health safety environment

HSE MANUAL

STOP

THINK

GO

E. GRUBEN'S TRANSPORT LTD.

EMERGENCY CONTACT LIST - EGT MANAGEMENT & STAFF

Tuk Base Camp and Night Security (24 hours/day)	**TEL:**	**867-977-7000**
	FAX:	**867-977-7040**
Tuk Base Camp Manager	**TEL:**	**867-977-7016**
Safety/Loss Control	**TEL:**	**867-977-7014**
Randy G. Hein	**CELL:**	**403-638-9636**
Superintendent of Operations	**TEL:**	**867-977-7017**
Doug Saunders	**CELL:**	**867-678-0045**
Project Manager	**TEL:**	**867-977-7010**
Bob Stefure	**CELL:**	**867-678-0053**
Chief Executive Officer	**TEL:**	**867-977-7008**
Russell Newmark	**CELL:**	**867-678-0042**
EGT Vice President	**TEL:**	**867-977-7004**
Merven Gruben	**CELL:**	**867-678-0044**
EGT Inuvik Office	**TEL:**	**867-777-6625**
	FAX:	**867-777-6633**
EGT Expediting Office	**TEL:**	**867-777-4678**
	FAX:	**867-777-2302**
EGT South	**TEL:**	**780-987-5708**
	FAX:	**780-987-5715**
Alan Reimer	**CEL:**	**780-298-5735**

EMERGENCY RESPONSE CONTACT LIST – OUTSIDE AGENCIES

Tuk Health Centre	**TEL:**	**867-977-2321**
Tuk RCMP	**TEL:**	**867-977-1111**
Tuk Fire Department	**TEL:**	**867-977-2222**
Inuvik Hospital	**TEL:**	**867-777-8000**
Inuvik RCMP	**TEL:**	**867-777-1111**
Inuvik Fire Department	**TEL:**	**867-777-2222**
Inuvik Renewable Resources	**TEL:**	**867-777-7230**
Workers' Compensation Board – Accident Reporting	**TEL:**	**1-800-661-0792**
Northwest Territories Spill Line	**TEL:**	**867-920-8130**

CONTENTS

1.0 POLICY AND LEADERSHIP

1.1 PHILOSOPHY

E. Gruben's Transport Ltd. believes that safety, productivity and quality of services are all interlinked. To be successful, we must achieve high standards in all these areas.

The key to providing a viable, high quality work environment is to encourage all employees to embrace the concept of Prevention.

We will achieve continued improvement in aspects of our Safety Program by the following key principles:

- **Provide strong commitment from management;**
- **Provide leadership to compliment management;**
- **Provide training and skills upgrading for new and present personnel;**
- **Set and implement performance standards – involving everyone;**
- **Measure our safety, productivity and performance;**
- **Reward superior performance through the presentation of Safety Awards;**
- **Emphasize sound recruiting procedures;**

Education and awareness of safe work procedures and policies and the implementation of these procedures and policies on an individually motivated basis will better enable the achievement of the goal of Accident Prevention.

Russell Newmark
Chief Executive Officer

Sept 2009

1.2 MISSION STATEMENT

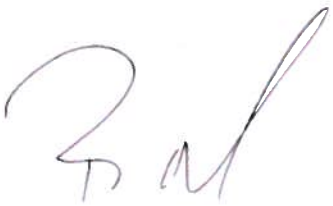
In order to provide the highest possible level of customer satisfaction to all of our customers and clients, E. Gruben's Transport Ltd. is committed to provide the best possible service and is committed to continued improvement.

To our organization a "Quality Work Environment" will mean that:

- **E. Gruben's Transport Ltd. will conduct its business in a manner that is acceptable to all concerned in and around the communities in which we work.**
- **E. Gruben's Transport Ltd. will strive to provide training and orientation to our employees to ensure that everyone will work in a safe and efficient manner.**
- **E. Gruben's Transport Ltd. will provide a healthy and safe work environment for all employees.**
- **E. Gruben's Transport Ltd. will abide by all government, industry and local rules and regulations.**
- **E. Gruben's Transport Ltd. will be committed to protecting the environment and wildlife and maintain Public Health and Safety through its operations.**

Goals of our Quality Work Environment are both humanitarian and economic. It is our duty to send each employee home to their family, whole and healthy, and at the same time ensure their job security.

The only way to avoid accidents and to ensure the Safe Quality Work Environment is through Accident Prevention. Each and every individual in the organization must accept this basic fundamental.



Russell Newmark
Chief Executive Officer

Sept 2009

1.3 CORPORATE OBJECTIVES

Our commitment to quality is driven by four clear Corporate Objectives:

Job Security for all;

Provide a safe and healthy work environment;

Pursue opportunities for growth;

Maintain financial stability and strive for monetary gains;

To achieve the Corporate Objectives, E. Gruben's Transport Ltd. shall therefore follow five basic principles:

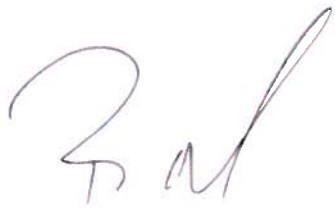
Focus on the situation, issue or behaviour, not the person;

Maintain the self-confidence and self-esteem of others;

Maintain constructive relationships with our employees, peers and managers;

Take the initiative to make things better;

Lead by example;



Sept 2009

Russell Newmark
Chief Executive Officer

1.4 SUBSTANCE ABUSE POLICY

E. Gruben's Transport Ltd. is committed to the health, safety and productivity of its personnel, sub-contractors, customers and the communities in and through which it operates.

The Company recognizes that the use of illicit drugs and the misuse of alcohol and medications can limit an employee's ability to properly perform his/her job and can have a serious negative impact on the health and safety of themselves and others. Therefore, as part of our overall safety policy, we have instituted this policy.

The following standards apply to all E. Gruben's Transport Ltd. personnel, Sub-Contractor personnel, and any visitors while being transported to or from or while at any project site or premises:

- The use, possession, distribution or sale of alcoholic beverages on worksites or in company owned, rented or leased equipment and facilities are strictly prohibited.
- The use, possession, distribution or offering for sale of illegal and performance impairing drugs or drug paraphernalia is strictly prohibited.
- The possession, distribution or sale of prescription medications obtained illegally and the presence on the body of illegal drugs is strictly prohibited.
- If personnel have any concerns as to their ability to perform their jobs while taking a prescription drug or other medication, they have an obligation to report the use of the drug to a company health professional, or to their supervisor. This may result in modified work or temporary reassignment.
- All persons employed by E. Gruben's Transport Ltd. and/or by any Sub-Contractor who violate these policies will be immediately removed from the worksite.
- The company will institute testing for illegal drugs and/or alcohol, if deemed necessary. All personnel shall acknowledge the company's policy and note that a positive test shall be cause for immediate removal from the worksite. Testing will be performed by an approved third party firm and all results shall remain confidential. Testing may include Pre-Employment testing, Post-Incident testing and Reasonable Cause testing, depending upon the safety sensitivity of the position of the individual and as deemed necessary by E. Gruben's Transport Ltd. management. Reasonable Cause testing will take place when the company supervisors and/or management determine that the behaviour or appearance of an individual while on duty indicates probable alcohol or drug use.
- E. Gruben's Transport Ltd. will review every previous Drug and/or Alcohol related violation on a case-to-case basis to determine if entry to E. Gruben's Transport Ltd. camps or worksites is appropriate.
- Further information can be obtained from E. Gruben's Transport Ltd. management.

Sept 2009

Russell Newmark
Chief Executive Officer

1.5 ROLES AND RESPONSIBILITIES

Chief Executive Officer

- Report directly to the Board of Directors of E. Gruben's Transport Ltd.
- Develop, together with other managers, EGT's mandate, overall objectives and policies
- Communicate corporate objectives, mandate and policies to management employees, clients, regulators, suppliers and subcontractors
- Responsible for corporate good governance and regulatory compliance
- Responsible for corporate financial management including dealing with financial and legal requirements
- Develops and implements corporate risk and insurance policies
- Responsible for overall operations of E. Gruben's Transport Ltd.
- Report on EGT's progress in achieving performance and safety goals and objectives
- Provide direction and strategy for the future
- Create a motivational environment for all employees
- Lead by example

Superintendent of Operations

- Report directly to the C.E.O.
- Provide leadership and support to Base Camp Manager, Project Managers and Project Supervisors
- Communicate company goals and expectations
- Aligns key team-building people in the roles of planning, organizing and controlling
- Communicate as necessary to key regulators and clients
- Develop and implement operational plans for company infrastructure
- Develop and implement operational plans for company construction projects
- Communicate operational plans to company managers, foremen and crew leaders
- Lead by example

Manager, Safety and Loss Control

- Report Directly to the CEO
- Communicate and assists, where possible, with Operations Manager, Base Camp Manager, Project Managers and Supervisors
- Responsible for E. Gruben's Transport Ltd. safety measurements and statistics
- Responsible for E. Gruben's Transport Ltd. incident investigation and claims
- Oversees the E. Gruben's Transport Ltd. Safety Program and Safety Awards Program
- Responsible for employee training files and certificates
- Assist in development and implementation of operational plans and training programs
- Awareness of and communication to management and employees of regulatory issues and requirements
- Create the opportunity, reasons and incentives for everyone to work safely and productively
- Assume the duties of the Project Safety Designate when required

Base Camp Manager & Project Supervisors

- Report directly to the C.E.O. and/or Operations Manager
- Responsible for day to day Base Camp Operations and Construction Projects
- Develop and enacts plans for staffing requirements
- Provide leadership to employees and support to Operations Manager
- Raise awareness of long term vision for Operations Manager through good communication of values
- Chair, Base Camp Safety and Health committee meetings and morning tailgate meetings
- Ensure that safe work procedures are followed in EGT operations
- Lead by example
- Assume the duties of the Project Safety Designate when required

Project Safety Designate

The Project Safety Designate will be or report to the Project Superintendent and/or the Manager of Safety and Loss Control

Administer the on-site safety program.

Enforcement company rules

Ensure site orientations and new hire orientations are completed.

Ensure policies, bulletins, posters, rules and regulations are posted where applicable.

Act as a resource to the project supervisor(s), foremen and local safety committee in accident investigations, analysis and preparation of accident reports and summaries.

Perform new, and review completed, hazard assessments and assists in taking corrective actions.

Ensure all safety equipment is available, in good condition and is properly used and stored.

Ensure that the corrective action(s) identified, whenever deficiencies are identified, have been implemented by the responsible worker(s).

Assist with safety seminars, weekly safety meetings, daily toolbox meetings or training on the worksite.

Complete competency assessments, including reviewing of training tickets/ licenses, relative to the program.

Participates in worksite health and safety committees, and communicates the results to worksite superintendent.

Accompany or designate a person to accompany injured workers for medical attention.

Foremen and Crew Leaders

- Report to Project Superintendent and/or Operations Manager
- Communicate and assist, where possible, with the Operations Manager and Base Camp Manager
- Ensure that the company safety program and all regulatory permits and requirements are complied with during Project operations.
- Lead safety and tailgate meetings
- Ensure company equipment complies with all basic safety program, regulatory and legal requirements and standards
- Ensure all company signs and placards are current and being used
- Communicate with Operations Manager and Mechanic Supervisors as to current equipment conditions and requirements and to equipment maintenance repair needs
- Keep all employees involved and aware of Project events and needs
- Ensure all hazard warnings are sent out to field
- Assist Safety Manager with accident investigation and reporting
- Conduct worksite safety inspections
- Assist in development and implementation of operational plans and training programs
- Provide information to management on Project progress and safety measurements
- Chair Job Site Safety and Health committee meetings and morning tailgate meetings

Equipment Operators and Drivers

- Report directly to foremen and crew leaders in the field
- Ensure that the equipment are in good running condition
- Adhere to defensive driving and operating as per training
- Zero tolerance to the use of alcohol and drugs as per testing criteria
- Properly secure load and maintains winching equipment
- Committed to customer satisfaction
- Adhere to Government regulations and EGT's basic safety manual
- Employ safe working procedures at all times
- Participates in tailgate and general safety meetings
- Utilize the proper permits
- Certified with TDG, WHMIS and First Aid
- Has training in Environmental Awareness

- Report all claims as soon as possible to Supervisor
- Identify hazards and informs all those concerned

Tradespersons

- Report directly to foremen and crew leaders in the field
- Communicate with and takes direction as necessary from the Base Camp Manager or Project Superintendent
- Zero tolerance to the use of alcohol and drugs as per testing criteria
- Committed to customer satisfaction
- Adhere to Government regulations and EGT's basic safety manual
- Employ safe working procedures at all times
- Utilize the proper permits
- Certified with TDG, WHMIS and First Aid
- Has training in Environmental Awareness
- Report all claims as soon as possible to Supervisor
- Identify hazards and informs all those concerned

Labour Crews

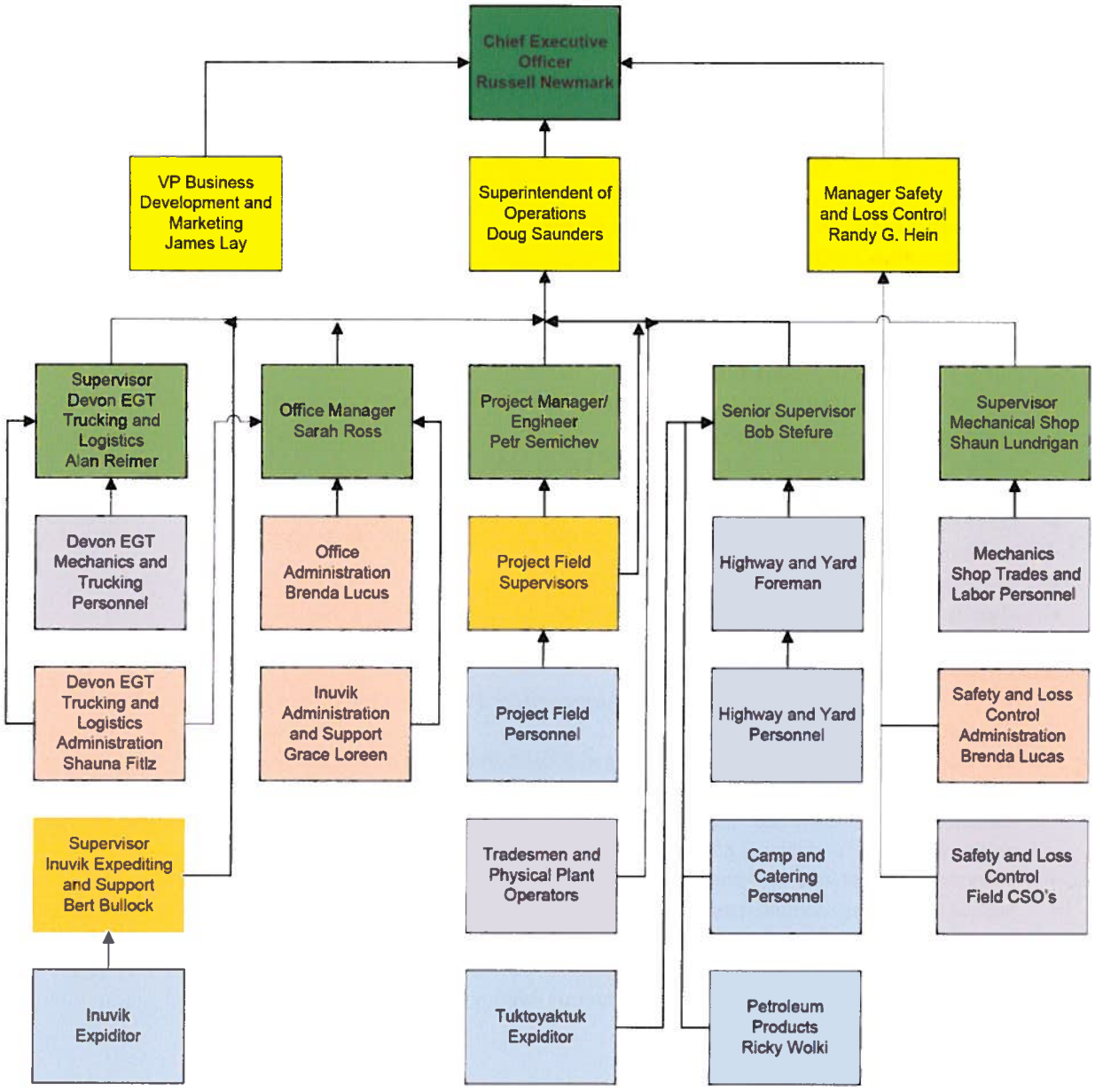
- Report directly to foremen and crew leaders
- Adhere to defensive driving as per training
- Zero tolerance to the use of alcohol and drugs as per testing criteria
- Committed to customer satisfaction
- Adhere to Government regulations and EGT's basic safety manual
- Employ safe working procedures at all times
- Certified with TDG, WHMIS and First Aid
- Has training in Environmental Awareness
- Report all claims as soon as possible to Supervisor
- Identify hazards and informs all those concerned

Administrative Officers and Clerks

- Report directly to the COO, Operation Manager and/or Base Camp Manager as required and as per job description
- Communicate daily with Base Camp Manager, Project Managers and Project Supervisors
- Communicate with the Manager, Safety and Loss Prevention in regard to incident information
- Responsible for all daily administrative operations, which can include public relations, working with general public, customers and clients and telephone reception
- Responsible for all incoming and outgoing mail
- Responsible for all accounts payable and accounts receivable
- Receive and verify all employee time
- Responsible for all company payroll
- Responsible for all Canada Customs and Revenue Agency Payroll and GST remittances
- Lead by example

E. GRUBEN'S Transport Ltd.

OPERATIONAL CHART



2.0 MANAGEMENT INVOLVEMENT AND COMMITMENT

2.1 HEALTH, SAFETY & ENVIRONMENTAL GUIDING PRINCIPLES

E. Gruben's Transport Ltd. will integrate the following principles into all aspects of operations:

- All occupational injuries and illnesses are preventable;
- All work shall be conducted in compliance with applicable laws and regulations;
- Safe work performance and protection of the environment in which we work are fundamental values integrated into our business;
- Operations in the Beaufort Mackenzie Delta area shall be conducted with emphasis on actively protecting the health and safety of our people and the environment;
- Systems and resources are in place to ensure work is conducted safely;
- All personnel, throughout the company, have a personal responsibility to perform their work safely and to protect the environment;
- Everyone has the obligation to stop work when an unsafe act or condition is identified. Corrective action shall be taken to ensure conditions are safe before resuming plans;
- E. Gruben's Transport Ltd. will participate with industry to develop and implement effective emergency response plans;
- E. Gruben's Transport Ltd. will identify and implement improvement opportunities for the health, safety and environment program.

