act in Part 5.1 as it applies to its obligations in this SWP.

This RTW safe work practice will be applied at all Richardson's Bulk Sales Ltd work locations.

Definitions and Regulatory Considerations

1. Duty to Accommodate

   The duty to accommodate refers to an employer's legal responsibility under human rights legislation and the Workers Compensation Act (WCA) to take all reasonable steps to place a worker with a physical or mental disability in a position that accommodates his or her medical work restrictions. This obligation exists for both occupational and non-occupational injuries or illnesses. Employers are required to take reasonable steps to accommodate a worker to the extent that accommodation does not cause undue hardship to the employer.

2. Restricted/Modified Work

Temporary modified work includes any changes to regular job duties required as a result of an injury or illness, whether work related or not. This includes changes in:

- Tasks or functions;
- Workload (e.g. hours or work schedules);
- Environment or work area; or
- Equipment.

It can also include:

- Training;
- Work normally performed by others; or
- Work specifically designated as a RTW program.

Suitable modified work must:

- Accommodate the worker's medical restrictions;
- Enable the worker to perform the modified work duties without endangering his/her recovery or safety, or the safety of others;
- Contribute to the worker's physical and vocational rehabilitation by the promotion of activity and involvement in the workplace;
- Promote the restoration of the worker to his/her pre-incident level of employment;
- Be a safe, meaningful and productive part of the employer's operations; and
- Not create undue hardship for the worker.

3. Vocational Rehabilitation and Duty to Cooperate (WCB Act Part 6, Sections 89.1-89.3)

- Worker's Duties

  Workers will take all reasonable action to mitigate the worker's loss of earnings resulting from an injury, and if the circumstances require, cooperate with the Board in the development of a vocational or other rehabilitation plan that is intended to return the worker to employment.

- Duty of Employer to Cooperate

  Richardson's Bulk Sales Ltd will cooperate with the Board and with the worker in efforts to achieve the early and safe return of the worker to the worker's employment.

- Termination or Reduction of Compensation

  If without good reason, a worker fails to cooperate in, or is not available for, a vocational or other rehabilitation program, the Board may reduce or suspend the compensation payable to that worker.

4. Egregious Conduct

   In the event modified work ends as a result of a worker's egregious conduct, the WCB will pay benefits as though the modified work is still in place. This means that a worker's entitlement to temporary wage loss benefits may be reduced or suspended. Egregious conduct is conduct that is obviously wrong and would be seen as such to a reasonable person. Should the WCB consider the conduct not to be egregious, they may still determine that it qualifies as a failure to cooperate.

Procedure

1.0 RTW Policy

Richardson's Bulk Sales Ltd believes that the RTW program not only benefits the injured employee; it also has a positive impact on Richardson's Bulk Sales Ltd as a whole. Modified work:

- Reduces the human and financial costs of disability to workers;
- Provides a connection to the workplace, which has a significant impact on a worker's healing and successful return to the workplace;
- Maintains confidence and improves morale amongst co-workers; and
- Reduces the cost of disability for employers.

As part of the RTW communication and training program, Richardson's Bulk Sales Ltd employees will be informed of the RTW program when hired, at their formal orientation and during an annual refresher which may be conducted as part of a safety meeting.

2.0 Modified Work Offers

Suitable employment may be offered to employees who:

1. Are temporarily unable to do their regular job duties due to a compensable injury if:
    - A productive work assignment, suitable to the employee's limitations is available;
    - The work assignment will have a rehabilitative effect on the employee's condition; and
    - Complete rehabilitation is expected to occur within a reasonable time period.

    Note: This condition also applies to employee's who are not forced to miss work days, due to the injury, but require a few days of light duty before returning to full duties. This situation is defined as Stay at Work.

2. Are permanently disabled due to a compensable injury if:

   A work assignment suitable to the employee's limitations, education and training is available. It may be necessary for some employees to obtain additional training before they are qualified to perform the work assignment.

3.0 Key Principles

Richardson's Bulk Sales Ltd's RTW program is based on the following key principles:

1. Respect and Dignity

   All parties are to be treated with respect and dignity.

2. Joint Responsibility and Development

   Employers are responsible for the development and implementation of a basic health and safety program for the prevention of injuries/illnesses with the support of all employees. Workers and employers should jointly participate in a modified work program in order to achieve mutual understanding, commitment, and increase the potential for success.

3. Responsibility and Accountability

   A safe and effective modified work program clearly establishes responsibilities and accountability to guide and direct RTW.

4. Worker Involvement

   The worker's participation in the development of his or her modified work plan provides a sense of ownership and responsibility for his or her rehabilitation, on and off the job.

5. Communication

   A successful modified work program and plan should have ongoing communication and consultation among the participants.

6. Focus on Rehabilitation

   Modified work programs and plans should have a rehabilitative focus to allow for a safe, effective, and timely RTW.

7. Continuation of Work Relationship

   The continuation of communication, work relationship/routine between the worker and employer will facilitate the worker's recovery and reduce the length of time off work and the duration of disability.

8. Safe, Meaningful, Productive Work

   To increase effectiveness, the tasks and duties contained in an individual's modified work plan must be safe, suitable, meaningful, and productive.

9. Abilities

   The focus should be on workers' abilities, not disabilities. Workers must be medically able to perform the duties safely without risk of injury/illness to themselves or others.

10. Training, Knowledge and Experience

    To be effective, workers must have the training, knowledge, skills, and experience to safely perform tasks and duties included in the individual return to work plan.

4.0 Steps in the Return to Work Program

1. An approved health care provider (doctor, occupational health nurse, physiotherapist, etc.) gives medical clearance for a worker to undertake modified duties and identifies his or her medical restrictions.

2. Richardson's Bulk Sales Ltd verifies that the modified work being offered is consistent with a worker's medical restrictions.
3. The worker and Richardson's Bulk Sales Ltd agree to an employer's written offer of restricted work. The written offer or agreement should describe the specific job duties, demands, pay, hours of work, and duration of the modified duties.
4. For work related injury or illness:
    - Richardson's Bulk Sales Ltd sends documentation of the restricted work offer to the WCB;
    - The WCB adjudicator or case manager reviews the work offer and either approves it or negotiates changes;
    - The worker and Richardson's Bulk Sales Ltd ensure the restricted work plan is followed and advise the adjudicator or case manager of any required changes; and
    - The adjudicator or case manager confirms any changes with the worker, employer, and the worker's treatment provider, where necessary.
5. This process is to be posted in the workplace and communicated to all employees.

5.0 Responsibilities

1. Richardson's Bulk Sales Ltd is responsible to:
    - Treat all parties, including the worker, with respect and dignity;
    - Comply with the duty to accommodate by accommodating injured or ill workers in safe, suitable, meaningful, and productive modified work positions;

- Assign an individual to the position of RTW Coordinator and ensure individual is suitably trained, including applicable legislation in regards to injury management and privacy issues;
- Ensure that supervisors, health and safety personnel, and employees are adequately trained about the modified work program;
- Ensure a coordinated effort is used, including involvement by the injured worker, supervisor, RTW Coordinator, and HR Department;
- Richardson's Bulk Sales Ltd will identify and maintain a list of suitable modified work positions/tasks that can be safely performed by injured employees;
- Richardson's Bulk Sales Ltd will prepare a Physical Demands Analysis (PDA) for each modified work position which is likely to be available to injured employees;
- The modified work positions will be established by the PDA to pre-determine which jobs can be performed by injured employees based on the specific restrictions likely to be encountered;
- Injured employees will be placed according to their restrictions, the PDAs developed for the modified work positions and the availability of modified work positions;
- Provide support to, and work with, supervisors to address modified work issues, including any impacts on the work unit from the placement of workers on modified work programs (e.g. productivity, safety);
- Ensure supervisors and health and safety personnel monitor workers on modified work programs;
- Set up a modified work program that considers:

- Best practice models of modified work programs do not distinguish between occupational and non-occupational injuries and illnesses;
- For work related injuries, the program must comply with the WCB's legislation and policy. The legislation and policy is also an excellent resource for establishing a modified work programs for non-occupational injuries and illnesses;
- Consulting with workers and their union representatives where applicable;
- Establishing of target end dates and a review of plans as healing progresses; and
- Tracking and analyzing all RTW outcomes in order to improve the program;

- All medical records must be kept confidential in a locked file and accessed only on a "need-to-know" basis by those persons who require the information to do their jobs, and to ensure the safety of the injured employee with the approval of the senior manager in charge of human resources;
- Retain all records for each case for the duration of the employee's service with Richardson's Bulk Sales Ltd; and
- Medical records cannot be released unless agreed to by the employee or required under the law or a court order.

2. If hurt, workers are responsible to:

- Report your injury or illness immediately to your employer;
- Seek medical treatment. If the injury or illness is work related, tell your doctor;
- Report the injury or illness to the WCB if it happened at work; and
- Participate in the recommended treatment plan.

3. While on modified work, workers are responsible to:

- Perform safe, suitable, meaningful and productive modified work;

- Advise Richardson's Bulk Sales Ltd of your progress, and of any problems as soon as possible;
- Attend all medical appointments and participate in the recommended treatment plan;
- Inform your health care provider of Richardson's Bulk Sales Ltd's modified work program;
- Advise Richardson's Bulk Sales Ltd of any medical appointments, medical work restrictions, and of any medications you are taking;
- Advise Richardson's Bulk Sales Ltd and your WCB case manager/adjudicator, if the injury or illness is work related, of any changes. As your condition improves, your duties can be adjusted; and
- Ask Richardson's Bulk Sales Ltd if additional expenses that you may incur (e.g. transportation to medical appointments, lost wages, travel expenses) will be reimbursed.

6.0 Information for Supervisors/Managers working with Employees in Return to Work (RTW) Programs

- Richardson's Bulk Sales Ltd is committed to supporting employees recovering from illness or injury by providing alternate/modified job duties when appropriate.
- A RTW Plan is based on the nature and extent of the employee's disability as well as their expected recovery time, in accordance with their physician's recommendations.
- Plans may include reduced hours and/or reduced physically or psychologically demanding tasks, which will gradually increase as the employee regains ability.
- They may also consist of transitional work assignments in other jobs or departments, modified duties which change or eliminate some job functions, and/or physical modification of the workplace.

- The RTW Coordinator will monitor the employee's progress through the RTW Plan, consult with the employee, and modify the plan as required.
- Supporting an employee on a RTW Program.
- If you are a Richardson's Bulk Sales Ltd supervisor of an employee returning to work after injury/illness, here are some recommended actions to use to ease his or her transition back into the workplace:

1. Create a Welcoming Environment

   Prior to the employee's return, meet with his or her colleagues to discuss any concerns they have about the impact on their responsibilities, as well as to promote the importance of being supportive as their colleague readjusts and discuss the steps and goals of the RTW program. If appropriate, consider organizing a welcoming event.

2. Update the Employee Prior to RTW

   As soon as possible, meet with the employee to update him or her about the status of the workload, policy and personnel changes, and any other changes that have occurred during their absence.

3. If your Employee is Participating in a Supernumerary RTW Program

   Remember that the RTW program is an extension of your employee's treatment so that they can progress their tolerance to their regular duties and hours of work – they are not part of the unit workload considerations. This allows the employee to manage symptoms and pace activities.

4. Give the Employee Time to Readjust

   Be aware that some people may need a little time to get back into the swing of their former workday routine. Encourage them to ask for guidance, consider if re-training is necessary and provide support.

5. Support your Employee if the Transition Proves Difficult

   If an employee is having difficulty readjusting to the workplace, you can note and discuss changes and expectations in work performance, as well as listen to the employee's response and concerns. It is important to keep in mind that the goal of a graduated RTW is to progress the employee back into their regular position and tasks.

Forms

- Modified Work Agreement

References

- Formalizing a Modified Work Program – Alberta WCBhttps://www.wcb.ab.ca/return-to-work/return-to-work-planning/formalizing-a-modified-work-program.html
- Workers' Compensation Board of Albertawww.wcb.ab.ca
- WorkSafeBC Recovery and Work.https://www.worksafebc.com/en/claims/recovery-work
- WorkSafeBC Publication – Guidelines for Modified Work.https://www.worksafebc.com/en/resources/health-safety/books-guides/guidelines-for-modified-work?lang=en

Right to Refuse Dangerous Work and Disciplinary Action

Purpose

All workers have the right to refuse or stop any task or operation where concerns or questions regarding the control of health and safety hazards exists. A worker may refuse to do work or particular work if a worker believes on reasonable grounds that there is an undue hazard at the work site or that the work constitutes an undue hazard to the worker's health and safety or to the health and safety of another workeror any other person.

An "undue hazard" in relation to any occupation includes a hazard that poses a serious and immediate threat to the health and safety of a person.

No person shall take any disciplinary action against a worker by reason of that worker acting in compliance with the Act, the Regulations, the OHS Code, or an order issued under the Act. This safe work practice provides the necessary guidance and direction to Company workers and management in the event that a dangerous condition arises at any Company work site.

Scope

The conditions and requirements of this safe work practice shall be applied and enforced at all work sites owned or operated by Richardson's Bulk Sales Ltd where any worker feels that they are being asked to perform a task or function that they consider on reasonable grounds to constitute an undue hazard, or for which they have not been trained to perform. This SWP will adhere to the requirements of Part 3 of the AB OHS Act - Dangerous Work and Disciplinary Action.

Procedure

1.0 Responsibilities

1.1 Employer's Responsibilities

Employers are responsible to ensure that:

- Workers are educated on their right to refuse dangerous work, and the procedures for refusing dangerous work;
- Any form of discipline directed at any individual for exercising their right to refuse dangerous work under the Act is not tolerated;
- All work refusal occurrences are documented for lessons learned and to ensure that corrective measures are put into place; and
- When Richardson's Bulk Sales Ltd or a supervisor at a work site knows or ought to know of a condition at the work site that is or is likely to be dangerous to the health and safety of a worker, Richardson's Bulk Sales Ltd or a supervisor shall not require or permit any worker to do that work until the dangerous condition is remedied.

1.2 Worker's Right to Refuse Dangerous Work

A worker may refuse to work or to do particular work at a work site if the worker believes on reasonable grounds that there is an undue hazard at the work site or that the work constitutes an undue hazard to the worker's health and safety or to the health and safety of another worker or another person.

When exercising a right to refuse to work or to do particular work, a worker shall ensure, as far as it is reasonable to do so, that the refusal does not endanger the health and safety of any other person.

2.0 Work Refusal Process

A worker who refuses to work or to do particular work according as described in 1.2 above shall promptly report the refusal and the reasons for it to Richardson's Bulk Sales Ltd or the supervisor or to another person designated by Richardson's Bulk Sales Ltd or a supervisor.

On being notified of an undue hazard, Richardson's Bulk Sales Ltd shall:

- Ensure that work stops, and may not resume, until the undue hazard or dangerous work concern has been addressed;
- A worker who refuses to work or to do particular work shall promptly report the refusal and the reasons for it to Richardson's Bulk Sales Ltd or their supervisor or to another person designated by Richardson's Bulk Sales Ltd or the supervisor;
- When Richardson's Bulk Sales Ltd receives a report Richardson's Bulk Sales Ltd will as soon as possible, inform the Joint Health and Safety Committee, if there is one, or the Health and Safety Representative, if there is one, of the report;
- Richardson's Bulk Sales Ltd may require a worker who has made a report to remain at the work site and may assign the worker temporarily to other work assignments that the worker is reasonably capable of performing;
- A temporary assignment if there is no loss in pay, is not disciplinary action for the purposes of section 18 of the Act;
- If Richardson's Bulk Sales Ltd does not remedy the alleged undue hazard immediately, Richardson's Bulk Sales Ltd will, after discussing the matter with the worker who refuses to work or do particular work immediately inspect the alleged undue hazard;

- Richardson's Bulk Sales Ltd will take any action necessary to remedy any undue hazard, or ensure that such action is taken;
- When a worker has refused to work or to do particular work, Richardson's Bulk Sales Ltd will not request or assign another worker to do the work until Richardson's Bulk Sales Ltd has determined that the work does not constitute an undue hazard to the health and safety of any person or that an undue hazard does not exist;
- On completing an inspection, Richardson's Bulk Sales Ltd will prepare a written report of the refusal to work, the inspection, and the action taken, if any;
- Richardson's Bulk Sales Ltd will give a copy of the report to:
    - The worker who refused work; and
    - The Joint Health and Safety Committee if there is one; or
    - The Health and Safety Representative if there is one;
- If a worker who receives the report is of the opinion that an undue hazard still exists, the worker may notify an OHS officer;

- Where Richardson's Bulk Sales Ltd becomes aware that a notification to an officer was made, Richardson's Bulk Sales Ltd will advise any other worker that Richardson's Bulk Sales Ltd assigns to do the work, in writing, of:
    - The first worker's refusal;
    - The reasons for the refusal; and
    - The reason why, in the opinion of Richardson's Bulk Sales Ltd, the work does not constitute an undue hazard to the health and safety of any person or that an undue hazard is not present; and
- An officer who receives a notification shall investigate the matter and prepare a written record of the investigation and the officer's findings, and shall give the Joint Health and Safety Committee, if there is one, the Health and Safety Representative if there is one, the worker, and the employer a copy of the record.

Prohibition of Discriminatory Action

No person shall take any disciplinary action against a worker by reason of that worker acting in compliance with the Act, the Regulations, the OHS Code, or an order issued under this Act.

A worker who has reasonable cause to believe that the worker has been subjected to disciplinary action in contravention of Section 18 of the Act, may file a complaint with an officer within 180 days after the alleged contravention occurs, but not afterwards.

An officer who receives a complaint shall prepare a written report of the worker's complaint, the investigation, and the officer's findings and shall give the worker and the employer a copy of the report.

- The officer will proceed as described in section 19(1) of the OHS Act; and
-

If an officer determines that disciplinary action has been taken against a worker who has acted or participated in an activity described above:

- There is a presumption in favour of the worker that the disciplinary action was taken against the worker because the worker acted in compliance with the Act, the Regulations, the OHS Code, or an order issued under the Act, and
- The onus is on the person who contravened section 18 of the Act to establish that the disciplinary action was taken against the worker for a reason other than that the worker acted in compliance with the Act, the Regulations, the OHS Code, or an order issued under this Act.

3.0 Supervisor/Manager Guide

- When a worker refuses to do a job, Richardson's Bulk Sales Ltd is required to investigate the reason for the work refusal as described in this SWP.
- At no loss of pay as described in this SWP, Richardson's Bulk Sales Ltd may temporarily send the worker to another job.
- Richardson's Bulk Sales Ltd cannot discipline workers for refusing to do dangerous work. Asking a worker to do dangerous work is against the law.
- If after investigation as described in this SWP the job is found to be dangerous only because the worker is not qualified to perform it, Richardson's Bulk Sales Ltd may get the job done by finding a qualified worker to do the work. The new worker must be told that another worker would not do the job following the process described in this SWP. The new worker also has a right to refuse to do the work if it is dangerous.
- If the job is found to be dangerous, then the supervisor and Richardson's Bulk Sales Ltd must follow all of the steps in this SWP to determine and implement the necessary controls prior to the work proceeding.

References

- Alberta Occupational Health and Safety Act, Part 3 Dangerous Work and Disciplinary Actionhttps://www.alberta.ca/ohs-act-regulation-code.aspx
- Canada Labour Code Part II.http://laws-lois.justice.gc.ca/eng/acts/L-2/page-22.html#h-46
- Human Resources and Social Development Canada, Pamphlet 4 – Right to Refuse Dangerous Work.http://www.labour.gc.ca/eng/health_safety/pubs_hs/refuse.shtml
- Employment and Social Development Canada – Right to Refuse Dangerous Work.https://www.canada.ca/en/employment-social-development/services/health-safety/reports/right-refuse.html

Safeguards

Purpose

A safeguard is the umbrella term for a number of measures that provide workers with effective protection from harmful contact with hazardous moving parts or other harmful conditions. Safeguards include barrier guards, safety devices, shields, awareness barriers, warning signs, or other appropriate means used singly or in combination.

Richardson's Bulk Sales Ltd has developed this safe work practice to provide supervisors and workers with information and guidance with respect to safeguarding best practices and the requirements under Alberta OHS Code Part 22: Safeguards. The guidelines contained in this SWP will be used to develop job and equipment specific use, care, and maintenance procedures for safeguards.

Scope

The conditions and requirements of this safe work practice will be strictly applied and enforced by all workers and supervisors engaged in construction, inspection, and maintenance activities at any work site owned or operated by Richardson's Bulk Sales Ltd where the potential for exposure to moving machinery, hot/cold surfaces, energized electrical equipment, pneumatic or hydraulically operated equipment, sharp or cutting surfaces, or any other hazardous equipment or condition may be experienced.

Procedure

1.0 General Safeguarding Requirements

Every machine that has exposed moving, rotating, electrically charged, or hot parts or that processes, transports, or handles material that constitutes a hazard to an employee shall be

equipped with a machine guard that:

- Prevents the employee or any part of his body from coming into contact with the parts or material;
- Prevents access by the employee to the area of exposure to the hazard during the operation of the machine; or
- Makes the machine inoperative if the employee or any part of his clothing is in or near a part of the machine that is likely to cause injury.

2.0 Safeguarding Practices

1. Richardson's Bulk Sales Ltd will provide safeguards if a worker may accidentally, or through the work process, come into contact with:
    - Moving parts of machinery or equipment;
    - Points of machinery or equipment at which material is cut, shaped, or bored;
    - Surfaces with temperatures that may cause skin to freeze, burn, or blister;
    - Energized electrical cables;
    - Debris, material, or objects thrown from machinery or equipment;
    - Material being fed into or removed from process machinery or equipment;
    - Machinery or equipment that may be hazardous due to its operation; or
    - Any other hazard.

2. If Richardson's Bulk Sales Ltd determines that an effective safeguard cannot be provided in the circumstances, Richardson's Bulk Sales Ltd will ensure that an alternative mechanism or system or change in work procedure is put into place to protect workers from being exposed to hazards that exist if there is no safeguard.
3. Richardson's Bulk Sales Ltd will place warning signs on machinery that starts automatically:
    - On a clearly visible location at a point of access to the machinery, and
    - Giving clear instructions to workers on the nature of the hazard.
4. If a worker may be injured if a machine fails, Richardson's Bulk Sales Ltd will install safeguards on the machine strong enough to contain or to deflect flying particles of material and/or broken parts of the machinery.
5. Loose clothing, long hair, dangling accessories, jewellery, or other similar items that are likely to be hazardous to the health or safety of an employee in a workplace shall not be worn unless they are so tied, covered, or otherwise secured as to prevent the hazard.

3.0 Tampering with Safeguards

1. A person must not remove a safeguard from a machine that is operating if the safeguard is not designed to be removed when the machine is operating.
2. A person must not remove a safeguard or make it ineffective unless removing it or making it ineffective is necessary to perform maintenance, tests, repairs, adjustments, or other tasks on equipment.
3. Where a machine guard is installed on a machine, no person shall use or operate the machine unless the machine guard is in its proper position.
4. If a worker removes a safeguard or makes it ineffective, the worker must ensure that:
    - Alternative protective measures are in place until the safeguard is replaced;
    - The safeguard is replaced immediately after the task is completed; and

- The safeguard functions properly once replaced.

5. If a safeguard for machinery is removed or made ineffective and the machinery cannot be directly controlled by a worker, the worker who removes the safeguard or makes it ineffective must Lockout/Tag Out the machinery or must render it inoperative.

4.0 Covered Openings

1. Richardson's Bulk Sales Ltd will ensure that an opening or hole through which a worker can fall is protected by:
   - A securely attached cover designed to support an anticipated load, or
   - Guardrails and toe boards.
2. If a person removes a cover, guardrail, or toe board, or part thereof, which is protecting an opening or hole for any reason, Richardson's Bulk Sales Ltd will ensure that a temporary cover or other means of protection replaces it immediately.
3. If a temporary cover is used to protect an opening or hole, Richardson's Bulk Sales Ltd will ensure that a warning sign or marking, which clearly indicates the nature of the hazard:
   - Is posted near or fixed on the cover, and
   - Is not removed unless another effective means of protection is immediately provided.

5.0 Guardrails

1. Richardson's Bulk Sales Ltd will ensure that a guardrail required by the respective provincial regulation has, as a minimum:

- A horizontal top member installed between 920 millimetres (3 feet) and 1070 millimetres (3.5 feet) above the base of the guardrail;
- A horizontal intermediate member spaced mid-way between the top member and the base;
- Vertical members at both ends of the horizontal members with intermediate vertical supports, which are not more than three metres (10 feet) apart at their centres; and
- Are constructed of lumber that is 38 millimetres by 89 millimetres (1.5 inches x 3.5 inches) or material with properties the same as or better than those of lumber.

2. Despite the aforementioned requirements, a temporary guardrail does not require a horizontal intermediate member if it has a substantial barrier positioned within the space bounded by the horizontal top member, toe board, and vertical members, which prevents a worker from falling through the space.
3. Richardson's Bulk Sales Ltd will ensure that a guardrail is secured so that it cannot move in any direction if it is struck or if any point on it comes into contact with a worker, materials, or equipment.

6.0 Protection from Falling Objects

1. Richardson's Bulk Sales Ltd will ensure that workers in a work area where there may be falling objects are protected from the falling objects by an overhead safeguard.
2. Richardson's Bulk Sales Ltd will ensure that a safeguard used under subsection 1 is designed to withstand the shock loads from objects that may fall onto it.
3. Despite the aforementioned, if the danger from falling objects is in a location in a work site where workers go intermittently or incidentally to perform their regular duties, Richardson's Bulk Sales Ltd may place appropriate and adequate warning signs, horns, flashing lights, or similar devices at the location to warn workers of the hazard.

7.0 Toe Boards

1. Richardson's Bulk Sales Ltd will ensure that:
    - A toe board required by the respective provincial regulation is not less than, as a minimum, 140 millimetres (5.5 inches) in height above the surface of the work area, and
    - The space between the bottom of the toe board and the surface of the work area is not more than six millimetres (1/4 inch) high.
2. Richardson's Bulk Sales Ltd will ensure that toe boards are installed at the outer edge above the work area if a worker may be under a permanent floor, platform, mezzanine, walkway, ramp, runway, or other permanent surface where:
    - Guardrails are installed, or
    - Materials can fall more than 1.8 metres (6 feet).
3. Richardson's Bulk Sales Ltd will ensure that toe boards are installed at the outer edge above the work area of temporary scaffolding or a temporary work platform if materials can fall more than 3.5 metres (11.5 feet).
4. Richardson's Bulk Sales Ltd will ensure that toe boards are installed around the top of a pit containing a machine with exposed rotating parts if workers may be working in the pit.