The Guiding Principles will be reviewed as part of employer & contractor orientations, training programs and at regular safety meetings.

2.2 HEALTH, SAFETY & ENVIRONMENTAL POLICY

A safe and healthy work environment for all our personnel is the first priority on every job and task we undertake. E. Gruben's Transport Ltd. will endeavour to protect the health and safety of all individuals who work on or are affected by our activities while maintaining the highest standards of environmental performance.

E. Gruben's Transport Ltd. is committed to providing active leadership and participating in safety, occupational health, environmental protection and loss control programs. This commitment will be demonstrated by operating in a manner that avoids or mitigates adverse health, safety and environmental impacts.

E. Gruben's Transport Ltd. will ensure that:

- Our operations will meet or exceed the requirements of relevant occupational health and safety legislation, environmental protection legislation, industry standards and corporate policy.
- All our personnel and others employed on our behalf are informed of the requirements to protect themselves and their fellow workers from injury and occupational illness, to protect the environment, and to protect the reputation and assets of the company and its clients; and that they receive the necessary information, training and equipment, and management support to do so.
- We will determine and evaluate risk factors and mitigate the hazardous conditions and environmental impacts of our operations during planning, implementation and operational phases of our projects.
- All levels of our organization will maintain a rigorous commitment to health, safety and the environment and our operations will be subject to ongoing occupational health and safety evaluations to ensure compliance with this policy.
- E. Gruben's Transport Ltd. will continue improvement practices to achieve a "Zero Accident" performance.

R G Hein

Sept 2009

Russell Newmark
Chief Executive Officer

Randy G. Hein
Safety Manager

2.3 COMPANY RESPONSIBILITIES

The success of the company's Health, Safety and Environmental Program depends upon the participation and involvement of everyone in the company.

2.3.1 Management Responsibilities:

E. Gruben's Transport Ltd. management is ultimately responsible for the development and on-going support of the HSE Program and its implementation throughout all levels of the company. This includes:

- Setting and integrating company HSE goals and objectives with business goals;
- Knowing and adhering to all applicable laws and regulations;
- Establishing and maintaining on-going HSE programs;
- Emphasizing HSE requirements through ongoing communication with company personnel;
- Supplying the resources and expertise required to address HSE issues;
- Identifying areas where additional training is required and supplying that training;
- Developing and communicating safe work practices;
- Tracking and reviewing HSE performance;
- Supporting field supervisors in all efforts that are required to achieve a safe, healthy and environmentally responsible workplace;
- Providing personnel with information and equipment necessary so that they are able to perform their duties in a safe, healthy and environmentally responsible fashion;
- Using HSE criteria in the subcontractor selection process;
- Ensuring that equipment is certified and well maintained;
- Identifying short and long term health exposure risks, and mitigating personnel exposure to these risks;
- Employing the best environmental practices for work being conducted;
- Establishing effective emergency response procedures;
- Providing open avenues of communication for input and feedback from the workplace to management;
- Sharing best practices & lessons learned amongst the workforce to continually improve the HSE performance.
- Management shall make regular tours of company worksites to ensure the health , safety and environmental goals and objectives are being met.

2.3.2 Supervisors' Responsibilities:

We are required by law to provide workers with instruction, training and supervision by a competent supervisor to ensure that work is carried out in a healthy, safe and environmentally responsible fashion. Our Job Supervisor will be experienced and knowledgeable in the following areas of duty:

- Informing all workers of E. Gruben's Transport Ltd. HSE program requirements and ensuring that these requirements are followed;
- Ensuring workers are informed of their rights and responsibilities under Occupational Health and Safety legislation, including their right to refuse unsafe work;
- Providing new workers with a site-specific orientation when they arrive on location;
- Providing instruction and training on safe work procedures for assigned tasks, including rules from relevant safety legislation;
- Ensuring the availability and proper use and maintenance of Personal Protective Equipment for all personnel;
- Conducting and recording pre-task safety meetings and hazard assessments with workers;
- Ensuring new workers are directly supervised by a competent worker until they have demonstrated the ability to perform an assigned task safely;
- Ensuring only properly trained workers operate equipment or machinery;

- Regularly inspecting the work site to ensure safe work practices and OH & S regulations are being followed;
- Identifying hazards, informing personnel at work site of identified hazards and taking steps to remove, avoid and/or mitigate these hazards;
- Identifying hazardous materials on the work site and providing instruction to workers as required by WHMIS legislation;
- Stopping work when unsafe conditions or activities are present and taking action to remedy such conditions or activities prior to resuming work;
- Ensuring adequate emergency response procedures and equipment are in place and understood by all personnel;
- Reporting and investigating any accidents or near misses and reporting these findings to E. Gruben's Transport Ltd. Safety Officer;
- Use practices, procedures & enclosures that maximize protection of the environment;
- Store, Transport & Dispose of wastes in accordance with accepted industry & regulated practices.

2.3.3 Workers' Responsibilities

For our HSE program to function successfully, the active involvement and participation of all levels of E. Gruben's Transport Ltd. personnel is required. All employees will be expected to:

- Show up for each shift physically and mentally able to perform their duties responsibly and safely;
- Follow company safety policies;
- Follow company job procedures;
- Use and maintain any Personal Protective Equipment (PPE) required for general use and for specific tasks at hand, and report and replace defective or damaged PPE;
- Maintain work-site in a clean and orderly state;
- Inspect and maintain equipment and tools according to recommended procedures and maintenance schedules, removing from service any unsafe equipment or tools and reporting and/or repairing damaged equipment and tools prior to placing then back in service;
- Report and, where possible, correct any unsafe condition of practice which may exist;
- Eliminate identified hazards or mitigate the hazardous conditions so that an accident cannot occur;
- Stop work when an unsafe act or condition is identified and take steps to ensure conditions are safe before work is resumed;
- Ask the supervisor for instruction and direction if the employee does not have the skill or adequate information to conduct the task competently;
- Report all injuries, incidents and near misses, whether or not medical treatment is required or physical damage;
- Actively participate in safety meetings and job planning meetings.

2.3.4 Subcontractor Responsibilities:

- All companies and individuals contracted to work for E. Gruben's Transport Ltd. will be required to be fully aware of E. Gruben's Transport Ltd. HSE Policy and Program and will be expected to comply with the conditions therein;
- As an integral part of the process of selecting subcontractors, E. Gruben's Transport Ltd. will consider past safety and environmental performance of subcontractors, comprehensiveness of subcontractors' own HSE programs and willingness to comply with E. Gruben's Transport Ltd. HSE program;
- E. Gruben's Transport will make every effort to clearly communicate these HSE requirements to sub-contractors and will continue to include subcontractors and their personnel in E. Gruben's Transport Ltd. operated training programs and HSE development programs;

- Subcontractors personnel will be expected to participate in the E. Gruben's Transport Ltd. HSE program and will have the same responsibilities as are described in Supervisors' Responsibilities and/or Workers' Responsibilities sections above, according to the role they have been contracted for;

Further specific details on subcontractor requirements can be found in the form of a sub-contractors handbook which is presented to subcontractors prior to commencing work.

2.3.5 Visitors' Responsibilities:

- No unauthorized visitors will be permitted at E. Gruben's Transport Ltd. work site or facilities;
- All visitors to E. Gruben's Transport Ltd. facilities and work sites must report to the site supervisor and/or camp manager;
- Visitors to E. Gruben's Transport Ltd. worksites and facilities will be required to be aware of E. Gruben's Transport Ltd. HSE Program dependent on the level of supervision and access to work sites and facilities they will have;
- Basic rules and requirements of the E. Gruben's Transport Ltd. HSE Program will be prominently posted and a "basic visitor's orientation" will be provided to visitors with minimal access. More complete orientations will be required for visitors with greater access to facilities and worksites;
- The use of Personal Protective Equipment is mandatory where required and E. Gruben's Transport Ltd. will make sure PPE is available for visitors at various locations throughout our facilities and job sites;

2.4 Safety Responsibility Evaluation

Management is responsible for making regular tours of company worksites and reviewing all general health, safety and environmental supervisory responsibilities. Upon completion of regular management tours, if necessary, management will construct a list of specific health, safety and environmental improvements to enhance the success of company worksite health, safety and environmental programs.

Management assigns specific safety responsibilities to supervisors.

Management monitors supervisor performance by evaluating how well safety responsibilities are fulfilled. If safety responsibilities are not fulfilled, management determines why and initiates appropriate enforcement measures as required.

2.4.1 Work Site Supervisor Responsibilities

2.4.1.1 Communications

The Work Site Supervisor must:

- Review the company safety program and its benefits with all new employees to the company or new to a job.
- Review job descriptions and describe to workers their specific safety responsibilities.
- Inform workers of their right to refuse to work under unsafe conditions.
- Question workers on their knowledge of the safety program, their safety responsibilities and job descriptions.
- Explain to workers the penalties for violating regulatory requirements and company safety policies.
- Review with workers all applicable safety rules, standard work procedures and emergency procedures.
- Conduct safety meetings as required and record minutes.
- Send copies of meeting minutes to the company office, and post them on work site bulletin boards.

2.4.1.2 Hazard Identification and Control

The Work Site Supervisor must:

- Inspect work sites for hazardous conditions and compliance with regulatory and owner requirements.
- If possible, remove or correct hazardous conditions.
- Mark remaining hazards and notify workers of the hazard type, location and the protection required.
- Whenever necessary, contact company or government safety personnel to help control hazards.
- Establish equipment inspection and maintenance procedures.
- Schedule and rotate crews to ensure stress and fatigue do not contribute to work site hazards.
- Stop work if it becomes unsafe.

2.4.1.3 Workers' Performance

The Work Site Supervisor must:

- Ensure workers work safely and follow standard work procedures;
- Point out and correct unsafe work practices as soon as they are noticed;
- Set an example by working safely and following standard work procedures;
- Recognize workers for using safe work procedures;
- Encourage workers to provide input into safety program development and maintenance;
- Ensure workers report every incident and accident;

2.4.1.4 Incident and Accidents

The Work Site Supervisor must:

- Immediately notify the appropriate manager of any accidents or incidents;
- Shut down operations and clear the area if an accident causes or could cause serious injuries or equipment damage;
- Obtain medical aid if required;
- Follow company procedures for notifying next-of-kin and dealing with media;
- Report all incidents and accidents and comply with regulatory requirements;
- Conduct investigations, using outside specialists as required, of all accidents and incidents;
- Record all injuries and report findings to the appropriate manager;
- Co-operate with government investigators;

2.4.1.5 Supervisor Safety Inspection Checklist

1. Site-specific orientation.
2. Training on safe work procedures.
3. Proper use and maintenance of PPE.
4. Pre-task safety meeting & hazard assessment with workers.
5. New worker supervision.
6. Worker observation – safe work inspections.
7. Work site physical condition inspection.
8. WHMIS legislation discussion.
9. Work stoppage under unsafe conditions.
10. Emergency response procedures.
11. Reporting and investigating incidents & accidents.
12. Waste disposal regulated practices.

2.4.2 Inspections

Management is responsible for taking regular tours and inspections of company worksites and reviewing all general health, safety and environmental company responsibilities. Upon completion of regular tours and inspections, management will construct a list of specific health, safety and environmental improvements to enhance our goal of excellence in health, safety and environmental performance.

Planned health, safety and environmental inspections are a key management tool that significantly contributes to preventing loss producing incidents. They also provide an opportunity for employees to participate in inspecting their own work area. These are many examples of possible inspection formats, and each of them has a specific purpose. The intent of any inspection is to identify and correct actual or potential hazards and ensure continued compliance with regulations and company health and safety standards.

See section **3.4 Inspections** in **Hazard Identification & Risk Control** section, below, for a more thorough discussion of the role of inspections and maintenance in Safety Evaluation.

3.0 HAZARD IDENTIFICATION & RISK CONTROL

The health and safety management guide outlines the process for identifying potential hazards in the workplace and methods for assessing and controlling these hazards in an appropriate manner. The balance of our health and safety management system deals primarily with controlling these hazards. It is through the control of hazards that the frequency and severity of incidents can be reduced. The purpose of this policy is to identify the process to be used by the organization to identify and assess risk and control hazards. Generally, hazard identification, assessment and control will be achieved by following the standard steps of guidance.

Hazard Recognition, Assessment and Control

Hazard Recognition

The first step in a hazard assessment process is recognition. Some of the ways hazards can be recognized are:

- Through both formal and informal inspections of the defined work areas and material storage areas
- Through audits and safety reports, as a means of comparing specific tasks to existing procedures
- Through daily site / task meetings where, through worker involvement, hazards can be identified from experience
- During field-level or last minute risk assessments performed by individuals on-site and crews using the STOP & THINK process
- Through the completion of a Job Site Safety Analysis (JSA) by those workers responsible for completing the work tasks
- By monitoring of the injury and incident trends on our own projects and in the industry on a local, provincial and national basis
- Through specific safety meetings held at the start of each project to discuss expected tasks, hazards and controls
- Through the observation of targeted safe or at risk behaviors

Hazard Assessment

The second step in the hazard assessment process is the assessment of the risk associated with a hazard identified. The risk is very much a subjective assessment and based on an individual's tolerance to a risk. At EGT, our goal is to reduce the level of risk, where possible, to the lowest level. Where this is not possible, EGT management will either refuse to do the work or control the risk to a level that is acceptable to our employees and the customer. The essence of any health and safety management system is the identification and control of hazards in the work place. The entire system hinges on hazards being identified and controlled in order to achieve our goal of zero injuries in the work place. These start at the planning phases of work or project through to the actual execution and completion of work. Within EGT's health and safety management system, several components make up the entire hazard assessment process. These are to be used in combination by all EGT personnel.

The components are as follows:

- Project Hazard Assessment
- Site Specific Safety Plan (SSSP)
- Daily Site Safety Tailgate Meetings - Safe Work Permits
- Job Safety Analysis (JSA)
- Field-Level Risk Assessments (FLRA)
- Last Minute Risk Assessments (LMRA)
- Employee Behavior-Based Observations
- Hazard Identification / Near-Miss Reporting

Hazard Control

The third step in a hazard assessment process is to determine a level of control to mitigate the risk to an acceptable level and ensure that the control is implemented. Additionally, the control needs to be evaluated for effectiveness and monitored for compliance.

The following are three common methods of hazard control that should be considered when faced with hazards:

Engineering Controls - these controls deal with design of equipment or systems to protect workers or protect against failure. Engineering controls can significantly reduce hazards in maintenance and construction activities. Some applications of engineering controls are:
- Establish criteria for the design and execution of heavy lifts
- Installation of guards or barriers to protect against hazards
- Installation of ventilation systems to remove contaminants

Administration Controls - these types of controls generally deal with people. Though proper planning plays an important part in all hazard control, it is a must for administrative controls to be effective. Some examples of administrative controls are:
- Training
- Safe work practices and procedures
- Job Safety Analysis
- Safety meetings

Personal Protective Equipment (PPE): PPE must be chosen specifically for each hazard, with consideration given for the degree of hazard and the limitations of the PPE. PPE should not be used if in doubt about its suitability for the task; seek information from the supplier or manufacturer. Personal Protective Equipment (PPE) is the last choice for hazard control. Due to the temporary and constantly changing nature of our tasks, personal protective equipment is often the most practical and common choice. Refer to EGT's PPE policy further in this manual.

Project Hazard Assessment
A project hazard assessment should be completed by the respective project manager for all work projects that are to be undertaken by EGT. This form is to be completed and provided to the eventual on-site supervisor with the project start-up sheet. No work should be performed unless the appropriate EGT management team member has completed this document. Once the project hazard assessment has been completed by the project management representative it should then be reviewed with a member of the respective safety department. This document, once completed, should be made available on-site and be reviewed regularly by site personnel for relevance to specific site hazards. As the conditions or scope of work changes from the originally documented project hazard assessment, other methods of assessment such as Daily Tailgate Meetings, Job Safety Analysis, Hazard Identification and Near Miss Reporting, and Behavior-Based Observations should be utilized. Where and if a project hazard assessment cannot be completed for a specific project, then a Site Specific Safety Plan must be completed. The best results for the assessment and control of hazards at a project have proven to be realized when both of these documents have been completed

3.1 Hazard Identification Reports ("Hazard ID's")

Hazard Identification reports are used to alert site supervisors to any hazardous conditions or unsafe work procedures found by workers and others on the site. The value of observation and involvement of workers in the field cannot be over-emphasized in the identification of hazards. Placing some of the onus for hazard identification on the workers most closely involved helps give participants a sense of ownership and buy-in to the entire HSE program.

Hazard Identification reports fill in the gaps between regular company inspections and help enable supervisors and workers to provide a safer worksite. Hazard I.D's allow greater participation of the workers in their own safety as well as enabling them to easily bring to the attention of supervisors unsafe conditions or practices which have been overlooked through the inspection process.

Employees, contractors & subcontractors are to notify the appropriate supervisor of any hazard observed on the company worksite. Hazard I.D. Reports can be given verbally or in writing. EGT has developed simple Hazard/Near Miss Reports for this purpose.

After assessing the hazards, every effort should be taken to eliminate the hazard. In the event the hazard cannot be eliminated, all potentially affected personnel must be informed of the hazard and the hazard must be immediately marked with any of the following hazard indicators, as would be appropriate under the circumstances:

- Danger Sign
- Flags
- Lights
- Alarms
- Barricades
- Fences
- Labels
- Placards

Identified hazards are documented on an "Action Plan to Correct an Identified Hazard" form.

The form outlines the following:

- Date & location of identified hazard (s).
- Description of the hazard (s).
- Name of hazard reporter.
- Corrective action taken and by whom.
- Date to be completed and/or completion date.
- Signed off by: Supervisor, Safety Supervisor and/or Senior Administration.

When a hazard is identified:

- Specify who is responsible to correct the identified hazard.
- Set a deadline date for the hazard correction.
- Complete the E. Gruben's Transport Ltd. form, "Action Plan to Correct an Identified Hazard" and forward to appropriate supervisor.

3.2 Observation of Worker Behaviour

The observation of worker behaviour is a significant aspect of the responsibility of all supervisors (see section 2.4.1 above for a more detailed discussion of supervisor's observation of workers). Peer observation and mentoring are also useful and beneficial means of monitoring the behaviour of workers, especially of workers new to a job or a task.

3.3 Observation of Work Site Physical Conditions

Management, supervisors and all field personnel are expected to observe the work site for hazards which may exist or which may appear. The different perspectives which different personnel will have of a work site are all valuable in the identification of hazards. In particular, these are the clear responsibility of all work site supervisors.