References

- Alberta Occupational Health and Safety Code, Part 22: Safeguards, Sections 310 - 321.https://www.alberta.ca/ohs-act-regulation-code.aspx

Safety and Legislative Compliance

Purpose

Richardson's Bulk Sales Ltd will comply with all relevant legislation which governs health and safety at its worksites. Employees, consultants, contractors, subcontractors, and visitors shall abide by the applicable Acts, Regulations, Codes, and other statutes in the jurisdiction in which their work is to be performed. Relevant legislation may include, but not be limited to:

- Provincial Utilities, Energy, Mines, and Resources Acts:
  - Oil and Gas Regulations; and
  - Interim directives and information letters.
- Federal and provincial OHS Acts, Regulations, Codes, and municipal bylaws;
- Provincial Workers' Compensation Board (WCB) Act and Regulations;
- Workplace Hazardous Materials Information System (WHMIS);
- Transportation of Dangerous Goods (TDG) Act and Regulations;
- Canadian Energy Regulator Act;
- Provincial Boiler and Pressure Vessel Acts;
- Building Code of Canada;
- Canada Labour Code, Part II; and
- Canadian Electrical Code.

Scope

The conditions and requirements of this safe work practice shall be applied to all work sites owned or operated by Richardson's Bulk Sales Ltd where workers are required to comply with and enforce provincial and/or federal regulatory requirements with respect to the workplace.

Procedure

1.0 Occupational Health & Safety Legislation (OHS)

A copy of the provincial Occupational Health & Safety (OHS) Act, Regulation, and Code is available at the head office, field offices, and work sites.

Workers will be trained in how to access these documents how to look up regulations relevant to their work.

- Online references http://humanservices.alberta.ca/working-in-alberta/307.html

2.0 Workers' Compensation Board (WCB)

Workers' Compensation is a no-fault disability insurance that insures Richardson's Bulk Sales Ltd and its workers for work injuries. It compensates injured workers for lost income, health care, and other costs due to a work-related injury.

1. Richardson's Bulk Sales Ltd will only hire contractors and other third parties who can provide proof of WCB insurance and general liability Insurance.
2. WCB and insurance coverage will be confirmed by obtaining a WCB clearance letter through the WCB website. This site also supplies daily notification of any changes to accounts listed.
3. Contractors, subcontractors, and consultants must have WCB coverage related to their services being provided.

- Related Resources:
  - Online WCB information. http://www.wcb.ab.ca/
  - Alberta WCB Online Reporting Forms with directions. https://www.wcb.ab.ca/resources/for-workers/forms-and-guides.html

3.0 Industry Regulators

3.1 AER - Alberta Energy Regulator

The AER ensures that the discovery, development, and delivery of Alberta's energy resources and utilities services take place in a manner that is fair, responsible, and in the public interest.

They regulate the safe, responsible, and efficient development of Alberta's energy resources: oil, natural gas, oil sands, coal, and electrical energy, and the pipelines and transmission lines to move the resources to market.

Operating out of eight centres, the Field Surveillance branch staff inspects construction, operation, and abandonment operations at oil, gas, and oil sands facilities.

They respond to emergencies and public complaints on a 24-hour basis, facilitate resolution of landowner-industry conflicts, participate in public-industry liaison committees, and ensure a consistent approach to non-compliant operators.

Field Surveillance contributes to the industry's understanding and knowledge of AER requirements and regulations at the field level. The branch also ensures that oil and gas operations are conducted responsibly and in a manner that protects the public, the environment, and the resources.

- Related Resources www.aer.ca

3.2 CER – Canadian Energy Regulator

The CER regulates pipelines, energy development, and trade in the Canadian public interest. The CER oversees the companies operating oil and gas pipelines and electrical powerlines that cross a national, provincial, or territorial border.

The CER also:

- Reviews applications for new projects and upgrades to current ones;
- Provides oversight of oil and gas exploration and activities on frontier lands and offshore not otherwise regulated under territorial law or joint federal/provincial accord;
- Decides what can be transported in pipelines and how much companies are allowed to charge for their services; and
- Approves the export and import of natural gas and the export of oil.

4.0 Workplace Hazardous Materials Information System (WHMIS)

WHMIS is Canada's national hazardous communication program for hazardous workplace chemicals.

The hazard communication elements of WHMIS include appropriate labelling of hazardous products and hazardous material, comprehensive Safety Data Sheets (SDS), and worker education and training programs.

The Canadian Hazardous Product Act, Part II, and associated Hazardous Products Regulations, administered by the federal agency Health Canada, requires suppliers and importers to appropriately

label hazardous products and to transmit or obtain Safety Data Sheets (SDS) as a condition of sale or importation. The legislation also places a de facto requirement on suppliers and importers to assess their products against specified hazard classification criteria established in the Hazardous Products Regulations.

Occupational health and safety legislation, administered by each of Canada's governments, requires Canadian employers to ensure that hazardous products are appropriately labelled in the workplace that associated Safety Data Sheets (SDS) are made available to workers, and that workers are educated and trained to ensure the safe storage, handling, use, and disposal of hazardous products in order to protect worker health and safety.

- Related Resources
  - CCOHS: Headlines – What is WHMIS. http://www.ccohs.ca/headlines/text51.html
  - WHMIS Quick Facts. http://www.hc-sc.gc.ca/ewh-semt/occup-travail/whmis-simdut/index-eng.php

5.0 Transportation of Dangerous Goods (TDG) Act and Regulations

TDG stands for Transportation of Dangerous Goods. In Canada, the transportation of potentially hazardous materials is regulated under the federal Transportation of Dangerous Goods Act and Regulations which are administered by Transport Canada. The TDG Act and Regulations set out criteria for the classification of materials as dangerous goods and state how these materials must be packaged and shipped.

- Related Resources
  - TDG – Review of the Act. http://www.tc.gc.ca/eng/tdg/consult-actreview-menu-148.htm

6.0 Canadian Energy Regulator Act

The National Energy Board is an independent federal agency that regulates several aspects of Canada's energy industry. Its purpose is to promote safety, security, environmental protection, and efficient energy infrastructure and markets in the Canadian public interest within the mandate set by Parliament in the regulation of pipelines, energy development, and trade.

The Canadian Energy Regulator Act requires the Regulator to review applications for licences to export or import petroleum, natural gas, or electricity and for certificates of public convenience and necessity to construct pipelines or international power lines. Licences or certificates may be made subject to terms or conditions designed to protect and preserve the quality of air and water resources in the construction, operation, and abandonment of pipelines and international power lines. The Regulator could deny a permit or certificate on the grounds of the likelihood of significant air or water quality damage.

- Related Resources
- Canadian Energy Regulator Act. https://laws-lois.justice.gc.ca/eng/acts/C-15.1

7.0 Provincial Boiler and Pressure Vessel Act

The Boilers and Pressure Vessels discipline of Safety Services is responsible for establishing and interpreting the codes, standards, and respective regulations under the Safety Codes Act. Municipal Affairs works in partnership with the Safety Codes Council and the Alberta Boilers Safety Association (ABSA) to develop and provide relevant information to the boiler and pressure vessels industry.

The Safety Codes Act set out the minimum requirements for the design and construction of pressure equipment under the jurisdiction of the Act. Codes and standards are updated regularly by technical committees comprised of representatives of owners, manufacturers, the concerned public, other affected parties, and jurisdictions. Codes and standards are declared in force by the Design, Construction, and Installation of Boilers and Pressure Vessel Regulations.

According to the PESR Section 35, the owners of pressure equipment must report to ABSA any unsafe condition, accident, or fire that occurs with respect to that pressure equipment. The ABSA interpretation of Section 35 is contained in Information Bulletin No. IB18-004-R1 and should be consulted for reporting requirements for any incident involving pressure equipment. Form AB-097 is to be used for incident reporting and determining where to submit the report.

The Safety Codes Act and Pressure Equipment Safety Regulation (PESR) establishes requirements for formal registration of quality management systems and establishes the Administrator's authority to require pressure vessel users and owners to submit their Quality Management System for registration. Owners with a satisfactory Quality Management System, that is accepted and filed with ABSA, are issued an Alberta Quality Program Certificate of Authorization Permit for the scope of activities that are defined in the written description of their Quality Management System. AB-512 "Owner-User Pressure Equipment Integrity Management Requirements" is the document issued by ABSA which specifies the information required by applicants and the features required for an acceptable quality management system for pressure equipment integrity management.

- Related Resources
  - ABSA. http://www.absa.ca/
  - Boiler and Pressure Vessel Safety. http://www.tsask.ca/index.php/boiler-and-pressure-vessel-safety.html

8.0 Building Code of Canada

The National Building Code of Canada 1995 and the National Building Code of Canada 2005 apply to the construction of buildings, including extensions, substantial alterations, buildings undergoing a change of occupancy, and upgrading of buildings to remove an unacceptable hazard.

All requirements in the 2005 NBC are linked to one or more of the following four top-level objectives:

- Safety;

- Health;
- Accessibility; and
- Fire and Structural Protection of Buildings.

Under Canada's Constitution Act, building regulation is the responsibility of provincial and territorial governments. Most provinces and territories adopt or adapt the model NBC and enforce its requirements.

- Related Resources
  - National Building Code of Canada. http://www.nrc-cnrc.gc.ca/eng/publications/codes_centre/2010_national_building_code.html
  - Codes Canada Publications, Government of Canada. https://nrc.canada.ca/en/certifications-evaluations-standards/codes-canada/codes-canada-publications
  - National Building Code of Canada 2005. https://www.nrc-cnrc.gc.ca/obj/doc/solutions-solutions/advisory-consultatifs/codes_centre-centre_codes/2005_nbc_revisions_december2007.pdf

9.0 Canada Labour Code, Part II

Part II of the Canada Labour Code, Occupational Health and Safety, applies to federally regulated businesses and federally regulated worksites.

- Related Resources
  - Canada Labour Code Part II. http://laws-lois.justice.gc.ca/eng/acts/L-2/page-22.html#h-46
  - Part II: Occupational Health and Safety. http://laws.justice.gc.ca/eng/regulations/SOR-86-304/FullText.html.

10.0 Canadian Electrical Code.

As it relates to the oil and gas industry, sections 18 and 20 of the Canadian Electrical Code define hazardous locations and specify the types of electrical equipment and wiring methods acceptable in areas where flammable or explosive materials are handled, stored, or produced. In such areas, the risk of a fire or explosion may exist due to the presence of flammable gases or vapours. The electrical code provides requirements for protection, in hazardous locations, from electrical ignition sources due to the effects of electrical arcing or heating.

- Related Resources
  - Canadian Electrical Code. www.csagroup.org
  - National Electrical Code.http://www.nfpa.org/aboutthecodes/AboutTheCodes.asp?DocNum=70&cookie%5Ftest=1

Safety Data Sheets

Purpose

Safety Data Sheets (SDSs) are summary documents that provide information about the hazards of a product and advice about safety precautions. SDSs are required for hazardous products under the federal WHMIS 2015 program which is aligned with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) (see WHMIS). SDSs must be made available at the field office/work site for all hazardous products that workers will come into contact with. Workers must be familiar with provisions of the SDS for all hazardous products that may be used. This SWP will describe the general information contained in a SDS and the training requirements for employees.

Scope

Richardson's Bulk Sales Ltd is required to have current SDSs for all of the hazardous products which workers may encounter. SDSs will be readily available at the worksite and workers will be trained in how to access SDSs at their worksite.

Procedure

1.0 SDS Availability

- Many products may pose a hazard to workers under certain conditions. SDSs provide technical information related to the composition and behaviour of hazardous products under certain conditions. Most substances which are used in the workplace will have an SDS;
- SDSs will be verified when receiving a hazardous product or before working with a hazardous product. Richardson's Bulk Sales Ltd will use its purchasing and hazard assessment procedures to ensure that SDSs have been received and evaluated prior to any work with the substances;
- If an SDS is not found or received, that product may not be used and Richardson's Bulk Sales Ltd will contact the supplier. Suppliers are responsible for providing a current SDS for the product; and
- WHMIS requires a current and up to date SDS to be supplied by the manufacturer of the product. SDSs must only be updated when there is new information or when the supplier becomes aware of "significant new data".

2.0 Sixteen Sections of a SDS

SDSs are divided into sixteen specific sections

1. Identification
    - Product Identifier (as it appears on the label).
    - Recommended uses and restrictions on use.
    - Name, address, and phone number of the Canadian Supplier.
    - Emergency telephone number.

2. Hazard Identification

- Hazard class and category.
- Label elements: symbol, signal word and hazard statements.

3. Composition Information on Ingredients

- Chemical name, common name and synonyms, CAS registry number.
- For each material or substance in a mixture.

4. First Aid Measures

- Instruction on what to do by route of exposure.
- Most important symptoms or effects.

5. Fire Fighting Measures

- Suitable and unsuitable extinguishing media.
- Specific hazards arising from the hazardous product (hazardous combustion products).
- Special precautions for firefighters.

6. Accidental Release

- Methods to contain a spill or leak.
- Clean-up procedures.
- Safety precautions.

7. Handling and Storage
    - Information on safe handling and storage practices.
8. Exposure Controls, Personal Protection
    - Personal protective clothing and equipment necessary to prevent exposure to the chemical.
    - Occupational exposure guidelines.
9. Physical and Chemical properties
    - Physical and chemical properties that help identify the product and the type and degree of hazard.
10. Stability and Reactivity
    - Conditions that could cause the chemical to have a potentially hazardous reaction.
    - Incompatible materials and hazardous decomposition products.
11. Toxicological Information
    - Complete description of toxic health effects, routes of exposure, symptoms of toxicology and acute and chronic effects.
12. Ecological Information
    - Effects of the chemical if released into the environment.
    - Describes the chemical's environmental fate.

13. Disposal Consideration
    - Proper safe handling procedures for disposal and methods of disposal.
14. Transport Information
    - UN number and shipping name.
    - Transport hazard classes, packing group, hazards and precautions.
15. Regulatory Information
    - Safety, health and environmental information specific to the product.
16. Other Information
    - Date of the latest revision of the SDS.

Employees will receive training in how to use the sections of the SDS to ensure that chemicals and other substances which can be hazardous are evaluated prior to use and that employees are made aware of the hazard controls to employ before working with the substances.

References

- CCOHS - WHMIS 2015 - Safety Data Sheet (SDS).http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/sds.html

Scaffolding and Temporary Work Platforms

Purpose

Richardson's Bulk Sales Ltd workers may use work platforms and temporary supporting structures in the course of carrying out their work. This safe work practice is designed to provide safety guidance on the requirements which must be followed to establish specific safe job procedures for the erection, construction, and inspection of scaffolds and platform structures. This SWP will adhere to the requirements of the Alberta OHS Code Part 23.

Scope

The conditions and requirements of this safe work practice shall apply to all work sites owned and operated by Richardson's Bulk Sales Ltd where workers are required to provide, erect, use, maintain, or inspect scaffolds, platforms, or supporting structures that provide or allow access to elevated work areas.

Procedure

1.0 Responsibilities

1.1 Management Responsibilities

Management is responsible to provide the necessary support and training required to ensure that only competent personnel are involved in the procurement, erection, maintenance, inspection, and dismantling of scaffolding and work platform equipment.

- No employee shall use a temporary structure unless he/she has been trained and instructed in its safe and proper use.

1.2 Supervisors are responsible to:

- Ensure that scaffolding and temporary work platforms are erected, inspected, and dismantled by qualified personnel, and
- Ensure that workers observe all safety rules while working from scaffolding and platforms.

1.3 Workers' Responsibilities

Workers are responsible to:

- Conduct an inspection prior to each use;
- Ensure that any observed hazards have been identified, reported, and suitably addressed prior to use. and, If conditions change during use in a way that may create an imminent danger or hazard, they must stop the work, prevent further access and bring it to the attention of the site supervisor; and
- A worker using a rolling scaffold must engage the wheel locking devices or block the scaffold against movement while the scaffold is stationary and a worker is working from the scaffold.

2.0 General Information

All scaffolds require specific competencies and abilities to safely erect, use, and dismantle them.

Types of scaffolds:

- Tube and Clamp – Is adjustable to most work conditions;
- Frame – Has standard components and is as adjustable as the tube and clamp;

- Modular – Very adjustable, quick erecting, and uses standard components;
- Suspended Platform – Is hung by cables from the top of the building and lowered to the work area; and
- Elevating platform – Is mobile and self-propelled.

Many incidents associated with scaffolds occur during erection or dismantling. Only competent workers may erect or dismantle a scaffold. Workers may fall from a scaffold or be hit by objects dropped from higher elevations during erection and dismantling.

3.0 Design and Standards

Richardson's Bulk Sales Ltd will ensure that a scaffold is:

- Supported against lateral movement by adequate bracing;
- Anchored by one tie-in for each 4.6 metres (15 feet) vertical interval and one tie-in for each 6.4 metres (21 feet) horizontal interval;
- Anchored by one tie-in for each three metre (10 feet) vertical interval and one tie-in for each three metre horizontal interval if the scaffold is hoarded; and
- Set plumb on a base plate, jackscrew, or other load dispersing device on a stable service.

Richardson's Bulk Sales Ltd will ensure that scaffolds erected to provide working platforms during the construction, alteration, repair, or demolition of buildings and other structures comply with CSA Standard CAN/CSA-S269.2-M87 (R2003) Access Scaffolding for Construction Purposes.

4.0 Load

Richardson's Bulk Sales Ltd will ensure that a scaffold is designed and constructed to support at least four times the load that may be imposed on it. Additionally, Richardson's Bulk Sales Ltd will ensure that:

- The load to which a scaffold is subjected never exceeds the equivalent of ¼ of the load for which it is designed;
- A scaffold used to carry the equivalent of an evenly distributed load of more than 367 kilograms per square metre (75 lbs/sq.ft.) is designed and certified by a professional engineer and is constructed, maintained, and used in accordance with the certified specifications; and
- All workers on a scaffold are informed of the maximum load that the scaffold is permitted to carry.

5.0 Tagging Requirements

Richardson's Bulk Sales Ltd will ensure that a scaffold is colour coded using tags at each point of entry to indicate their status and condition in accordance with the AB OHS Code Part 23, Section 326(1).

- Color codes are as follows:
  - Green tag with “Safe for Use” or other similar wording to indicate is safe for use;
  - Yellow tag with “Caution, Potential, or Unusual Hazard” written on it; or
  - Red tag with “Unsafe for Use”, or other similar wording, to indicate it is not safe for use.
- A tag attached to a scaffold, expires 21 calendar days after the date of the inspection that it records; and
- Workers will be trained on the recognition and use of scaffold tags.

A worker must not use a scaffold that has:

- A red tag;
- A green or yellow tag that has expired; or
- No tag at all.

6.0 Vertical Ladder on Scaffold

Richardson's Bulk Sales Ltd will ensure that a vertical ladder that gives access to a working level of a scaffold is used by a worker only to move up and down between levels of the scaffold.

Workers moving between levels of a scaffold on a vertical ladder must not extend a part of their body, other than an arm, beyond the side rails of the ladder and must maintain a three-point stance on the ladder at all times.

Richardson's Bulk Sales Ltd will ensure that a vertical ladder to a working level on a scaffold:

- Is securely fastened to the scaffold;
- Is not more than 6.5 metres (21 feet) in height above the scaffold level on which the base of the ladder rests;
- Extends at least one metre (39 inches) above the uppermost working level of the scaffold;
- Does not lean away from the scaffold; and
- Has rungs that are uniformly spaced at a centre distance of 250 millimetres to 305 millimetres (10 inches to 12 inches).

7.0 Scaffold Planks

Richardson's Bulk Sales Ltd will ensure that a commercially manufactured scaffold plank is used, stored, inspected, and maintained to the manufacturer’s specifications as follows:

- Graded as scaffold grade or better;
- Sized 51 millimetres by 254 millimetres (2 inches x 10 inches);
- Is visually inspected by a competent worker before it is installed in a scaffold;

- Is not used if a visual inspection reveals damage that could affect its strength or function;
- Extends not less than 150 millimetres (6 inches) and not more than 300 millimetres (12 inches) beyond a ledger; and
- Is secured to prevent movement in any direction that may create a danger to a worker.

8.0 Scaffold Platform

Richardson's Bulk Sales Ltd will ensure that the platform of a scaffold:

- Is a minimum width of 500 millimetres (20 inches), except that a nominal 300 millimetre (12 inches) wide platform may be used with ladderjacks, pump jacks, or similar systems;
- Does not have an open space between the platform and a structure that is greater than 250 millimetres (10 inches) in width;
- If not level, is designed to ensure adequate footing for workers using the platform; and
- Is continuous around obstructions that would create openings into or through which a worker might step or fall through.

9.0 Propelled Work Platforms (Elevated Platforms and Aerial Lifts)

Elevated platforms and aerial lifts/devices (scissor lifts, articulated basket lifts, telescoping basket lifts, etc.) are also subject to the requirements of the Powered Mobile Equipment SWP and Fall Protection and Fall Protection Plans SWP.

1. Standards

Richardson's Bulk Sales Ltd will ensure that a self-propelled work platform manufactured on or after July 1, 2014, with a boom supported elevating platform that telescopes, articulates, rotates, or extends beyond the base dimensions of the platform meets the requirements of:

- CSA Standard CAN/CSA-B354.4-02, Self-Propelled Boom-Supported Elevating Work Platforms, or
- ANSI Standard ANSI/SIA A92.5-2006, Boom-Supported Elevating Work Platforms.

Richardson's Bulk Sales Ltd will ensure that a self-propelled integral chassis elevating work platform manufactured on or after July 1, 2014, with a platform that cannot be positioned laterally completely beyond the base and with its primary functions controlled from the platform meets the requirements of:

- CSA Standard CAN/CSA-B354.2-01, Self-Propelled Elevating Work Platforms, or
- ANSI Standard ANSI/SIA A92.6-2006, Self-Propelled Elevating Work Platforms.

Richardson's Bulk Sales Ltd will ensure that a telescopic aerial device, aerial ladder, articulating aerial device, vertical tower, material-lifting aerial device, or a combination of any of them, when mounted on a motor vehicle, whether operated manually or using power, meets the requirements of CSA Standard CAN/CSA-C225-00 (R2005), Vehicle-Mounted Aerial Devices.

2. Training – Competency and Qualifications

(see sections 1.0 to 5.0 of the Powered Mobile Equipment SWP)

Aerial lifts and elevated platforms have hazards that are specific to the equipment used and the fact that workers are being elevated and working from moving platforms.

Richardson's Bulk Sales Ltd will ensure that operators and those working from elevated platforms and aerial lifts receive instructions and training by either appropriately certified 3rd parties or competent certified in-house trainers using an approved or recognized training program. The training will include all general operator responsibilities and be specific to the equipment which will be operated and/or worked from.

Training will be conducted before work is performed and re-training will be conducted at a minimum of every three years. Training and certifications will be recorded on the employee's comprehensive training record and retraining requirements will be indicated.

Specifically, the training will include:

- Fueling or electrical recharging procedures and precautions;
- How to operate the device(s) safely in accordance with the equipment manufacturer's requirements, the nature of the work and workplace and in accordance with all applicable safety legislation and requirements of this safety program;
- The limitations of the equipment;
- An operator's pre-use inspection;
- The operator skills required by the manufacturer's specifications for the equipment;
- The basic mechanical and maintenance requirements of the equipment;
- Loading and unloading the equipment if doing so is a job requirement;
- The hazards specific to the operation of the equipment at the work site; and
- The use of outriggers or any other load stabilizing devices and the required ground conditions, level surfaces, and use of load bearing pads and floats

3. Operating and Safety Requirements

All OEM operating requirements must be followed as well as the requirements of the Powered Mobile Equipment SWP with respect to safe operation, traffic safety, etc.

Fall protection is required for all workers working in baskets, platforms, or other devices as outlined in this SWP and Section 1.0 of Fall Protection and Fall Protection Plans specific to aerial platforms.

Aerial platforms must inspected annually by a competent approved person with recertification stickers affixed and retained in records and logbooks as required.

Rated load capacities must be displayed with a permanent waterproof label. Outriggers where supplied must be used.

No field or shop modifications of any type may be performed to any component of aerial platforms and devices unless they are performed and approved by the equipment manufacturer. Safety devices may not be defeated or modified in any way.

10.0 Scaffold Inspection and Maintenance

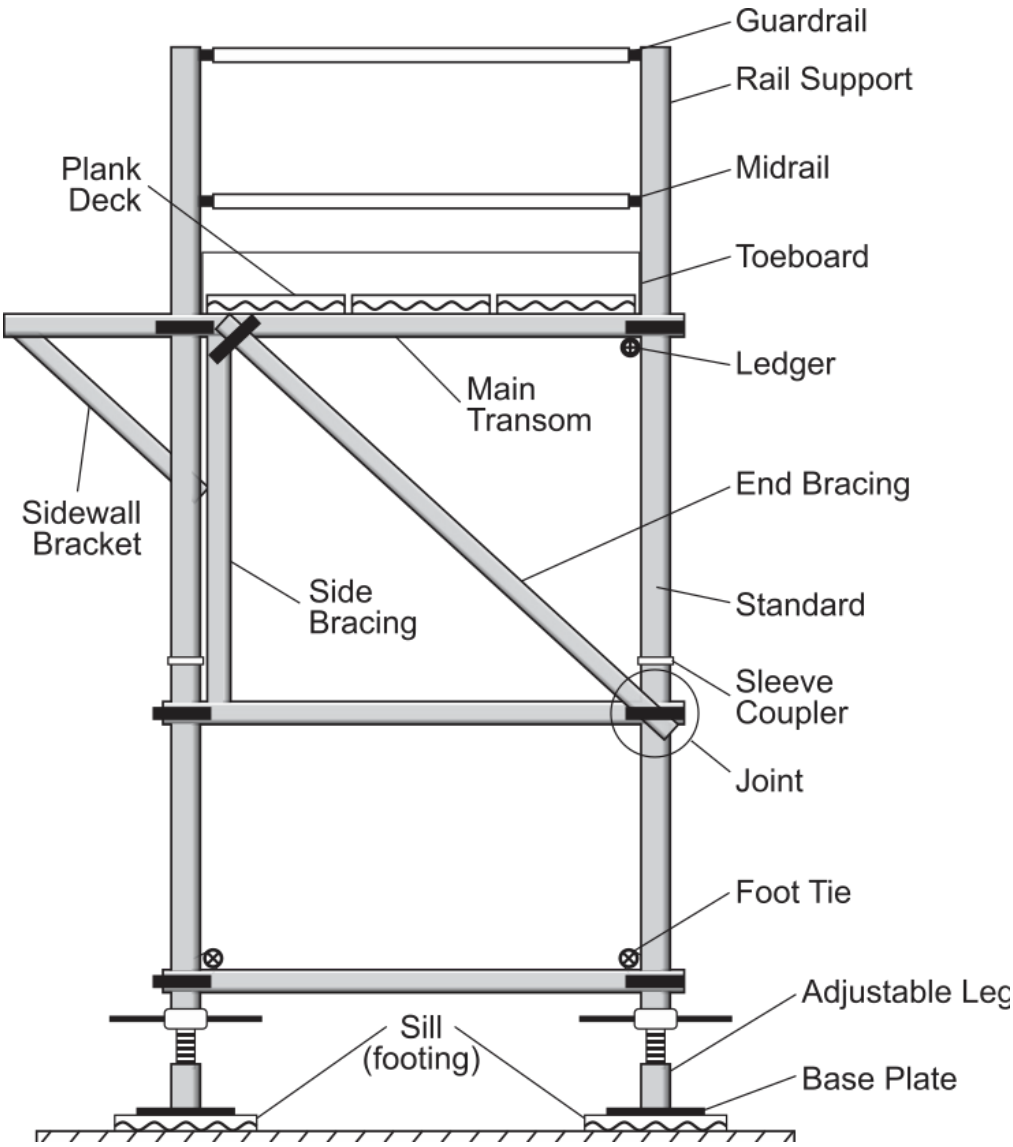
Scaffolding assemblies that remain erected over an extended period of time (21 days or more) will be subjected to regular inspections by competent persons. Some of the inspection elements include, but are not limited to:

- Inspecting scaffolds before each use, and attach a copy of the checklist to the main access point;
- Confirming that there are no obvious signs of movement on the vertical or horizontal axis; and
- Ensuring that:
    - Clamps and couplings are free of debris (dirt, mud, building materials, grit, etc.);
    - Appropriate vertical ladders are in place;
    - Components are free from burrs, paint, and corrosion;
    - Planks are not warped, twisted, split, broken, worn, or too thin;
    - Tubes are not dented, bent, or split;
    - Pins are properly in place on each coupler;
    - Foundations are firm and solid;
    - The base plate is on its footing;
    - Hand rail, mid-rail, and toe board are in place;

- The scaffold does not block exits or fire equipment;
- Components from different manufacturers are not mixed;
- Swivel connections are able to rotate through 360 degrees; and
- Scaffold footing is not on loose soil, on pavement, on glass, over trenches, on a concrete block, on a manhole, or on a slope greater than 6:1.

Scaffolding and Temporary Work Platforms

Scaffold Components



References

- Alberta Occupational Health & Safety Act, Regulation, and Code, Part 23: Scaffolds and Temporary Work Platforms; Schedule 6: Dimensions of Scaffold Members.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Oil and Gas Occupational Safety and Health Regulations, under Part II of the Canada Labour Code, Part III: Temporary Structures and Excavations, Scaffolds 4.10.

Short Service Employee Program

Purpose

New employees may run an increased likelihood of being injured due to their inexperience or unwillingness to seek assistance. This SWP provides guidelines and requirements for ensuring the safety of new or “Short Service” employees. The Short Service Employee (SSE) Program addresses the requirements to supervise, train, and monitor new employees and existing employees in new positions. The guidelines and requirements of this SWP will be used to develop specific procedures for training and supervising new employees in pre-defined tasks.

Scope

This procedure applies to all Richardson's Bulk Sales Ltd worksites. This program or an equivalent may be requested of contractors who perform services for the Company on either Company or client worksites.

Definitions

Mentoring: A process of transferring skills and knowledge from one person to another in a work environment.

Short Service Employee (SSE): A full time or temporary employee with less than six months experience in the same type of job or employment at Richardson's Bulk Sales Ltd.

Short Service Employee Mentor: A person who has working experience with Richardson's Bulk Sales Ltd and who is assigned to the Short Service Employee.

Procedure

1.0 Responsibilities

1.1 Supervisor Responsibilities

The responsibilities of supervisors in the Short Service Employee Program are:

- To ensure that work crews maintain a ratio of one mentor to each SSE and that work crews do not exceed 50% SSEs;
- To ensure that an appropriate Job Safety Analysis (JSA) has been developed for critical tasks to be performed by the SSE;
- To assign a Short Service Employee Mentor and to ensure that the Mentor has and maintains proper knowledge and skills in the particular job tasks assigned;
- To ensure that the SSE Mentor is adequately training the SSE;
- To ensure that the SSE is gaining the particular knowledge and skills in the particular job tasks;
- To ensure that the SSE is appropriately identified using an acceptable designation system;
- To ensure that all safety rules and Company policies and procedures of Richardson's Bulk Sales Ltd are communicated to the SSE and are being followed;
- To meet with the Mentor initially and on a daily basis to determine SSE progress, and then at an appropriate interval once the program is established without incident; and
- Prior to starting any work at a non-Richardson's Bulk Sales Ltd work site, the supervisor shall notify the client or the client's representative (project coordinator, contractor contact, and/or on-site supervisor) of any short service/new employees that will be present on the Richardson's Bulk Sales Ltd work crew and the stipulations that they are subject to under this SWP.

1.2 Mentor Responsibilities

The responsibilities of mentors in the SSE Program are to:

- To be willing and able to devote the necessary time to succeed as a mentor;
- Possess knowledge and skill in the job tasks assigned to the SSE;
- Exhibit the ability to recognize hazards and unsafe acts;
- Take the time to review the JSA or equivalent procedure for each critical task to be performed that day;
- Be willing and able to effectively listen to the SSE to determine if the SSE is learning and retaining the knowledge being shared;
- Closely observe the SSE for application of safety techniques and provide a high level of direction in the form of hands-on suggestions and other performance feedback;
- Be willing to watch the SSE perform a job without interfering as long as the SSE is not in a position to hurt themselves, others, or damage equipment;
- Provide a positive safety attitude, avoid criticism, and strive to build confidence and self-esteem in the SSE;
- Be able and willing to constructively challenge personnel in the workplace that do not comply with the site procedures, policies, or requirements;
- Keep abreast of new methods in their field of expertise;
- Refrain from committing any unsafe acts;
- Demonstrate a positive work ethic at all times;

- Follow all Company policies and procedures and ensure that the SSE is familiar with and abides by these policies and procedures; and
- Remain on site while the SSE is performing work.

1.3 Contractor Responsibilities

- In cases where the contractor is using SSEs for the work, the contractor must have in place a mentoring process, acceptable to Richardson's Bulk Sales Ltd, designed to provide guidance and development for SSE personnel.
- A mentor can only be assigned one SSE per crew and the mentor must be onsite with the SSE to be able to monitor the SSE.
- Where sub-contractors are involved and required to participate in the SSE Program, the hiring contractors will manage their sub-contractors in alignment with this process.

1.4 Short Service Employee Responsibilities

The SSE must make every effort to assist, observe, question, and emulate his or her Mentor.

The responsibilities of the SSE are to:

- Be willing to watch and listen to the Mentor;
- Establish a positive safety attitude towards assigned job tasks;
- Be willing to gain the knowledge and skill required to safely complete their job tasks;
- Stop and report unsafe conditions at any time;
- Participate in all safety-related meetings and training; and
- Follow all safety rules and policies.

2.0 Program Procedure

2.1 Notification

The Human Resources department must notify the SSE's Supervisor and Richardson's Bulk Sales Ltd Safety Coordinator prior to an SSE candidate commencing work so that they can make the appropriate arrangements.

2.2 Orientation

Each SSE shall be provided a Company orientation specifically based on job position and job related topics prior to performing job tasks as described in the training section of this program.

2.3 Short Service Employee Designation System

The purpose of the SSE Designation System is to make the SSE more visible to other workers on the jobsite. This will encourage them to observe the SSE worker more closely in critical situations. The preferred method of identification will be a green hardhat or a green hand sticker on the hard hat.

Some other methods can include:

- A hardhat of highly visible colour;
- Highly visible hardhat stickers;
- A uniquely coloured or marked high visibility vest; and
- Other approved systems.

The method used to identify SSEs will be communicated to Richardson's Bulk Sales Ltd.

2.4 Training

1. The Supervisor shall ensure that each SSE is properly trained in:
    - The hazard(s) present in the work place;
    - The policies, procedures, processes and PPE utilized to control these hazards to prevent illnesses, injuries, property damage, and/or environmental incidents; and
    - The skills necessary to conduct their assigned jobs safely and efficiently while providing quality and economy.
2. The Supervisor shall ensure that each SSE is properly trained before starting work when:
    - The employee is first hired;
    - The employee is appointed a new job assignment; and
    - The employee is exposed to new substances, processes, procedures, equipment, etc. that represent a new hazard to the employee.
3. SSEs will be prohibited from working in high-hazard areas, or operating mobile equipment until they are competent to do so and have been verified through an on-the-job assessment.
4. The number of SSEs in a crew must be considered in relation to the hazard level of the job.
5. An SSE will not work alone.
6. The On-the-job training program and training forms will be used to monitor progress.

2.5 Work Monitoring

Short Service Employees shall be monitored for compliance with health, safety and environmental policies and procedures. Subject to the six month term and once the SSE has demonstrated competency and compliance with HSE policies and procedures according to the on-the-job training

program described in this program, the employer/contractor may remove the hi-visibility identifier or hard hat.

3.0 Documentation

The Human Resources department shall complete the SSE Notification form for new employees and forward to the Supervisor and Safety Coordinator prior to the commencement of work.

All records for the SSE Orientation, Training, and Mentoring Program will be maintained at the employee's location by the Supervisor.

Upon completion of a successful mentoring term, the Supervisor signs off and forwards notification to the Human Resources department and the Safety Coordinator. If additional mentoring or training is required, or it is deemed that the employee is not suitable for the position, similar notification must be given.

Forms

- Short Service Employee (SSE) Program Notification

Site Traffic Control – Flagging

Purpose

Flagging is provided to control traffic flow through work areas at reduced speeds and to control the hazards to personnel working in traffic areas. The flagperson is responsible for maintain safe traffic flow of on-site equipment and vehicles. This SWP will establish the requirements for the flagging safe job procedures to be developed for specific tasks.

Scope

This procedure shall be applied and enforced at all properties owned or operated by Richardson's Bulk Sales Ltd. It shall also apply to any road, trail, or portion of land where Richardson's Bulk Sales Ltd would be expected to implement and to enforce traffic control requirements in accordance with provincial legislative requirements and to ensure the safety of workers and the public.

Procedure

1.0 Flagperson Visibility

It is important for the flagperson to be in full view of all vehicles and to stand adjacent to lanes where equipment or traffic is travelling. The flagperson should avoid congested areas and must not stand in the lane being used for moving traffic.

The flagperson must be clearly visible for a distance sufficient to permit vehicle operators to respond to their instructions. An approved high visibility safety vest and other clothing must be worn as an outer garment, and it must be reflective when used at night.

If at any point the flagman is no longer visible, all equipment movement through that area must stop.

2.0 Hand Signalling Devices

Approved hand signalling devices must be used when controlling traffic. Flags used for signalling purposes must be of acceptable size, made of an appropriate grade of red material, and securely fastened to a staff approximately 1 metre (3 feet) in length.

3.0 Training

Flagpersons must be given a standard course by an approved safety organization or equivalent in traffic control and must understand all Richardson's Bulk Sales Ltd rules and guidelines governing their work.

Special emphasis will be placed on the following:

- Proper attitude when dealing with other workers and the public;
- Use of signalling and communication tools;
- Proper method for directing traffic;
- Safety equipment for personal protection;
- Maintaining a safe position while controlling traffic; and
- Emergency procedures.

4.0 Flagging Procedures

The following methods of flagging must be used:

- To stop traffic, the flagperson must face approaching traffic and extend the flag horizontally across the traffic lane in a stationary position so that the full area of the flag is visible hanging below the staff. The free arm may be raised with the palm turned toward approaching traffic;
- When it is safe for vehicle operators to proceed, the flagperson must turn parallel to the traffic movement. When the flag is used, drop the arm with the flag, lowering it from the view of the vehicle operator, and motion traffic ahead with the free arm. The red flag must never be used to signal traffic to proceed; and
- To slow traffic with the flag, the flagperson must give the stop signal, and then change to the signal to proceed before the vehicle comes to a stop.

5.0 Automatic Traffic Control

Depending upon the work location, hazards, size, complexity of the control requirements, and Company resources, it may be advantageous to install automatic traffic control equipment. In the event that automatic traffic control is the chosen method, the automatic signals will be obeyed at all times, regardless of time of day/night or flow of traffic.

6.0 Other Considerations

Alberta Occupational Health and Safety Code, Part 12: General Safety Precautions

If traffic on a public highway is dangerous to workers, Richardson's Bulk Sales Ltd will protect workers from the traffic using any one or a mixture of the following:

- Warning signs;
- Barriers;
- Lane control devices;
- Flashing lights;
- Flares;

- Conspicuously-identified pilot vehicles;
- Automatic or remote-controlled traffic control systems;
- Designated persons directing traffic; and
- Methods described in the 2014 Manual of Uniform Traffic Control Devices for Canada, and its updates, published up to and including February 21, 2014, by the Transportation Association of Canada (TAC).

References

- Alberta Occupational Health and Safety Code, Part 12: General Safety Precautions, Section 194(1) Vehicle Traffic Control.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Manual of Uniform Traffic Control Devices for Canada (1998), and its updates published up to and including April 30, 2004, published by the Transportation Association of Canada.http://mutcd.fhwa.dot.gov/pdfs/2003r1r2/mutcd2003r1r2complet.pdf
- Saskatchewan Occupational Health and Safety Regulations 2020, Part 10: Safeguards, Storage, Warning Signs, and Signals, Section 9-21, Designated Signallers.http://www.publications.gov.sk.ca/details.cfm?p=4355

Slinging and Rigging Operations

Purpose

Slinging and rigging are important elements in lifting and moving loads. Improper rigging is an important cause of lifting incidents. This safe work practice establishes the safety requirements for all rigging operations performed on Richardson's Bulk Sales Ltd premises and/or work sites. It includes requirements for the maintenance, inspection, registration, and storage of rigging equipment. This SWP establishes the requirements to establish specific slinging and rigging safe job procedures required for Richardson's Bulk Sales Ltd activities.

Scope

This safe work practice shall apply to all work sites owned or operated by Richardson's Bulk Sales Ltd that employs rigging activities. The use, care, inspection and maintenance of rigging and lifting devices will adhere to the requirements of the Alberta OHS Code, Part 21: Rigging.

Procedure

1.0 Rigging Design and Ratings

1.1 Lifting Devices

Richardson's Bulk Sales Ltd will verify that the manufacturer has supplied all below the hook lifting devices with documentation that defines the permissible operating conditions, design criteria, documentation of testing, maintenance requirements, and examination and inspection requirements.

Each lifting device shall be marked to show:

- Safe Working Load (SWL);
- Unique identification number; and
- Date of last certification and/or date of next certification.

1.2 Devices

All below the hook lifting devices shall comply with applicable provincial standards and industry-accepted codes of practice and shall be marked in the same manner as lifting appliances.

Engineered below the hook lifting devices (e.g., spreader bars) shall be designed, manufactured, and tested in accordance with recognized industry standards.

All lifted equipment (e.g., man basket, work platforms) shall be designed, manufactured, inspected, tested, and certified in accordance with applicable provincial standards and industry-accepted codes of practice.

Any lifted equipment units not certified to an accepted standard shall be structurally verified by a qualified engineer and shall be load tested.

1.3 Registry of Lifting Devices

A register, which records the following data, shall be maintained for all lifting equipment:

- Manufacturer and description;
- Identification number;
- Safe Working Load;
- Date when the equipment was commissioned;

- Particulars of defects and steps taken to remedy them;
- Dates and numbers of certificates of tests, inspections, and examinations, and the name of the person who performed these;
- Dates of inspections and inspection frequencies; and
- Maintenance logs.

The above requirements may be recorded using a dedicated register and/or as part of a maintenance management system.

The register will be maintained by the senior work site operator and will be readily available for examination by the site supervisor or any authorized person.

1.4 Breaking Strength

Richardson's Bulk Sales Ltd will ensure that rigging is not subjected to a load of more than:

1. 10% of the breaking strength of the weakest part of the rigging, if a worker is being raised or lowered;
2. 20% of the ultimate breaking strength of the weakest part of the rigging in all other situations, unless the manufacturer has fatigue rated the rigging in accordance with CEN Standard EN 1677-1: 2000, Components for slings – Part 1: Forged steel components grade 8; and
3. If the rigging is fatigue rated in accordance with CEN Standard EN 1677-1: 2000 and a worker is not being raised or lowered, the maximum load must not exceed 25% of the ultimate breaking strength.

Despite subsection (a), the Company may use a dedicated rigging or lifting assembly designed and certified for a particular lift or project by a professional engineer, but the dedicated rigging or lifting assembly must be re-rated to comply with subsection (a) before it is used for another lift or project.

1.5 Safety Factors

Richardson's Bulk Sales Ltd will ensure that rigging components are rated relative to their ultimate breaking strength in accordance with the following safety factors:

- Running lines 3.5 to 1;
- Non-rotating hoist lines 5 to 1;
- Tugger lines/blocks for pulling 3 to 1;
- Pendant lines/guy lines 3 to 1; and
- Winch lines 2 to 1.

Richardson's Bulk Sales Ltd will ensure that rigging components or hoisting lines that are used in any towing operation are not used for any hoisting operation.

1.6 Sling Standards

Richardson's Bulk Sales Ltd will ensure that all wire rope, alloy steel chain, synthetic fibre rope, metal mesh slings, and synthetic fibre slings manufactured on or after July 1, 2014, meet the requirements of ASME Standard B30.9-2006, Safety Standard for Cableways, Cranes, Derricks, Hoists, Hooks, Jacks, and Slings.

Richardson's Bulk Sales Ltd will ensure that below-the-hook lifting devices, other than slings, meet the requirements of ASME Standard B30.20-2006, Below the Hook Lifting Devices.

Richardson's Bulk Sales Ltd will ensure that synthetic fibre slings are permanently and legibly marked or appropriately tagged with the following:

- The manufacturer’s name or trade mark;

- The manufacturer's code or stock number;
- The safe working load for the types of hitches permitted; and
- Where appropriate, the type and material of construction.

Richardson's Bulk Sales Ltd will ensure that slings at a work site are not subjected to pull tests beyond 100 percent of their rated load capacity.

2.0 Rigging and Lifting Devices and Lifted Equipment – General Requirements

2.1 General

All purchases of rigging and lifting accessories must be in compliance with an accepted industry standard and must be of adequate strength and suitable for the intended use.

2.2 Use

All rigging and lifting accessories shall be:

- Stored in a dedicated area, where practical, and kept covered, dry, or otherwise protected from the environment – typically a rigging loft. Equipment shall be stored in such a manner as to avoid mechanical damage, corrosion, or chemical exposure, etc.;
- Colour-coded where applicable. Rigging and lifting accessories that are incorrectly colour-coded shall be stored in a separate, clearly marked area and returned for re-inspection, certification, and colour coding;
- *At all Richardson's Bulk Sales Ltd locations, the colour RED is used for condemned equipment or that which is unfit for service. Any **repairable** equipment marked RED (such as hoists or chain blocks) shall be stored in a safe, locked quarantine locker. All other equipment, such as slings and nylon straps, shall be made unusable and disposed of;

- Labelled or provided with readable marks with the minimum information:
  - ID/Serial number;
  - WLL (Work Load Limit) or SWL (Safe Working Load); and
  - Last/date load inspection (in event of limited marking space, apply colour code or label);
- Checked before they are used to confirm their correct rating for the work to be done;
- Visually examined for defects and damage prior to use. Equipment in unacceptable condition shall be tagged and set aside for repair or disposal in the same place as incorrectly colour-coded accessories;
- Used only within their WLL ratings;
- Loaded progressively without shock loading;
- Removed from service for inspection, testing, and re-certification if it is suspected they have been subjected to loads in excess of their rated capacities, including the effect of shock loading by snatch lifting; and
- Applied carefully if used on slippery surfaces. Where required, means to stop slippage must be used to avoid an unstable load.

2.3 Pre-Use Inspections

A pre-use check of the condition and capacity must be made by the user before every use. Faulty accessories shall be discarded such that they are safe from accidental use and in line with the requirements of 2.2.

1. Rejection standards for cable and wire rope include:

- Visible permanent distortion, such as bulging, bird-caging, crush damage, stranding, and core protrusion;
- Excessive wear and tear or damage;
- Reduction of diameter;
- Kinks;
- Flesh hooks;
- Damaged end clamps or end connections;
- More than five of the wires are broken in any five diameter length or three or more closely grouped wires are broken;
- Wear or corrosion affects individual wires over more than one third of the original diameter of the rope;
- Evidence that the rope structure is distorted because of bulging, kinking, birdcaging, or any other form of damage;
- Evidence of heat or arc damage; or
- The normal rope diameter is reduced, from any cause, by more than:
    - 0.4 millimetres if the normal rope diameter is eight millimetres (5/16 inch) or less;
    - One millimetre (if the normal rope diameter is more than eight millimetres (5/16 inch) and less than 20 millimetres (¾ inch);
    - Two millimetres if the normal rope diameter is 20 millimetres (3/4 inch) or more and less than 30 millimetres (1 3/16 inch); and
    - Three millimetres (1/8 inch) if the normal rope diameter is 30 millimetres (1 3/16 inch) or more.

2. Rejection standards for lifting straps include:

- Damaged outer protection (in case of endless straps);
- Damage of 10% of the fibre;
- Damage due to a twist;
- Damaged stitches;
- Oil or chemical contamination;
- Illegible label; or
- Heat damage.

3. Rejection standards for chain work include:
    - A component is more than 10% worn (reduction of diameter);
    - Any component is distorted in any way; or
    - Markings are illegible (e.g., WLL).
4. Rejection standards of a balance beam include:
    - Distorted or worn padeye, or
    - Distorted parts.

All equipment must be provided with proper and valid certification. Equipment without certification must be rejected until a re-certification is completed.

2.4 Testing and Examination

Testing and examination of rigging and lifting equipment shall take place in accordance with requirements set by the manufacturer and the applicable provincial regulations.

All rigging and lifting equipment must be re-examined and tested in the event that repairs or modifications have been made.

The examination must be performed by a certified service provider. After examination, the updated certificates are filled for historical purposes.

2.5 Chains

The chains used in chain slings and to secure loads shall not be:

- Hammered to reshape distorted links;
- Joined together using bolts and nuts;
- Shortened by twisting or knotting; or
- Subjected to load if the chain is kinked or twisted and the links cannot move freely.

Special care shall be exercised when using chain. The pre-use check shall focus in particular on corrosion and flexibility of each link.

2.6 Eyebolts

- Only certified eyebolts shall be used and screwed down to the shoulder or until the threaded section has bottomed out (shoulder type eyebolts are preferred). Care shall be taken to avoid mismatching of dissimilar threads.
- Ensure that eyebolts and lifting lugs supplied by equipment manufacturers are for the whole of the load and not just for a particular part of the assembly.
- Eyebolts shall only be used in combination with hooks when a shackle, which comfortably accommodates the hook, is fitted between the hook and the eyebolt. A screw in eyebolt without a collar must only be used for vertical lifting operations.
- Specifically designed padeyes must be used for all side lifting forces.

- Slings shall never be passed through eyebolts; use shackles with the eye of the sling attached to the shackle.
- Eyebolts delivered on new equipment shall be removed after installation and cannot be used again unless re-certified.

2.7 Hooks

Only safety hooks with a safety latch, mousing, or shackle (self-closing or spring-loaded) shall be used by free-hanging loads under constant tension and full gravity loads.

For use with tuggers and on the rig floor, moon-pool areas, or man-riding winches, these are not allowed due to the potential to open.

Care shall be taken during materials handling operations to ensure that:

- The safety latches (mouse) on crane and sling hooks are in good working order and the latches close properly;
- Hooks are only used in conjunction with other lifting accessories, such as rings and slings, which fit properly and are secure on the hook;
- Personnel are kept clear of the swing path of a hook; and
- Personnel do not place themselves underneath a hooked load.

Richardson's Bulk Sales Ltd will ensure that a worn, damaged, or deformed hook is permanently removed from service if the wear or damage exceeds the specifications allowed by the manufacturer or as set out in part 21 of the AB OHS Code.

Safety hooks have two barriers that will prevent accidental release:

- Due to the scissor action, the hook will have a positive locking, and
- The hook will have a safety latch (which might be a hazard if the hook turns 180 degrees and a safety bar is not on top of the safety latch).

For dynamic loads or whilst lifting in confined spaces, only shackles shall be used.

2.8 Fibre Slings

Also known as webbing and flat belt slings, fibre slings will be made of synthetic material and shall be round or flat in section.

Fibre slings shall be protected from sharp edges by sacking or similar padding and also from potential chemical damage.

Fibre slings are subject to the same test criteria as all other lifting appliances and shall not be used if there is no readable label. Fibre slings shall be kept in a clean and dry place to ensure that seams and labels are undamaged.

Prior to each lift, a visual inspection is required to ensure that there is no structural damage, visible evidence of any damage evident in the cover, local abrasion, cuts (including to the edge), chaffing, knots (which reduce load capacity by 25 to 100%), stains, broken stitches, unidentified label, or softening signs. If any of these signs are visible, the fibre sling shall not be used. It should be red tagged, contained in a secured locked area pending further examination or disposed of to prevent further use.

Note: Richardson's Bulk Sales Ltd will ensure that a worn or damaged sling is permanently removed from service if the wear or damage exceeds the specifications allowed by the manufacturer.

Lifts using fibre slings shall always be vertical to avoid:

- Overloading the edge of a flat sling;
- The risk of tearing the sling; or
- The risk of cutting a sling by lateral movement of the sling over sharp edges.

2.9 Lifted Equipment – Rigger Check

Before use, the rigger shall check that the lifted equipment and attached lifting set are suitable and that the load is satisfactorily secured. The check shall ensure that:

- The load is secured in such a way that it cannot move around;
- The load does not stick out over the sides of the lifted equipment;
- Multi-leg slings on open carriers, tanks, special containers, and modules are secured against snagging the load, etc. Net or canvas can be used as covering or the legs of the slings can be secured with cable ties;
- The load is positioned such that it is easy and safe for the receiver to handle the material when unloading the load carrier;
- Equipment is always placed on pallets when loading containers;
- Pallets or timber are always used on the floor of the basket;
- A safety net is used to prevent load from falling out of load carriers with doors;
- Heavy and/or unstable items are secured by means of tensioning arrangement;
- There are no loose parts on the load that could fall off during the lift;
- Multi-leg chain slings are not crossed when attached to load; and
- Dangerous goods are suitably identified in accordance with TDG regulations.

2.10 Lifting Anchor Systems in Concrete

The use of designed lifting anchor systems in concrete is approved only for newly installed equipment, thereafter the anchor must be inspected by a competent person or recertified by a professional engineer.

Concrete plates which are designed for frequent lifts, are normally designed with stainless steel spherical heads. Prior to each lift, a visual inspection by a competent person needs to be conducted to check for corrosion or structural damage to the proper (SWL) lifting key and heads.