3.4 Inspections

Management is responsible for taking regular tours and inspections of company worksites and reviewing all general health, safety and environmental company responsibilities. Upon completion of regular tours and

inspections, management will construct a list of specific health, safety and environmental improvements to enhance our goal of excellence in health, safety and environmental performance.

Planned health, safety and environmental inspections are a key management tool that significantly contributes to preventing loss producing incidents. They also provide an opportunity for employees to participate in inspecting their own work area. These are many examples of possible inspection formats, and each of them has a specific purpose. The intent of any inspection is to identify and correct actual or potential hazards and ensure continued compliance with regulations and company health and safety standards.

Inspections can include:

- Determining if there are deficiencies in tools, equipment, and process controls (for example, dikes, spill containment, storage tank alarms etc.);
- Monitoring the progress of previously identified recommendations;
- Monitoring and correcting unsafe and environmentally damaging conditions;
- Monitoring and correcting unsafe actions of people;
- Determining actual or potential hazards arising from installing or modifying a facility and associated equipment;
- Demonstrating management's commitment to the community's safety and welfare, and to protecting the environment;
- Identifying health hazards and industrial hygiene concerns; and
- Taking the opportunity to recognize and reinforce positive behaviours.

Inspections enable personnel to help ensure that company safety standard and regulatory requirements are being followed. Inspections enable personnel to identify hazards before they become a problem. The end result to regular inspections will be a list of hazards, potential hazards and corrective measures for these hazards.

Hazard corrections will be documented and will include:

- Corrective measures taken.
- Name of person assigned to correct hazard.
- Deadline date for correction.
- Date correction was completed.
- Types of Company Inspections
- Management and Supervisor worksite/jobsite tours.
- Worker observation (At-risk behaviour inspection).
- Work site (Physical conditions inspection).
- Equipment and vehicle inspections.
- Engineering safety inspections involving Engineering Controls:
- Eliminating hazards/enclosing hazards.
- Isolating workers from hazards.
- Reducing transmission of hazards to workers.

3.4.1 General Worksite Inspections

These will include all field and office work sites, yards, mechanical shops, work camps and company recreation areas such as lounges and dining halls.

Inspections will be scheduled according to hazards at the sites and the hazardousness of the work and worksite.

Work site inspections should assess the following:

- Physical layout and conditions of the site (including location, terrain, season and weather).
- Hazards associated with the materials being handled.

- Conditions of equipment and tools used.
- Work practises and behaviour of people at the site. (Includes employees, contractors, sub-contractors, visitors and clients).
- The level and quality of supervision given to workers.

Examples of physical hazards, including worksite equipment and materials, which are to be inspected include:

- Slipping and tripping hazards
- Presence of dangerous gases
- Faulty or missing emergency equipment
- Improper or missing signs
- Faulty machinery, cables, tie-downs etc.
- Poor housekeeping
- Confined spaces
- Inadequate or missing PPE
- Blocked exits
- Overhead hazards
- Electrical hazards
- Difficult terrain for vehicular or personal movement
- Flammable, corrosive or explosive materials
- Missing material – safety data sheets

3.4.2 Work Practices - Worker Knowledge & Behaviour to Inspect

Employees will be observed and questioned where applicable to ensure that they:

- Know and follow safe work procedures;
- Properly use tools and equipment;
- Correctly use PPE and other safety equipment;
- Are adequately trained to perform their work properly;
- Know emergency response procedures;
- Properly oversee and direct workers under their supervision;

In the event that unsafe work practices and unsafe work sites are encountered, work should be stopped immediately until the problems can be rectified, whether through further instruction, better procedures, or improved engineering controls. Work should be stopped:

- For unsafe behaviour.
- For unsafe work practices.
- For unsafe worksite conditions.

Individual personnel and work groups should also be rewarded by management for implementing safe worker practices and safe worksite practices.

3.4.3 Equipment & Vehicle "Walk-Around" – Pre-Trip Inspections

- Daily pre-trip equipment and vehicle walk-around inspections are to be done prior to commencing daily work duties to monitor any wear and tear.
- If there is more than one operator, assign who will be responsible for equipment and vehicle walk-around inspection.
- Critical checks would include fluid levels, belts, hoses and electrical connections.
- Required emergency survival gear will also be checked

3.4.4 Company Inspection Checklist

- Standard checklist ensures nothing is missed.
- Checklists provide a detailed record of the inspection findings.
- Checklists provide a detailed record of corrective measures needed.
- Include monthly inspections of shop and yard.
- On-going inspections of work practices and work site conditions.

3.4.5 Government Inspections

- Inspect to ensure company meets Regulatory Requirements.
- These inspections may assess records, plans, policies, equipment and/or work procedures.
- The inspectors may interview anyone on the work site.
- They have the right to remove any item from the work site they need to inspect further.
- Anyone on site at the time of the inspection must co-operate with the inspector.
- Stop work orders can be given if Life-Threatening conditions are discovered.
- Lesser violations will attract orders to correct the violations or deficiencies.

3.4.6 Inspection and Maintenance of Mobile Equipment

Much of the work that E. Gruben's Transport Ltd. performs involves the use of heavy mobile equipment. It is therefore extremely important that we pay specific attention to the inspection and maintenance of this equipment. The quality and performance of mobile equipment is directly proportional to the soundness and sustainability of the Shop Preventative Maintenance Program.

E. Gruben's Transport Ltd. management has made improved inspection and maintenance of heavy and mobile equipment a company priority. We have made available modern maintenance facilities, experienced personnel and appropriate equipment for the job. In order for the shop to provide quality, on-time support to the equipment fleet, E. Gruben's Transport Ltd. shops are open for business 12 hours/day, 7 day/week in the summer and 24 hour/day, 7 days/week during winter operations.

A senior Shop/Field Supervisor is responsible for selecting the proper equipment for the job when ordering new equipment. The senior Shop/Field Supervisor works in concert with the Superintendent of Operations and the C.E.O. of E. Gruben's Transport Ltd. when ordering new equipment. The right equipment for the job is of paramount importance in attaining continual improvement in performance at the worksite.

To ensure that workers use the tools and equipment properly, it is vital that tools and equipment be properly inspected, maintained, and kept in good repair. Our maintenance program will reduce the risk of injury, damage and lost production.

EGT will maintain all tools, equipment, and vehicles in a condition that will maximize the safety of all personnel and the efficiency of construction. EGT "maintenance program" shall be maintained and will include the following components:

Adherence to applicable regulation, standards and manufacturers specifications
Service by qualified personnel
Scheduling and documentation of all maintenance work
Maintenance repair reporting procedures
Tag out procedures for equipment and tools

Responsibilities

Management

Make available the necessary resources to maintain this program.

Superintendents

The supervisor shall be responsible for the application of the program in his/her area of responsibility.
Shall report and remove from service any equipment, which is defective.

Employees

Prior to operation of any equipment, tools or vehicles, employees shall check for any defects.
Shall report and remove from service any equipment, tools, or vehicles that are defective and note in logbook where applicable.
Defects will be reported in writing on cry sheets and turned into the maintenance department.
Shall fill out logbooks for any off road equipment, heavy trucks (larger than one ton) or any lifting equipment they operate.
Will not operate equipment, tools or vehicles that have been tagged out until it has been repaired and tag removed.
Operator or designate will be responsible for the daily maintenance checks and topping up fluid levels as well as greasing of the equipment being operated. Operator will also fill out checklists and write any repairs needed on cry sheets.

Mechanics

Are responsible for scheduling and documentation of all maintenance work.
Remove from service any equipment that is defective.

3.4.7 Inspection and Maintenance Intervals

Driver Inspections: Drivers are required to do a "Walk-Around" inspection of their vehicles prior to commencing their daily operations. If repairs are required at any time the driver completes a "Cry Sheet" which lists the problems and repair requirements. Drivers are requested to provide lots of lead time to the Shop Foreman in regard to serious, time-consuming repairs. Well-documented "Cry Sheets" reduce the costs of inefficiency.

Shop Inspections: All equipment is scheduled for Safety/Maintenance Inspections at 250-hour intervals. If any repair is required, the Shop Supervisor approves authorization immediately. No equipment is authorized to depart from the Shop to resume regular duties if it is in need of repair.

Full Service Maintenance Program, Trucking: A 13-Point Preventative Maintenance Program is in place for tractors and a 6-Point Preventative Maintenance Program is in place for trailers. Specialized equipment, such as boom trucks, will undergo Regular Safety Inspections by the supplier's maintenance personnel.

Tractor Inspections will include:	Lubrication	Steering	Engine
	Transmission	Clutch	Brakes
	Differential	Electrical	Battery
	Radiator	Wheel and Tires	Lights
	Safety and Survival Equipment		
Trailer Inspections will include:	Lubrication	Body	Lights
	Landing Gear	Brakes	Wheels and Tires

Full Service Maintenance Program, Heavy Equipment: Maintenance Programs for Heavy Equipment and tracked vehicles will vary depending on the type of equipment. At minimum it will include, as applicable:

Lubrication	Steering	Engine
Transmission	Clutch	Brakes
Electrical	Battery	Lights
Radiator	Tracks	Final Drives
Hoses	Safety and Survival Equipment	

Full Service Facilities are available. Shop Facilities have all the necessary equipment, licensed mechanics and are in operation every day to ensure proper maintenance is performed.
The "Inspection and Maintenance of Equipment Program" has been designed to exceed all Safety Standards and to support E. Gruben's Transport Ltd. view that Prevention is key to providing the best service to our customers.

3.5 First Time Purchasing Of Hazardous Products

The following steps will be taken:

- Supervisor contacts safety supervisor and requests MSDS evaluation of new product;
- Safety Supervisor obtains MSDS Sheet for the new product;
- A Hazard Assessment is performed for the new product via the MSDS Sheet;
- A decision is made to purchase or not purchase the product.

4.0 RULES AND SAFE WORK PROCEDURES

4.1 Process for Developing Standard Work Procedures

1. List all jobs on all the work sites.
2. Create a list of critical jobs.
3. Assess the jobs and list in order of risk.
4. Break high-risk jobs into steps.
5. Determine hazard control for each step.
6. Describe regulatory requirements.
7. Test procedures in the field.
8. Finalize the written procedures.
9. Train workers to follow the procedures.

Advantages:

- Workers identify high-risk tasks within their own jobs, which require controls, and this puts them in a "prevention mode" for safety.
- The procedure becomes the company generic work procedure for that job.
- Standardization of job procedures improves efficiency and saves supervisory time for orientation for new employees or for regular employees new to a particular job.
- Provides an excellent opportunity for the supervisor and the worker to work together in a positive, constructive manner.

1. **List all jobs at the worksites.**

2. **Create a list of critical jobs in which any of the following might occur:**

   - Serious injuries
   - Frequent injuries
   - Severe property damage
   - Significant interruptions to production
   - Public liability
   - Government intervention

3. **List the jobs in order by the degree of hazards they present and the frequency with which they are performed.**

4. **Break high risk jobs into steps.**

Analyze each job by observing and interviewing workers. Record the following information:

- Job name and location
- Each step of the job and its hazards
- Roles of each worker involved
- Special equipment required
- Applicable regulatory requirements

5. **Determine measures needed to control job hazards, such as:**

   - Engineering controls to eliminate hazards
   - Workers training
   - Personal protective and safety equipment

- Hazard markings
- Safety meetings

If engineering controls or worker training can be used to permanently or reduce the impact of hazards, implement them.

Prepare the standard health, safety and environmental work procedure by listing the steps of the job, in the order in which they will occur, and the control measures required for each step (excluding one-time measures such as engineering controls and training).

Also describe:

- Regulatory requirements
- Special equipment required
- Specific training requirements for workers (e.g., BOP Level I or journeyman electrician)

6. **Test the health, safety and environmental procedure in the field to ensure it:**

- Is accurate
- Meets regulatory requirements
- Is understandable to workers

7. **Finalize the written health, safety and environmental procedures and place it at appropriate worksites.**

8. **Train workers to follow the health, safety and environmental procedures.**

4.2 Safety Rules

Safety rules are established to communicate clear expectations for proper workplace behaviours. Safety rules are written to protect all employees and visitors from known hazards and to ensure E. Gruben's Transport Ltd. meets regulatory requirements.

To comply with regulatory requirements E. Gruben's Transport Ltd. safety rules must meet or exceed Legislated Standards that apply to all work undertaken by E. Gruben's Transport Ltd.

4.2.1 Communicating Safety Rules

To ensure everyone on the work site knows and understands the safety rules, they must be communicated in a variety of methods and in an on-going fashion.

Ways to Communicate:

Provide all new and returning employees with worker orientations

Make copies of EGT Health, Safety & Environmental Safety Manual available and easily accessible for employee reference.

Post the safety rules in areas of where staff use frequently.

- Review safety rules at regular safety meetings, management meetings and orientations.
- Distribute copies of the safety rules.
- Discuss safety rules during on-the-job training programs.
- Refer to appropriate safety rules at pre-job meetings.

4.2.2 Reinforcing Safety Rules:

- Workers at-risk behaviour observation will be conducted by supervisors and peers through inspections at worksites. Immediate correction and documentation of the at-risk behaviour is vital.

4.2.3 General Safety Rules

The safety rules listed below are applicable to all personnel. Compliance with these basic rules is mandatory and in the best interest of all personnel:

- Adhere to maximum allowable work hours and rest period as per legislated requirements.
- Exemptions to requirements must have prior regulatory approval, through obtaining extended hour work permits.
- Use or being under the influence of alcohol or illegal drugs, while on the job, is strictly prohibited.
- Workers taking prescribed medication, which may impair their ability to work, shall not engage in any work activity that may endanger the health and/or safety of themselves or other co-workers and employee's.
- Workers shall advise their immediate supervisor when using prescription medication.
- Smoking is prohibited in all workplaces, except in designated smoking areas. Smoking in the workplace is prohibited by law. Certain exemptions exist for remote work camps. See section 4.19, Smoking in the Workplace, for further details.
- Matches, lighters, cell phones and pagers are prohibited in some work areas.
- Beards or excess facial hair are not permitted on any workers who may be required to wear respiratory equipment, which requires a seal to the face.
- Workers shall not work around moving machinery if they are wearing loose clothing or jewellery, or have long hair, which is not contained.
- Workers shall not engage in practical jokes, horseplay, boisterous conduct, and/or un-necessary running in a work area.
- Firearms are prohibited on company premises (other than emergency flares) except for authorized wildlife monitors and supervisors.
- All existing gun laws must be followed.
- Flammable and combustible materials must be stored appropriately and at safe distances from sources of ignition.
- All inside door handles for entrance; cooler and freezer doors shall be free of defects and open freely.
- Gas lines from propane tanks shall be protected to prevent damage from vehicles or equipment driving over the lines.
- Electrical cords from light plants or cords used for plugging in vehicles and equipment must be protected to prevent damage to the lines.
- Personnel shall be provided with appropriate means of communication as determined by risk assessment.
- Stairs with more than three steps must be provided with handrails.
- Catering service providers shall have printed procedures for safe food handling.
- Kitchen staff shall familiarize themselves with all employee health and safety procedures that immediately effective them on a day-to-day basis.
- Equipment will be stored in a neat and tidy manner, with all unused materials and equipment to be stored in designated areas.
- Oily and greasy rags must never be left lying around with spills cleaned up immediately, walkways to be kept free of obstacles ice and snow.
- All incidents, whether property, personal, environmental or "near misses", regardless of their nature, will be promptly reported to supervisors. Workers not promptly reporting incidents will be subject to disciplinary actions, up to and including immediate dismissal.
- Any worker, company or contractor, abusing or causing willful damage to any company, client, or public property is subject to disciplinary actions up to and including immediate dismissal.
- Except inside office facilities or control cabs, workers will use appropriate PPE at all times, including hearing and hand protection.

- Equipment, including hand tools and PPE, will only be used for their intended purpose, with damaged or worn out equipment, being promptly tagged and removed from service.
- Only authorized workers are permitted to operate power equipment and tools, which will be operated as per manufacturer instructions, including grounding or double insulating all electrical hand tools.
- Garbage and rubbish will be cleaned up, collected and disposed of as per directions in the EGT environmental policy, with burning permitted through an agreement between EGT designate, the customer and, when necessary, regulatory bodies.
- Compressed gas cylinders shall be stored and transported in an upright position, labeled as per dangerous goods legislation and capped when not in use. Oxygen may be stored or transported in a horizontal position when secured.
- Employees are only allowed to ride in carriers designed for human transport, and which includes designated seating and a personal restraint system. Workers will not ride in or on hooks, hoists, tailgates, fenders or other material handling equipment.
- Horseplay, fighting, and or use of firearms except for designated personnel are strictly forbidden, and are grounds for disciplinary action, up to and including immediate dismissal.
- All workers will attend and participate in safety meetings and worksite orientations, and participate in the company hazard assessment and identification process. This includes a review of site-specific hazards and the safe practices necessary to perform it.
- Signs will be maintained in good condition, and when erected for temporary purposes, be removed when they are no longer needed.
- The use of cell phones is prohibited when operating equipment. Only use of hands free cell phones are permitted in vehicles while in motion.
- The use of any type of audio headphone equipment is strictly prohibited on the worksite.
- Within the confines of the row, speed will be limited to a maximum of 30 km/h and dead slow when passing workers.
- Do not open or close valves unless authorized. Do not activate any electrical switches unless authorized.
- Barricade all open excavations as necessary
- All barricades or warning signs that are temporarily removed must be replaced before crew leaves area.
- No trespassing off row or worksite.
- No animals will be allowed on any worksite or in any vehicles unless used in the course of work.

4.2.4 Specific Safety Rules

E. Gruben's Transport Ltd. Health, Safety and Environmental handbooks are issued to all E. Gruben's Transport Ltd. employees. All new employees receive a handbook at their orientation. All new and returning employees must complete the orientation prior to commencing employment.

The handbook covers a multitude of specific items under the general headings of:

A. Environmental Management
B. Ice Road Safety
C. General Information

4.2.5 Personal Protective Equipment (PPE)

All employees have access to PPE and E. Gruben's Transport Ltd. will comply with the Northwest Territories Safety Act S.N.W.T. 1996, c.9 4 (b); wherein, "Every employer shall take all reasonable techniques and procedures to ensure the Health and Safety of every person in his or her establishment".

In addition E. Gruben's Transport Ltd. will, as a condition of employment, require every worker employed with or in connection with E. Gruben's Transport Ltd. to abide by the Northwest Territories Safety Act S.N.W.T. 1996, c.9 5 9b) which states, "every worker employed on or in connection with an establishment shall, in the course of his or

her employment, as the circumstances require, use devices and articles of clothing or equipment that are intended for his or her protection and provided to the worker by his or her employer, or required pursuant to the Regulations to be used or worn by the worker.

Workers have the shared responsibility of protecting themselves, and wearing the necessary PPE for the work they are doing.

4.2.6 General PPE Rules

Engineering, work practice and administration controls are the preferred means of reducing or controlling hazards which may endanger the health and safety of workers. Residual risks require the use of PPE following the rules listed below:

Workers shall be responsible for the proper care, maintenance, cleaning and use of PPE that is assigned or loaned to them;
Supervisors are responsible for ensuring that workers are adequately trained in the proper use of, and responsibilities for the PPE;
Workers shall not use PPE that is defective or unsafe;
Such articles shall be taken out of service and reported to the supervisor and replaced immediately.
Visitors to operating areas of work sites will be required to wear all applicable PPE that is required for the work site.

4.2.7 Head Protection

All personnel entering our projects must wear the appropriate protective headgear. This includes all company employees, contractor personnel, visitors and representatives of organizations making deliveries to our projects etc. During winter operations, liners for hard-hats are also required.

Employees will not be permitted to alter their hard-hats in any way that affects their protective value, such as drilling holes in them for "decorative" purposes or wearing in a manner that the peak of the cap is not over the wearers face. Metal or cowboy type hard-hats shall not be permitted at any time on EGT work-sites. Shop and maintenance personal may wear bump type hard hats where permitted by regulatory bodies.
CSA approved hard hats shall be worn by all personnel while engaged in activities where a risk of injury to the head may exist. In addition:

A hard hat shall never be worn without a properly adjusted suspension;
Metal hard hats are not permitted due to electrical conductivity and inferior impact resistance to sharp objects; and,
Off-road helmets must be worn when operating quads and snowmobiles. Workers have the shared responsibility of protecting themselves, and wearing the necessary PPE for the work they are doing.

4.2.8 Foot Protection

Safety footwear is designed to protect against foot hazards in the workplace. Safety footwear protects against compression, puncture and impact injuries.
Safety footwear is divided into three different grades, which are indicated by colored tags and symbols.
The tag color indicates the amount of resistance the toe will provide to different weights dropped from different heights.
The symbol indicates the puncture resistance of the sole. For example, a triangle indicates puncture resistance to 135 kg. (300lbs.) pressure without being punctured by a 5cm. (2") nail.
Persons employed by EGT will wear only, high cut construction grade boots with the green triangle.
The individuals' goal when selecting the appropriate protective footwear should be to over protect.

CSA approved safety-toed boots shall be worn by all workers while engaged in activities where a risk of injury to the feet exists. Also note:

There may be additional requirements for wet, slippery and winter conditions; and,
Running shoe style safety footwear is not acceptable.

4.2.9 Eye & Face Protection

Personnel involved in any operation where the chance of eye injury could occur shall wear the appropriate, approved eye protection. These activities include but not limited to exposure to excessive dusts, chemicals, or flying particles, jackhammer or sandblasting operations, and working on or around lathes or chop saws. Employees in the area of welding, heating or cutting operations must have properly tented glasses to protect from the ultra violet rays. CSA approved side shields and over the glasses are available to all employees who wear prescription eyeglasses. No employee shall wear contact lenses at a work site as these may trap or absorb particles or gasses, which may cause anything from eye irritation to blindness.

Employees using tinted eye protection must be cautioned that a hazard exists when proceeding from well-lighted areas into darker areas. The eyes and eyewear require a few minutes to adjust to extreme changes in lighting situations such as these.

All employees while engaged in activities where a risk of injury to the eyes or face may exist shall wear CSA approved eye and face protection. Eye and face protection also means:

Face shields shall be worn in addition to eye protection while using grinding, buffing or striking tools.
Face shields shall be made available whenever they may be required;
Goggles shall be worn when handling liquid or powder chemicals where there is a risk of splash hazard;
In some situations, a face shield shall be used in conjunction with the goggles for additional eye and face protection; and,
Face shields and goggles shall be provided as required.

4.2.10 Hearing Protection

Construction projects, regardless of size, shape or description, are historically noisy places. (Noise may be defined as unwanted sound.)

It is not always feasible or practical to engineer noise out of the construction environment. Thus, hearing protection is a basic necessity that is provided to employees who are exposed to noises above acceptable levels.

"Ear plugs" are provided for continuous exposure to noise levels of a higher frequency, such as constant running of machinery in an enclosed space. For long exposures to noise requiring hearing protection, employees shall be provided with "earmuffs".

All work areas where noise levels exceed 85dBA shall be identified by the display of appropriate signs indicating the high noise area and ***"Hearing Protection required".*** Additional hearing protection includes:

All workers entering or working in areas that are marked as high noise areas shall wear CSA approved hearing protection devices;
Supplied hearing protection devices may be either of the plug or muff design and shall be supplied.

4.2.11 Limb & Body Protection

Employees shall be properly attired on our construction projects. Clothing appropriate for work to be performed shall be worn. The minimum attire shall include a proper shirt, long pants, and CSA approved footwear suitable for construction work. Cut-off t-shirts, shorts and shoes are not suitable attire and shall not be permitted on any

company project site. Where deemed necessary by project hazards, fire resistant/retardant clothing will be required. Appropriate work clothing for the work being performed means:

Where a potential fire and explosion hazard exists, Fire Retardant Clothing (FRC) shall be worn;
Approved cold weather clothing shall be worn by or available to all personnel working in the Mackenzie Delta or while being transported via air transport;
A luminous vest or reflective tape on front or back of outer garments shall be worn; and,
Workers shall wear appropriate gloves or mitts to protect their hands from workplace hazards.

4.2.12 Respiratory protection

Some of our projects are executed operating near facilities, gas wells and contaminated sites. Atmospheric contaminants may pose a potentially serious hazard to the health and safety of employees. The appropriate approved respiratory protective equipment shall be issued to employees involved in work areas where airborne contaminants may be a hazard. Employees required to use respiratory protective equipment will be trained in the use, maintenance, handling and storage. Special precaution shall be observed for the more sophisticated respiratory protection devices.

Respiratory protective equipment may vary from the simple dust mask to a self-contained breathing apparatus. **The safety department** shall either conduct or arrange for the necessary training to be conducted on the more sophisticated respiratory protective equipment, when required.

Project supervisors shall provide ample warning of hazardous operations requiring training on this type of respiratory protection. An example might be remediation and cleanup of contaminated sites. Training and equipment availability may dictate a delay in operations, should the proper requests not be submitted in a timely fashion.

Respiratory protection must not be considered a substitute for engineering control methods. Respiratory protective devices might be restricted in use to intermittent exposures or for operations that are not feasible to control by other methods. Supervisors must be aware that respiratory protective devices fall into two general categories:

1. **Air purifiers**, which remove the contaminant from the breathing air by filtering or chemical absorption.
2. **Air suppliers**, which provide clean air from an outside source or from a cylinder(s).

Selection of the appropriate respiratory protective equipment shall be based on the following guidelines:

1. The identification of the substance or substances for which respiratory protection is necessary.
2. The determination of the hazards of each substance and their significant physical and chemical properties.
3. The determination of the maximum levels of air contamination expected the probability of oxygen deficiency, and the conditions and duration of exposure.
4. The determination of the capabilities and characteristics essential to the safe use of the respiratory protective device.
5. The determination of what facilities, spare parts and equipment are needed for maintenance, so as not to cause unnecessary delays in the operation.

The selection of the appropriate respiratory protective device to be used for a specific operation shall be a joint effort between the **safety department and the project supervisor**.

The **project supervisor** must be consulted on the requirement, selection, and the equipment training time needed, well in advance of the actual operation.

Worker cooperation

Since a respirator often becomes uncomfortable after wearing it for extended periods, the worker must fully realize the need for protection, or they will not wear it. To promote cooperation, supervisors shall:

1. Prescribe respiratory protective equipment only after every effort has been made to eliminate the hazard.
2. Explain the hazards and the need for respiratory protective equipment, completely, to the worker.
3. Fit the respirator carefully.
4. Provide the direction and means for maintenance and cleanliness, including sterilization before reissue.
5. Instruct the worker in the proper use of the respirator.
6. No beards or long sideburns are permitted, as a proper seal will not be attained.

4.3 Enforcement

E. Gruben's Transport Ltd. will hold employees accountable for adherence to all rules, practices and procedures. Supervisors will promote and enforce rules and safe work practices.

Employees must be aware of penalties and the increasing consequences for their actions.

At E. Gruben's Transport Ltd. a progressive discipline system is in place for general disciplinary cases and may be used in the following format with regard to disciplinary action:

First Offence: A verbal warning that is accompanied by a dialogue between the employee and the supervisor shall be given. The supervisor will explain the reason for the warning and how the employee must act or perform in the future. The warning will be recorded so that a record of it exists in the employee's personnel file.

Second Offence: A written warning shall be given. The supervisor will review the facts with the employee as well as the previous warning. They will agree on a resolution to the problem before the employee returns back to work. The supervisor will follow up with a memo to the employee and a submission to his/her file.

Third Offence: A suspension of the employee (with or without pay) shall be given. The supervisor will be firm in asking the employee about their desire for further employment in the company. The time off will give the employee a chance to consider their actions as well as their intentions for the future.

Fourth Offence: No further warnings – immediate dismissal.

E. Gruben's Transport Ltd. reserves the right to depart from all or a portion of this format in the event that E. Gruben's Transport Ltd. deems it necessary, due to unique circumstances involved in the disciplinary case. Particularly flagrant offences, which are conspicuously bad or offensive may be dealt with more severely.

4.4 Legislative Compliance

Safety legislation is designed to protect workers, the public and the environment. Compliance with legislation helps prevent personal injuries, fines and legal actions. E. Gruben's Transport Ltd. will comply with regulatory requirements as a minimum standard for our safety program. Regulatory requirements include all Acts, Regulations, Policies, Practices and Procedures administered by Government and their Agencies.

Relevant Legislation:

A large range of regulatory agencies covers work undertaken by E. Gruben's Transport Ltd. The following list of regulatory agencies represents some of the more prominent legislation whose regulations govern our work:

NWT Occupational Health & Safety Act
NWT Workers Compensation Act
Transportation of Dangerous Goods Act
WHMIS Legislation
National Energy Board
Canada Labour Code
Building Code of Canada
Canadian Electrical Code

E. Gruben's Transport Ltd., by reason of its geographical location, falls under the statutes of the Northwest Territories Workers Compensation Board, Canada Labour Code Part II and the Oil & Gas Occupational Safety & Health Regulations. The Canada Labour Code, Oil and Gas Occupational Safety & Health Regulations utilize the National Energy Board as its enforcement arm.
Any incident or accident investigation occurring on Oil & Gas Leases in the Northwest Territories falls under the jurisdiction of the National Energy Board, along with any other areas under federal jurisdiction.

The Northwest Territories Workers' Compensation Board Safety Act exercises jurisdiction on Safety Regulations which do not fall under the Canada Labour Code.

4.4.1 Canada Labour Code Regulations

Regulations Respecting Occupational Safety & Health Made Under Part II of the Canada Labour Code

The following are a summary of some specific duties of employers as they relate to E. Gruben's Transport Ltd.

DUTIES OF EMPLOYERS

124. Every employer shall ensure that the health and safety at work of every person employed by the employer is protected.

R.S., 1985, c. L-2, s. 124; R.S., 1985, c. 9 (1st Supp.), s. 4; 2000, c. 20, s. 5.

Specific Duties of Employer

125. (1) Without restricting the generality of section 124, every employer shall, in respect of every work place controlled by the employer and, in respect of every work activity carried out by an employee in a work place that is not controlled by the employer, to the extent that the employer controls the activity,

(*a*) Ensure that all permanent and temporary buildings and structures meet the prescribed standards;

(*b*) Install guards, guard-rails, barricades and fences in accordance with prescribed standards;

(*c*) Investigate, record and report in the manner and to the authorities as prescribed all accidents, occupational diseases and other hazardous occurrences known to the employer;

(*d*) Post at a place accessible to every employee and at every place directed by a health and safety officer

(i) A copy of this Part,

(ii) A statement of the employer's general policy concerning the health and safety at work of employees, and

(iii) Any other printed material related to health and safety that may be directed by a health and safety officer or that is prescribed;

(*e*) Make readily available to employees for examination, in printed or electronic form, a copy of the regulations made under this Part that apply to the work place;

(*f*) if a copy of the regulations is made available in electronic form, provide appropriate training to employees to enable them to have access to the regulations and, on the request of an employee, make a printed copy of the regulations available;

(*g*) Keep and maintain in prescribed form and manner prescribed health and safety records;

(*h*) Provide prescribed first-aid facilities and health services;

(*i*) Provide prescribed sanitary and personal facilities;

(*j*) Provide, in accordance with prescribed standards, potable water;

(*k*) Ensure that the vehicles and mobile equipment used by the employees in the course of their employment meet prescribed standards;

(*l*) Provide every person granted access to the work place by the employer with prescribed safety materials, equipment, devices and clothing;

(*m*) Ensure that the use, operation and maintenance of the following are in accordance with prescribed standards:

(i) Boilers and pressure vessels,

(ii) Escalators, elevators and other devices for moving persons or freight,

(iii) All equipment for the generation, distribution or use of electricity,

(iv) Gas or oil burning equipment or other heat generating equipment, and

(v) Heating, ventilation and air-conditioning systems;

(*n*) Ensure that the levels of ventilation, lighting, temperature, humidity, sound and vibration are in accordance with prescribed standards;

(*o*) Comply with prescribed standards relating to fire safety and emergency measures;

(*p*) Ensure, in the prescribed manner, that employees have safe entry to, exit from and occupancy of the work place;

(*q*) Provide, in the prescribed manner, each employee with the information, instruction, training and supervision necessary to ensure their health and safety at work;

(*r*) Maintain all installed guards, guard-rails, barricades and fences in accordance with prescribed standards;

(*s*) Ensure that each employee is made aware of every known or foreseeable health or safety hazard in the area where the employee works;

(*t*) Ensure that the machinery, equipment and tools used by the employees in the course of their employment meet prescribed health, safety and ergonomic standards and are safe under all conditions of their intended use;

(*u*) Ensure that the work place, work spaces and procedures meet prescribed ergonomic standards;

(*v*) Adopt and implement prescribed safety codes and safety standards;

(*w*) Ensure that every person granted access to the work place by the employer is familiar with and uses in the prescribed circumstances and manner all prescribed safety materials, equipment, devices and clothing;

(*x*) Comply with every oral or written direction given to the employer by an appeals officer or a health and safety officer concerning the health and safety of employees;

(*y*) Ensure that the activities of every person granted access to the work place do not endanger the health and safety of employees;

(*z*) Ensure that employees who have supervisory or managerial responsibilities are adequately trained in health and safety and are informed of the responsibilities they have under this Part where they act on behalf of their employer;

R.S., 1985, c. L-2, s. 125; R.S., 1985, c. 9 (1st Supp.), s. 4, c. 24 (3rd Supp.), s. 4; 1993, c. 42, s. 4(F); 2000, c. 20, s. 5.

Duties of Employees - Health and safety matters

126. (1) While at work, every employee shall
(*a*) use any safety materials, equipment, devices and clothing that are intended for the employee's protection and furnished to the employee by the employer or that are prescribed;

(*b*) Follow prescribed procedures with respect to the health and safety of employees;

(*c*) Take all reasonable and necessary precautions to ensure the health and safety of the employee, the other employees and any person likely to be affected by the employee's acts or omissions;

(*d*) Comply with all instructions from the employer concerning the health and safety of employees;

(*e*) Cooperate with any person carrying out a duty imposed under this Part;

(*f*) Cooperate with the policy and work place committees or the health and safety representative;

(*g*) Report to the employer anything or circumstance in a work place that is likely to be hazardous to the health or safety of the employee, or that of the other employees or other persons granted access to the work place by the employer;

(*h*) Report in the prescribed manner every accident or other occurrence arising in the course of or in connection with the employee's work that has caused injury to the employee or to any other person;

(*i*) Comply with every oral or written direction of a health and safety officer or an appeals officer concerning the health and safety of employees; and

(*j*) Report to the employer any situation that the employee believes to be a contravention of this Part by the employer, another employee or any other person.

No relief of employer's duties

(2) Nothing in subsection (1) relieves an employer from any duty imposed on the employer under this Part.
Limitation of liability

(3) No employee is personally liable for anything done or omitted to be done in good faith by the employee when the employee is assisting the employer, as requested by the employer, in providing first-aid or in carrying out any other emergency measures.

R.S., 1985, c. L-2, s. 126; R.S., 1985, c. 9 (1st Supp.), s. 4; 1993, c. 42, s. 6(F); 2000, c. 20, s. 8.

Refusal to work if danger

128. (1) Subject to this section, an employee may refuse to use or operate a machine or thing, to work in a place or to perform an activity, if the employee while at work has reasonable cause to believe that

(*a*) The use or operation of the machine or thing constitutes a danger to the employee or to another employee;

(*b*) A condition exists in the place that constitutes a danger to the employee; or

(*c*) The performance of the activity constitutes a danger to the employee or to another employee.
No refusal permitted in certain dangerous circumstances

(2) An employee may not, under this section, refuse to use or operate a machine or thing, to work in a place or to perform an activity if

(*a*) The refusal puts the life, health or safety of another person directly in danger; or

(*b*) The danger referred to in subsection (1) is a normal condition of employment

For other questions not covered specifically in the above Employer's Duties, please refer to the document Canada Labour Code – Part II

A COPY IS AVAILABLE TO EMPLOYEES ONLINE AND IN THE EGT BASE CAMP AND PROJECT OFFICES

4.4.2 Duties of Employers – Oil and Gas Occupational and Health

Oil and Gas Occupational and Health Regulations
PART XVI - HAZARDOUS OCCURRENCE INVESTIGATION, RECORDING AND REPORTING

[SOR/94-165, s. 59(F)]

Interpretation
16.1 In this Part,

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

(*a*) 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 disabling injury occurred, whether or not that subsequent day is a working day for that employee,

(*b*) 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

(*c*) Results in the permanent impairment of a body function of an employee; (*blessure invalidante*)

"Minor injury" means an employment injury or an occupational disease for which medical treatment is provided and excludes a disabling injury. (*blessure légère*)

SOR/94-165, s. 60.

Report by Employee

16.2 Where an employee becomes aware of an accident or other occurrence arising in the course of or in connection with his work that has caused injury to him or to any other person, he shall without delay report the accident or other occurrence to his employer, orally or in writing.