During lifting operations of concrete plates, all available lifting anchors are to be used according to the manufacturers design specifications.

2.11 Lifting Nipples and Lifting Caps

Lifting nipples and lifting caps shall be certified and approved for lifting. Before use, a check shall always be carried out to ensure that the thread section on the pipe and on the lifting nipple or lifting cap are undamaged, that the lifting equipment is correctly installed, and that the thread dimension and type are the same. When moving a load provided with a lifting nipple or lifting cap, the area below the travel path shall be placed out-of-bounds.

2.12 Lifting Point on Lifted Component

The use of a lifting point on a component, which is designed to lift only the weight of the component itself, shall be described in the manufacturer's instructions for use or documented in another way. Pre-use and post-use check of such lifting points shall be carried out and only certified lifting points shall be used.

2.13 Gas Bottle Load Carriers

Gas bottles shall be transported only with fitted protection caps in certified load carriers designed for the purpose of safely lifting the bottles. Pre-slinged or chained carriers for gas bottles must be certified and provided with the necessary identification signs.

2.14 Padeyes

A padeye may be permanently fixed or welded to the equipment or temporarily installed on the lifting beam of the load to be lifted. It shall be specifically designed and certified for the lifting operations concerned. Uncertified padeyes must never be used.

There are various types of padeyes, depending on the use and design. Attention must be given to the angle under which the lifting work will be performed on the padeye. A screw-in padeye without a collar must only be used for vertical lifting operations (i.e., in line with the centre line of the padeye). Padeyes with collars may be exposed to sideways lifting forces if designed for the purpose.

All supplied certified padeyes can be stored and re-certified for possible re-use. Uncertified padeyes (mostly supplied during new building) shall be removed and may not be used in any lift. Fixed padeyes permanently fastened to the load must also be certified and must conform to local requirements before use.

2.15 Pallets and Use of Pallet Hooks (Load Hook)

1. Pallets

    - Only purpose-built (designed to ISO 6780) pallets in good condition and without loose or broken boards and blocks shall be used for transporting loads. Damaged pallets shall be taken out of service and shall be returned for repair or disposal. Loads shall be secured on pallets with tension strapping, plastic shrink-wrap, cargo netting or, alternatively, using a box pallet. Pallets shall be secured on the load platform. Only equipment designed for lifting pallets shall be used.

2. Use of Pallet Hook

1. - When using a pallet hook, ensure that the forks of the pallet hooks have at least the minimum length of the size of the load to be lifted. When a load is lifted using a manually-controlled or semi-automatic pallet hook, the load must always be in a horizontal position or at a small backward angle. In the event of any deviation, the lift shall be stopped and appropriate action shall be taken to secure a safe lift as described in this SWP.

    - Each pallet hook will be provided with an inspection certificate, manufacture identification, last inspection date, SWL, own weight (as from 100 kg), weight scale, and centre point of gravity (for semi-automatic pallet hooks).

2.16 Shackles

Ensure that:

- For all lifts of material or personnel, only shackles with a double-locking device shall be used (e.g., nut plus split pin or screwed connection with split pin). For securing static loads, other types of shackles can be used;

- Shackles without rotating bolts should not be used in permanently installed lifting arrangements due to the danger of transferring rotating forces to the shackle bolt;

- If shackles without rotating bolts are used in lifting arrangements, the bolt shall be properly secured to withstand any rotating forces transferred to the shackle bolt;
- Shackles are matched to the grade of sling in use;
- Shackles are marked with SWL or WLL, size, and test mark; and
- Threaded shackle pins are secured in place with seizing wire prior to use.

2.17 Wire Rope Clips

Where applicable, wire rope slings and semi-permanent terminations of wire ropes can be made by the use of wire rope clips with two gripping surfaces (U-bolt clamps shall not be used on lifting equipment).

Wire rope clips must be properly applied according to manufacturer specifications, including the insertion of a thimble in the eye of the sling and the application of sufficient torque to the securing nuts. Any de-rating of the original rope must be accounted for.

When making up a sling or termination, always ensure that:

- New clips are used; used clips do not have the full holding ability;
- A thimble is inserted in the eye of the sling. This prevents the rope from wearing and deforming;
- The clips are fitted in accordance with the manufacturer's instructions;
- All threads and nut bearing surfaces are greased, unless manufacturer's instructions state otherwise;
- Full recommended torque settings are achieved, e.g., 49 Nm for 16 mm diameter rope;
- Periodic checks of torque settings are carried out as specified below:
    - As soon as the service load is hung on the rope;
    - After 24 hours in service;

    - After seven days in service;
    - After one month in service;
    - At six monthly intervals from the date of installation; and

- A record is kept of measured torque values when terminations are first made and during each subsequent periodic check.

2.18 Testing and Examination

Testing and examination of rigging and lifting equipment shall take place in accordance with the requirements set by the manufacturer and/or applicable provincial regulations.

All rigging and lifting equipment must be re-examined and tested in the event that repairs or modifications have been made.

The examination must be performed by a certified service provider. After examination, the updated certificates are filled for historical purposes.

2.19 Prohibition

Workers will not be lifted or otherwise transported on any hoisting or lifting equipment unless the equipment is dedicated for that purpose and has been specifically designed for the purpose.

References

- Alberta Occupational Health and Safety Code, Part 21: Rigging, Sections 292 – 309. https://www.alberta.ca/ohs-act-regulation-code.aspx
- Alberta Construction Safety Association Safe Work Practice – Rigginghttp://www.youracsa.ca/resources/safety-program-resources

Substance Abuse

Purpose

Richardson's Bulk Sales Ltd has implemented a substance abuse program to ensure that workers, the public, and the environment are protected from the negative effects of substance abuse in the workplace. This Safe Work Practice is to be used in conjunction with the “Fit for Duty” requirements contained in the “Rules” section of this Health and Safety Manual. The policy for this Substance Abuse Program will be signed and approved by senior management.

Scope

Richardson's Bulk Sales Ltd will apply the conditions of the Substance Abuse Program at all work sites owned or operated by the Company while being attentive to the rights, privacy, and dignity of the individual. With respect to drug and alcohol testing protocols Richardson's Bulk Sales Ltd will generally follow the guidelines contained in the latest revision of the COAA, Construction Owners Association of Alberta and ESC, Energy Safety Canada: Canadian Model for Providing a Safe Workplace Alcohol and Drug Guidelines and Work Rule (hereinafter the “Canadian Model”).

Definitions

Richardson's Bulk Sales Ltd has adopted the following definitions from the Canadian Model:

Alcohol: Any substance that may be consumed and that has an alcoholic content in excess of 0.5 per cent by volume.

Drugs: Includes any substance, chemical, or agent the use or possession of which is unlawful in Canada or requires a personal prescription or authorization from a licensed treating physician, or the use of which is regulated by legislation (such as marijuana/ cannabis), or any other psychoactive substance, and any non-prescription medication lawfully sold in Canada, and drug paraphernalia.

Drug Paraphernalia: Includes any personal property that is associated with the use of any drug, substance, chemical, or agent the possession of which is unlawful in Canada, or the use of which is regulated by legislation such as marijuana/ cannabis.

Prescription Drugs: Drugs that can only be obtained with a prescription from a registered health care professional licensed to prescribe drugs. Prescription drugs must be made out to a specific individual, have a drug identification number, and be dispensed by a licensed pharmacist.

Non-prescription Drugs: Drugs that can be lawfully purchased without a prescription.

Psychoactive: Cause changes to subjective experience and/or behaviour by altering the central nervous system functioning.

Procedure

1.0 Rules and Responsibilities

1.1 Richardson's Bulk Sales Ltd Responsibilities

Richardson's Bulk Sales Ltd has the following responsibilities:

1. To promote workplace safety;
2. To protect workers, the public, and the environment;
3. To recognize that substance abuse problems may occur and to establish an Employee and Family Assistance Program (EFAP) designed to deal with employee problems including drug and alcohol abuse;

4. To ensure that all drug and alcohol testing records are kept strictly confidential in a locked file only accessible to senior management and designated human resource personnel who require the information as part of this program; and
5. Provide supervisors with training on recognition of impairment and substance abuse problems and the appropriate response procedures required as cited in this program.

1.2 Management Responsibilities:

1. Provide a safe and healthy workplace;
2. Provide prevention programs that emphasizes awareness, education and training with respect to the use of drugs and alcohol and the effects on the workplace;
3. Ensure effective employee assistance services are available to employees and sub-contractors as required;
4. Assist employees in obtaining confidential assessments, counselling, referral, and rehabilitation services;
5. Actively support and encourage rehabilitation activities and re-employment opportunities where applicable;
6. Ensure that all employees understand the existence of and content of the work rules as part of the employee's orientation to the Company; and
7. Ensure that alcohol and drug testing is performed according to the standards set out in this policy.

1.3 Supervisor Responsibilities

1. Be knowledgeable about the drug and alcohol policy and procedures;
2. Ensure they comply with all Richardson's Bulk Sales Ltd established work standards as part of their responsibility to perform their work-related activities in a safe and effective manner;

3. Be knowledgeable about the use of drugs and alcohol and be able to recognize the signs and symptoms of the use of alcohol and drugs;
4. Take action on performance deviations or misconduct; and
5. Take action on reported or suspected drug or alcohol use by employees or any other workplace parties.

1.4 Worker Responsibilities

Employees and Sub-Contractors are Responsible:

1. To perform duties in a safe and competent manner and to satisfy the “Fit for Duty” requirements of section of the Richardson's Bulk Sales Ltd Health and Safety Program;
2. To inform Richardson's Bulk Sales Ltd of the use of any prescription and off-the-shelf medication (including medicinal marijuana (cannabis) and related compounds) which may affect the worker’s ability to perform their duties safely and competently;
3. To take all reasonable steps to verify with the prescribing physician, health care professional or dispenser, the effects of any medication that they may purchase or be prescribed;
4. To advise their supervisor, prior to starting any work, of any recommended activity restrictions and/or performance impairment that may occur as a result of the use of any prescription or non-prescription medication which they are taking (including marijuana (cannabis) or related compounds);
5. To use prescription and off the shelf medicines responsibly, as prescribed, dispensed or according to instructions. Observe all adverse interaction recommendations and immediately report to Richardson's Bulk Sales Ltd any side effects and impairment which they experience and seek immediate medical attention or review; and
6. To advise Richardson's Bulk Sales Ltd of any drug and alcohol abuse or addiction or any other drug and alcohol related problems that could impair performance or affect the ability to report for work “fit for duty”.

1.5 Alcohol and Drug Rules

An employee at a Company workplace or work site shall not use, possess, or offer for sale, alcohol, drugs other than those permitted by section 1.6 below and any product or device that could tamper with any sample for an alcohol or drug test.

An employee shall not report to work or work:

1. With an alcohol level equal to or in excess of 0.04 grams per 210 litres of breath;
2. With a drug level equal to or in excess of the concentrations of the drugs set out in Tables 1 and 2 of the COAA-ESC Canadian Model (attached to this SWP as Appendix A); or
3. While the employee's ability to safely perform his or her duties is adversely affected because of the use of alcohol and/or drugs, whether prescription drugs or non-prescription drugs, lawful or unlawful (see Fit for Duty).

1.6 Possession of Prescription and Non-prescription Drugs Rule

An employee may possess a prescription or non-prescription drug prescribed for him or her at a Company workplace if:

1. The use of the prescription or non-prescription drug does not adversely affect the employee's ability to safely perform his or her duties, and the employee is using the prescription or non-prescription drug for its intended purpose and in the manner directed by the employee's physician or pharmacist or the manufacturer of the drug; or
2. The employee has notified his or her supervisor or manager before starting work of any potentially unsafe side effects, and the employee complies with conditions and limitations set by the employer respecting the possession and use of the drug before reporting to or being at the Company workplace or work site; and
3. The employee is, and remains, fit for duty as described in the Health and Safety Program.

2.0 Testing

For all positions drug and alcohol testing will be required as follows:

1. When it is suspected that a worker's performance has been impaired by drug or alcohol use which may have contributed to a workplace incident that did, or had the potential to, result in serious injury or damage (post incident testing). Testing will be performed as soon as reasonably practicable;
2. When there are reasonable grounds, based on direct observation, to believe that a Richardson's Bulk Sales Ltd employee or other worksite party is unfit for duty or is exhibiting dangerous behaviour;
3. Where reasonable cause exists, based on observation or performance indicators, to suspect alcohol or drug use; and
4. As part of the action plan to return to work after a worker has undergone rehabilitative treatment for drugs or alcohol.

For positions deemed to be safety sensitive the following drug and alcohol testing may be required in addition to those cited above:

- Pre-employment or pre-transfer to a safety sensitive position;
- Pre-access to Company, contractor and third-party worksites; and
- Random drug testing.

Workers will be advised in advance of testing requirements and the testing protocols to be used. Unless otherwise specified, alcohol and drug testing procedures will be according to Appendix A of the Canadian Model.

For the purposes of establishing a positive test result:

- Urine drug concentration limits and oral fluid drug concentration limits will be for the substances and concentrations cited in Tables 1 and 2 respectively, from the Canadian Model, in its latest revision, and
- Alcohol concentration limits shall not exceed 0.04 grams per 210 L of breath. Workers will be expected to cooperate fully when requested to undertake a drug and alcohol test, rehabilitation, or counselling. Refusal to cooperate in these matters, when requested by Richardson's Bulk Sales Ltd, will result in disciplinary action.

Workers will be expected cooperate fully when requested to undertake a drug and alcohol test, rehabilitation, or counselling. Refusal to cooperate in these matters, when requested by the Company, will result in disciplinary action.

Screening tests yielding a positive result will be subject to confirmatory tests as outlined in 4.0 of this SWP. Testing and retesting will be consistent with the protocols and requirements of the "Alcohol and Drug Work Rule" of the Canadian Model in its current version.

Unless specified elsewhere, Drug and Alcohol testing will be for the substances named at the levels cited in the "Alcohol and Drug Work Rule" of the COAA-ESC, "Canadian Model" in its latest version.

2.1 Alcohol and Drug Testing Procedures

General

- Alcohol and drug testing procedures will be as described in Appendix A of the Canadian Model in its latest revision.
- Richardson's Bulk Sales Ltd will retain a certified laboratory to conduct urine drug testing.
- The laboratory must be the holder of a certificate issued by the Substance Abuse and Mental Health Services Administration (SAMHSA) of the United States Department of Health and Human Services under the National Laboratory Certification Program.
- Richardson's Bulk Sales Ltd will retain a certified laboratory to conduct oral fluid testing.

- Oral fluid testing will be permitted for post-incident testing, reasonable cause and random testing.
- Oral fluid testing will not permitted for site access.

Point of Collection Testing (POCT)

- If a post-incident or reasonable cause test is required, Richardson's Bulk Sales Ltd may at times use a point of collection test (POCT) for assessing the risk of having an employee return to work.
- A POCT device used for this purpose will have a Health Canada approval, and will be intended for urine assessment only, and will be calibrated.
- Only collection personnel trained to U.S. DOT standards shall administer the POCT. Such collection personnel will comply with all standard operating procedures including address chain of custody and quality control.

POCT Collection Procedures and Chain of Custody

This procedure is general and although all of the principles must be followed, will depend on site-specific circumstances. A detailed description is provided in - Appendix A of the Canadian Model A-2 Drug Testing (Urine Testing).

- The donor (person from whom a urine specimen is collected) is informed of the requirement to test in private, and is directed to go to a collection site.
- The donor will be escorted to the collection site if the test is for post-incident or reasonable cause purposes or as required by the site program.
- The collection site will be designated for this use and will be private, well lit, clean, and disinfected as required and will contain furnishings and lockers so as to allow the collection process to proceed without undue inconvenience to the donor.
- The donor's identity is confirmed by a supervisor if present or with government issued ID.
- The donor removes all outer clothing (jacket, coveralls, coat) and leaves these and all other bags and personal items with the collection site person.

- All items must be removed from pockets for inspection by the collection person. Items that could be used as an adulterant are surrendered to the collection person. Clear evidence of an attempt to adulterate or substitute is a refusal to test.
- The collection person selects an individually sealed, Health Canada approved specimen container. The donor may provide the urine sample in private in most circumstances. The specimen must contain at least 45 ml. Incomplete samples or refusals must be completely documented respecting the collection effort and reasons for incompletion.
- The collection person notes the volume and temperature of the specimen container and any unusual findings upon inspection of the container.
- If the temperature is outside the acceptable range the donor must provide a second sample under direct observation by an approved person of the same gender according to US DOT rules and regulations.
- The collection person splits the specimen into two specimen bottles. One bottle is primary the other secondary. Tamper evident bottle seals are placed on each bottle and the seals are dated by the collection person and initialed by the donor certifying that it is their urine sample.
- An approved standard custody and control form is completed by the donor and the collection person. The bottles and lab copy of the custody and control forms are sealed in a plastic bag. The bottles are shipped as quickly as possible.
- The laboratory must be the holder of a certificate issued by the Substance Abuse and Mental Health Services Administration of the United States Department of Health and Human Services under the National Laboratory Certification Program.
- The lab will follow all chain of custody and testing procedures as described in A.2 of Appendix A of the Canadian Model.

3.0 Safety Sensitive Positions

A position is considered safety sensitive if it meets one of the following conditions:

1. Duties and responsibilities which, if improperly performed, could reasonably be expected to result in a serious negative impact on the health or safety of workers, the public, or the environment including significant property damage, and
2. Any position having direct responsibility for supervising any others whose work falls within the conditions listed above.

4.0 Dealing with a Positive Test

1. The initial sample will be re-tested to confirm or negate a positive test result.
2. If the test is again positive, the worker will meet with a Richardson's Bulk Sales Ltd Medical Advisor to review the result and have an opportunity to explain how the positive result may be related to factors other than drug or alcohol use.
3. If the re-test is confirmed to be positive by a Richardson's Bulk Sales Ltd Medical Advisor, the worker will not be allowed to resume their job duties until their case has been evaluated according to this program and Richardson's Bulk Sales Ltd policies. The employee may be subject to disciplinary action or rehabilitative care depending upon the circumstances.
4. Rehabilitation and/or reasonable accommodation (as described in 7. below) may not be offered if the employee has not declared a drug or alcohol dependency prior to a positive test or if it causes Richardson's Bulk Sales Ltd undue hardship as defined under prevailing safety and human rights legislation.
5. A worker who has taken time off for rehabilitative care may be required to successfully pass a medical assessment, including a drug and alcohol test, prior to returning to work.
6. A worker who has violated the “Fit for Duty” rules and/or this Substance Abuse Safe Work Practice and has not previously informed Richardson's Bulk Sales Ltd of a drug and alcohol related disability will be subject to disciplinary action.

5.0 Program Application: New Hires

Pre-employment drug and alcohol testing may be used for positions deemed safety sensitive. A positive test could result in the candidate being ineligible.

Candidates for employment must report all drug, alcohol, prescription and non-prescription drug use that may reasonably be expected to affect their ability to work safely including the ability to safely drive using their own or company vehicles on company business.

An existing employee, bidding on or applying for a safety sensitive position within the Company, who tests positive, or who refuses to complete the medical testing requirement, including for drugs and alcohol, will not be eligible for the position offered, may not be eligible to re-apply for that or another safety sensitive position and may be subject to disciplinary action.

6.0 Assistance: The Rehabilitative Approach

Richardson's Bulk Sales Ltd supports a rehabilitative approach to assist workers to meet their job requirements if:

- They declare their substance abuse problem;
- They have not violated any company rules; and
- Are seeking assistance.

Rehabilitation must fall within the bounds of Richardson's Bulk Sales Ltd's rules and policies, must not impose an undue hardship on Richardson's Bulk Sales Ltd, and must follow the mandate Richardson's Bulk Sales Ltd's Employee and Family Assistance Program (EFAP).

Drug and Alcohol Dependency:

- Employees who have a drug and alcohol dependency may, under some circumstances, be considered to have a disability and be eligible for accommodation under the Alberta Human Rights Act;

- Employees who do not have a dependency may not have recourse to this accommodation under the Act;
- Richardson's Bulk Sales Ltd supervisors will obtain assistance from senior management for any employees with declared or suspected drug and alcohol dependency;
- Richardson's Bulk Sales Ltd will determine if an employee has a disability that qualifies for being reasonably accommodated with a rehabilitative action plan. A rehabilitative action plan may include suspension from work and off-site treatment, drug and alcohol counselling, re-assignment, restrictions on work, restrictions in driving Company vehicles, and future drug and alcohol testing;
- Richardson's Bulk Sales Ltd will only assess an employee's dependency using expert assistance and will not discuss dependency with any party nor accuse an employee of being alcohol or drug dependant; and
- Employees will not be unjustly accused of, or treated as if, they have a drug and alcohol dependency.

References

- Alberta Occupational Health and Safety Act, Obligations of Employers, Workers, Etc., Section 2(1).https://www.alberta.ca/ohs-act-regulation-code.aspx
- COAA, Construction Owners Association of Alberta and Energy Safety Canada (ESC): Canadian Model for Providing a Safe Workplace -Alcohol and Drug Guidelines and Work Rule, V6.https://www.coaa.ab.ca/library/category/safety/subcategory/canadian-model/
- Oil and Gas Occupational Safety and Health Regulations, under Part II of the Canada Labour Code, Part XVIII: Safe Occupancy of the Workplace, Condition of Employees, Section 18.16 and 18.17.http://laws.justice.gc.ca/eng/regulations/SOR-86-304/FullText.html
- Saskatchewan Occupational Health and Safety Act, Part II: Responsibilities of the Employer, Supervisor, Worker, Owner, and Contractor. http://www.publications.gov.sk.ca/details.cfm?p=4355

- Saskatchewan Human Rights Commission – Drug and Alcohol Testing – A general Guide. http://saskatchewanhumanrights.ca/learn/policies

Appendix – Drug Concentration Testing Limits

Table 1 – Urine Drug Concentration Limits

Drugs or classes of drugs	Screening concentration equal to or in excess of ng/mL	Confirmation concentration equal to or in excess of ng/mL
Marijuana metabolite	50	15
Cocaine metabolite	150	100
Opioids		
- Codeine	2000	2000
- Morphine	2000	2000
- Hydrocodone	300	100
- Hydromorphone	300	100
- Oxycodone	100	100
- Oxymorphone	100	100
6-Acetylmorphine	10	10
Phencyclidine	25	25
Amphetamines	500	—
- Amphetamine	—	250
- Methamphetamine	—	250
- MDMA [1]	500	250
- MDA[2]	—	250

Source: U.S. Department of Transportation, Rule 49 CFR Part 40, January 1, 2018.
1. Methylenedioxymethamphetamine
2. Methylenedioxyamphetamine

Table 2 – Oral Fluid Drug Concentration Limits

Drugs or classes of drugs	Screening concentration equal to or in excess of ng/mL	Confirmation concentration equal to or in excess of ng/mL
Marijuana (THC)	4	2
Cocaine metabolite	20	—
- Cocaine or Benzoylecgonine	—	8
Opioids	40	—
- Codeine	—	40
- Morphine	—	40
- Hydrocodone	—	40
- Hydromorphone	—	40
- Oxycodone	—	40
- Oxymorphone	—	40
6-Acetylmorphine	—	4
Phencyclidine	10	10
Amphetamines	50	—
- Amphetamine	—	50
- Methamphetamine	—	50
- MDMA [1]	—	50
- MDA[2]	—	50

Source: COAA and Energy Safety Canada, 2018.
1. Methylenedioxymethamphetamine
2. Methylenedioxyamphetamine

Tools, Equipment, and Machinery

Purpose

All machinery, powered tools and equipment that has rotating, reciprocating, or moving components presents a potential risk to workers as does equipment that stores or transmits energy such as compressors. Powered tools include those that are pneumatically powered. Richardson's Bulk Sales Ltd has developed this safe work practice to provide the guidelines required to minimize safety risks when working with or near this equipment. The requirements of this SWP will be used to develop safe job procedures specific to the tools, equipment, and machinery in regular use by Richardson's Bulk Sales Ltd.

Scope

The conditions and requirements of this safe work practice apply to all work sites owned or operated by Richardson's Bulk Sales Ltd where workers are required to use, install, inspect, maintain, or service any tool or piece of equipment or machinery in the course of conducting their work-related activities.

Procedure

1.0 Operating Requirements

1. If contact between moving parts of machinery, electrically energized equipment, or part of the work process and a worker’s clothing, jewellery, or hair is likely, Richardson's Bulk Sales Ltd will ensure that:

- The worker's clothing fits closely to the body;
- The worker does not wear bracelets, rings, dangling neckwear, a wristwatch, or similar articles; and
- The worker's head and facial hair is short or confined and cannot be snagged or caught.

2. If contact between moving parts of machinery, electrically energized equipment, or part of the work process and a worker's clothing, jewellery, or hair is likely, a worker must:
   - Wear clothing that fits closely to the body;
   - Not wear bracelets, rings, dangling neckwear, a wristwatch, or similar articles; and
   - Have head and facial hair that is short or confined and cannot be snagged or caught.
3. Richardson's Bulk Sales Ltd will ensure that a worker is not in danger because the machines installed at a work site are close to each other or to a worker.
4. Richardson's Bulk Sales Ltd will ensure that machinery or equipment used to move, to raise, or to lower workers is designed by the manufacturer or certified by a professional engineer as being appropriate for that purpose.
5. Richardson's Bulk Sales Ltd will ensure that an alarm system is installed if:
   - A machine operator does not have a clear view of the machine or parts of it from the control panel or operator's station, and
   - Moving machine parts may endanger workers.

   The alarm system must effectively warn workers that the machine is about to start.
6. Richardson's Bulk Sales Ltd will install a positive means to prevent the activation of equipment if:
   - A worker is required, during the course of the work process, to feed material into the machine, or

- A part of the worker's body is within the danger zone of the machine.

7. Before starting machinery, an operator must ensure that starting the machinery will not endanger the operator or another worker. While operating machinery, an operator must also ensure that its operation will not endanger the operator or another worker.
8. Richardson's Bulk Sales Ltd will ensure that an operational control on equipment:
    - Is designed, located, or protected to prevent unintentional activation, and
    - If appropriate, is suitably identified to indicate the nature or function of the control.
9. A worker must not leave a machine, or a part of or extension to a machine, unattended or in a suspended position unless the machine is immobilized and secured against accidental movement.
10. A worker must not shift a drive belt on a machine manually while the machine or motor is energized.
11. Richardson's Bulk Sales Ltd will ensure that a permanent drive belt shifter:
    - Is provided for all loose pulleys on a machine, and
    - Is constructed so that the drive belt cannot creep back onto the driving pulley.
12. Richardson's Bulk Sales Ltd will ensure that the drive mechanism of a powered, continuously-fed feeder device permits the feeder mechanism to be stopped independently of the processing mechanism.
13. A worker must not permit the trigger of an actuated fastening tool to be mechanically held in the "ON" position unless the manufacturer's specifications permit the tool to be used that way.
14. Richardson's Bulk Sales Ltd will ensure that:

- A grinder is operated in accordance with the manufacturer's specifications and equipped with a grinder guard;
- The maximum safe operating speed of the grinder accessory in revolutions per minute is equal to or greater than the maximum speed of the grinder shaft in revolutions per minute;
- If a hand-held grinder is used, the object being ground cannot move;
- The guard of a hand-held grinder covers the area of the grinder accessory contained within an arc of at least 120 degrees of the accessory's circumference; and
- If a tool rest is installed on a fixed grinder, the manufacturer's specifications are followed, if they exist, or the tool rest is:
  - Installed in a manner compatible with the work process;
  - Securely attached to the grinder;
  - Set at or within three millimetres (1/8 inch) of the face of the wheel; and
  - Set at or above the centre line of the wheel.