Investigation

16.3 (1) Where an employer is aware of an accident, occupational disease or other hazardous occurrence affecting any of his employees in the course of employment, the employer shall, without delay,

(*a*) Take necessary measures to prevent a recurrence of the hazardous occurrence;

(*b*) Appoint a qualified person to carry out an investigation of the hazardous occurrence; and

(*c*) Notify the safety and health committee or the safety and health representative, if either exists, of the hazardous occurrence and of the name of the person appointed to investigate it.

(2) In addition to the investigation referred to in paragraph (1) (*b*), where the hazardous occurrence referred to in subsection (1) is an accident involving a ship or aircraft or a motor vehicle on a public road, the employer shall investigate the accident by obtaining from the appropriate police or other investigating authority a copy of the report made by that authority in respect of the accident.

(3) As soon as possible after receipt of the report referred to in subsection (2), the employer shall provide a copy thereof to the safety and health committee or the safety and health representative, if either exists.

SOR/94-165, s. 61.

Hazardous Occurrence Report

[SOR/94-165, s. 62(F)]

16.4 (1) The employer shall report, by the most rapid means of communication available to the employer, the date, time, location and nature of any accident, occupational disease or other hazardous occurrence referred to in section 16.3 to a safety officer and to the safety and health committee or the safety and health representative, if either exists, as soon as possible but not later than 24 hours after becoming aware of the occurrence, where the occurrence resulted in one of the following circumstances:

(*a*) The death of an employee;

(*b*) A missing person;

(*c*) A disabling injury to an employee;

(*d*) The implementation of emergency rescue, revival or evacuation procedures;

(*e*) A fire or explosion that threatened the safety or health of an employee;

(*f*) The free fall of an elevating device that rendered the elevating device unsafe for use by an employee;

(*g*) An accidental accumulation, spill or leak of a hazardous substance; or

(*h*) The loss of or damage to support craft.

(2) A written report of the accident, occupational disease or other hazardous occurrence referred to in subsection (1) shall be submitted by the employer within 14 days after the occurrence to

(*a*) The regional safety officer at the regional office; and

(*b*) The safety and health committee or the safety and health representative, if either exists.

(3) The report referred to in subsection (2) shall be in the form set out in Schedule I to this Part and contain the information required by the form.

SOR/88-199, s. 19; SOR/94-165, s. 63.

16.5 Where an investigation referred to in subsection 16.3(2) discloses that the accident resulted in a circumstance referred to in subsection 16.4(1), the employer shall, within 14 days after the receipt of the report of the accident made by the police or other investigating authority, submit a copy of the report to the regional safety officer at the regional office.

Minor Injury Record

16.6 (1) Every employer shall keep a record of each minor injury of which he is aware that affected any of his employees in the course of employment.

(2) A record made pursuant to subsection (1) shall contain

(*a*) The date, time and location of the occurrence that resulted in the minor injury;

(*b*) The name of the injured or ill employee;

(*c*) A brief description of the minor injury; and

(*d*) The causes of the minor injury.

Annual Report

16.7 (1) Every employer shall, not later than March 1 in each year, submit to the Minister a written report setting out the number of accidents, occupational diseases and other hazardous occurrences of which the employer is aware that affected any of the employees of the employer in the course of employment during the 12 month period ending December 31 in the preceding year.

(2) The report referred to in subsection (1) shall be in the form set out in Schedule II to this Part and contain the information required by the form.

SOR/94-165, s. 64.

Retention of Reports and Records

16.8 (1) Subject to subsection (2), every employer shall keep a copy of each report and record referred to in this Part for one year after its submission to the regional safety officer or the Minister.

(2) Every record with respect to a result referred to in paragraph 16.4(1) (*f*) shall be kept by the employer for a period of five years after the hazardous occurrence.

SOR/94-165, s. 65(F).

4.4.3 Canada Oil & Gas Operations Act – Telephone List

Hazardous occurrences (as prescribed under Part XVI of the Oil and Gas Occupational Safety and Health Regulations) are to be reported to the N.E.B. immediately. The N.E.B also requires notification of any accident including any incident requiring Medical Evacuation.

Secretary
National Energy Board
444 Seventh Avenue S.W.
Calgary, Alberta T2P 0X8 •

Emergency Number (403) 807-9473
Fax: (403) 292-5503

NWT Spill Reporting (24 Hour Spill Line)

Office: (867) 920-8130

4.4.4 Canada Oil & Gas Geophysical Operation Regulations Conditions of Approval

Comments:
This is an area of shallow biogenic gas deposits. The operator must be familiar with Section 19, of the Canada Oil and Gas Geophysical Operation Regulations Drilling Shot Holes for Charges. All necessary precautions shall be made while drilling shot holes to ensure that any released gas is not ignited. The following precautions, as a minimum, are to be taken:

1. **Shot Holes**
   (a) There must be no open ignition sources such as generators, heat sources or smoking.

   b) If gas is encountered while drilling, a flowing hole report, that indicates the shot hole location, must be submitted, without delay to a N.E.B. Safety Officer.

   (c) All unnecessary electrical is turned off.

   (d) The engine is equipped with air intake shut-off valves that can be activated by the driller.

   (e) The drilling rig is positioned, with respect to the wind, so that gas encountered during drilling will not accumulate in the vicinity of the rig.

   (f) Use alternative means of communication to report the encountering of shallow gas, not the cab radio in the rig that has encountered the gas.

   (g) If gas is encountered, explosives shall not be detonated in the encountering shot hole until cleared by the N.E.B. Safety Officer.
   (h) A check valve is to be installed on the kelly hose.

   (i) Water vents must be left open and never closed while drilling or loading water; and

   (j) Water must be loaded from a source that has low potential for gas with the suction hose placed well below the bottom of the ice. This condition also applies to obtaining camp water from a frozen water body where shallow gas may be a concern.

2. **Ice Monitoring**
   Prior to crossing or working on any body of water, not found to be frozen to the bottom, the following procedures are to be followed:

   (a) Where practical, electronic profiling should be utilized to determine ice thickness prior to vehicular travel;

(b) The ice is to be profiled utilizing the same care and due diligence that would be displayed drilling shot holes. Ice areas shall not be crossed or worked on until profiling indicates that the ice thickness is satisfactory as per approved company Health, Safety and Environmental Manual;

(c) A record of profiles shall be available at the request of the N.E.B. Safety Officer
(d) Equipment and personnel shall not travel beyond or on ice that has not been previously tested and profiled;

(e) if gas is encountered or may be expected in an area, frequency of profiling is to increase so as to identify any areas that may have been eroded due to ice thinning; and

(f) if gas is found to be venting through the ice a N.E.B. Safety Officer must be informed prior to any work being conducted in that area.

4.8 Harassment Policy

Harassment

E. Gruben's Transport Ltd. commitment to providing safe workplaces also includes a commitment to provide a safe and respectful atmosphere where harassment or the threat of violence are not tolerated. Disciplinary action may result for anyone who harasses another person, or for any personnel who fail to act properly to end harassment.

No-one, which includes a manager, supervisor, employee, contractor, or a member of the public, is required to tolerate harassment for any reason, at any time. Likewise, no-one has the right to harass anyone else at work or in any situation related to employment.

"Harassment" may be defined as any repetitive or occasional conduct, comment, gesture or contact that is directed toward an individual or group that is insulting, intimidating, humiliating, malicious, degrading or offensive, or is of a nature that, on reasonable grounds, could be perceived as placing a condition of a sexual or other nature on employment or on any opportunity for training or promotion.

Harassment is against the law. The *Canadian Human Rights Act* and the *Canadian Labour Code* protect workers from harassment. The *Criminal Code* protects workers from physical and sexual assault. All workers have the right to live and work without being harassed.

Filing a Complaint

Every employee of E. Gruben's Transport Ltd. is entitled to employment free of harassment, and we will make every reasonable effort to ensure that no employee is subjected to it. An employee who feels that he/she is a victim of harassment should take the following actions:

- Report the complaint to his/her immediate supervisor. If circumstances do not permit this, the complaint may be brought to the next level of administration;
- Maintain a written record of all relevant details including
    1. The name of the harasser;
    2. Date(s), time(s) and location(s) of harassment incidents(s);
    3. Description of harassing behavior; and
    4. The physical, social and/or emotional effects caused by the harassing behavior.

Under the *Fair Practices Act* (NWT and Nunavut), an employer cannot fire or otherwise penalize an employee for filing a complaint about harassment or discrimination at work. Employees are also entitled to make a complaint under the *Human Rights Act*.

Addressing a Complaint

Upon receipt of a harassment complaint, E. Gruben's Transport Ltd. will:

Conduct an investigation by questioning the:

1. complainant,
2. named aggressor(s), and
3. witnesses;

Maintain confidentiality with respect to the complainant and the circumstances related to the complaint except where disclosure is necessary for the purposes of investigating the complaint or taking disciplinary action;

Treat all complaints of harassment seriously, whether they are made formally or informally, and act on all complaints quickly, confidentially and fairly;

Take disciplinary action against any person under the organization's direction who subjects any employee to harassment, up to and including dismissal; and

Discipline any personnel who knowingly allow harassment of a co-worker to persist.

Workplace Violence

All workers have the right to work in an environment that is protected from violence or the threat of violence, from workers or non-workers. Violent behavior, fighting and/or disregard for other persons and their property will result in permanent removal of involved workers.

"Violence" is the attempted, threatened or actual exercise by a person of any physical force so as to cause injury to a worker, and includes any threatening statement or behavior which gives a worker reasonable cause to believe that the worker is at risk of personal injury.

Threats of violence will be handled in the same manner as any other workplace harassment. Criminal proceedings may be used if it is felt that the risk to any worker warrants it.

4.9 Tuk Base Camp Rules

All personnel should familiarize themselves with the camp layout and the facilities available, and familiarize themselves with the emergency exits. If everyone does their part to keep the camp clean and in good condition it will ensure continued availability of the various amenities.

E. Gruben's Transport Ltd. is not responsible for personal belongings. Please take time to ensure that your personal items are secure. Insuring personal belongings is the responsibility of each individual.

Smoking is permitted in one area of the camp. The coffee room located on the second floor is the selected designated smoking area. Otherwise, smoking is strictly prohibited in the rest of the camp.

The consumption and/or possession of alcohol or non-prescription drugs are strictly forbidden in the camp or on E. Gruben's Transport Ltd. property. A zero tolerance policy is in effect regarding these items and failure to comply may result in immediate removal from the camp. An authorized EGT representative may conduct a search of rooms and personal effects in the presence of the occupant and/or owner.

Coveralls, hard hats, work boots and other work clothing are to be left in the mudroom. Hats may not be worn in the dining room. Bare feet are not permitted outside of the bedrooms or recreational areas.

Please use courtesy and common sense in regards to activity and noise levels in the camp at all times.

Do not tamper with the fire/smoke alarms and do not use the fire exits except in the case of an emergency.

Please make yourself familiar with the fire exits in the building. In the event of a fire please ensure the safety of yourself and others by calmly proceeding to your designated fire exit.

Candles or any other devices that generate open flame are prohibited within the camp.

Visitors are permitted only in common areas and only until 11:00 pm. Guests are not permitted in the dorm area.

4.10 Tuk Base Emergency Contacts

Nursing Station	Tuktoyaktuk	(867) 977-2321
RCMP	Tuktoyaktuk	(867) 977-1111
Fire Department	Tuktoyaktuk	(867) 977-2222
Inuvik Hospital	Inuvik	(867) 777-8000
Camp Switchboard	Tuktoyaktuk	(867) 977-7000

SHOULD THE FIRE ALARM SOUND – GO TO THE NEAREST EXIT CLOSING DOORS BEHIND YOU.

EVACUATE TO MUSTER STATION

1. MUSTER STATION

MAIN BULDING ENTRANCE (LOBBY)

2. ALTERNATE MUSTER STATION

WAREHOUSE

SEE FIRST PAGE OF THIS MANUAL FOR COMPLETE LIST OF EMERGENCY CONTACTS FOR BOTH COMPANY REPRESENTATIVES AND GOVERNMENT AGENCIES.

4.11 Company Vehicle Policy

E. Gruben's Transport will provide safe, fully-functioning small vehicles of the best quality that can reasonably be purchased. These vehicles will be used to carry out the company's business and to enhance the public and customer image of the company. EGT realizes driving is one of the most hazardous tasks workers perform. It is the only task that is completed frequently that has the potential for severe personal injury even if everything reasonable has been done prior to starting the task. All personnel operating an EGT vehicle (owned, leased or rented) will do so in accordance with all applicable laws, regulations and EGT's safety policy. To assist in the prevention of driving related incidents the following guidelines will be followed:

- Any employee operating a licensed vehicle on or off right of way must possess a valid driver's license of proper class. Any changes to status of driver's license must be reported immediately to the EGT Supervisor.
- mployees will ensure vehicles, which have been assigned to them, are operated in accordance with this program, including the drug and alcohol policy, in accordance to driving regulations and are only used for approved company business. **Employees will be financially responsible for any traffic violations.** Workers receiving, and failing to report any known traffic violations, will be

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subject to disciplinary action, up to and including dismissal.

- Workers are to ensure that the driver of any vehicle they are a passenger in, is fit and able to operate the vehicle in accordance with this policy.
- All company vehicles will be driven with their headlights **on** at all times, to ensure that vehicles, both on-coming and following, have a greater chance of awareness of their presence.
- Workers will ensure vehicles are in good repair and clean condition. Only personnel authorized to complete repairs are allowed to complete maintenance on vehicles.
- Drivers of company vehicles, are responsible for reporting all accidents or damage to their supervisor immediately, and ensure any injured person receives prompt medical attention. The drivers are also responsible to report the accident to all applicable authorities as directed by regulation.
- All commercial company vehicles will be equipped with proper safety equipment in accordance with highway and worksite rules and regulations. Each vehicle will have, as a minimum, a fire extinguisher, first aid kit, reflective triangles.
- Workers will secure vehicle loads, as per legislative and company requirements, prior to moving the vehicle. Loose objects must not be transported in the crew compartment of the vehicle.
- Vehicles will be operated in accordance with the Territorial or Provincial Highway Traffic Act.
- All occupants of EGT small vehicles must wear seatbelts at all times.
- EGT vehicles will not be driven in excess of posted speed limits. Road and traffic conditions may dictate lower maximum allowable speeds.
- All personnel are responsible for conducting maintenance checks of fuel, all fluids and tire pressure, and for ensuring that required safety/emergency equipment is present prior to departure.
- All operators are to conduct a thorough walk-around of vehicles prior to departure. Windows and mirrors are to be kept clean and free of obstruction.
- All personnel traveling on ice roads must wear or carry adequate winter clothing including insulated winter boots, winter parka with hood, insulated wind pants, gauntlet gloves or mittens and winter head wear.
- All personnel traveling out of town must comply with Journey Management Procedures.

Heavy vehicle operators will meet the requirements of the National Safety Code (N.S.C.), including the completion of an "hours of service" logbook. The logbooks will be completed as per N.S.C. Guidelines and handed into the applicable division office.

Vehicles designated for out of town and ice-road use will be equipped with the following:

- Two-way radio with, at minimum, company local repeater channels.
- First Aid Kit
- Fire-extinguisher
- Reflective triangles/flare kit
- Rotation beacon
- Emergency Survival Kit
- Spare tire, jack and wheel wrench
- Shovel and tow-strap

E. Gruben's Transport Ltd. vehicles and personnel are not permitted in town during working hours unless authorized by supervisory personnel. When authorized, personal trips must be done during scheduled coffee or lunch breaks Supervisors will note time on timesheets of any personal trips to town outside of these designated periods.

E. Gruben's Transport Ltd. vehicles are not permitted in town after 8:00 p.m. unless authorized by senior supervisory personnel. Personnel wishing to go into town after hours must arrange transportation with Night Security. Arrangements will be made to pick up personnel at 11:00 p.m. at a designated central location. Night

shift security personnel will not make other extra trips into town to pick up personnel and will not make multiple stops in town looking for personnel. Personnel who do not return on the 11:00 p.m. bus and who do not report to work the following morning will be issued a warning and will be subject to the enforcement procedures outlined in this package.

4.12 Journey Management Procedures

Purpose

To provide guidelines for assuring personnel traveling in the Mackenzie Delta region are accounted for and are appropriately equipped for any adverse conditions that may be encountered during their travels.

Scope

This procedure applies to all E. Gruben's Transport Ltd. and subcontractor personnel traveling in the Mackenzie Delta on behalf of E. Gruben's Transport Ltd. Following are guidelines that field supervisors should use when planning travel by personnel in the Delta region.

Responsibility

E. Gruben's Transport Ltd. Tuk Base Camp Manager has overall responsibility and acts as Journey Manager, or appoints a designate. He/she is responsible for the co-ordination and implementation of all aspects of this procedure.

1. Tuk Base Manager – **Office 867-977-7000**

2. Tuk Base Night Security will carry out Journey Management Procedures as required for trips originating or terminating after 8:00 p.m. Office: **867-977-7000**

3. The Inuvik Expediting Manager will carry out Journey Management Procedures for trips originating and terminating in Inuvik. **Office: 867-777-4678**

Procedure

1. Check local weather forecast prior to departing for your destination. In the event that severe weather is forecast for the region, delay your travel plans until more favorable conditions exist. If a radio is not available, the local weather office can be contacted at 1-867-777-4183 in (Inuvik) or 1-867-977-2564 in (Tuktoyaktuk). Weather conditions from Environment Canada are downloaded daily from the internet and posted at the Tuk Base front desk and the Inuvik Airport Road Office. If weather conditions are favorable, you must file a Journey Management plan prior to departure. These are at the front desk at the Tuk Base Camp and at the Inuvik Airport Road Office. A copy is attached below, in section 4.12.1.

2. The driver of the vehicle must submit Journey Management details to the Base Camp Manager, preferably in person. If absolutely necessary, this may be done by telephone or company radio. The Base Camp manager is then responsible for updating the Journey Management Board and document relevant information on the Journey Management form. At remote sites, the duties of the Tuk Base Camp Manager are assumed by the Site Supervisor or the Medic.

Information required includes:
- Date of journey
- Driver Name
- Passenger name(s)
- Destination
- Departure Time & Location

Route Details
Check-in Time(s) and Location(s)
Estimated Time of Arrival
Radio frequency and cell phone number

In addition, all vehicles operating for E. Gruben's Transport Ltd. must be equipped with the appropriate emergency equipment. This includes appropriate winter clothing with reflective striping, survival kit, road hazard kit, first aid kit and fire extinguisher. A complete check-list for all vehicles traveling on ice roads is attached below in section 4.12.2. These checklists can be found at the Tuk Base front desk and at the Inuvik Airport Road Office. The Journey Manager will verify whether vehicles have all the required equipment prior to departure.

The driver must, upon arrival at his destination, closeout the journey with the Journey Manager. At this point details are completed on the Journey Management form, which is kept as a permanent record, and are removed from the Journey Management Board.

3. Based on details listed above, the journey will be monitored. Any deviation from original plans, or unforeseen delays, must be reported by radio or telephone to the Journey Manager. The Journey Manager then updates the Journey Management form and board.

4. Certain ice-roads accessing work locations may be radio controlled. All vehicles must be equipped with two-way radios programmed with the frequencies used on that particular road. Procedures applicable to these ice-roads will be followed by E. Gruben's Transport Ltd. personnel.

5. In the event there is an overdue journey (based on estimated time of arrival) the Journey Manager will attempt to contact the driver, and if a significant amount of time has elapsed without contact (over two hours, from E.T.A.), the Journey Manager will enact procedures to find the vehicle.

6. The Journey Management form can also be used to track travel on a job site for audit reasons. A copy of completed Journey Management Forms is to be retained and collected at the end of each job.

7. Some client companies have their own Journey Management systems in place. E. Gruben's Transport Ltd. will ensure its personnel also follow client journey management procedures as required.

4.12.1 JOURNEY MANAGEMENT DAILY JOURNAL

DATE: _____

All EGT and subcontractor vehicles travelling should be entered on this sheet.
Clip board should remain on Tuk Base front desk.
Initial that the journey manager at the other end of trip has been notified at start of Tuk-based journeys and at completion of journeys with Tuk as Destination.
Initial confirmation that trips have been completed, and that all necessary notifications have been completed.
Completed sheets to be turned in to the Safety Office.

NAMES (Including passengers)	VEHICLE	ROUTING	DEPART. TIME	ARRIVAL TIME	RADIO/ CELL #s	NOTIFY OTHER END	ALL COMPLETE

4.12.2 CHECKLIST FOR ALL EQUIPMENT TRAVELLING ON ICE ROADS

ALL E. GRUBEN'S TRANSPORT LTD. AND SUBCONTRACTOR VEHICLES AND EQUIPMENT MUST CONTAIN THE FOLLOWING EQUIPMENT PRIOR TO TRAVELLING ON WINTER ROADS:

- ☐ FIRE EXTINGUISHER
- ☐ FIRST AID KIT
- ☐ EMERGENCY SURVIVAL KIT
- ☐ REFLECTIVE TRIANGLES/FLARES
- ☐ SHOVEL
- ☐ TOW STRAP
- ☐ SPARE TIRE, JACK, WHEEL WRENCH
- ☐ TWO-WAY RADIO WITH EGT AND CLIENT FREQUENCIES, AS APPLICABLE
- ☐ DRIP TRAY, IF EQUIPMENT IS TO REMAIN AT EGT OR CLIENT REMOTE SITE

ALL EGT AND SUBCONTRACTOR PERSONNEL MUST CARRY WITH THEM:

- ☐ WINTER GEAR, INCLUDING PARKA, GLOVES, WINDPANTS AND BOOTS
- ☐ EGT REQUIRED PPE, INCLUDING HIGH VISIBILITY CLOTHING

ALL PERSONNEL MUST COMPLETE JOURNEY MANAGEMENT PROCEDURES FOR ANY AND ALL TRIPS OUT OF TOWN

4.13 Abandoned Vehicle Protocol

The following practices and procedures are to be followed by crew personnel in the event of a vehicle remaining on the road for various reasons. These reasons might include but not be limited to the following:

- Vehicle becoming disabled due to mechanical failure.
- Transport Company dropping the vehicle as per directions.
- Vehicle left on the road due to extreme weather conditions.
- Vehicle out of fuel.
- Operator of the vehicle becoming incapacitated.
- Suspension of operations due to an emergency on the site, and
- Following direction of a peace officer, company HSE personnel, client or government representative.

Definitions:

An ***"abandoned vehicle"*** is defined as any type of motorized vehicle, which has been left on a roadway where traffic may access up to or past its location. This also includes trailers, which are left for repair, maintenance or simply for retrieval at a later date.

"Site Supervisor" is defined as any controlling supervisor located on the prospect or in control of the personnel on a site. It is specifically titled in this fashion to designate the individual who is making decisions on a day-to-day basis and who typically represents the company as well as the client.

The term ***"disabled"*** is defined as a state of repair in which the vehicle is unable to safely proceed in a forward motion and/or under the proper control of the operator.

"Extreme Weather Conditions" are defined as environmental conditions, which restrict visibility or movement to such a state that advancement of the vehicle would compromise the safety of the driver or occupants.

Abandoned Vehicle Protocol Procedures:

- Any vehicle (s) left at a location on a roadway will cause the following safety procedures to be undertaken without exception.
- Vehicles left on a roadway because of mechanical difficulty and/or weather related reasons would have the vehicle pulled to the extreme right hand side of the road wherever possible. If there is a critical or sudden breakdown and the vehicle is not optimally situated, every attempt is to be made to place it against the side of the road including towing, pushing or other method suitable to the situation and type of vehicle.
- Notification of the breakdown or abandonment of the vehicle shall be completed with the site supervisor as soon as practicable. The site supervisor shall ensure that any local work locations such as drill rigs, gas plants; camps, etc. are notified of the hazard of the vehicle.
- Every attempt will be made by the site supervisor to ensure that vehicles dropped off by transport trucks are dropped in the best location possible. This will include but not be limited to the following:
- On a long stretch of ice road where a vehicle operator could reasonably see the equipment and give them adequate warning that an alteration in speed or direction of travel may be required.
- On the extreme right side of the road, and
- Where possible, within the confines of a "push-out" so that vehicles not seeing the obstruction until the last moment will not have their path of travel impeded.
- If the practices and procedures of "establishment of the roadside as a workplace" are not completely attainable for any reason, the repairs are not to be started at any time. This vehicle will remain static until such time as the conditions are met. In addition, personnel shall not interact with the vehicle at any time for any reason. This includes retrieval of equipment, removal of documents, or any other contact with the vehicle.

Practices and Procedures:
The following practices and procedures will be adhered to in all cases and without exception when a vehicle is being left out on a roadway without personnel in attendance.

- Prior to the requirement to use these procedures, site supervisors and other supervisory personnel shall ensure that all proper equipment is in place in each vehicle to allow this procedure to be utilized.
- A regular practice of removing or attending to the vehicle as soon as reasonably practicable will be conducted on the crew.
- All motorized vehicles will have reflective flares, first aid kits and fire extinguishers on board as a minimum standard. Supervisory personnel will conduct risk management on this scenario where exigent circumstances warrant, and where indicated by changing or new conditions.
- Company personnel will receive training regarding the proper deployment or warning/hazard equipment.
- The use of reflective triangles will be completed immediately upon parking of the vehicle, and they will be deployed in the following manner.
- Behind the vehicle, the triangles shall be erected on the right hand side of the road at distances of 5, 10 and 100 meters, and in position that is in line with the rear outside tire or track of the vehicle. The operator of the vehicle shall ensure that the reflective triangles shall be clean so that oncoming vehicles can properly see the reflective triangles.
- In the event that the vehicle is in a difficult area of the road where a limited view of the vehicle is possible due to bushes, road curves or weather, additional triangles shall be immediately obtained and placed in a manner consistent with other vehicles being able to spot the markers from both directions and in a suitable time to stop or avoid the site.
- If the site is dusty to a point where the triangles become unsuitable, the site supervisor will utilize other appropriate methods of warning the public of the vehicle's position.

If repairs are not anticipated to be available in a reasonable amount of time the vehicles shall be removed to a more appropriate site, following the procedures established for *"procedure for the roadside as a workplace"*.

Prior to the starting of the work shift, all workers who are tasked to be in care and control of a vehicle regardless of type shall conduct a daily inspection, which is to include all safety equipment required in the case of breakdown or abandonment of the vehicle.

During the deployment of reflective triangles or other warning devices, the personnel conducting these tasks shall ensure that they are wearing the proper clothing with proper reflective striping and other appropriate PPE as dictated by the site supervisor.

At no time will workers place themselves between another vehicle and their disabled vehicle to signal or control access to the site.

4.14 Establishment of the Roadside as a Workplace Protocol

The following practices and procedures are to be followed by crew personnel in the event that vehicle repairs must be made on a vehicle sitting on a road. The following hazards may be present on the site during these procedures:

- Vehicle traffic from both sides of the road
- Restricted view of the site by other drivers
- Drivers not paying 100% attention due to staring at the scene
- Vehicles ignoring warning signs
- Vehicles too wide for the established passing area, and
- Other drivers misjudging passing area and striking vehicle or workers

Definitions

"Site Supervisor" is defined as any controlling supervisor located on the prospect or in control of the personnel on a site. It is specifically titled in this fashion to designate the individual who makes decisions on a day-to-day basis and who typically represents the company as well as the client.

The term ***"disabled"*** is defined as a state of repair in which the vehicle is unable to safely proceed in a forward motion and/or under the proper control of the operator.

"Extreme weather conditions" are defined as environmental conditions that restrict visibility or movement to such a state that advancement of the vehicle would compromise the safety of the driver or occupants.

"Effective repairs" are defined as repairs that allow the vehicle to be safely driven to another location where the risks and hazards are reduced.

Procedures

The following procedures and practices are to be adhered to when conducting effective repairs under this protocol:

Workers are to physically ensure that signage in the form of reflective triangles are still in place on the site, and are placed effectively.

Procedures relating to effecting repairs are to be reviewed in the form of a tailgate meeting and are to be followed prior to and during the task. Any deviations from the established plans require a documented JSA (job safety analysis) and new risk assessment completed prior to work beginning.

Warning signs indicating personnel are conducting work ahead must be set in place in conjunction with the previously placed triangles/warning devices. These are to be place in both directions on the roadway in a manner consistent with opposing traffic being able to stop or conduct avoidance maneuvers in a safe manner.

In the event that the crew does not have appropriate signage, properly briefed and outfitted workers will be used as temporary traffic control persons.

All personnel conducting rescue tasks related to the abandoned vehicle will wear PPE which will include:

- Hardhat
- High visibility clothing
- Proper clothing for the environment, and
- Any specialized PPE to conduct special tasks

At no time will any worker place him/her self in a position which physically blocks access to vehicles to the site. Four-way flashers are to be used on any auxiliary vehicles to ensure increased visibility to the general public. Auxiliary vehicles are to be placed near disabled vehicles in such a manner so the headlights are not to blind the vision of oncoming traffic. In addition, the vehicle will be facing the same direction as the normal flow of traffic, and in a position so, that the width of the road is not unduly reduced by the vehicle.

At no time when the auxiliary vehicle is facing traffic will the high beams of the headlights be engaged.

Workers on the site shall ensure that a tailgate safety meeting is conducted prior to beginning work. In addition, their JSA shall be reviewed to ensure that all steps have been completed prior to exposure to the hazards associated with their tasks.

If at any time the conditions of the site change or deteriorate, the personnel at the site shall re-evaluate the situation and if deemed necessary, the procedures shall be stopped and site vacated until approved by site supervisor to return and complete the task.

4.15 Ice Road Safety

The Construction Supervisor shall be responsible for maintaining safety standards on the ice. He/she has the authority to cease any or all of ice operations should he/she deems it necessary. All persons involved in operations on the ice should have taken a short course to become familiar with the hazards involved and the precautions to be taken when operating on ice.

When the primary use of an ice road is to facilitate the transport of a drilling rig and associated equipment, personnel must keep in mind that heavy rig modules and associated equipment will have the right-of-way.

4.15.1 Personal Safety

An ice road is a difficult and challenging driving area to begin with. Vehicle breakdowns and sudden changes in the weather can compound the hazard to a critically unsafe condition for ill-prepared personnel. Prevention is the KEY!

- Dress adequately for the weather and ensure that each person in the vehicle has arctic clothing sufficient to wait out an extended period of time in an unheated vehicle.
- You may be required to wear safety glasses while traveling and proper winter foot-wear will be compulsory when walking on the ice road.
- Food and water should be taken along when traveling the ice road in case of a breakdown and a delay in being picked up.
- Be sure to inform someone of your travel plans on the ice road and include your estimated arrival time.
- Carry communications in the form of a radio and/or telephone, or travel in convoy with vehicles possessing communication equipment.
- Single persons should not venture onto the ice when there is no help at hand.

4.15.2 Vehicle Requirements

All vehicles are required to carry the following items when traveling on ice roads:

- Always begin your journey with a full tank of fuel.
- Portable or fixed drip liner must be used when the vehicle is parked for any length of time on the ice road.
- Snow shovel and tow rope should be carried.
- Working headlights, horn, heater and windshield wipers.
- Survival gear, food and water.
- First Aid kit.
- Reflective triangles.
- Fire Extinguisher.

4.16 General Ice Road Safety

- Rig modules and heavy equipment have right-of-way.
- All traffic to come to a complete stop at intersections.
- Speed limits are in effect for everyone's safety. Drivers are to be prepared for speed limits of 60 km/hr on the ice road with maximum speeds of 25 km/hr on curves and ice bridges.
- Do not tailgate another vehicle as two vehicles act as a single load which increases stress on the ice road.
- Make a mental note of kilometre markers as you travel in the event of an emergency.
- Do not discard foreign materials on ice.
- Slow down until ride smoothes out, if roads are rough.

4.16.1 First Time Use of Roads

The majority of all ice failure accidents occur when clearing a new section of an ice road. Before any vehicle is allowed on a new section of road, a survey must be done with an ice profiler. Those operating the profiler will be properly trained and experienced.

4.16.2 Communication

- All equipment working on an ice road must be equipped with a two-way radio.
- All personnel must notify their supervisor or the base camp manager before departing camp for ice road travel, or for any other travel that takes them away from their base, or from their normal duties.
- Personnel must log onto the Journey Management Board and follow all Journey Management Procedures. If an employee forgets to log on before leaving for work/job site, he/she should radio Tuk Base Camp and have someone in administration log on to the Journey Management Board.
- Adequate communications is vital to the safe and efficient operation of an ice road.
- Job Superintendents and the Tuk Base Camp Manager shall be responsible for ensuring that communications between base, the rig, all equipment operators, truck drivers and supervisors are maintained.
- Employees will call their immediate site supervisor every hour to let their supervisors know how they are doing and to ensure that everything is okay.
- Communication among all personnel in the form of regular safety meetings will help ensure a safe and efficient operation on the ice.

4.16.3 Driving Practices

Speeds must be slower on "arctic pavement" than down south.
Braking distances are much greater on ice – do not lock up your wheels.
The snow banks are hard and should one be hit with the vehicle sliding sideways a roll over will likely occur.
Vehicle damage can be expected from a straight-on encounter with a frozen snow bank.

Slow your vehicle before entering a curve or corner.
The ice surface will be very slippery in the spring when the sun starts melting the surface and the road becomes slightly wet.
Use good judgment and don't be lulled into a false sense of security when driving on that smooth, straight, long and wide ice road.

Cold Weather Operating Limitations at –40

Operating equipment and working outside in temperatures of –40C or below can be extremely hazardous to personnel and very hard on equipment. Caution must be exercised and all non-critical work curtailed or cancelled until the weather improves. Management approval must be obtained for all outside work when the temperature reaches –40C. Please refer to the Cold Work Procedures *******

4.16.4 Fresh Water Ice Thickness Chart

LOAD	ICE THICKNESS INCHES	CM
250 lbs man	2	5
Snowmobile	4	10
1 ton 4x4 pick-up crew cab	12	30
D6D Cat c/w winch	24	61
D65P Komatsu c/w winch	27	68
D7G Cat c/w winch	29	73
140G Cat grade c/w wing	26	66
670A Komatsu grade c/w wing	26	66
WA250 Komatsu loader	21	53
WA380 Komatsu loader	23	58

NWT Transportation Chart - - Load Bearing Capacity of Ice
Note: Load Bearing Capacity of ice will be calculated according to this formula. However, reductions in allowable loading may be required due to thermal stress, fatigue and ice quality cracks, vehicle speeds, snow cover and load duration.

Note: Minimum thickness for any manned vehicle of less than 1000 kilograms is 15 cm.

Safety is of fundamental importance to on-ice operations in the Beaufort Sea due to the remoteness of the work sites, the severe environment and the danger of ice failure. It is the intention of this section of the manual to decrease the risk of accidents occurring due to ice failure by providing guidelines for safe working practices on the sea ice.

When stuck in snow or mud:

- Stop immediately and try to back up.
- Do not spin wheels. Rock vehicle back and forth.

4.16.5 Winter maintenance Tips

- Keep wipers in good condition;
- Keep headlights clean;
- Keep windshield and all glass clean and clear;
- Use good all-season or snow tires that are properly inflated;
- Unusual vehicle noise may be caused by ice;
- Keep windshield anti-freeze tank full;
- Use premium gas when very cold outside;

- Clear all snow from font of vehicle hood/windows;
- A cold battery is less efficient;

4.16.6 Working and Traveling on the Ice Road

Most winter travel in the Mackenzie Delta is on ice roads, built over tundra, on the Mackenzie River and its many channels, or on lakes. Extreme cold temperatures, limited daylight and stormy conditions are a potential hazard to all workers throughout the winter season. Safety is of fundamental importance to on-ice operations in the Mackenzie Delta due to the remoteness of the work sites, the severe environment and the danger of ice failure.

The following safety precautions need to be observed when working and traveling on ice roads:

- Winter survival gear should be carried with the worker at all times;
- Arctic boots, parka with hood, wind pants, mitts and face protection. In extreme weather continually check co-worker for signs of frostbite;
- Before departing work site and heading to another work site or community, employee must inform the radio operator or a supervisor of your estimated time of departure (ETD) and estimated time of arrival (ETA) at destination and check back in upon arrival at the destination;
- Make sure your vehicle has adequate fuel, spare tire, and survival gear and is in good mechanical condition. Never travel over ice that has not been approved for travel by the GNWT Transportation Department, the company or the client. Never travel over ice whose thickness has not been confirmed by use of an approved ice profiler;
- Drive using extreme caution as ice roads can be slippery, with unexpected curves, intersections and large bumps created by ice cracks, pressure ridges and sand bars.

4.16.7 Safe Practices on Ice

Recommended safety practices include the following:

The construction supervisor shall be responsible for maintaining safety standards on the ice. He/she has the authority to cease any or all on-ice operations should it deem necessary.

All persons involved in operations on the ice shall be orientated to become familiar with the hazards involved and the precautions to be taken when operating on ice.

During initial ice checking or snow ploughing, single persons or single vehicles should not venture onto the ice when there is no help at hand.

Safety meetings should be held daily to keep all workers and supervisors informed of the current conditions of the ice roads and where the equipment will be working that day.