15. A worker must not grind material using the side of an abrasive wheel unless the wheel:
    - Has been designated for that purpose, or
    - Adjust a tool rest while a grinder accessory is in motion.

16. Richardson's Bulk Sales Ltd will ensure that a chain saw:
    - Is operated, adjusted, and maintained in accordance with the manufacturer's specifications, and
    - Is designed or equipped with a mechanism that minimizes the risk of injury from kickback when the saw is in use.

17. A worker must not adjust the chain of a chain saw while the saw's motor is idling.

18. Richardson's Bulk Sales Ltd will ensure that a circular saw blade with a crack of any size adjacent to the collar line, or with a crack elsewhere that exceeds the limits specified in the applicable provincial Regulations or Code, is:

    - Removed from service, and
    - Replaced or repaired.

19. Richardson's Bulk Sales Ltd will ensure that a hand-operated cut-off saw, other than a radial arm saw, is equipped with a device that returns the saw automatically to the back of the table when the saw is released at any point in its travel, and also ensure that a limit device is used to prevent a swing or sliding cut-off saw from travelling past the outside edge of the cutting table.

20. Tools and machinery may only be operated by competent persons. Richardson's Bulk Sales Ltd will ensure that every employee is trained by a qualified person appointed by Richardson's Bulk Sales Ltd in the safe operation, inspection, maintenance and use of all tools and machinery that they will be required to use or maintain prior to undertaking any of these activities. Richardson's Bulk Sales Ltd will designate the specific persons qualified and competent to provide this training. Training will include on-the-job evaluation of the employee's ability to undertake the work safely.

21. Pneumatic tools

    - Personnel using pneumatic tools must ensure that the source of air supply pressure does not exceed the working pressure or operating capacity of the respective tool;
    - Compressed air shall not be used for cleaning purposes except where reduced to less than 100 kPa and then only with effective chip guarding and personal protective equipment as determined by a hazard and risk assessment; and
    - Compressed air shall not be used by employees to clean themselves or any other person.

2.0 Inspections, Maintenance and Safety Devices

The following general guidelines should be considered when performing work on any tool, or piece of equipment or machinery.

1. Ensure that all safety devices and guards are in place before servicing or using equipment. Some of these devices include, but are not limited to:
    - Safety hook and mouse;
    - Back-up horns and alarms;
    - Rollover protection devices;
    - Locking devices, brakes, and guards;
    - Isolation devices, such as a positive air shut-off;
    - Lights and annunciation systems; and
    - Fail safe systems, deadman switches etc.
2. Workers using machinery or equipment are responsible for identifying and bringing any observed deficiencies that may render it unsafe for use to their supervisor's attention as soon as reasonably practicable. Workers will not use or permit to be used any tools and machinery that they have identified as having a safety deficiency.
3. Supervisors and management are responsible for tagging as unsafe, rendering inoperable, and removing defective tools, equipment, and machinery from service and for not returning the tools, equipment, or machinery to service until such time as the deficiency has been suitably corrected.

4. Third-party tools, equipment, and machinery should be visually inspected to ensure that they are serviceable and capable of performing the task and that they meet applicable regulations and standards prior to coming onto Richardson's Bulk Sales Ltd work site.

5. Do not remove guards located on rotating or reciprocating machinery to perform a repair or maintenance unless the machinery is shut down, de-energized, and locked out. All forms of hazardous energy must be controlled prior to beginning any work. There must be a written Lockout Tag Out procedure (LOTO) specific to the machinery whose hazardous energy is being controlled provided by Richardson's Bulk Sales Ltd. The LOTO must be in-place and employees must be trained in the LOTO procedure before any work is undertaken. Guards must be replaced before machinery is reactivated.

6. Ensure that all machinery capable of starting automatically from a remote location is appropriately identified.

7. Ensure that metal tags or stamps bearing the manufacturer’s specifications as to maximum loads, pressures, etc., are not removed, altered, obscured, or defaced.

8. Clearly identify the function of all machinery and equipment controls.

9. Ensure that machinery and equipment is spaced in such a way as to allow safe access by workers for both maintenance and escape purposes.

10. Ensure that all electrically-driven or non-explosion proof generators, compressors, diesel engines, etc., are a safe distance from any area where there is the potential for explosive gases or vapours in the air.

11. Before re-fuelling, shut off all gas-driven equipment and electrical sources. Use extreme caution when moving or walking around hot/cold surfaces, and ensure that clothing, jewellery, and hair are appropriately secured.

12. Where machinery can be safely serviced while running, Richardson's Bulk Sales Ltd will ensure that the servicing is undertaken only by a person with the appropriate training and experience and that all guards and safety controls which allow the work to be performed safely are in-place.
13. When machinery or equipment has been locked out and tagged out, no one is allowed to remove or replace someone else's tag or lock.
14. Construct or improvise guards to protect against temporary hazards, such as open pits, excavations, or unusual conditions in a work area, or when overhead work is being carried out.
15. When starting or operating machinery or equipment, neither the operator nor any other worker is to be endangered by its operation.
16. A code of practice must be developed by Richardson's Bulk Sales Ltd and must be in place if a guard is to be modified or removed from a piece of machinery or equipment on a temporary basis.
17. Richardson's Bulk Sales Ltd will ensure that all equipment used at a work site:
    - Is maintained in a condition that will not compromise the health or safety of workers using or transporting it;
    - Will safely perform the function for which it is intended or was designed;
    - Is of adequate strength for its purpose; and
    - Is free from obvious defects.

3.0 Training

Richardson's Bulk Sales Ltd will ensure that a worker is trained in the safe operation of the equipment the worker is required to operate. The training will include:

- The selection of the appropriate equipment;
- The limitations of the equipment;
- An operator's pre-use inspection;
- The use of the equipment;
- The operator skills required by the manufacturer's specifications for the equipment;
- The basic mechanical and maintenance requirements of the equipment;
- Loading and unloading the equipment if doing so is a job requirement; and
- The hazards specific to the operation of the equipment at the work site.

References

- Alberta Occupational Health and Safety Code, Part 3: Specifications and Certifications; Part 15: Locking Out; Part 19: Power Mobile Equipment; Part 22: Safeguards; Part 25: Tools, Equipment, and Machinery.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Alberta OHS Regulation 15 Safety Training.

Transportation of Dangerous Goods (TDG)

Purpose

Dangerous goods include potentially hazardous materials, such as explosives, compressed and liquefied gases, flammable liquids and solids, oxidizing materials, and other substances that are poisonous, infectious, radioactive, or corrosive. The Transportation of Dangerous Goods Act and Regulations (TDG) exists to protect people, the environment, and property when goods are being transported by road, rail, sea, or air. Richardson's Bulk Sales Ltd when shipping and carrying dangerous goods in quantities subject to TDG regulations will use this SWP to establish product specific TDG procedures and ensure that all shipments of dangerous goods comply with TDG requirements.

Scope

The conditions and requirements of this safe work practice shall be applied and enforced at all work sites owned or operated by Richardson's Bulk Sales Ltd and any public road where workers may be required to receive, maintain, or transport dangerous goods in the course of conducting their work-related activities on behalf of Richardson's Bulk Sales Ltd.

Procedure

1.0 Responsibilities

1.1 General Responsibilities

1. Before allowing a carrier to take possession of dangerous goods for transport, the consignor must determine the classification of the dangerous goods.

2. Before allowing a carrier to take possession of dangerous goods for transport, the consignor must prepare and give to that carrier a shipping document or, if the carrier agrees, an electronic copy of the shipping document.

3. A person must not offer for transport, transport, or import a means of containment that contains dangerous goods unless each dangerous goods safety mark is displayed on it.

4. A person must not handle, offer for transport, or transport dangerous goods in a means of containment unless the means of containment is designed, constructed, filled, closed, secured, and maintained so that under normal conditions of transport, including handling, there will be no accidental release of dangerous goods that could endanger public safety.

5. A person must load and secure dangerous goods in a means of containment and must load and secure the means of containment on a means of transport in such a way as to prevent, under normal conditions of transport, damage to the means of containment or to the means of transport that could lead to an accidental release of the dangerous goods.

6. A person who handles, offers for transport, or transports dangerous goods must be adequately trained and hold a training certificate or perform those activities in the presence and under the direct supervision of a person who is adequately trained and who holds a training certificate. An employer must not direct or allow an employee to handle, offer for transport, or transport dangerous goods unless the employee is adequately trained and holds a training certificate or performs those activities in the presence and under the direct supervision of a person who is adequately trained and who holds a training certificate.

7. In the event of an accidental release of dangerous goods from a means of containment, a person who has possession of the dangerous goods at the time of the accidental release must make an immediate report of the accidental release to appropriate provincial authority, if the accidental release consists of a reportable quantity of dangerous goods or a reportable emission of radiation as described in the Table in Section 8.1 of the TDG Regulations. The person must make an immediate report to:

    - The appropriate provincial authority;

- The person's employer;
- The consignor of the dangerous goods;
- For a road vehicle, the owner, lessee, or charterer of the road vehicle;
- For a railway vehicle, CANUTEC at (613) 996-6666;
- For a ship, CANUTEC at (613) 996-6666, a Vessel Traffic Services Centre or a Canadian Coast Guard radio station;
- For an aircraft, an aerodrome or an air cargo facility, CANUTEC at (613) 996-6666 and the nearest Regional Civil Aviation Office of the Department of Transport and, if the aerodrome is an airport, the operator of the airport;
- For Class 1, Explosives, and Class 6.2, Infectious Substances, CANUTEC at 613-996-6666; and SOR/2008-34; and
- For an accidental release from a cylinder that has suffered a catastrophic failure, CANUTEC at (613) 996-6666.

8. Emergency Response Assistance Program (ERAP)

An ERAP is required for companies that perform certain activities that involve the transportation of dangerous goods in Canada. According to subsection 7(1) of the TDG Act, there is an order for which persons require an ERAP.

A person in Canada requires an approved ERAP when they:

- Import certain dangerous goods, or
- Offer for transport certain dangerous goods

Only when the above does not apply, the person who requires an approved ERAP is the one who:

- Handles certain dangerous goods while in Canada, or
- Transports certain dangerous goods while in Canada.

The ERAP guide from Transport Canada can be used to help determine if an ERAP is required.

https://www.tc.gc.ca/eng/tdg/guide-find-out-need-emergency-response-assistance-plan.html

1.2 Responsibilities of the Consignor

Before allowing a carrier to take possession of dangerous goods for transport the consignor (the shipper) must ensure that, in accordance with TDG Regulations, the goods are:

- Classified correctly;
- Packaged appropriately;
- Marked (Safety Marks must be displayed);
- Labelled; and
- Documented.

The consignor must provide to the carriers a copy of the shipping document and placards, if necessary. Consignors must also report any dangerous occurrences in accordance with the regulations.

1.3 Mandatory Consignor Certification

A consignor's certification is a statement on the shipping document which confirms that the dangerous goods have been properly classified, packaged and labelled with safety marks according to the TDG Regulations. This certification will be mandatory.

The certification must be made by the consignor or by an individual acting on his or her behalf. The name of the consignor (or representative), and not his/her signature, must be indicated on the

shipping document.

The certification appearing on the shipping document must be one of the five proposed certifications in the subsection 3.6.1(1). Richardson's Bulk Sales Ltd when acting as the consignor will use the following certification or an approved equivalent:

“I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, are properly classified and packaged, have dangerous goods safety marks properly affixed or displayed on them, and are in all respects in proper condition for transport according to the Transportation of Dangerous Goods Regulations.”

1.4 Responsibilities of the Carrier

Carriers must follow all applicable Company, TDG, and other legal requirements. They are responsible for:

- Checking the shipment before accepting it;
- Checking the documentation for accuracy;
- Mounting placards (Dangerous Goods Safety Marks);
- Maintaining or replacing safety marks, labels, and placards, if necessary;
- Ensuring that the following documents are in the vehicle:
    - Proper shipping documents as outlined in the regulations, and
    - A current TDG certificate.
- Delivering shipping documents as outlined in the regulations; and
- Reporting any dangerous occurrences that happen during transport.

2.0 Accidental Release(s)

Where an accidental release of dangerous goods in excess of a prescribed quantity or concentration occurs, or is imminent; from a means of containment being used to handle or to transport dangerous goods, any person who at the time has the charge, management, or control of the means of containment shall report the occurrence or imminence of the release.

Every person required to make a report shall, as soon as possible in the circumstances, take all reasonable emergency measures to reduce or to eliminate any danger to public safety that results or may reasonably be expected to result from the release.

3.0 Means of Containment

A person must not handle, offer for transport, or transport dangerous goods in a means of containment unless the means of containment is designed, constructed, filled, closed, secured, and maintained so that under normal conditions of transport, including handling, there will be no accidental release of dangerous goods that could endanger public safety.

4.0 Loading and Securing

A person must load and secure dangerous goods in a means of containment and must load and secure the means of containment on a means of transport in such a way as to prevent, under normal conditions of transport, damage to the means of containment or to the means of transport that could lead to an accidental release of the dangerous goods.

5.0 Reporting of an Accidental Release

In the event of an accidental release of dangerous goods from a means of containment, a person who has possession of the dangerous goods at the time of the accidental release must make an immediate report of the accidental release to Richardson's Bulk Sales Ltd, who will contact the appropriate provincial authority if the accidental release consists of a quantity of dangerous goods

or an emission of radiation that exceed quantities set out for each Class of dangerous goods. Emergency reports according to the provisions of Part 8 of the TDG Regulations must be made to the local police authorities, provincial spill notification centres, and CANUTEC (refer to Environmental Reporting (Spills and Releases)).

6.0 Documentation

Documentation that meets the requirements of the TDG Act must accompany every shipment of dangerous goods.

6.1 Permit of Exemption

- If the carrier company is either a member of an industry association (such as CAPP, CAODC, PSAC, or SEPAC), which as a service may provide “equivalent level of safety” permitting, or the company is providing services to a member company, they may be able to operate with an exemption from specific documentation requirements under the Act.
- Field vehicles must have the permit onboard and the permit must be applicable for the type and quantity of materials hauled and for the jurisdictions travelled within. If the carrier company is not an association member, or is not able use a permit of their customer, they require an equivalent permitting system to be in place.
- Empty chemical barrels, oil/gas samples, waste motor oil, solvents (in any amount over one litre), methanol, and glycol are considered “Dangerous Goods” and a permit must be readily available in your vehicle. Failure to present a permit to the RCMP or other regulatory officers will result in a fine each time you are stopped.
- For the permit of exemption to be valid, the operator must be trained in its use and be in physical possession of both a current TDG Certificate and the permit for equivalent level of safety.
- TDG Permit of Exemption Certificates are required to be renewed every three years.
- Similar permits for “equivalent level of safety” are available through provincial industry associations and/or organizations within British Columbia and Saskatchewan.

6.2 Keeping Shipping Document Information

A consignor must be able to produce a copy of any shipping document:

- For two years after the date that the shipping document or an electronic copy of it was prepared or was given to a carrier by the consignor;
- For dangerous goods imported into Canada, for two years after the date that the consignor ensured that the carrier, on entry into Canada, had a shipping document or was given an electronic copy of one; and
- Within 15 days after the day on which the consignor receives a written request from an inspector.

7.0 Training

TDG Training Certificates are required to be renewed every three years.

8.0 Transportation of Dangerous Goods (TDG)

Dangerous goods include potentially hazardous materials, such as:

- Explosives;
- Compressed gases;
- Liquefied gases;
- Flammable liquids and solids;
- Oxidizing materials; and
- Substances which are poisonous, infectious, radioactive, or corrosive.

Note: All carrier loading points must have both WHMIS and TDG placards identifying the product to be transported.

References

- Transportation of Dangerous Goods Act and Regulation.
- Alberta Occupational Health and Safety Code, Part 4: Chemical Hazards, Biological Hazards, and Harmful Substances; Part 20: Radiation Exposure; Part 29: WHMIS; and Part 33: Explosives.https://www.alberta.ca/ohs-act-regulation-code.aspx
- TDG Act, 1992.http://laws-lois.justice.gc.ca/eng/acts/T-19.01/.
- Transport Canada: Transport Dangerous Goods.https://tc.canada.ca/en/dangerous-goods/transporation-dangerous-goods-canada
- Transportation of Dangerous Goods (TDG): Review of the Act. http://www.tc.gc.ca/eng/tdg/consult-actreview-menu-148.htm
- British Columbia Occupational Health and Safety Regulations, Part 5: Chemical and Biological Substances.https://www.worksafebc.com/en/law-policy/occupational-health-safety
- Saskatchewan Occupational Health and Safety Regulations 2020, Chemical and Biological Substances, Part 21, Part 22: WHMIS, and Part 26: Explosives. http://www.publications.gov.sk.ca/details.cfm?p=4355
- Saskatchewan Transportation of Dangerous Goods Act and Regulation http://www.publications.gov.sk.ca/details.cfm?p=4355

Violence Prevention

Purpose

Richardson's Bulk Sales Ltd workers may be at risk of violent conduct by members of the public, employees of other companies, other persons with whom workers have a personal relationship, or co-workers.

This violence SWP is a Violence Prevention Plan and provides the guidelines required for Richardson's Bulk Sales Ltd to identify and respond to potential workplace violence issues and to establish worksite-specific violence safety procedures. Where violence hazards are identified, action will be implemented to eliminate the threat, control its effects on the recipients, and provide individuals with the knowledge, skills, and abilities to use this SWP for their own protection.

Scope

The conditions of this violence in the workplace SWP and supporting prevention and resolution procedures shall be applied and enforced at all work sites owned or operated by Richardson's Bulk Sales Ltd.

Definition

Harassment: Harassment occurs when a person is subjected to objectionable or unwelcome conduct, comment, bullying, or action that will or would cause offence or humiliation to a worker or adversely affects the worker's health and safety. Harassment can take many forms. It may be, but is not limited to: words, signs, jokes, pranks, intimidation, physical contact, or violence.

Violence: Whether at a work site or work-related, means the threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm, and includes domestic or sexual violence. This definition includes the exposure of workers to domestic

violence at work. A threat against a worker's family that is a result of the worker's employment is considered a threat against the worker.

Procedure

1.0 Responsibilities

1.1 Company Responsibilities

1. Richardson's Bulk Sales Ltd is committed to providing a work environment free from violence. To this end, Richardson's Bulk Sales Ltd will ensure that none of its workers are subjected to or participate in harassment or violence at the work site. Richardson's Bulk Sales Ltd will appoint an individual to act as an Advisor who will manage the identified requirements and conditions of the policy in the event of a violation.

2. Richardson's Bulk Sales Ltd will ensure that workers are instructed in:

    - How to recognize workplace violence and violence hazards, including domestic violence at work;
    - The policy, procedures, and workplace arrangements that effectively minimize or eliminate workplace violence;
    - The appropriate response to workplace violence, including how to obtain assistance; and
    - Procedures for reporting, investigating, and documenting incidents of workplace violence, including domestic violence. If a worker has been exposed to workplace violence, Richardson's Bulk Sales Ltd will ensure that the worker is advised of and is provided with the means to consult a health care professional for treatment and/or counselling.

3. Education methods used to educate workers on Richardson's Bulk Sales Ltd's workplace violence program may include orientations, training courses, videos, workshops, safety meetings, and information pamphlets.
4. Richardson's Bulk Sales Ltd will ensure that a worker is advised to consult a health professional of the worker's choice for treatment or referral if the worker:
    - Reports an injury or adverse symptom resulting from workplace violence, or
    - Is exposed to workplace violence.

1.2 Workers

Workers shall abide by the conditions of any violence in the workplace policies and procedures and shall report any violence experienced or observed to their respective supervisor.

2.0 Risk of Violence – Violence Hazard and Risk Assessment

Hazards created by violence or the threat of violence.

Violence or potential violence may cause:

- Physical injuries (specific acts of violence);
- Psychological injuries (specific, general, or potential violence);
- Lead to absenteeism (specific, general, or potential violence); and
- Lead to poor morale and unsafe behaviours (specific, general, or potential violence).

When the possibility of violence exists (violence hazards), Richardson's Bulk Sales Ltd will proceed as follows:

1. Conduct a risk assessment to determine the risk of injury to workers from violence arising out of their employment. The risk assessment must be carried out with the Health and Safety Committee and/or Health and Safety Representative where there is one.
2. Identify the risk factors and develop and implement appropriate preventive control measures.
3. Inform workers of the nature and extent of risks of violence at a work activity.
4. Establish local procedures and/or policies and work arrangements to eliminate the risk, or to minimize the risk where the risk cannot be eliminated.
5. Establish procedures for reporting, investigating, and documenting incidents of violence.
6. Respond to incidents of violence (e.g., investigation, corrective actions, and advising victims to contact their personal physician for treatment or referral).
7. Provide adequate training to workers who may be exposed to risk which include the:
    - Means of recognizing risk;
    - Policies, procedures, or control programs that have been developed to eliminate, minimize, or control violence; and
    - Appropriate responses to incidents of violence including reporting, investigating, and documenting incidents.

Federal OHS Regulation Requirements

The committee and/or representative where one exists, will jointly monitor the accuracy of the workplace violence and harassment risk assessment and, if necessary, update it in order to reflect a change to the information set out in the assessment, including:

- A change to the risk factors, and
- A change that compromises the effectiveness of a preventive measure developed and implemented.

Richardson's Bulk Sales Ltd and the committee or representative will jointly review the workplace violence and harassment assessment every three years and, if necessary, update it.

The company and the workplace committee or the health and safety representative will jointly review and, if necessary, update the workplace assessment if notice of an occurrence is provided and:

- The occurrence is not resolved, and the principal party ends the resolution process, or
- The responding party is not an employee or the company.

3.0 Levels of Risk

The risk assessment shall classify employees as belonging to three different levels of risk. They include:

3.1 Level 1

Office worker or other person(s) with little or no contact with the public, usually in their own office, or where work space and access to their work space is restricted by a physical barrier or other employee.

3.2 Level 2

Front desk employees, drivers, delivery persons, or any other person(s) who deal directly with the public. These employees either deal with individuals who have access to the workplace during normal working hours or who regularly travel and meet with persons while away from their normal work location.

3.3 Level 3

Staff members who deal directly with the public or employees on matters concerning payables, contracts, discipline or any other matter that has the potential to escalate into acts of violence.

The risk assessment is completed by evaluating the violence hazard according to the probability, exposure and severity of the individual violence risks that an employee may be exposed to:

- If a significant violence hazard exists then specific procedures to eliminate or control the risk of violence must be implemented for each risk identified.

4.0 Procedures to Eliminate or Minimize Risk

The procedures to eliminate or minimize risk include the following:

- If the risk assessment identifies that there is a likelihood that a worker may be injured at the work site, then a physical barrier and controlled access should be considered;
- Employees exposed to violence hazards should not work alone and will be provided with a means to summon assistance immediately;
- Staff should be trained on what procedures they should follow in the event of violence. This would include information and training on how to recognize, anticipate, and deal with potentially violent persons and who they should call when help is needed;
- Procedures for reporting, investigating, and documenting incidents will be the same as those for reporting injuries at the work site, including the completion of the appropriate WCB forms if an injury was sustained by the employee;
- All incidents of violence and harassment must be reported and investigated. Notice of a violence incident or occurrence must contain the following information:
    - The name of the principal party and the responding party, if known;
    - The date of the occurrence; and

    - A detailed description of the occurrence;

- The Advisor should investigate and document all incidents in order to make recommendations and have any additional hazard controls implemented as it as it affects the worker and the work site;
- The Advisor will advise all parties of the results of the investigation and the corrective actions taken;
- A Violent Incident Report Form and/or Suspect and Vehicle Identification Worksheet Form should be completed;
- Where appropriate, the local police should be contacted to investigate the incident with respect to any criminal activity; and
- These procedures apply whenever there is a work-related violent interaction between the public or a co-worker and a Company employee.

Federal OHS Regulation Requirements

- Richardson's Bulk Sales Ltd will conduct an initial review of every notice of an occurrence of violence or harassment. Following the initial review, the occurrence is deemed to be resolved if the notice does not contain the name of the principal party or otherwise allow their identity to be determined.
- If an occurrence is not resolved in the initial review, an investigation of the occurrence must be carried out if the principal party requests it. If the occurrence being investigated is resolved before the investigator has provided their report, the investigation will be discontinued.

5.0 Specific Preventative Measures – Emergency Procedures

Richardson's Bulk Sales Ltd will institute the following preventive control measures as practicable and appropriate:

- Restricted access to work areas;

- Locked doors;
- Key card access;
- Building security cameras;
- Building alarms and/or fencing;
- Adequate lighting; and
- Working alone procedures.

Responses to the threat of violence will differ depending on the circumstances according to the risk assessment. The following is a general emergency procedure:

- Obtain help from co-workers according to the procedures established for violence hazards;
- Isolate the violent person by preventing access according to the procedures established for violence hazards;
- Use force to defend yourself against an unprovoked assault, as long as you use no more force than is necessary to prevent the assault or the repetition of it;
- Do not attempt to apprehend or restrain the individual unless there is no other option or unless you are trained and/or authorized to do so;
- Inform your supervisor as soon as possible, who in turn will inform the Advisor, who in turn shall inform the police;
- Obtain first-aid treatment and/or a medical examination from a qualified physician if you have been assaulted and/or injured;
- Protect and preserve any physical evidence (e.g., weapon, finger prints, and clothing); and
- Write a report of what you experienced or witnessed.

6.0 Evaluation and Monitoring of the Violence/Harassment in the Workplace Program

To evaluate and monitor the program:

- Richardson's Bulk Sales Ltd shall evaluate and monitor the effectiveness of the Violence/Harassment in the Workplace Program annually or when conditions change;
- A risk assessment shall be completed every three years for all job positions; and
- The assessment shall be retained on file until replaced by the next three year review.

To evaluate emergency procedures:

Richardson's Bulk Sales Ltd and the committee and/or representative will jointly develop emergency procedures that are to be implemented if:

- An occurrence poses an immediate danger to the health and safety of an employee, or
- There is a threat of an occurrence.

Richardson's Bulk Sales Ltd will make these emergency procedures available to all employees. After every implementation of the emergency procedures, the company and the committee and/or representative will jointly review and, if necessary, update the procedures.

7.0 Training Program

Richardson's Bulk Sales Ltd shall provide information, instruction and training on the factors that contribute to workplace violence that are appropriate to the workplace of each employee exposed to workplace violence or a risk of workplace violence including domestic violence at work. Richardson's Bulk Sales Ltd shall provide information, instruction, and training:

- Before assigning to an employee any new activity for which a risk of workplace violence has been identified;

- When new information on workplace violence becomes available; and
- At least every three years.

The information, instruction, and training shall include the following:

- The nature and extent of workplace violence and how employees may be exposed to it;
- The communication system established to inform employees about workplace violence;
- Information on what constitutes workplace violence and on the means of identifying the factors that contribute to workplace violence;
- The workplace violence prevention measures that have been developed; and
- The procedures for reporting on workplace violence or the risk of workplace violence.

This SWP will be used as the basis for the training to be provided and the training will be recorded on the employee Orientation Checklist and refresher training on the On-The-Job Training form.

Federal OHS Regulation Requirements

Richardson's Bulk Sales Ltd and the committee and/or representative will jointly develop or identify the training on workplace harassment and violence that is to be provided to employees, the company and the designated recipient. The training will be specific to the culture, conditions, and activities of the workplace and include the following elements:

- The elements of the workplace harassment and violence prevention policy taken from this SWP;
- A description of the relationship between workplace harassment and violence and the prohibited grounds of discrimination set out in the Canadian Human Rights Act; and
- A description of how to recognize, minimize, prevent and respond to workplace harassment and violence as determined from the risk assessment.

Richardson's Bulk Sales Ltd and the committee and/or representative as the case may be will jointly review and, if necessary, update the training at least once every three years and following any change

to an element of the training. Richardson's Bulk Sales Ltd will ensure that an employee is provided with the training:

- Within three months after the day on which their employment begins or, in the case of an employee whose employment began before the day on which the Regulations come into force, within one year after the day on which the Regulations come into force, and
- At least once every three years after that; and following any update to the training or their assignment to a new activity or role for which there is an increased or specific risk of workplace harassment and violence.

Forms

- Telephone Threat Report
- Violent Incident Report

References

- Alberta Occupational Health & Safety Code, Part 27: Violence.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Canada Labour Code Part IIhttp://laws-lois.justice.gc.ca/eng/acts/L-2/page-22.html#h-46
- Canada Labour Code, Part II: Chapter L-2, The Act, Duties of Employers, Section 125(s).http://laws-lois.justice.gc.ca/eng/acts/L-2/page-22.html
- Canada Labour Code, Workplace Harassment and Violence Prevention Regulations

  https://laws-lois.justice.gc.ca/eng/regulations/SOR-2020-130/page-1.html#docCont

- Alberta Occupational Health and Safety Bulletin VAH001-Violence and Harassment, Revised June 2004.
- CSA Z1000 Occupational Heath and Safety Management.https://store.csagroup.org/ccrz__ProductDetails?viewState=DetailView&cartID=&sku=CAN/CSA-Z1000-14
- Saskatchewan Occupational Health & Safety Regulations Section 3-26: Violence.http://www.publications.gov.sk.ca/details.cfm?p=4355

Wildlife Driver Safety

Purpose

Vehicle collisions with wild animals are a significant cause of motor vehicle accidents in most jurisdictions. A vehicle encounter with a large animal may result in severe injuries or death. This safe work practice will provide guidelines to be used to develop safe job procedures for wildlife collision avoidance specific to the conditions likely to be encountered by Richardson's Bulk Sales Ltd employees.

Scope

The requirements of this safe work practice shall be applied by all workers performing duties on behalf of Richardson's Bulk Sales Ltd. The requirements of this SWP should be included in Richardson's Bulk Sales Ltd's Journey Management process.

Procedure

1.0 Practice

Wildlife behaviour is unpredictable, drivers need to adjust their driving to compensate and give themselves time to recognize the hazard and react appropriately, especially at night or in low visibility conditions. Depending upon your location there may be increased seasonal risks to be aware of. Be aware that wildlife can be encountered at any time of the year.

The following recommendations should be followed to control the danger of wildlife collisions:

- Obey posted speed limits and slowdown in areas known to have a high incidence of wildlife. Lower speeds result in better reaction time and, if there is a collision, less damage and fewer injuries;

- Be especially cautious at dusk and dawn, when wildlife encounters are most common;
- In certain locations be aware that there are certain months where wildlife collisions are at their peak;
- Ensure all vehicle occupants are wearing their seatbelts;
- Watch for signs indicating animal crossings. Slow down when travelling through these zones;
- Scan the road from shoulder to shoulder and be prepared to immediately slowdown if movement or eye reflection is observed. Animals can jump suddenly into your path;
- If you spot wildlife near or on the road, flash oncoming vehicles with your headlights to alert them. Similarly, watch for flashing lights from oncoming vehicles warning of wildlife and slowdown accordingly;
- Honk your horn and flash your lights when you encounter wildlife on or near the road in an effort to scare them away from the road;
- Animals travel in groups, so if you spot one, be aware that other animals may be nearby;
- If you are travelling in a convoy, or have workmates who will be driving the same stretch of road where wildlife has been observed, be sure to warn them of any wildlife observations that you have made; and
- In the event of any animals appearing on the road in front of you, brake firmly in a straight line and sound your horn. Do not swerve. This could result in a loss of control and your vehicle leaving the road, with resulting damage and injury worse than hitting wildlife.

2.0 Additional Actions

The following actions are some of the ways that Richardson's Bulk Sales Ltd management may use to increase employee awareness with regards to safe driving and the threat of collisions with wildlife.

- Take disciplinary action if required when workers are not following Company driving rules;
- Prepare and distribute bulletins highlighting driving related safe work practices and all driving incidents including lessons learned;
- Include information and articles in the bulletins on driver safety and wildlife incidents; and
- Arrange for defensive driver education training.

Workers' Compensation Board

Purpose

The Workers' Compensation Board (WCB), provides "no fault" insurance protection to Company employees who suffer an injury or illness because of their work-related activities. The insurance premium is paid for by Richardson's Bulk Sales Ltd; it covers loss of wages, medical costs, and rehabilitation costs. Where there is a permanent disability the WCB may pay disability benefits. Richardson's Bulk Sales Ltd will ensure that WCB reports are completed and submitted in a timely fashion and that all WCB claims are effectively and fairly managed. Richardson's Bulk Sales Ltd has a return to work program to assist injured workers, see Return to Work (RTW) Program.

Scope

The WCB program will be applied to all employees of Richardson's Bulk Sales Ltd at all work locations.

Procedure

1.0 General Reporting Requirements

Any Company employee who is injured or becomes ill (including psychological injuries) as a result of a job-related condition, accident, or traumatic event must notify his or her supervisor immediately who will record the information on the First-Aid Report form. Under the WCB Act, the supervisor and the employee must report the any injuries which:

- Cause the employee to be off work beyond the day of the accident;

- Require modified work beyond the day of injury;
- Require ongoing medical treatment;
- Result in dental or eyeglass damage;
- May result in permanent disability; and/or
- May result in medical layoff at a later date.

1.1 Reporting Forms

Richardson's Bulk Sales Ltd will file the Employer's Report of Injury/Illness, Occupational Disease with the WCB .

The worker must complete and submit the Worker's Report of Injury or Occupational Disease for the province/territory in question

1.2 Worker

- As with all injuries or illnesses, major or minor, immediately report the occurrence to your supervisor. Your supervisor will notify the appropriate manager. Your report will be recorded in Richardson's Bulk Sales Ltd's incident report file.
- Richardson's Bulk Sales Ltd will provide transportation to the nearest medical treatment centre and cover related costs.
- If you receive medical attention for your injury, let the attending medical person know that the accident happened at work. Doctors attending injured workers are required, under the Workers' Compensation Act, to provide documents regarding initial treatment and subsequent visits.

- If your injury prevents you from returning to your job the day after your accident, the injury must be reported to the WCB. Ask your supervisor for the appropriate Worker's/Employee's WCB form. These forms are also available from your local WCB office or on-line.
- Your supervisor is also required to report work-related accidents. If you can't return to work as a result of the criteria outlined on Page 1 of this procedure, an Employer's report must be filed with the WCB.
- Under the Workers' Compensation Act, Richardson's Bulk Sales Ltd has 72 hours, after being made aware of the injury, to file a report.

1.3 The WCB Adjudicator

- The WCB adjudicator (or claims manager) facilitates and coordinates all of the activities required with regards to a claim. Your adjudicator will coordinate all the compensation benefits, medical services, vocational rehabilitation, and physical rehabilitation you require because of your injury.
- At the start of your claim, the adjudicator will determine your requirements and, in consultation with you, draw up a rehabilitation/return-to-work plan. To do this, the adjudicator will first ensure your healing and rehabilitation needs are met.
- The rehabilitation/return-to-work plan gives you an expected return to work date (if it is known) and details the responsibilities of everyone involved. You and all the parties involved in your progress (including Richardson's Bulk Sales Ltd) have ownership in the plan's success.
- In the event that the complexity of a claim requires ongoing medical and/or vocational rehabilitation, your file may be transferred to a case manager.

1.4 The WCB Claims Process

- The claims process starts when a report of injury is filed with the Workers' Compensation Board. A report from an employee, employer, or doctor will initiate the first step in the process - claim file creation.

- WCB creates a file for the worker and assigns it to a claims adjudicator. They will review the information from the employee, employer, and physician and determine whether or not it is an acceptable work-related claim.
- For an acceptable claim, the claims adjudicator will establish the compensation rate and issue compensation payment. A letter is sent to the worker and employer informing them that the claim has either been accepted or disallowed.
- The worker focuses on recovery and getting well so that they can return to work. The worker will receive various forms of treatment (recommended by their doctor), such as physical therapy. All treatments must be approved by the WCB for coverage of medical costs.
- The adjudicator oversees all aspects of the worker's file and works toward rehabilitation so that the worker can eventually return to his or her original occupation. When this is not possible, alternate occupations or retraining will be considered.
- If you have any questions about interpretation of the Workers' Compensation Act, policies, or the claims process, you should contact the WCB office nearest you.

1.5 Filing a WCB Claim

- You must fill out a Worker's Report of Injury or Occupational Disease for the province/territory in question and tell your doctor the injury is a work-related injury. Your doctor is required to report his or her findings to the WCB within two days of your visit.
- Richardson's Bulk Sales Ltd will also file an Employer's Report of Injury or Occupational Disease for the province/territory in question. This must be done within 72 hours of learning about the injury.

- Remember, for Richardson's Bulk Sales Ltd to meet the aforementioned reporting requirement, it is imperative that you immediately notify Richardson's Bulk Sales Ltd that you have experienced a work-related injury.
- You can send your report to your supervisor (by fax) if necessary, to the Human Resources representative, or to the health and safety representative if you have one, or mail it to the respective local WCB office.

1.6 WCB Benefits

- After a compensable work-related injury has occurred, an injured worker gains access to the benefits available through the Workers' Compensation Act.
- An injured worker can receive temporary compensation (90% of net earnings up to the maximum insurable earnings). This is to make up for the lost wages during the time they are recovering from their injuries and being rehabilitated back to the work force.
- Health care benefits are also provided, and may cover such things as hospitalization, visits to the doctor, prescriptions, physical therapy, and rehabilitation programs, as needed.
- Vocational rehabilitation services and related benefits may be offered to injured workers who are unable to return to their pre-accident employment and modified work is not available.
- Some workers may be eligible for an economic loss payment when they are unable to return to their original work and are employed at a lower income level because of their compensable disability. This continues for as long as the worker is unable to return to their pre-accident wage or until retirement age.

- Throughout the first year after a worker is injured as a result of an accident, the employer must make contributions for health benefits when the worker is absent from work because of the injury sustained from the accident if the employer was making contributions for the worker prior to the accident and the worker continues to pay the workers portion of the contribution, if any, while absent from work.
- Finally, a non-economic loss payment may be given to a worker who has suffered permanent physical damage because of a compensable injury.

CLAIMS DISABILITY MANAGEMENT

Injury Response, Reporting and Investigation Flowchart

1.7 Reporting Forum (Alberta)

Injuries or occupational diseases can be reported by telephone, fax, or mail:

- Telephone: Edmonton (780) 498-3999, Calgary (403) 517-6200;
- Toll-free, out of province: (800) 661-9608;
- Fax: Edmonton and area (780) 498-7999, Calgary (403) 517-6001; or
- Toll-free: (800) 661-1993.

Forms

- Employer's Forms.https://www.wcb.ab.ca/resources/for-employers/forms-and-guides/
- Worker's Forms.https://www.wcb.ab.ca/resources/for-workers/forms-and-guides.html

References

- Alberta Worker's Compensation Board Legislation.https://www.wcb.ab.ca/about-wcb/policy-and-legislation/legislation.html

Working Alone

Purpose

Working alone or in isolation presents hazards to employees. Richardson's Bulk Sales Ltd has developed this SWP to provide guidelines for establishing specific procedures when employees are working alone or where assistance is not readily available if the employee is injured or ill.

Scope

This SWP applies to all Richardson's Bulk Sales Ltd locations and worksites. Each worksite or work area will develop a Site-Specific Procedure (SSP) for Working Alone and workers will be trained in the Working Alone program requirements.

Procedure

1.0 Hazard Assessment

A Working Alone Procedure and a Working Alone Hazard Assessment must be completed if working alone hazards have been identified.

These assessments shall be available for the workers to review and workers shall be trained in the requirements of the procedure.

Working alone hazards will be eliminated or controlled.

2.0 Potential Hazards

Potential hazards include:

- Loss of communication needed for requesting assistance;
- Delays in reporting times;
- Injury requiring assistance;
- Weather and road conditions; and
- Transportation problems.

3.0 Equipment and Training Requirements

1. Richardson's Bulk Sales Ltd will, for any worker working alone, provide an effective communication system consisting of:
    - Radio communication;
    - Landline or cellular telephone communication; or
    - Some other effective means of electronic communication that includes regular contact by Richardson's Bulk Sales Ltd or designate at intervals appropriate to the nature of the hazard associated with the worker's work.
2. If effective electronic communication is not practicable at the work site, Richardson's Bulk Sales Ltd will ensure that:
    - A Richardson's Bulk Sales Ltd supervisor or designate visits the worker;
    - The worker contacts Richardson's Bulk Sales Ltd or designate at intervals appropriate to the nature of the hazard associated with the worker's work;

- Every worker who works alone must have a designated “Working Alone Contact”; and
- The “Working Alone Contact” may be a co-worker, a permanently staffed work site control room, a third-party emergency answering service, or an automated working alone tracking system.

4.0 Working Alone Plans

4.1 Low Risk Working Alone Procedure

Daylight Hours, Normal Weather Conditions, Non-hazardous location:

- Notify your “Working Alone Contact” of check-in times and locations of work;
- If multiple travel routes are an option, then the route selected will also be noted; and
- If your arrival at a check-in location is delayed by more than one hour, you must notify your “Working Alone Contact” of your new estimated time of arrival.

4.2 High Risk Working Alone Procedure

Hazardous or Remote Locations, Call-outs, Adverse Weather Conditions:

- Notify your “Working Alone Contact” prior to departure, and advise your contact of your estimated time of arrival at the location;
- Notify your “Working Alone Contact” of arrival at location;
- Conduct a hazard assessment of the problem or job scope, notify your contact or a competent person, discuss the hazards of job, work procedure to be used, any additional required safeguards, and provide an estimate of how long you will be at the location;
- Notify your “Working Alone Contact” when you are finished and ready to leave the location and estimated time of arrival at next work site, base, or home;

- Notify your "Working Alone Contact" of arrival at the next check point, base, or home;
- If you are delayed or expect to be delayed arriving at your next check-in point by more than one hour, notify your "Working Alone Contact" of amended estimated time of arrival, and
- During adverse weather conditions, notify your "Working Alone Contact" of your exact route to be followed. Shorter check-in time intervals are recommended.

4.3 Overdue Worker Response Plan

- The Overdue Worker Response Plan shall be initiated when a worker is one hour overdue.
- The worker's "Working Alone Contact" shall:
  - Attempt to contact the overdue worker by cell phone or radio;
  - Immediately notify the worker's supervisor of the circumstances;
  - The supervisor will discuss options with the "Working Alone Contact" and together they will agree on an action plan; and
  - The action plan may include any or all of the following:
    - Continued attempts to contact the overdue worker by cell phone or radio;
    - The "Working Alone Contact" or other designated individual will drive the route taken by the overdue worker in an attempt to contact the worker. Specific PPE safety equipment may be required for rescue activities by those involved with the Overdue Worker Response Plan;
    - The "Working Alone Contact" or the supervisor may request search assistance resources in the area who have been identified in the contact list;

- The “Working Alone Contact” or supervisor will call the local hospital(s) to establish whether an injured person has been admitted; and
- The “Working Alone Contact” or supervisor may notify the local police or RCMP of the circumstances with a request for assistance.

4.4 Working Alone Prohibitions

Working alone is not permitted in the following circumstances as determined by a hazard assessment prior to beginning work:

- Work which is being performed on or near live electrical conductors or within safe approach distances to energized equipment as set out in Working in the Vicinity of Electrical Lines and Cables;
- Entering or working in confined spaces as defined in Confined Space Entry;
- Entering or working in any atmosphere that is or might become hazardous by reason of exceeding an OEL for a contaminant, or that exceeds 10% of the LEL or where the oxygen concentration is not between 19.5% and 23.0% by volume; and
- Entering or working in any area, building, equipment, vessel, or facility that may become hazardous to a lone worker and where assistance is not available in a reasonable amount of time to ensure the safety of the worker.

5.0 Documentation

- Each individual worker shall be required to provide a detailed list of the “Working Alone Contacts” (colleagues, supervisor, answering service, and/or industry co-workers) that they intend to use.
- A copy of this list is to be kept by all “Working Alone Contacts” and the worker’s supervisor.
- A Working Alone Log is mandatory and must contain the following information:

- Worker name;
- Date;
- Scheduled check-in time;
- Actual check-in time;
- Location and work activity; and
- Working Alone Logs shall be made available for audit purposes and filed for two years.

6.0 Review

The response plan will be reviewed annually under the direction of the Emergency Response Manager to ensure that it continues to meet the needs of the corporation and its workers.

Forms

- Working Alone Log Sheet

References

- Alberta Occupational Health and Safety Code, Part 28: Working Alone.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Working Alone Safely: A Guide for Employers and Employees.https://open.alberta.ca/publications/2485490

- Occupational Health and Safety (OHS) Working Alone Requirements: OHS Information for Workers and Employers - Government of Alberta. https://open.alberta.ca/publications/9781460136591
- British Columbia Occupational Health and Safety Regulation, Part 4: General Conditions, Section 4.21-4.23 Working Alone or in Isolation.https://www.worksafebc.com/en/law-policy/occupational-health-safety
- WorkSafe BC, Working Alone or in Isolation.https://www.worksafebc.com/en/health-safety/hazards-exposures/working-alone
- Saskatchewan Occupational Health and Safety Regulation 2020, Part 3: General Duties, Section 3-24, Working Alone or at Isolated Place of Employment.http://www.publications.gov.sk.ca/details.cfm?p=4355

Working in Cold Temperatures

Purpose

Workers may be at risk of exposure to cold temperatures and cold wet conditions during their work activities. Exposure to cold conditions occurs during outdoor seasonal work, and indoors in refrigerated or cold storage areas. Workers exposed to cold conditions may be at risk of cold stress injuries. This SWP will be used to develop specific safe job procedures for workers who are regularly exposed to cold work.

Scope

These SWP guidelines shall be considered whenever work is to be conducted where Richardson's Bulk Sales Ltd workers will be exposed to cold temperatures, wind, and/or rain for extended periods of time.

Procedure

1.0 Hazard Assessment

If workers are or may be exposed to conditions that could cause hypothermia or cold-related injury, a risk assessment should be performed to determine areas and tasks where the workers may be at risk. The potential for accidental exposure to cold conditions should be included in this assessment.

2.0 Physiology of Cold Stress

2.1 Health Factors

Susceptibility to cold injury varies from person to person. Table 1 summarizes some of the health factors involved in cold stress.

Table 1 – Factors Involved in Cold Stress

Environment	Personal Characteristics	Other
• Temperature; • Wind; and • Humidity.	• Age; • Weight; • Fitness; • Impaired circulation; • Previous cold injury; and • Acclimatization to cold.	• Clothing; • Physical activity; • Fatigue; • A worker's use of medication(s); and • Consumption of alcohol or use of nicotine.

2.2 Heat Loss and Maintaining Heat Balance

1. Body heat can be lost in any of the following ways:
    - Immersion of the body parts (e.g., the hands, feet, or the entire body) in cool or cold liquids;
    - Direct contact with cold surfaces (e.g., the ground, tools, machinery, or products being handled);
    - Conduction of heat through wet or damp clothing, including clothing damp through perspiration;
    - Exposure to cold air, including inhaled and exhaled cold air;

- Evaporation of sweat; and
- Consumption of cold liquids or foods.

2. The body maintains heat balance in two main ways:

- By restricting blood flow – the body automatically reduces the amount of blood circulating through the skin and cooled body parts by constricting blood to those regions. By doing so, warm blood is diverted to the body's core, maintaining the temperature of internal organs and the brain, and
- By shivering – this can temporarily raise a person's body temperature. Slight to moderate shivering is not uncomfortable and will not warm a person. Severe, uncontrolled shivering occurs when body temperature falls to 35°C (normal body temperature is 37°C). During severe shivering, body heat production can rise to as high as four to five times as is normal. Severe shivering is a sign of danger and a severely shivering worker should be immediately removed from exposure to the cold.

3.0 The Effects of Cold on Performance

The ability of workers to function and work normally is affected by exposure to cold conditions. The changes to human performance under such conditions are due to two factors:

1. The environmental temperature.
2. The clothing required to function at a particular temperature.

As temperature decreases and the duration of exposure increases, the following changes can be experienced:

- Reduced dexterity of the hands and feet;
- Reduced sense of touch;

- Impaired ability to perceive heat, cold, and pain;
- Reduced joint mobility;
- Reduced grip strength;
- Hypothermia (e.g., reduced body temperature, which in its extreme form can result in death);
- Frostbite (e.g., frozen tissue, or frostnip – very mild, superficial freezing of exposed skin);
- Reduced coordination; and
- Reduced ability to make decisions.

The clothing worn to maintain personal comfort in the cold can limit performance in the following ways:

- Hats and hoods may interfere with hearing, vision, and movement;
- Bulky clothing layers may restrict movement and become a hazard when working around machinery and/or moving parts;
- Gloves, mittens, and over-mitts may reduce dexterity and tactile “feel”;
- Footwear may be heavy and bulky and may compromise the ability to use footholds and vehicle foot pedals; and
- The weight and bulk of clothing increases the amount of effort required when moving.

4.0 Cold Protection Measures

Temperature and wind conditions at the work location should be known (e.g., weather report on the radio, current weather office information);

Steps should be taken to protect workers from wind (or indoors from drafts or forced air from handling units). The combination of low temperature and even moderate winds can quickly create dangerous working conditions.

Ensure that heated rest areas, such as a truck cab, tent, or suitable structure, are available.

5.0 Work Practices

A schedule of regular rest breaks should be established to allow workers to warm up. These breaks should be not less than ten minutes in length and should be taken in a heated area.

The following cold work practices should be followed:

- Under conditions of continuous work in the cold:
    - Heated warming shelters (tents, cabins, rest rooms, etc.) should be provided. Workers should be encouraged to use these at regular intervals, with the frequency of use determined by the severity of environmental exposure;
    - When entering the heated shelter, outer and middle clothing layers (as necessary) should be removed to prevent overheating and to permit dampness to evaporate. A change of dry clothing may be necessary;
    - Warm fluids should be consumed at the work site to provide energy, warmth, and replace fluids lost during work. Significant fluid loss can occur during the cold due to sensible and insensible sweating, breathing, and the extra energy requirements of working in cold. Dehydration in the cold is a serious concern as it increases a worker's susceptibility to hypothermia; and
    - The onset of severe shivering and the feeling of excessive fatigue, drowsiness, irritability, or euphoria are indications for immediate return to shelter.
- The following additional precautions apply at colder temperatures:
    - Workers should be under constant protective observation by a buddy or supervisor;

- Work rate should not be high enough to cause sweating. If heavy work must be performed, rest periods in heated shelters and the opportunity to change into dry clothing should be provided;
- New workers should not be required to work full time during the first days of employment until they become accustomed to the working conditions and required protective clothing;
- Weight and bulkiness of clothing should be included in estimating required work performance;
- Work should be arranged to minimize periods of standing or sitting still; and
- Workers should be appropriately trained as outlined in the section, Worker Training.

6.0 Personal Measures

6.1 Diet

Workers have increased energy requirements when working in the cold. Consult a dietician for the best way to obtain the necessary calories and nourishment for the specific working conditions. Light snacks and warm fluids should be taken during rest breaks.

Alcohol must not be consumed when working in the cold. Alcohol produces a deceptive feeling of warmth but may contribute to dehydration and impaired judgment.

6.2 Dressing for the Cold

- To stay warm in the cold:
  - Clothing must be layered to manage moisture and keep dry;
  - Insulating layers must trap air to stay warm; and
  - The worker must be protected from the wind and weather.

- To remain comfortable as weather and work conditions change, clothing layers should be added or removed or ventilation openings in clothing opened or closed. Clothing layers should be managed to remain comfortably warm.
- Every effort must be made to avoid sweating and becoming damp.
- Consider the work to be performed and the weather conditions, and have workers dress so that layers can be shed and they can still remain comfortably warm.
- If clothing becomes damp and remains that way, workers should be prepared to replace them before becoming chilled and hypothermic.
- If a worker is sweating, then their clothing is probably too warm for the conditions and tasks being performed.
- Use three clothing layers for cold weather work– inner, middle, and outer. Be mindful of synthetic recommendations in situations requiring clothing with fire resistant (FR) or anti-static properties.
- FR clothing next to the skin must be made of non-melting natural fibres, such as wool or silk, or an acceptable fire-retardant material. The general practices described below should be followed.

Inner Layer

- The first layer of clothing should manage moisture by moving perspiration away from the skin to keep the worker dry and comfortable.
- Avoid cotton, especially in long underwear and socks. Once cotton is wet, whether through perspiration, rain, or snow, it loses all insulating properties.