Quality control and field inspections by the construction supervisor are critical to ensuring a safe and successful operation.

Signs designating the maximum allowable speed and weight shall be posted at the entrance of the ice road and at hazard points.

All heavy equipment operators should be aware of the hazards associated with parking their vehicles near one another for extended periods. Transport trucks should park 100 m/300 ft apart.

Every vehicle should have survival gear and radios. Systematic communication should be established with the construction or transportation supervisor.

During periods of strong winds (30 knots), or periods when the temperature fluctuates by more than 15 Deg C within 48 hours, no vehicle heavier than a pick-up should go on the ice until the ice surface has been inspected by qualified personnel.

Weather forecasts should be watched closely so that periods of high crack probability can be identified. Also, the ice surface should be monitored closely so that changes in ice stability are noted.

4.16.8 Cracks on the Ice - Thermal

Thermal cracks are caused by expansion or contraction of the ice due to a change in temperature. These cracks are usually distributed randomly over the ice and spaced well apart. They can occur when snow is removed from the ice.

Thermal cracks are usually dry but may be wet and dangerous.

If the air temperature changes by 15 deg C or more within 48 hours an investigation of the ice surface should be done in a light truck to ensure no dangerous cracks have formed.

4.16.9 Cracks on the Ice – Wind Generated

These cracks are caused from strong winds that can occur anywhere, parallel or perpendicular to the shoreline. They are wider than thermal cracks and are often wet. They can usually be repaired once the wind stops.

Wind generated cracks are very dangerous, so no equipment heavier than a pick-up truck should go on the ice when the winds are 30 knots or more until an inspection of the ice is done.

Wind forecasts should be watched closely so that periods of high crack probability can be identified in advance.

4.16.10 Loads on Ice

When considering loads on ice, we must consider moving loads and stationary loads separately.

Moving Loads

Under a moving load, the ice surface will deflect and rebound which creates a flexural wave in the water under the ice.

There is a special and very dangerous case that arises when the speed of the flexural wave corresponds with the vehicle speed, the ice may crack or break up. By traveling within the posted speed limit this will not occur.

To avoid problems from flexural waves in areas of shallow water (less than 10m/30 ft deep), when approaching the shorelines, or where sandbars have been identified, heavy loads should not exceed 50 km/h.

Stationary Loads

Loaded trucks, if stopping on the ice road, must park with at least a 100m/300 ft. distance between vehicles.

The time required for ice failure is highly variable but can be instantaneous if severe over loading of the ice occurs.

Stationary loads must be moved under any of the following circumstances.

1. If radical or circular cracks develop.
2. If continued cracking of the ice is heard or observed.
3. If water appears on the surface of the ice.

If your vehicle breaks down, do not park closer than 10m/30 ft from the snow banks. Refer to the Abandoned Vehicle Protocol.

Slow down when passing a vehicle which has broken down. Do not stop beside a heavily loaded vehicle which has broken down with another loaded vehicle.

4.16.11 Snow on the Ice

Snow is both a load and insulation on the ice. When a road is cleared on the ice, it must be at least 30m/90ft wide and the snow banks must not be higher than 2/3 of the ice thickness. Equipment operators must be extremely cautious when flattening large snow banks.

It is advisable to leave 5 – 10 cm (2"-4") of compacted snow on the ice. This will help traction and protect the ice from tracked vehicles and sunlight. It will also reduce the risk of thermal cracking on the ice.

4.16.12 Flooding

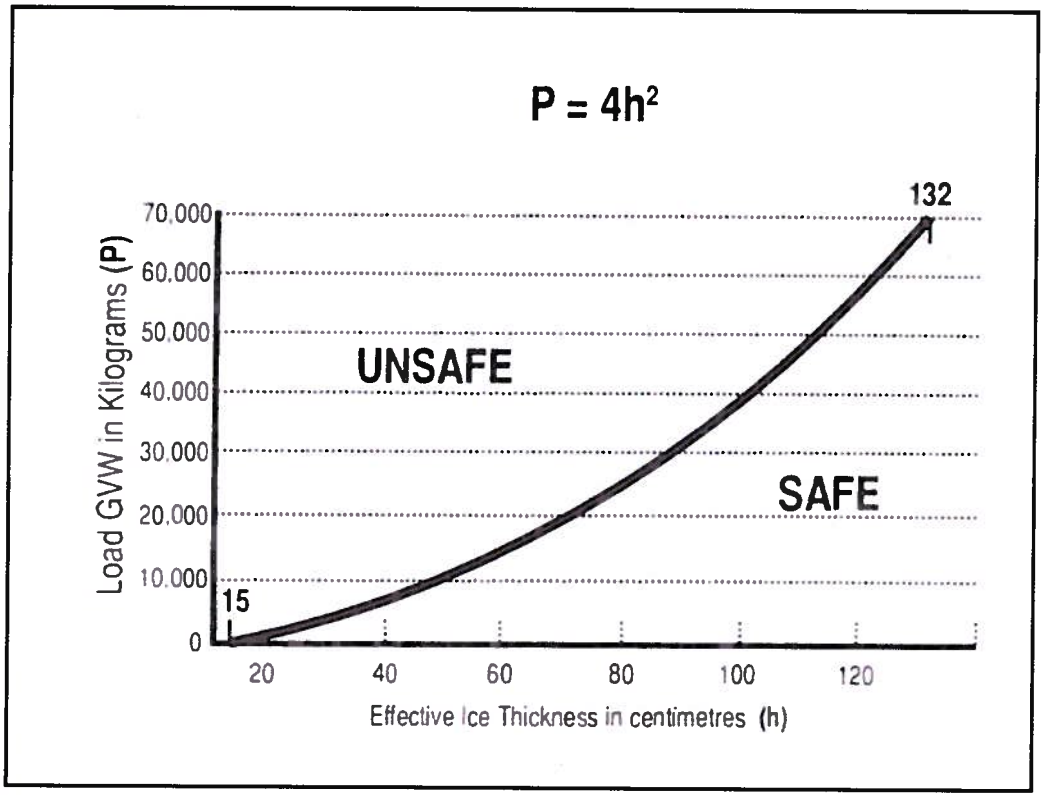
Flooding can commence as soon as the ice is 30cm (12 in) thick. Each flooding session should be limited to that depth of water that will freeze within 12 hours.

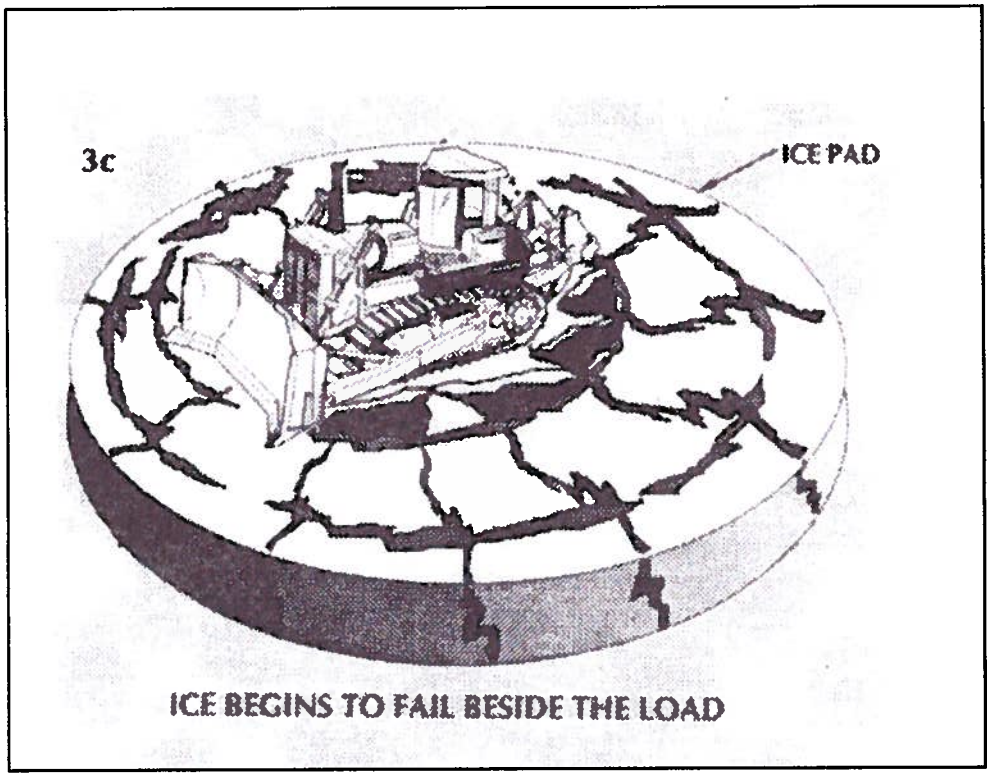
-20C will freeze 5 cm (2 in) of water overnight and –30C will freeze 8 cm (3 in) of water overnight.

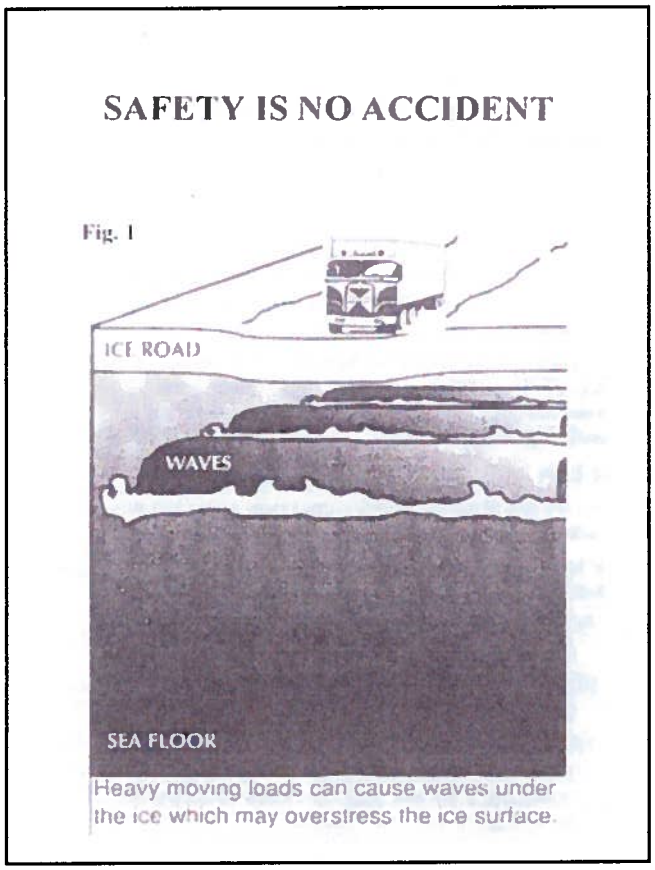
The presence of wind or snow will increase or decrease the freezing rate, respectively.

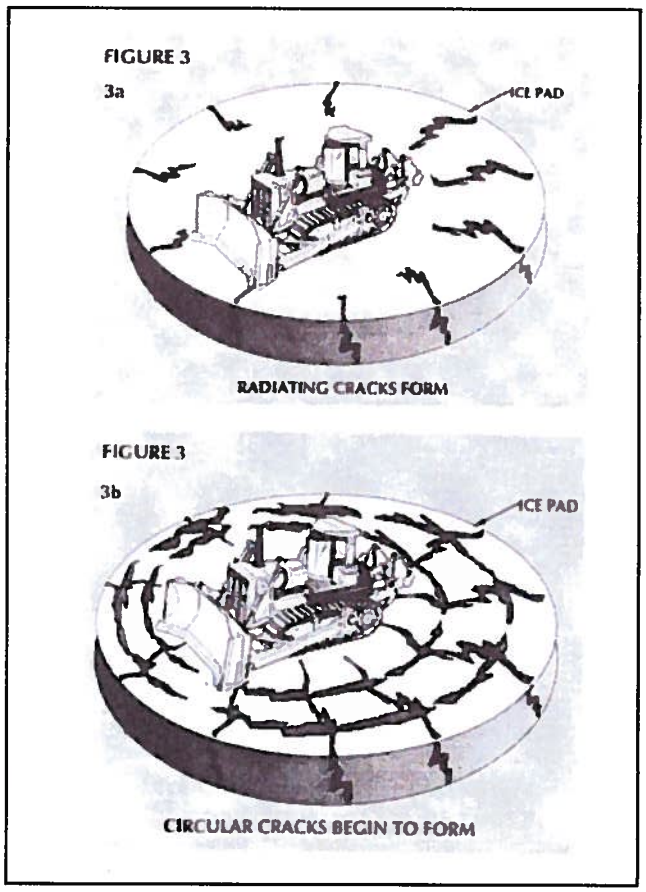
For maximum strength, all snow should be removed before each flooding session. Packing the snow to an even thickness and then flooding "slushing" can provide a thicker ice sheet in less time though the ice is not as strong.

4.16.13 Ice Charts




3c
ICE PAD
ICE BEGINS TO FAIL BESIDE THE LOAD


SAFETY IS NO ACCIDENT
Fig. 1
ICE ROAD
WAVES
SEA FLOOR
Heavy moving loads can cause waves under the ice which may overstress the ice surface.



4.17 Cold Weather Operations

Extreme cold temperatures are a concern for our winter operations in the Mackenzie Delta. Cold weather is a hazard to exposed workers and is hard on mechanical equipment. We understand that levels of productivity will necessarily decrease due to extreme cold. We are also aware that we must help protect our workers from exposure to extreme cold.

Primary Hazards

Exposure
Poor visibility
Eye sensitivity

Safe Work Procedure

The best method for staying warm in cold weather is to insulate the most exposed parts of the body.
Crew members must watch each other for signs of frostbite, such as skin that starts to freeze (i.e. turns white). Refer to the section on the treatment of frostbite in this manual.
During cold, windy weather, protect the face head and neck. Large amounts of body heat can be lost from these areas even when other parts of the body are adequately clothed.
Commonly exposed parts of the body are feet, knees and wrists. Always insure that socks are pulled up high and that gloves extend well up the forearm. Both must be dry. Coveralls and boots must make a good seal, as must gloves and jackets. Feet and fingers will freeze even in the best of boots and gloves if blood flow is constricted by cold exposure at poorly insulated areas further up the limb.

An example of suitable cold weather foot-wear is good woolen socks in cellular rubber boots and loose insoles of insulating material. An insulated insole is better than extra socks.
Long underwear helps protect the legs from cold.
Little blood flows through the body's joints. This means that they will get cold quickly.
Dress using many layers so that clothing can be added or removed as conditions change.
Avoid tight clothing, which will restrict circulation to the hands and/or feet.
Avoid exertion to levels which cause sweating. Sweat will later cool the body temperature. Wear, closest to the skin, materials which will help wick perspiration away from the body.
Ears can be protected by using a toque or quilted hard-hat liner. Hearing protection may still be required, since liners do not significantly reduce noise.
Never engage controls or equipment when visibility is obscured by steam, snow or ice-fog. Equipment running in extremely cold temperatures will generate large amounts of visible exhaust and ice-fog.
When working in bright sunlight with snow cover, wear tinted safety glasses with UV protection.
Exercise caution when handling diesel fuel and gasoline during cold weather operations. The cold burn resulting from contact with spilled fuel or fuel-soaked clothing can be severe.
It is important that all personnel who are exposed to extreme cold take adequate nourishment throughout the day to ensure they are generating adequate body heat.

WINDCHILL EQUIVALENT TEMPERATURES

Wind Speed (km/hr)	Temperature (Celsius)							
	0	-5	-10	-15	-20	-25	-30	-35
10	-2	-7	-12	-17	-22	-27	-32	-38
20	-7	-13	-19	-25	-31	-37	-43	-50
30	-11	-17	-24	-31	-37	-44	-50	-57
40	-13	-20	-27	-34	-41	-48	-55	-62
50	-15	-22	-29	-36	-44	-51	-58	-66
60	-16	-23	-31	-38	-45	-53	-60	-68

Workers will be provided access to a warm, sheltered environment as a place to warm up in cold weather. The warm environment can be provided by a camp, a heated worksite trailer, a heated vehicle, etc. Workers and supervisors are required to use good judgment in deciding how long to work outside before returning to a warm shelter to warm up, rest and drink some fluids.
Outside work will be suspended when the wind chill equivalent temperature is minus 55 or lower. During suspended work periods, employees will remain on active duty in a sheltered environment until conditions improve.

4.18 Smoking in the Workplace --- Interim Policy

Recent legislation prohibits the smoking of tobacco in the workplace. The *Environmental Tobacco Smoke Worksite Regulation* now deals with controlling the smoking of tobacco products in the workplace.

Smoking is prohibited in the workplace. This includes our offices, shops and warehouses, and most of our camp residences. It also includes, to the best of our current understanding, all work vehicles.

Smoking can only take place outside of contained work areas, and must take place more than 3 meters (10 feet) from any entrance.

It is possible to construct smoking enclosures outside of the workplace. However; a substantial enclosure would need a ventilation system.

Companies can be fined $5,000 dollars for violating this law and individuals can be fined $500.

There are, however, some limited exceptions for residents of remote work camps. In a remote camp an area may be designated as a smoking room as long as it is self-contained, has exhaust fans, and is not heated by forced-air furnaces.

Further clarification of this legislation is required before we can complete our policy on this subject.

When in doubt, don't smoke!

Emergency Response Chart

Injury to Worker
Duties of the
First Person on Scene

Serious Injury
Work Ceases and Scene is Protected

Minor Injury
Work may Continue; However Scene is Protected

CALL / ADVISE
Area Code (867)

Office	977-7000
Doug Saunders	977-7017
Doug's Cel.	678-0045
Night Security	977-7000
Safety Manager	977-7014
Randy G. Hein	403-638-9636
Petr Semichev	977-7011
Bob Stefure	678-0053
Tuk Nursing Station	977-2321
Tuk RCMP	977-1111
Tuk Fire Dept.	977-2222
Inuvik Hospital	777-8000

Request First Aid
Or Medic
All First Aiders in the Area
Are to Respond

Assess the Situation

Administer First Aid
Arrange for Transportation
to Medical Facility

First Aid Applied by Self
Or First Aider

Injured Worker
Transported to Hospital

Record Incident
In the First Aid Book

Advise:

Doug Saunders
867-977-7017

Randy G. Hein
867-977-7014

Bob Stefure
867-977-7010

Complete Investigation
Submit Incident Report
Ensure Worker and Employer
WCB Forms or Completed and
Submitted

4.20 Radio Emergency Calls

The following is an example of how to respond to an emergency situation if it happened within range of the Tuktoyaktuk Base; however the particulars would change if working at a remote project site. A site specific plan will be developed in these cases and will form part of the site specific worker orientation.