- For inner layers, brands made of synthetic fibres, (e.g., nylon, polyester, polypropylene, etc.) silk, or wool that retain body heat when wet and wick perspiration to the outer layers for evaporation, leaving the body dry are preferred.
- Where FR clothing is required to be worn undergarments made of synthetic derivatives (such as nylon, polyester or polypropylene) must not be worn because of the flammable and melting characteristics of these materials. Garments worn next to the skin should be made of 100% wool, silk or other material that is certified or known to be resistant to flash fires or melting.

Middle Layer

- The second or middle layer(s) should trap warm air escaping from the body and hold it in open spaces within the layer(s) to keep the worker warm and insulated. Workers should wear several thin layers of clothing rather than one heavy garment. Layers can be added or removed depending upon weather and activity level.
- Select lightweight clothing that provides freedom of movement. Multiple middle layers give a worker the ability to tailor their needs for warmth based on environmental temperature and activity level.
- Look for middle layers that can be added or removed easily. Zippered neck openings and zippered leggings allow for ventilation.
- A down vest or jacket may be an appropriate middle layer.

Outer Layer

- The outer layer should provide protection from wind, rain, sleet, snow, and identified workplace hazards. It should also keep cold air and moisture from penetrating into the middle layer(s). Breathable fabrics may or may not be necessary. Windproofness is a critical feature of an outer layer used in cold, outdoor environments; however, only FR garments should be considered if there is any potential for the worker to be exposed to hydrocarbons.
- Two-way zippered front openings can be used to regulate heat load and ventilate the body.

- An outer layer having arm-pit zippers can be helpful in providing ventilation.
- Windproof pants or “wind pants”, fully zippered from the ankle to hip, can be added or removed without footwear having to be removed.
- Cotton twill that is water and windproof may be an alternative.

The extremities must also be protected. The following suggestions apply to the hands, head, and feet.

Handwear

- Mittens keep hands warmer than gloves since the fingers are together. With gloves, fingers are separated which causes them to lose heat from one another.
- Workers should wear thin glove liners under gloves or mittens. Liners need not be removed when removing gloves.
- Removable glove and mitten liners can be replaced and dried when they become damp or wet.
- New mitten styles include three-finger “lobster claws” which keep fingers warm yet offer good dexterity.
- Windproof overmitts offer additional hand protection without adding significant bulk.

Headwear

- Up to 50 percent of body heat is lost through the head. A hardhat liner or other head protection should be worn in the cold.
- Avoid cotton and use synthetic fabrics or wool instead.
- Select a helmet liner appropriate for the weather conditions and activity level. Consider thickness, extent of head coverage (e.g., open faced or full balaclava, ear coverage, etc.), need for windproofness, effect on vision and hearing, and ability to fit into or over protective headwear if required.
- A facemask and eye protection may be necessary under some circumstances.

Footwear

- Warm, insulated safety footwear is essential. Boots should have thick soles for insulation while standing in snow or on cold surfaces. Footwear selection should be based on the work being performed, the surfaces on which the worker will work, the weather conditions to which the worker will normally be exposed. Tight-fitting boots reduce circulation and can make feet feel cold.
- Footwear should be sized so that it will accommodate an extra layer(s) of socks. A synthetic sock liner worn beneath a synthetic blend or wool outer sock wicks moisture away from the skin, keeping feet drier and warmer.

7.0 Worker Training

Workers should be instructed in health and safety procedures appropriate to the tasks and environment in which those tasks are performed. This instruction should also include:

- Proper re-warming guidelines and appropriate first-aid treatment;
- How to dress for the cold;
- Recognition of frostbite and frostnip; and
- Recognition of the signs and symptoms of impending hypothermia. Additional special training may be required for those workers working in remote locations.

Table 1, at the end of this SWP, presents a recommended schedule of maximum cold weather work periods which should be followed by a rest period. The table takes into account the combination of wind and temperature, and applies to moderate to heavy work activity. The notes at the bottom of the table explain how to adjust its recommendations for light work activity.

8.0 Special Precautions

- Exposure to vibration may increase a worker's susceptibility to cold injury because of the way that vibration can reduce circulation, particularly in the extremities.
- Work performed in snow or ice-covered terrain may require tinted safety eyewear and/or sunglasses with side shields. If there is a potential for eye injury from blowing snow or ice crystals, special safety goggles should be worn. Workers in such situations should be prepared for white-out conditions and have a plan in place regarding movement and navigation under such conditions.
- Alcohol must be avoided. It produces a deceptive feeling of warmth but can affect circulation, fluid balance, and judgment.
- Limit the consumption of caffeine-containing beverages because they act as diuretics and affect hydration.
- Workers with health conditions that affect normal body temperature regulation or impair circulation (e.g., Reynaud's syndrome, diabetes, thrombophlebitis) should take appropriate precautions when working in the cold.
- Body parts that have sustained a frostnip or frostbite injury are sensitive to re-injury.
- If loose or bulky clothing is worn, special care should be taken when working around moving equipment or machinery to prevent clothing entrapment.

9.0 Working on Icy / Slippery Surfaces

Slip hazards exist whenever there is insufficient friction (resistance) between the sole of a shoe/footwear and the walking surface. A slip can cause a worker to lose balance causing strain to regain balance; or it may cause a fall and injury to the worker.

Risk of slipping depends on particular factors such as:

- Type of walking surfaces (e.g. icy leases, walkways, or stairs with non-grip surfaces etc.);
- Style and condition of footwear (e.g. worn down shoes or those with smooth surface soles are not recommended because of the reduced grip and support properties); and
- Presence of slippery material on the walking surface or on the sole of the footwear (e.g. accumulation of ice and snow).

Controls to reduce slip and fall risk while working on icy leases, include but not limited to the following:

- Approach with caution and assume that all wet, dark areas on pavements/pathways are slippery and icy. Dew, steam, or water vapour can freeze on cold surfaces, forming an extra-thin, nearly invisible layer of ice;
- If you must walk on ice/snow slow down, bend your knees slightly and take shorter strides or shuffle;
- Keep hands free and out of pockets;
- Exercise extreme caution if carrying loads;
- Use hand-rails or other aids where provided;
- Select CSA approved footwear that is designed for working on icy/slippery surfaces;
- Avoid footwear that readily accumulates snow or ice around the ice gripping devices, where it can become compacted;
- Avoid footwear or ice grippers where the tread pattern readily becomes clogged with snow or ice;
- Trial footwear before use to assess the effectiveness of the footwear in practice; and
- Clear, salt and sand slippery / icy surfaces, as required.

10.0 Cold Weather Effects and Recommendations

Table 2 summarizes the most common health problems workers are likely to encounter while working in cold – frostbite, trench foot or immersion foot, and hypothermia.

Table 1 – Threshold Limit Values (TLV) Work/Warm-up Schedule for Work in Cold Environments for Four-Hour Shifts

Air Temperature Sunny Day	No Noticeable Wind		8 km/h Wind		16 km/h Wind		24 km/h Wind		32 km/h Wind	
°C (approx.)	Max. Work Period	No. of Breaks	Max. Work Period	No. of Breaks	Max. Work Period	No. of Breaks	Max. Work Period	No. of Breaks	Max. Work Period	No. of Breaks
-26° to -28°	Normal work hours and break periods	1	Normal work hours and break periods	1	75 min	2	55 min	3	40 min	4
-29° to -31°	Normal work hours and break periods	1	75 min	2	55 min	3	40 min	4	30 min	5
-32° to -34°	75 min	2	55 min	3	40 min	4	30 min	5	Non-emergency work should cease	
-35° to -37°	55 min	3	40 min	4	30 min	5	Non-emergency work should cease			
-38° to -39°	40 min	4	30 min	5	Non-emergency work should cease					
-40° to -42°	30 min	5	Non-emergency work should cease							
-43° and below	Non-emergency work should cease									

Notes:

1. The schedule applies to any 4-hour work period with moderate to heavy work activity, with warm-up periods of 10 minutes in a warm location, and with an extended break (e.g., lunch) at the end of the 4-hour work period in a warm location. For Light-to-Moderate Work (limited physical movement), apply the schedule one step lower. For example, at -35°C with no noticeable wind, a worker at a job with little physical movement should have a maximum work period of 40 minutes with 4 breaks in a 4-hour period because they generate less body heat when they are less active and will get colder sooner.
2. The following is suggested as a guide for estimating wind velocity if accurate information is not available: 8 km/h: light flag moves; 16 km/h: light flag fully extended; 24 km/h: raises newspaper sheet; 32 km/h: blowing and drifting snow
3. If only the wind chill cooling rate is available, a rough rule of thumb for applying it rather than the temperature and wind velocity factors given above would be:
   a) Special warm-up breaks should be initiated at a wind chill of about 1750 W/m^2, and
   b) All non-emergency work should cease at or before a wind chill of 2250 W/m^2. Wind chill cooling rate is defined as heat loss from a body expressed in watts per metre squared which is a function of the air temperature and wind velocity upon the exposed body.

   In general, the warm-up schedule provided above slightly under-compensates for the wind at the warmer temperatures, assuming acclimatization and clothing are appropriate for winter work. On the other hands, the chart slightly over-compensates for the actual temperatures in the colder range because windy conditions rarely prevail at extremely low temperatures.
4. These TLVs apply only for workers in dry clothing.

Table 2 – Cold Weather Health Problems

Signs and Symptoms	Cause	Treatment	Prevention
Frostbite			

- Loss of sensation;
- Cold, pale, waxy skin;
- Formation of ice crystals (freezing) in tissue; and
- Usually affects nose, fingers, or toes.

- Exposure to cold for an extended period of time with improper or no protection;
- Touching very cold metal surfaces, such as a fence, door handle, or tool;
- Blood supply to extremities reduced or obstructed; and
- Contact with fluids, such as gasoline, cleaning fluid, etc., that evaporate very quickly.

- Affected areas should be warmed by placing warm hands against them (do not rub), by blowing on them, or by moving to a warm area;
- Frostbitten tissue must not be thawed if there is any chance that it will refreeze;
- If the injury affects entire fingers or toes, they should be re-warmed by immersion in warm - not hot - water for approximately 20-30 minutes. The use of other heat sources such as flames and radiant heaters, that may re-warm injured tissue unevenly or too quickly should be avoided;
- Once seriously injured tissue has been re-warmed, it should be wrapped in soft material and the affected area elevated; and
- Medical help should be obtained a soon as possible.

- Adequate clothing must be worn;
- Exposure to cold should be limited;
- Warm-up breaks should be taken; and
- Fellow workers should be warned of white waxy areas on skin.

Trench Foot or Immersion Foot

- Minor - reddening of the skin, slight numbness;
- Mild - swelling, numbness (reversible);
- Moderate - swelling, redness, bleeding into the skin, nerve damage; and
- Severe - swelling, bleeding into the skin, tissue death, intense foot pain, with swelling.

- Results from continuously having wet feet in cold water at near-freezing temperatures, and
- Water temperature need not be below freezing to cause injury.

- Warm and dry feet. Further exposure should be prevented, and medical aid sought out.

- Footwear should be comfortable, waterproof, and not too tight. Feet and socks must be kept dry;
- Feet should not be allowed to remain wet for prolonged periods of time;

- A spare pair of dry socks should be available; and
- Boots and wet socks should be removed as soon as possible. Feet should be dried and massaged well to promote circulation.

Hypothermia

- Cold extremities which are numb and clumsy, severe shivering, reduced mental alertness with irritability, lack of concentration, unusual or bizarre behaviour;
- The normal shivering response stops in severe hypothermia; and
- Loss of consciousness, coma, and death can occur if not treated.

- Overcooling of the body due to excessive loss of body heat, and
- Dehydration and fatigue are contributing factors.

- The person should be removed from the cold and further exposure prevented;
- Wet clothing should be removed and the victim re-warmed by wrapping in blankets. In severe cases the victim's outer clothing should be removed and the victim placed in a sleeping bag or blanket with one or two warm people (so that the body heat of the warm people can warm up the victim). Medical aid should be contacted as soon as possible for advice and assistance;
- Full body immersion in warm water at 38° - 40°C may be necessary in serious cases; and
- A conscious victim should be given sips of warm, non-alcoholic drinks. Alcohol must not be given.

- Adequate clothing must be worn to remain warm and dry;
- Exposure to cold should be limited;
- Workers must remain hydrated and well fed;
- Warm-up breaks should be taken; and
- If possible, working alone should be avoided and workers should watch for signs of hypothermia in their co-workers.

References

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Working in Hot Temperatures

Purpose

Working in high temperatures can place a worker at risk of experiencing heat stress. If the body loses its ability to control its core temperature as a result of heat stress serious health problems can result. This SWP will be used to establish the guidelines to be used for developing specific safe job procedures for workers who are regularly exposed to work in hot temperatures.

Scope

These guidelines shall be implemented whenever work is conducted where Richardson's Bulk Sales Ltd workers will be exposed to hot temperatures for an extended period of time.

Procedure

1.0 Acclimatization

The human body is adaptable and can acclimatize to some extent to hot work conditions. Acclimatization can take up to three weeks of continued physical activity under hot conditions to fully adapt to heat. Physically fit workers make this adjustment faster than unfit workers. After one week away from working in hot conditions, a person's acclimatization is lost. A small percentage of people are unable to acclimatize at all.

2.0 Progression of Heat Related Illnesses

The normal core temperature of the human body is 37°C. If the body temperature is raised by 2°C, increased stress causes sweating. The sweat evaporates and cools the body. If the body loses its ability to control its core temperature as a result of heat stress serious health problems can result.

2.1 Heat Cramps

Heat cramps are sharp muscle pains caused by losing salt through sweat.

2.2 Heat Edema

Mostly affecting the ankles, heat edema is swelling that can occur in workers unused to working in heat. Recovery occurs after a day or two in a cool area.

2.3 Heat Rashes

When sweat glands become plugged, a rash can appear on the skin.

2.4 Heat Stress

Extreme heat can put too much stress on the body. This can lead to a need to rest and recover and reduced ability to do physical or mental work.

2.5 Heat Exhaustion

Heat exhaustion happens when the body's electrolyte (dissolved salts) balance is upset due to excessive sweating without replacing both salt and water. Signs include weakness, intense thirst, nausea, diarrhoea, breathlessness, and numb hands and feet. Recovery usually occurs after resting in a cool area and drinking electrolyte replacing drinks.

2.6 Heat Stroke and Heat Hyperpyrexia

Heat stroke is a more serious condition in the heat stress progression. Heat stroke and heat hyperpyrexia can be diagnosed by watching for the following signs:

- Dry, hot skin (skin will be moist only for heat hyperpyrexia);
- Core temperatures that often exceed 41°C; and
- Complete or partial loss of consciousness.

Heat stroke and heat hyperpyrexia require prompt medical help.

2.7 Heat Syncope

Heat syncope is giddiness and fainting that occurs while standing. Caused by losing body fluids through sweating and lowered blood pressure, the most common occurrence is in people who are not used to working under hot conditions. Recovery is rapid after rest in a cool area.

3.0 Factors Affecting How Hot We Feel

There are six main factors which affect how hot the body feels.

1. Air temperature – The air is measured with a normal thermometer. Predicting how workers will be affected by the heat by using only this parameter is difficult.
2. Humidity – This is the amount of water vapour in the air. When the air is humid, people working under hot conditions will sweat, but the sweat will not evaporate as quickly. Less evaporation means less cooling.
3. Radiant heat – The sun, hot process equipment, or heaters can radiate heat to workers. By moving from sun to shade, or moving away from heat sources, a person can reduce their heat load.
4. Air speed – Also known as wind speed. It is moving air that promotes cooling and evaporation.

5. Physical activity – Body temperature increases with physical activity. Physical activity under warm or hot conditions can increase the effect of heat on a person.

6. Clothing – Clothing can shield a worker from radiant heat, prevent sweat from evaporating, or help to transfer heat. Wearing inappropriate clothing (e.g., air or water/vapour impermeable clothing, or multiple layers) under hot conditions can cause the worker to experience additional heat stress.

Age, fitness level, body weight, hydration, and use of prescription and non-prescription drugs may affect a person's ability to work in the heat.

4.0 Comfort Levels

Under ideal temperature and work conditions, people are unaware of being too hot or too cold. This is considered "thermally comfortable".

A person feeling "thermally uncomfortable" will feel hot but will not suffer harm as a direct result. Feeling too hot may make the person tired and may lead to lowered productivity and more mistakes, which could result in an incident or accident.

Administrative controls are the most practical solution to workers who work under hot conditions for just a few days per year. Workers who work outdoors can be made more comfortable with appropriate clothing, physical activity, and timing of work.

5.0 Heat Stress

Heat stress happens when hot working conditions have the potential to harm a worker. Heat stress may be:

1. Non-life threatening – includes conditions such as dehydration and heat exhaustion.

2. Life threatening – heat stroke, a condition during which the body is unable to regulate its temperature.

All workers and supervisors who work in hot conditions should be trained to recognize the symptoms of heat exhaustion, heat stress, and heat stroke.

Heat stress is possible if, in addition to the weather (or sometimes on its own), the work involves one or more of the following factors:

- High radiant heat (e.g., from hot process equipment, catalytic heater, etc.);
- High humidity;
- Intense physical activity; and
- Clothing that reduces the rate at which sweat evaporates and cools a person.

6.0 Controlling Hot Conditions

Each of the six factors that affect how hot a person feels can be controlled to some extent. Here are some suggestions:

1. Lower the temperature
    - Air conditioning;
    - Ventilation – a good ventilation system can remove hot air from a work area or building; and
    - If possible, open windows and doors to allow air to circulate.

2. Lower the humidity

- Ventilation – a good ventilation system can remove humid air. If the work process allows it, try to capture as much of the humidity at its source with air evacuation units;
- Dehumidifiers – these can remove moisture from the air; and
- Where possible, wear clothing that allows sweat to evaporate easily.

3. Reduce worker exposure to radiant heat

- Provide workers with shade from the sun, or move the work to a shaded location;
- Shield workers from any hot process, or relocate equipment that gives off heat;
- Use blinds, curtains, or reflective coatings on windows to reduce direct sunlight;
- In buildings, such as prefabricated metal, insulate the walls and ceiling; and
- Rotate workers into tasks and areas that expose them to less radiant heat.

4. Increase air speed or move air

- Increase air speed without creating an uncomfortable draught;
- Use fans or air blowers to circulate air; and
- Increase the number of air changes per hour. This also helps to remove hot air and humidity.

5. Control physical activity

- Have workers do fewer physically intense activities;

- If it is possible to choose a time of day to carry out physical tasks, do them in the early morning or once it is cooler in the evening. Avoid intense physical activity during the hottest period of the industrial process or day;
- Use additional workers for the job so as to distribute the workload;
- Select workers who are medically fit and capable of doing the work under hot conditions;
- Rotate workers to less demanding activities;
- Reduce the pace of work;
- Implement a schedule of work and rest intervals; and
- Provide cooled rest areas.

6. Wear appropriate clothing

- If possible, wear loose-fitting clothing that is light in weight;
- Try to wear clothing made of fabrics that wick sweat away from the skin and allow the sweat to evaporate;
- Aluminize reflective clothing near sources of radiant heat, such as hot furnaces;
- Insulated or cooled clothing, such as cooling vests, may be necessary; and
- Sunglasses and sunscreen may be needed to reduce sun exposure.

7.0 Fluids

Workers who work under hot conditions require more fluids than normal in order to prevent dehydration. Dangerous levels of dehydration (more than 10% of body weight) can occur quickly under very hot working conditions. Workers should watch for signs of dehydration. Two of these signs are:

- Dark coloured urine, and

- Feeling the need to urinate less often and in smaller quantities.

If workers experience either of these symptoms, they should drink more fluids (water or an electrolyte-replacement drink).

- Drinking water which is cool, but not cold and diluted electrolyte-replacement drinks are recommended;
- Alcoholic beverages and drinks containing large amounts of caffeine, such as coffee, colas, and other carbonated drinks, should be avoided;
- Workers should have ready access to fluids throughout the day. Workers working under hot conditions should drink approximately 250 millilitres (1 cup) of fluid every 20 minutes; and
- Salt used in foods and as seasoning is usually enough to replace any salt lost through sweating. If workers are concerned about losing too much salt, it is recommended that they drink a diluted electrolyte-replacement drink.

8.0 Determining if it is Too Hot to Work

1. The most popular and widely used method of assessing whether it is too hot for a worker to continue working involves using the “wet bulb globe temperature” (WBGT). The WBGT combines the wet bulb temperature (a measure of the cooling achievable through evaporation), black globe temperature (radiant heat measure) and the actual temperature.
2. To help assess heat stress, the American Conference of Government Industrial Hygienists (ACGIH) has prepared limits known as threshold limit values or TLVs (see Table 2). These take into account the WBGT reading, the intensity of the work being done (see Table 3), whether or not the worker is acclimatized, and the type of clothing the worker is wearing. The numbers in Table 2 represent WBGTs in deg. C corrected for the type of clothing being worn.

3. Combined, this information recommends what portion of each working hour a worker should be resting so that they do not suffer heat stress.
4. If prolonged work is required an industrial hygienist can assist in obtaining the appropriate measurements and using the tables correctly.

"Rest" does not have to mean that no work is done. It may be acceptable to have workers work in a cooler area doing tasks of equal or lesser intensity.

Table 1 – Health Problems Resulting from Heat Exposure

Problem and Symptoms	Treatment	Prevention
Heat rash (prickly heat) Tingling and burning of the skin, red itchy rash. Sweat glands plugged due to prolonged exposure of skin to heat, humidity, and sweat.	• Thorough drying; • Cool showers; • Calamine lotion; and/or • Aloe Vera.	• Keep the skin as dry as possible; • Rest in a cool place; • Shower often; • Change clothes frequently; and • Keep skin clean.
Heat cramps	• Massage the muscle(s), and	

Fainting Increased flow of blood to the skin to get rid of heat means less blood to the brain.	• Lie down in a cool place; • Drink cool fluids to lower body temperature; and • See a doctor if fainting recurs.	• Drink plenty of fluids at regular intervals, and • Avoid standing still in one position – move around.
Heat exhaustion Tired, weak, dizzy, clammy skin, slow weak pulse. Pale or flushed skin colour. Higher than normal heart rate (160 to 180 beats/min).	• Lie down with knees raised; • Drink cool, not cold fluids; and • Contact a doctor if conditions do not improve quickly.	• Take four to seven days to adjust (acclimatize) to the heat; • Drink plenty of fluids at regular intervals; and • Take rest breaks in a cool place.
Heat stroke Person usually stops sweating, body core temperature is high (40-43˚C), skin is hot		

and dry. Person experiences headache, dizziness, confusion, may lose consciousness, or have fits. Fatal if treatment is delayed.	• This is a medical emergency. Person must be taken to hospital as quickly as possible, and • Move worker to a cool or shaded area, remove clothing, wrap in wet sheet, pour on chilled water, and fan vigorously. Avoid overcooling. Treat for shock once temperature is lowered.	• Take four to seven days to adjust (acclimatize) to the heat; • Drink plenty of fluids at regular intervals; • Take rest breaks in a cool place; • Wear clothing appropriate for the conditions; and • Follow a work/rest schedule.

Table 2 – Threshold Limit Values (TLVs) for Heat Exposure

	Acclimatized				Not Acclimatized			
Work/Rest Schedule	**Light**	**Moderate**	**Heavy**	**Very Heavy**	**Light**	**Moderate**	**Heavy**	**Very Heavy**
100% Work	29.5	27.5	26		27.5	25	22.5	

75% Work/ 25% Rest	30.5	28.5	27.5	29	26.5	24.5	
50% Work/ 50% Rest	31.5	29.5	28.5	27.5	30	28	26.5	25
25% Work/ 75% Rest	32.5	31	30	29.5	31	29	28	26.5

Reference: ACGIH 2002; p.173

Notes:

1. Table 2 assumes eight-hour workdays in a five-day work week with conventional breaks.
2. The TLVs assume that workers exposed to these conditions are adequately hydrated, are not taking any medication, are wearing lightweight clothing, and are generally in good health.
3. Because of the strain associated with very heavy work among less fit workers, regardless of WBGT, several values are not given. Other types of physiological monitoring should be used in these cases.

Table 3 – Categories of Work and Example Activities

Work Category	Examples of Physical Activities in This Category
Resting	1. Sitting quietly, and 2. Sitting with moderate arm movements.

Light	3. Sitting with moderate arm and leg movements; 4. Standing with light work at machine or bench while using mostly arms; 5. Using a table saw; and 6. Standing with light or moderate work at machine or bench and some walking about.
Moderate	7. Scrubbing in a standing position; 8. Walking about with moderate lifting or pushing; and 9. Walking on level at 6 km/hr while carrying a 3 kg weight load.
Heavy	10. Carpenter sawing by hand; 11. Shovelling dry sand; 12. Heavy assembly work on a non-continuous basis; 13. Intermittent heavy lifting with pushing or pulling (e.g., pick and shovel work).
Very Heavy Work	14. Shovelling wet sand.

References

- Alberta Occupational Health and Safety Code, Part 2: Hazard Assessment, Elimination, and Control.https://www.alberta.ca/ohs-act-regulation-code.aspx
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Working in the Vicinity of Electrical Lines and Cables

Purpose

This code of practice was developed to reduce the number of accidental electrical equipment contacts, to assist workers to work safely in close physical proximity of electrical lines and equipment, and to assist the workers in applying appropriate emergency response measures in the event of an electrical utility contact. This COP will be used to establish site-specific procedures for work being carried out near electrical lines, cables, and wires.

Scope

The conditions and requirements of this code of practice apply to all work sites owned or operated by Richardson's Bulk Sales Ltd and shall be rigidly applied and enforced by Company workers.

Definitions

Conductor: A wire or cable or other form of metal capable of conveying electric current from one piece of electrical equipment to another or to ground.

AEUC: Alberta Electrical Utility Code (2016).

Electrical Equipment: Overhead electrical lines, buried underground electrical cable.

Locate Slip: Documentation provided by the locators at the time and place of the locate to the contractor. This slip identifies the location of buried electrical utilities near the site of the actual excavation.

Step Potential: The potential electrical difference between any two points on the ground that can be touched simultaneously by a person.

Procedure

1.0 Legislation and Regulations

The Alberta Electrical Utility Code (2016) (AEUC) contains specific instructions for utility employees working in the vicinity of electrical equipment. The Alberta OHS Code (AB OHS Code Part 17 - Safe Limit of Approach Distances) has adopted the applicable worker safety portions of the AEUC.

See Appendix 10.0 (excerpts from the AEUC) at the end of this Code of Practice that deals with:

- Aerial activities performed near electrical equipment;
- Excavation work near electrical equipment;
- Interference with systems;
- Moving equipment or buildings; and
- Special areas.

2.0 Safe Work Planning

Always consider electrical utilities to be live with the potential of causing serious injury or death. Contact with electrical equipment (e.g., overhead line or buried cable) must be avoided at all costs. On developing a safe work plan, consider such factors as:

- Scope of work;
- Type of excavation, hoisting, or other equipment that will be required;
- Height and reach of the equipment;

- Equipment replacement;
- Equipment or material loading/unloading;
- Worker competency;
- Soil condition;
- Interruptions to electrical services;
- Hazard to public;
- Use of ladders, pipe, and other conducting materials;
- Need to notify electric utility owner;
- Need to communicate all hazards to all workers at a work site, including contractors, subcontractors, and other employers or self-employed persons;
- Changing conditions; and
- Other hazards present (e.g., pipelines, gas, or chemicals).

3.0 Excavating (Refer to Ground Disturbance for further details)

- The worker shall ensure the locations of all buried electrical cables are marked before work begins on any excavation. Arrangements to have this done can be made through the applicable provincial One-Call centre.
- At least two (2) full working days notice are required.
- Before using mechanical equipment within one (1) metre (3.3 feet) of the locate marks, the buried electrical cables must be exposed using non-destructive excavation techniques acceptable to the electrical utility. There may be several cables buried near each other, side by side, or at different depths. If the locate marks have been tampered with, or if you do not begin work within fourteen (14) days of when the locates were done, request relocates through Alberta One-Call.

- In excavation planning, overhead electrical equipment must also be identified and controlled. Utility pole bases or other electrical equipment foundations and systems must not be exposed or damaged during excavation.
- Other considerations in safe work planning for excavation in the vicinity of buried electrical equipment include:
- Arranging to meet locators at site;
- Marking locations of all buried electrical equipment on plans and drawings (including lines that may now be out-of-service);
- Reviewing locate slips before excavating;
- Posting warning signs along the buried electrical equipment corridor; and
- Planning location of spoil piles so as not to reduce clearances to power lines.

4.0 Overhead Electrical Equipment

- Alberta OHS Code Part 17 requires that Richardson's Bulk Sales Ltd contacts the power line operator before work is done or equipment is operated within 7.0 metres (23 feet) of an energized overhead power line:
    - To determine the voltage of the power line, and
    - To establish the appropriate safe limit of approach distance listed in Schedule 4 of the OHS Code.

- Richardson's Bulk Sales Ltd will ensure that the safe limit of approach distance is maintained and that no work is done and no equipment is operated at distances less than the established safe limit of approach distance.
- Richardson's Bulk Sales Ltd will notify the operator of an energized overhead power line before work is done or equipment is operated in the vicinity of the power line at distances less than the safe limit of approach distances listed in Schedule 4 of the OHS Code and obtain the operator's assistance in protecting workers involved.
- Overhead power lines or wires are the electrical equipment contacted most often. Table 1 shows the safe approach distances to overhead power lines once the voltage has been established and the approach distances have been verified with the utility.
- For safe work planning it is essential to determine that established clearances have not been altered by such factors as buildings, landscaping, or spoil piles. Safe work planning may require that the horizontal distances to electrical equipment (e.g., working on a bridge, landfill berm, building, or scaffold near an overhead power line) be considered. There may be several services mounted on utility poles, such as:
    - More than one high voltage power line;
    - Low voltage power lines;
    - Telephone cables; and
    - Cable T.V. cables.

- It is important not to make physical contact with, or disturb, any overhead electrical and telecommunication services. Making physical contact with telephone lines, for example, can cause power lines to break or come down. If work is done or equipment is operated within 7 metres (23 feet) of an energized overhead power line, Richardson's Bulk Sales Ltd will contact the power line operator to determine the voltage of the power line and to measure the line to ground clearance.
- Call the Alberta One-Call number (1-800-242-3447, or *3447 cellular) to find out who operates the electrical utility in your work area. Unqualified persons must never attempt to measure clearances to power lines. The electrical utility can also assist in setting safe limits of approach and in developing a safe work plan.
- Other considerations in safe work planning for work near overhead electrical equipment include:
- Marking the location of all overhead power lines on plot plans and drawings;
- Posting warning signs along their route;
- Using a designated signaller;
- Marking the power lines to make them visible to the equipment operator by use of flags, danger notices, barriers, and similar;
- Physical guarding of the overhead power lines;
- Marking the limits of approach on the ground using a brightly coloured ribbon or rope;
- *Moving the overhead power lines;
- *Shutting off the power to overhead power lines;
- *Covering the overhead power lines with electrical protective equipment;
- Planning location of spoil piles (such as earth or other materials) so that they do not reduce the safe distance clearances to power lines;
- *Removing the automatic re-closing feature of power lines; and

*Denotes an activity that can only be conducted by the respective utility company.

5.0 Emergency Response Plan

The emergency response plan must be reviewed with the workers for all possible electrical emergencies. Emergency Response Plans should include:

- Knowing what to do if equipment becomes energized;
- First aid;
- Public protection;
- Notification of authorities;
- Availability and communication with emergency responders; and
- Medical aid beyond first aid.

6.0 Cranes, Excavation, and Other Equipment

- Whenever machinery is being used near electrical equipment, all workers in the vicinity shall be instructed to remain clear and out of contact with the frame of the equipment, hoisting lines, or the hoisted load except to attach or detach the load. The operator of the machine shall know the height, width, and maximum reach of the equipment. This information is available on the machine data sheet.
- When working near electrical equipment, “Keep clear - working near electrical lines and apparatus” signs will be displayed on the exterior of machines. A notice giving the following information shall be posted in the cabs of machines working near electrical equipment:
- The limits of approach to overhead power lines for persons and equipment;

- The machine shall not be moved near electrical equipment without the aid of a signaller; and
- Maximum height and reach of the machine with the boom or bucket fully extended (Machine Data Sheet) shall be posted in view of the operator of the machine.

A signaller or observer shall direct the moving of equipment near overhead power lines or other electrical equipment. The signaller shall be identified by a high visibility traffic vest and/or cuff.

7.0 Accidental Contact

7.1 Effects of Electrical Contacts

- In an electrical emergency, stay calm and think before you act. Don't become a victim while helping - call for help. If you try to pull the victim clear, you will also become a path for electricity.
- The passage of electricity through the body is called "shock". Small amounts of electrical current can cause involuntary muscle contractions and will prevent the victim from letting go of a conductor or calling for help.
- Burns are a common electrical related injury. Electricity can cause severe burns at points of entry and exit. Although entry and exit wounds may be small, bone and muscle can be extensively damaged.
- Electrical contact passing through the heart can cause the heart to stop beating. The effects of an electrical contact are determined by:
    - How much current is flowing through the body (measured in amperes and determined by voltage and resistance), and
    - The length of time electricity path or current passes through the body.

7.2 Equipment in Contact with Electrical Conductor

- If the equipment makes accidental contact with an electrical conductor, the operator shall try to move the machine from contact in the best possible manner, without causing further damage, such as pulling power lines to the ground. In most cases, this can be accomplished by moving the boom of the machine.
- If the machine cannot be moved, the operator shall stay on the machine, warn others in the vicinity to stay clear of the machine and ask someone to notify the electric utility. Remove the bucket from the ground in the case of an underground contact. Keep out of the excavation and do not touch the cables.
- HIGH VOLTAGE CONTACT will result in electrical current flowing down the boom and through the crane to the ground. The ground will then be energized with a high voltage near the crane.
- The operator should leave the machine only as a last resort, such as if the machine is on fire or other such emergency. If the operator has to leave a machine that has become energized, the operator must jump clear – the operator must NOT, under any circumstances, step down and allow any part of their body to be in contact with the ground while any other part of their body is touching the energized machine.
- Because of the hazardous voltage differential in the ground, the operator should jump with his or her feet together, maintain balance, and shuffle or hop slowly across the affected area. Do not take large steps because it is possible for one foot to be in a high voltage area and the other to be in a lower voltage area. The difference between the two can lead to electrocution. Once safely away from the machine and conductors, the operator has the following responsibilities:
    - To protect others by warning them and not allowing them to approach the energized equipment;
    - To call the electrical utility for help and to shut off the electric power; and
    - To notify Richardson's Bulk Sales Ltd management.

8.0 Moving or Lifting Wires

High voltage wires or other equipment can be handled safely only by someone who is trained and has special equipment and tools designed for high voltage.

Never attempt to move or raise an electrical conductor with a board or stick.

Never approach or touch an electrical conductor that is lying on the ground; it may be energized or may become energized. If possible, the area should be barricaded or guarded to prevent injury.

9.0 First Aid

Care of a Casualty if Injured:

Once a victim is no longer in contact with electricity and medical help has been called, check the following:

- Breathing - If victim is not breathing, use artificial respiration immediately. Every second counts;
- Pulse - Check for pulse and begin CPR if required (The new Red Cross protocol calls for CPR to start as soon as it is determined the victim is not breathing);
- Shock - Signs include cold or clammy skin, weak, shallow breathing, and rapid pulse. Loosen clothing and keep victim horizontal and warm until help arrives. Electrocuted victims will often go into shock. Keep this in mind when transporting the victim for medical attention. Cover the victim with a blanket if one is available. Remember, shock is potentially a life-threatening condition; and
- Burns - Avoid handling the affected area or removing burnt clothing. Don't use gauze or any material that is likely to stick to the wound.

A doctor must see an electrical shock victim, even if there is no apparent injury, as damage may occur to internal organs.

10.0 Excerpts from the Alberta Electrical Utility Code (2016)

10.1 Activities Performed Near Overhead Power Lines Rule 2-014

1. This Rule applies to activities near overhead powerlines and not the movement of persons, equipment, buildings, vehicles, or objects under overhead powerlines.

2. A person must contact the operator of the utility system before activities other than those in Subrule (1) are undertaken or equipment is operated within 7.0 meters of an energized overhead line to:

    - Determine the voltage of the power line; and
    - Establish the appropriate safe limit of approach distance listed in Table 1.

3. Except as provided for in Subrule (4), a person must ensure that the safe limit of approach distance, as established in Subrule (2), is maintained and that no activities are undertaken and no equipment is operated at distances less than the established safe limit of approach distance.

4. A person must notify the operator of the utility system before activities are undertaken or equipment is operated in the vicinity of the power line at distances less than the safe limit of approach distances listed in Table 1, and obtain the operator's assistance in protecting persons involved.

5. Notwithstanding Subrules (1) through (4), Table 1 does not apply to OHS Part 40 Utility Workers – Electrical.

6. A person must ensure that earth or other materials are not placed under or beside an overhead power line if doing so reduces the safe clearance to less than the Minimum Vertical Design Clearances above Ground or Rails as defined in Table 5 of this Code and the safe limit of approach distances listed in Table 1.
7. A person must follow the direction of the operator of the utility system in maintaining the appropriate safe clearance when conducting activities near an overhead power line.
8. If an activity is being carried out near the safe limits of approach distances specified in Table 1, the person completing the activity shall assign a person to act as an observer to ensure that the safe limit of approach distances will be maintained.
9. A person shall not excavate or perform similar operations in the vicinity of an overhead power line if it reduces the electrical and structural integrity of the power line including associated grounding equipment.

Table 1 – Safe Limits of Approach Distances from Overhead Power Lines for Persons and Equipment

(See Rule 2-014.)

Operating voltage of overhead power line between line conductors unless otherwise specified	**Safe limit of approach distance for persons and equipment**
0 - 750 V insulated or polyethylene covered conductors (1)	0.3 m
0-750 V bare, un-insulated	1.0 m
Above 750 V insulated conductors (1) (2)	1.0 m
0.75 kV - 40 kV	3.0 m
69 kV, 72 kV	3.5 m

138 kV, 144 kV	4.0 m
230 kV, 240 kV	5.0 m
500 kV	7.0 m
500kV DC Pole-Ground	7.0 m

Notes:

[1] Conductors must be insulated or covered throughout their entire length to comply with these groups.

[2] Conductors must be manufactured to rated and tested insulation levels.

10.2 Excavation Activities in the Vicinity of Underground Power Lines (Rule 2-020)

1. Before an excavation is started, the person responsible for the excavation shall contact the operator of the underground cables in the area to determine if underground cables are present at the excavation site.
2. Before an excavation is commenced, the operator of the underground cables located at the proposed excavation site shall identify and mark any underground cables that could be interfered with when the excavation is undertaken.
3. The person responsible for an excavation shall ensure that no excavations are undertaken within 1 m of any underground utility cable unless:
    - The excavation is done under the control of the operator of the underground cables; and
    - The excavation method is acceptable.

Note: The operator of the underground cable is responsible for assuring that excavation and exposure of cables is done safely. The operator will determine if direct supervision is required or if the work will be done in a safe manner without direct supervision.

10.3 Moving Equipment or Buildings (Rule 2-018)

1. The safe limit of approach distances listed in Table 1 do not apply to a transported load, equipment, or building that is transported under energized overhead power lines.
2. If the total height, including equipment transporting it, is less than 4.15 m, the load can be moved under lines.
3. If the height of the equipment, building, or object exceeds 4.15 m and the equipment, building, or object must be moved under overhead power lines or communication lines, the following precautions shall be taken:
    - The person or persons responsible for moving the equipment, building, or object shall contact the operator of the overhead lines before the move is begun and request assistance;
    - The operator of the overhead lines shall comply with the request for assistance as soon as possible; and
    - The operator of the overhead lines shall provide assistance in accordance with the requirements of the Occupational Health and Safety Act and the Safety Codes Act.

References

- Occupational Health and Safety Act, Sections, 3, 10, 24, and 33.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Occupational Health and Safety Regulation, Part 1, Section 14(1), 15(1).

- Occupational Health and Safety Code, Part 2, Part 3, Part 6, Part 11, Part 17, Part 32, and Part 34.
- Alberta Electrical Utility Code (2016).

Workplace Hazardous Materials Information System (WHMIS)

Purpose

This safe work practice describes the Workplace Hazardous Materials Information System (WHMIS), a Canada-wide Hazard Communication System that deals with health and safety at work sites where chemicals are handled. It is called worker “right to know” legislation. It allows anyone at a work site to be informed about the hazards of the chemicals they handle.

GHS stands for Globally Harmonized System an internationally agreed upon hazardous classification system adopted by the United Nations. Implementation of GHS in Canada involved changes to the previous WHMIS legislation (Hazardous Products Act) and a new Hazardous Products Regulations (HPR) under the Act. The WHMIS legislation aligns with the GHS elements and is referred to as WHMIS 2015.

All Canadian provinces and territories are subject to the legislative status for each province and can be obtained from the National WHMIS Portal – www.whmis.org.

Scope

The conditions and requirements of this safe work practice shall be rigidly applied and enforced at all work sites owned or operated by Richardson's Bulk Sales Ltd where workers may be exposed to any hazardous product while performing their work-related activities. Richardson's Bulk Sales Ltd will ensure that a hazardous product is used, stored, handled, or manufactured at a work site according to this SWP and WHMIS.

Richardson's Bulk Sales Ltd will only accept hazardous products with WHMIS 2015 labels and safety data sheets.

Richardson's Bulk Sales Ltd will ensure that their existing inventories of hazardous products are in compliance with WHMIS 2015.

Procedure

1.0 Responsibilities

1.1 Suppliers and Employers

Suppliers of hazardous products and employers are both responsible for providing information on hazardous products.

1.2 Suppliers

Suppliers are responsible for:

- Labelling hazardous materials supplied to the workplace, and
- Preparing Safety Data Sheets (SDS).

1.3 Richardson's Bulk Sales Ltd

Richardson's Bulk Sales Ltd and its contractors must make the WHMIS information available to all workers and ensure that hazardous substance checklists are retained for the regulated hazardous materials encountered on Company work sites and properties.

Richardson's Bulk Sales Ltd will ensure that all hazardous products on a work site:

- Are labelled with supplier labels and/or appropriate work site labels or other required identification;
- Have a corresponding current Safety Data Sheets (SDS) located for easy access by all workers. The SDS must be accurate at the time of every sale or importation of the hazardous product. Suppliers have an ongoing responsibility to make sure SDSs and labels are accurate and compliant; and
- Are handled and stored in accordance with Company and legislated requirements.

2.0 Worker Training

Richardson's Bulk Sales Ltd will ensure that a worker who works with or near a hazardous product or who performs work involving the manufacture of a hazardous product is trained in WHMIS, including:

1. The content required to be on a supplier label and a work site label and the purpose and significance of the information on the label.
2. The content required to be on a safety data sheet and the purpose and significance of the information on the safety data sheet.
3. Procedures for safely storing, using, and handling the hazardous product.
4. If applicable, the procedures for safely manufacturing the hazardous product.
5. If applicable, the methods of identification referred to in the code.
6. The procedures to be followed if there are fugitive emissions.
7. The procedures to be followed in case of an emergency involving the hazardous product.

Richardson's Bulk Sales Ltd will develop and implement the procedures above in consultation with the Joint Health and Safety Committee (where there is one).

2.1 WHMIS 2015 Training Requirement

Richardson's Bulk Sales Ltd will provide education and training to employees on:

- The hazard classes, pictograms, and labels;
- Their required elements, such as signal words;
- The meaning of all signal words and hazard statements found on labels and SDSs in the workplace;
- The SDS format and how to locate information needed to work safely with a product; and
- Worksite-specific training on measures to work safely with hazardous products.

3.0 Labelling Requirements

Richardson's Bulk Sales Ltd will adhere to the following regulatory requirements:

1. An employer must ensure that a hazardous product, or its original container at a work site, has a supplier label or a work site label on it.
2. An employer must not remove, modify, or alter a supplier label on a container in which a hazardous product is received from a supplier if any amount of the hazardous product remains in the container.
3. If the supplier label on a hazardous product or its container is illegible or is removed or detached, Richardson's Bulk Sales Ltd must immediately replace the label with another supplier label or a work site label.

4. If a hazardous product is received at a work site in a multi-container shipment and the individual containers do not have supplier labels on them, Richardson's Bulk Sales Ltd will apply a work site label to each individual container.

5. If an imported hazardous product under the Hazardous Products Regulations is received at a work site without a supplier label, Richardson's Bulk Sales Ltd will apply a label disclosing the information and displaying the hazard symbols required by the Hazardous Products Act (Canada).

6. If a bulk shipment of a hazardous substance is received at a work site, Richardson's Bulk Sales Ltd will:

    - If a supplier label is provided, apply the supplier label to the hazardous product or its container, or
    - If a safety data sheet or a statement in writing is transmitted in accordance with the Hazardous Products Regulations and a supplier label is not provided, apply a work site label to the hazardous product or its container.

    See Table 1 at the end of this section for further details.

7. If Richardson's Bulk Sales Ltd produces or manufactures a hazardous product for use at a work site, Richardson's Bulk Sales Ltd will ensure that the hazardous product or its container has, at a minimum, a work site label on it.

4.0 Decanted or Transferred Products

1. If a hazardous product is decanted or transferred at a work site into a container other than the container in which it was received from a supplier, Richardson's Bulk Sales Ltd will ensure that a work site label is applied to the container.

This requirement will apply for all hazardous products that have been transferred from their original containers.

2. The above does not apply to a portable container that is filled directly from a container that has a supplier label or a work site label if the entire hazardous product is required for immediate use and if the hazardous product is:
    - Under the control of and used exclusively by the worker who filled the portable container;
    - Used only during the shift during which the portable container is filled; and
    - The contents of the portable container are clearly identified on the container.

5.0 Safety Data Sheet Requirements

1. Richardson's Bulk Sales Ltd when acquiring a hazardous product for use at a work site must obtain a supplier safety data sheet for that hazardous product unless the supplier is exempted from the requirement to provide a safety data sheet by the Hazardous Products Regulations (Canada) and complies with the requirements of the exemption.
2. Richardson's Bulk Sales Ltd will store a hazardous product for which there is no supplier safety data sheet for not more than 120 days if Richardson's Bulk Sales Ltd is actively seeking the supplier safety data sheet.
3. If the most recent supplier safety data sheet for a hazardous product at a work site is three years from its latest revision, Richardson's Bulk Sales Ltd will, if possible, obtain an up-to-date supplier’s safety data sheet for the hazardous product.
4. Richardson's Bulk Sales Ltd will update a safety data sheet immediately after new hazard information becomes available to Richardson's Bulk Sales Ltd.
5. Richardson's Bulk Sales Ltd will ensure that the safety data sheet required by this Part is readily available at a work site to workers who may be exposed to a hazardous product and to the Joint Health and Safety Committee, if there is one.

6.0 WHMIS 2015

6.1 Hazard Groups

WHMIS 2015 applies to two major groups of hazards: physical, and health. Each hazard group includes hazard classes that have specific hazardous properties.

- **Physical hazards group**: based on the physical or chemical properties of the product - such as flammability, reactivity, or corrosivity to metals.
- **Health hazards group**: based on the ability of the product to cause a health effect - such as eye irritation, respiratory sensitization (may cause allergy or asthma symptoms or breathing difficulties if inhaled), or carcinogenicity (may cause cancer).

6.2 Hazard Class

Hazard classes are a way of grouping together products that have similar properties. Most of the hazard classes are common to GHS and will be used worldwide by all countries that have adopted GHS. Some hazard classes are specific to WHMIS 2015.

List of Hazard Classes

1. Physical Hazards:
    - Flammable gases;
    - Flammable aerosols;
    - Oxidizing gases;
    - Gases under pressure;

- Flammable liquids;
- Flammable solids;
- Self-reactive substances and mixtures;
- Pyrophoric liquid;
- Pyrophoric solids;
- Self-heating substances and mixtures;
- Substances and mixtures which, in contact with water, emit flammable gases;
- Oxidizing liquids;
- Oxidizing solids;
- Organic peroxides;
- Corrosive to metals;
- Combustible dusts;
- Simple asphyxiants;
- Pyrophoric gases; and
- Physical hazards not otherwise classified.

2. Health Hazards:

- Acute toxicity;
- Skin corrosion/irritation;
- Serious eye damage/eye irritation;

- Respiratory or skin sensitization;
- Germ cell mutagenicity;
- Carcinogenicity;
- Reproductive toxicity;
- Specific target organ toxicity – single exposure;
- Specific target organ toxicity – repeated exposure;
- Aspiration hazard;
- Biohazardous infectious materials; and
- Health hazards not otherwise classified.

6.3 Hazard Category

1. Each hazard class contains at least one category. The hazard categories are assigned a number (e.g., 1, 2, etc.) Categories may also be called "types". Types are assigned an alphabetical letter (e.g., A, B, etc.). In a few cases, sub-categories are also specified. Subcategories are identified with a number and a letter (e.g., 1A and 1B).
2. Some hazard classes have only one category (e.g., corrosive to metals); others may have two categories (e.g., carcinogenicity (cancer)) or three categories (e.g., oxidizing liquids). There are a few hazard classes with five or more categories (e.g., organic peroxides).
3. The category tells you about how hazardous the product is (that is, the severity of hazard).
    - Category 1 is always the greatest level of hazard (that is, it is the most hazardous within that class). If Category 1 is further divided, Category 1A within the same hazard class is a greater hazard than category 1B.
    - Category 2 within the same hazard class is more hazardous than category 3, and so on.

6.4 Hazardous Product Class and Category (Refer to Safety Data Sheets)

1. Suppliers must evaluate products that are covered by the Hazardous Products Act against specific criteria as required by the Hazardous Products Regulations. If the product meets any of the criteria for a hazard class, it is known as a hazardous product.
2. All hazardous products must be labelled according to the regulations, and must have a corresponding Safety Data Sheet (SDS). The hazard class and category will be provided in Section 2 (Hazard Identification) of the SDS.
3. Each hazard class or category must use specific pictograms and other label elements to indicate the hazard that is present, and what precautionary measures must be taken. Richardson's Bulk Sales Ltd will use the information provided by the label and SDS to be informed and to know how to safely use, handle, store, and dispose of the hazardous product.

6.5 Labels

1. In Canada, WHMIS legislation requires that products used in the workplace that meet the criteria to be classified as hazardous products must be labelled.
2. In most cases, suppliers are responsible for labelling the hazardous products that they provide to customers.
3. Employers are responsible for making sure that hazardous products that come into the workplace are labelled and to prepare and apply a workplace label when appropriate.
4. A supplier label is provided or affixed (attached) by the supplier and will appear on all hazardous products received at a workplace in Canada. If the hazardous product is always used in the container with the supplier label, no other label is required.
5. A workplace label is required when:
    - A hazardous product is produced (made) at the workplace and used in that workplace;

- A hazardous product is decanted (e.g., transferred or poured) into another container; or
- A supplier label becomes lost or illegible (unreadable).

6. The supplier label must include the following information:

- **Product identifier**: The brand name, chemical name, common name, generic name, or trade name of the hazardous product;
- **Initial supplier identifier**: The name, address, and telephone number of either the Canadian manufacturer or the Canadian importer*;
- **Pictogram(s)**: Hazard symbol within a red "square set on one of its points";
- **Signal word**: A word used to alert the reader to a potential hazard and to indicate the severity of the hazard;
- **Hazard statement(s)**: Standardized phrases that describe the nature of the hazard posed by a hazardous product;
- **Precautionary statement(s)**: Standardized phrases that describe measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous product or resulting from improper handling or storage of a hazardous product; and
- **Supplemental label information**: Some supplemental label information is required based on the classification of the product. For example, the label for a mixture containing ingredients with unknown toxicity in amounts higher than 1% must include a statement indicating the percent of the ingredient or ingredients with unknown toxicity. Labels may also include supplementary information about precautionary actions, hazards not yet included in the GHS, physical state, or route of exposure. This information must not contradict or detract from the standardized information.

Table 1: WHMIS 2015 Label Content

WHMIS 2015
Product Identifier
Supplier Identifier
Pictogram
Hazard Statement
Signal Word
Precautionary Statements
Supplemental Label Information

Table 2: WHMIS Pictograms

	**Exploding Bomb** (for explosion or reactivity hazards)		**Flame** (for fire hazards)		**Flame over Circle** (for oxidizing hazards)
	**Gas Cylinder** (for gases under pressure)		**Corrosion** (for corrosive damage to metals, as well as skin, eyes)		**Skull and Crossbones** (can cause death or toxicity with short exposure to small amounts)
	**Health Hazard** (may cause or suspected of causing serious health effects)		**Exclamation Mark** (may cause less serious health effects or damage the ozone layer*)		**Environment*** (may cause damage to the aquatic environment)
	**Biohazardous Infectious Materials** (for organisms or toxins that can cause diseases in people or animals)				

* The GHS system also defines an Environmental hazards group. This group (and its classes) was not adopted in WHMIS 2015. However, you may see the environmental classes listed on labels and Safety Data Sheets (SDSs). Including information about environmental hazards is allowed by WHMIS 2015.

References

- Alberta Occupational Health and Safety Code, Part 29: Workplace Hazardous Materials Information System.https://www.alberta.ca/ohs-act-regulation-code.aspx
- Canada Environment and Workplace Health.http://www.hc-sc.gc.ca/ewh-semt/occup-travail/whmis-simdut/index_e.html
- OSH Answers WHMIS General. https://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/general.html