1. Call Tuk Base three times in succession.

   "Tuk Base, Tuk Base, Tuk Base".

2. Give your name and location and state the nature of the emergency.

   Example: ***"This is Bob Cool. I am at mile 12 of Pete Creek Road and my engine has failed".***

3. Tuk Base should respond with 20 seconds.

   "Bob Cool this is Tuk Base. Go Ahead".

4. No other network traffic until emergency has been dealt with.

   "Bob Cool, this is Tuk Base – Bill Jones is on his way from Swimming Point to pick you up. ETA 30 minutes. Channel clear"

If Tuk Base does not respond to the call in 20 seconds the nearest supervisor will break in and respond. If no supervisor responds the nearest worker shall respond. Someone on the network must handle the call. All emergencies must be dealt with in an expedient manner and help must be dispatched before normal radio traffic may resume.

Note: many of our client companies use the emergency call "Medic, Medic, Medic" to denote a medical emergency on the radio.

Also note that EGT Night Security at Tuk Base is occasionally away from radio when doing their rounds.

4.21 Tuk Base Fire Response Plan

1. On discovering a fire, shout ***"Fire! Fire! Fire!"*** and activate nearest alarm pull box.
2. Evacuate to muster station, closing doors behind you.
3. Report to Base Superintendent and standby to assist.

The Base Camp Superintendent or alternate Manager shall:

1. Activate the municipal fire department and dispatch our own fire response team.
2. Send room monitors to check on evacuation if this activity is deemed safe.
3. Account for all building residents and visitors.
4. Direct heavy equipment and water trucks to standby.

All Residents and Staff including Yard Workers shall:

1. Report to muster station.
2. Standby to assist.

4.22 Emergency Response - General Practices

Maintain a Disciplined Approach To An Emergency Situation.

The way in which an emergency is handled can have a great effect on the outcome. When an emergency is encountered, confusion can be your worst enemy. All emergencies must be dealt with in a disciplined manner.

A disciplined approach to an emergency situation includes the following steps:

Protect yourself by retreating to a safe area.

The most important point to remember when responding to an emergency situation is ensuring your own personal safety first. If you are hurt or incapacitated while responding to an emergency, you are not only escalating the problem but you will no longer be able to take corrective action to address the emergency.

Depending on the nature of the emergency, you may need to evacuate the area, put on personal protective equipment or seek any other appropriate means of self-preservation.

Sound the alarm and call for help.
Ensure that other personnel have a clear picture of the emergency:

What happened?
Where?
When?
Known injuries? And,
Present status?

Always be sure that the information that you have provided has been understood.

Ask for the information to be repeated to ensure it is accurate.

Isolate the emergency area.

Establish who is in command?

If you are not alone, someone must take command of the emergency. The most senior person on site or the most experienced worker is usually the best person to assume command. Be clear and communicate who is in charge.

Decisions must be calculated and concise.

Orders must be clear and understood.

Assess the situation for hazards.

In an emergency, there can be many variables that pose a threat to safety. An immediate assessment of the situation must be undertaken to identify further potential hazards to personnel and to the public.

Establish a plan of attack, including a determination of people and requirements.

The plan should include consideration for the following:

- Capabilities of responders;
- Safety of responders/rescuers;
- Safety of the public;
- Access of the public;
- Hazards involved and how to eliminate or deal with them;
- Timelines (i.e. consequences of waiting vs. not);
- Availability of resources;
- Personal protective equipment;
- First aid and other medical emergency equipment;
- Firefighting equipment;
- Vehicles for transportation or response to the incident;
- Roadblock kits, barricades and appropriate signage; and,
- Communication equipment including ground-to-air frequencies.

Contain or control of the threat.

Implement the plan of attack plan to contain or control the threat. Worker response actions will default to their training.

Decontaminate, clean up and dispose of waste properly.

Before subjecting personnel to hazardous materials consider decontamination and cleanup requirements, including:

- Personal protective equipment for decontamination crew;
- Availability of showers;
- Eye wash stations;
- First aid and medical requirements; and
- Absorbents.

All personnel have the responsibility to dispose of materials and chemicals that can adversely impact the environment or human health in the proper manner in compliance with regulations, policies, procedures and Material Safety Data Sheets.

Consider waste impacts in all decisions.

Document the incident.

Records are to include:

- Plans, actions taken;
- Diagrams;
- Incidents date, time, location;
- Responder's names;
- Observations;
- Materials involved; and
- Diagrams, photos, and/or videos.

Emergency Scenarios for Possible Consideration

E. Gruben's Transport Ltd. operations could potentially involve a variety of possible emergency scenarios, which should be taken into consideration. These could include, but are not limited to:

- Injury or fatality;
- Worker or equipment through ice.
- Vehicle accident;
- Fire or explosion;
- Search and rescue for missing or overdue persons;
- Spill to environment of raw products (oil, salt water) or refined products (diesel, gasoline);
- Aircraft incident;
- Security problem, including acts of terrorism;
- Release of toxic gases;
- Natural disasters;
- Transportation of Dangerous Goods incident;
- Elevated or confined space rescue;
- Blow out;
- Pipeline rupture; and
- Natural gas release from fixed facility or during transport;

Personal Injury Emergency Responses

Due to the remoteness of the oil and gas industry worksites in the Mackenzie Delta, employees are required to maintain sufficient levels of medical care to address basic wellness in addition to emergency care.

For serious injuries a system must be in place to:

- Provide primary care for the injured worker;
- Consult a physician via radio or phone; and
- Prepare and care for the injured during transport and transferring of the injured to the care of medical professionals.

Emergency transportation vehicles (air or ground transport) must be available at work sites that are greater than 20 minutes time from a hospital or medical clinic under normal travel conditions.

The minimum level of care (training plus supplies and equipment) on any oil and gas site is governed by the Canada Labour Code, Oil and Gas Occupational Safety and Health Regulations, Part XVII First Aid.

Fire Emergency Response:

Each work area shall have a fire emergency procedure and all workers shall be made familiar with this procedure.

Regular exercises of fire drills shall be conducted to ensure optimum fire fighting and evacuation preparedness.

Each work area shall be evaluated for the fire hazard to ensure that the proper *"Fire Retardant Clothing"* (FRC) is available and being worn for that activity.

5.0 EMERGENCY RESPONSE AND SPILLS CONTINGENCY PLAN

5.1 Introduction

The following is a plan of emergency response actions to be initiated when required by staff of EGT, and their contractors, in relation to all work undertaken by EGT. The Emergency Response Plan (ERP) will be reviewed with all workers as part of their orientation before commencing work. Revisions to the ERP will be made as required to accommodate site specific hazards or other unique situations. Worker training will coincide with any changes made to the plan.

5.2 Immediate Response to Emergency Situations

5.2.1 Fire

Secure the scene, "protect yourself and others!"
Have all non-essential personnel clear the area
Notify other workers by voice and alarm
Immediately shut off power, engines, and fuel sources, if safe to do so
If the fire is small, extinguish it with the available firefighting equipment
If you cannot safely fight the fire, evacuate to a safe and secure area
Do a head count to account for all workers, and
Notify Supervision and Management in accordance with the emergency contact list

5.2.2 Vehicle or Mobile Equipment Incident

Secure the scene, "protect yourself and others!"
Shut off equipment and fuel source, if safe to do so
Provide assistance to injured persons
Call for medical assistance, if needed
If injured persons are in imminent danger, the remove injured persons and secure the incident scene
Control any spill or environmental hazard
Notify Supervision and Management in accordance with the emergency list
Record third-party names, addresses, contact number, driver's license, vehicle and license information

5.2.3 Serious Medical Incident

Secure the scene, "protect yourself and others!"
Attend to the injured person(s)
Call for medical assistance, if needed
Notify Supervision and Management in accordance with the emergency contact list

5.2.4 Wildlife Encounters

All workers will avoid situations that could create a wildlife encounter
All food items and domestic garbage should be secured
Garbage will be disposed of at approved sites only
Arctic and red fox may approach personnel to scavenge food. Avoid all contact as they may carry the rabies virus and exposure is through bites or saliva
Operations are usually in areas where bears may be encountered. Proper food handling and garbage disposal procedures will lessen the likelihood of bears being attracted to your operations. Information about bear detection and deterrent techniques can be obtained from the Department of Resources, Wildlife and Economic Development at 867-777-7308 or 867-777-7230

5.3 Spill Contingency Plan

The primary goal is to avoid spills or the unnecessary release of materials. All personnel shall have an environmental orientation prior to starting work. This will include a review of this Spill Contingency Plan (SCP).

In the unlikely event of a spill or release of materials, the objective will be a quick response. The SCP defines the responsibilities of site personnel and the required procedures for a quick response by emphasizing the need to reduce the safety hazards and minimize environmental impacts.

5.3.1 Preliminary Requirements

A copy of this Emergency Response Plan will be available on site during all field operations

Material Safety Data Sheets (MSDS) for each hazardous chemical shall to available on sit during field operations

Maps indicating major roads, access roads, nearby surface water bodies, any Hazardous Material stored on site, slope of land, nearby communities and other important features will be on site and available

All vehicle/equipment shall be equipped with spill kits and shovels. Spill kits, at a minimum, shall include sorbent pads or equivalent, shovels, and a means for containment of contaminated materials (e.g. impermeable tarps, barrels); and

Suitable communication equipment and all emergency numbers will be available prior to commencement of all field activities

5.3.2 Initial Response Procedures

In the event of a spill or a release of materials, the first person on the scene will"

Before attempting to stop the flow, protect the safety of all personnel at the site, and ensure all safety precautions have been taken. If possible, with without further assistance, control danger to human life (remove ignition sources)

Immediately obtain assistance of others by activation the Spill Response Team and begin to assess and contain the spill

Identify the material spilled, assess Material Safety Data Sheets (MSDS) information and implement appropriate safety procedures, based on the nature of the hazard. If the identity is unknown and if identification means further risks, the action must be based on the assumption that the product is extremely dangerous. The crew will not smell, taste, touch or attempt to reach ruptured containers if they are surrounded by contaminate

Assess the dangers and hazards to personnel in the vicinity of the spill. Immediate determinations must be made about the direction of the spills progress, whether downhill, towards water or already in the water

Stop the flow of the spill at the source if possible, when safe to do so

Notify the NWT 24 Hour Spill Report Line (867) 920-8130), if spill volumes exceed the Spill Report Threshold Quantities

Gather information on the status and nature of the situation

When notified of a spill, the Field Supervisor, or person in charge of the emergency response measure will immediately ensure that:

Action is take to control danger to human life

An onsite supervisor is designated, if not already present

In the event that a spill exceeds any of the threshold quantities, the person in charge of the emergency response measures will complete the Northwest Territories (NT) Spill Report Form and then immediately report the spill to:

NWT 24 Hour Spill Report Line (867) 920-8130

Note: For fuel or hydraulic spill this threshold limit on land is 100 liters

The local R.C.M.P. shall be notified if a risk to the public exists
The necessary equipment and personnel shall be mobilized and implemented to stop the source of the spill and commence clean up

5.3.3 General Spill Containment Procedures

Identify the contaminate, stop the source of the spill and when safe, immediately implement measures to limit the spread of the spill and to minimize the impacts to the environment
Prompt containment can reduce environmental exposure and risk. Containment measures may be land or water based. Land based measures include application of sorbents, construction of berms, and diversion/collection trenches. Water based measures could include dams, dykes and floating booms.
If the spill source is a leaking fuel truck, pump tanker dry (into appropriate containers or another tanker)
A shallow depression shall be excavated or a surface berm constructed in the path of the following product to stop and contain the flow. If feasible, without unduly delaying containment efforts, the surface stripping shall be salvaged and stored separate during excavations
Sorbent materials shall be utilized to contain and recover spilled material
Heavily contaminated soil and vegetation, as well as used sorbent material, shall be disposed of at an approved hazardous waste treatment facility
Traffic will be minimized on and around contaminated areas
Attempts will be made to restrict the movements of wildlife near the area affected by the spill, and
Remediation and final cleanup will be conducted until the spill and immediate location has been reclaimed to an equivalent capability prior to the incident

5.3.4 Spill Adjacent to a Water Body

Berms or trenches shall be constructed to restrain spilled products from entering into a water body
Spilled materials shall be recovered as quicly as possible
If spilled material enters an open water body, floating booms, skimmers and sorbent pads shall be deployed, if feasible, to contain and recover the spilled material
If spilled material is released onto a frozen water body, snow and sorbent pads shall be used to contain and clean up the spill. A backhoe, or similar equipment, will remove all materials to prevent future release into a water body
Contaminated areas, including downstream shorelines (non-frozen conditions), shall be cleaned up in consultation with Spill Response Specialists and the appropriate Government Agencies, and
In the event that spilled materials enter a frozen water body through or under the ice flowing or standing water, augering will be conducted to determine the extent of the spill plume. If feasible, a vacuum truck will be brought to the site to skim off the contaminants. As well, the appropriate regulatory agencies will be contacted and a post break-up monitoring and reclamation plan will be implemented to determine the extent of the impacts of the spill on the water body and its banks

5.3.5 Spot Spills

The RWED Environmental Protection Services, (867) 873-7654, is to be contacted soon after a spot spill to determine appropriate methods to remove or restore contaminated soils. Since impacts from small spills can generally be minimized if immediate action is taken, all small spot spills shall be cleaned up immediately
Activities in the immediate vicinity will be suspended until the Department of Transportation or an Inspector from RWED Environmental Protection Services grants permission to resume
Heavily contaminated soil and vegetation, and/or removed contaminated materials will be incinerated, if safe to do so, or disposed of at an approved waste facility
Locations where spot sills have occurred will be flagged and the GPS coordinate location recorded by the Person-in Charge of the spill. Flags shall be removed once the reporting is complete, and
The Person-in-Charge of the spill will document and report all details pertaining to the incident

5.3.6 Spill Reporting

The size of the spill will determine how the spill is reported by a determination of threshold quantities. Whenever the spill exceeds the threshold quantities, then the Northwest Territories (NT) Spill Report Form is to be completed and the spill is to be immediately reported to:

NWT 24 Hour Spill Report Line (867) 920-8130

When calling the NWT Spills Hotline, the person reporting the spill shall provide the following:

- Date and time of spill
- Direction spill is moving (or if it has stopped)
- Name and number of persons close to the location of the spill
- Type of contaminate spilled and the quantity spilled
- Cause of the spill
- Whether the spill is continuing or has stopped
- Description of the existing containment
- Actions taken to recover, clean-up and dispose of spilled contaminant
- Name, address and phone number of the person reporting the spill
- Name of person in charge of management or control at the time of the spill

5.3.7 Reporting Procedure Chain of Events

Worker notices spill

- Is the source of the spill still flowing?
- Can the source be safely shut off?

Worker notifies construction foreman and in sequence EGT Supervisor is informed; then as consequence, since this depends upon the size and severity of the spill, the Operations Manager or Project Engineer

- Estimate Spill reporting threshold quantities and proceed as previous detailed
- Call the NWT Spills Hotline to file a report and request further information

The Supervisor or Operations Manager notifies

- NWT Spills Hotline
- The R.C.M.P, if necessary (danger to public)
- Communities, who could be affected by spill

The NWT Spills Hotline notifies

- NWT Environment and Natural Resources
- Land and Water Board in area of spill
- Department of Indian Affairs and Northern Development
- Department of Fisheries and Oceans

The appropriate personnel arrive on site to contain and clean up the spill

5.3.8 Spill Kits

All vehicles and equipment will be equipped with a spill kit that, at minimum includes the following

Sorbent material (i.e. 10 pads, 2 socks or equivalent)
Disposable container (tarpaulin, pail, barrel)
Safety gloves and goggles, and
Shovel

All fuel and service vehicles will carry a spill kit that includes the following:

A minimum of 10 kg of sorbent material (i.e. 200 pads, 12 socks, 10 pillows, or equivalent)
Sorbent booms
Disposable container (tarpaulin, pails, barrel)
Safety gloves and goggles, and
Shovel

Extra spill kits will be stored at camp or storage locations

5.3.9 NWT Regulatory Agencies

NWT OHS	(867) 678-2301
NWT OHS (Yellowknife)	1-800-661-0792
NWT Forest Fire	1-800-661-0800
24 Hour NWT Spill Report Line	(867) 920-8130
RWED Environmental Protection Services	(867) 873-7654
Environment Canada	(867) 669-4710
Fisheries and Oceans Canada	(867) 777-7520/7521 or
Fisheries and Oceans Canada	(867) 669-4931
Mackenzie Valley Land and Water Board	(867) 669-0506
Gwich'in Land and Water Board	(8670 777-4954

5.3.10 Spill Report Threshold Quantities

Item No	TDGA Class	Description of Contaminant	Amount of Spill
1	1	Explosives	Any amount
2	2.1	Compressed Gas (Flammable)	Any amount of gas from containers with a capacity greater than 100 liters
3	2.2	Compressed Gas (Non-corrosive, Non-flammable	Any amount of gas from containers with a capacity greater than 100 liters
4	2.3	Compressed Gas (Toxic)	Any amount
5	2.4	Compressed Gas (Corrosive)	Any amount
6	3.1,3.2,3.3	Flammable Liquid	100 liters
7	4.1	Flammable Solid	25 kg
8	4.2	Spontaneously Combustible	25 kg
9	4.3	Water Reactant Solids	25 kg
10	5.1	Oxidizing Substances	50 liters or 50 kg
11	5.2	Organic Peroxides	1 liter or 1 kg
12	6.1	Poisonous Substances	5 liters or 5 kg
13	6.2	Infectious Substances	Any amount
14	7	Radioactive	Any amount
15	8	Corrosive Substances	5 liters or 5 kg
16	9.1(in part)	Misc. Products and Substances, excluding PCB Mixtures	50 liters or 50 kg
17	9.2	Environmentally Hazardous	1 liter or 1 kg
18	9.3	Dangerous Wastes	1 liter or 1 kg
19	9.1(in Part)	PCB Mixtures of % or More Parts Per Million	0.5 liters or 0.5 kg
20	None	Other Contaminants	100 liters or 100 kg

Environmental Protection Act, Consolidation of Spill Contingency Planning and Reporting Regulations R.R.N.W.T. 1990. C, Schedule B

6.0 TRAINING

E. Gruben's Transport Ltd. recognizes the value of establishing Training Programs in order to provide higher levels of safety in the workplace, higher levels of personnel competence and confidence, opportunities for personal advancement, greater levels of satisfaction amongst personnel in our employ, as well as to satisfy regulatory requirements. We also believe greater and broader training amongst all levels of our personnel will help us produce a higher quality of work for our clients and will result in greater opportunities for the company to gain new work and new clients.

E. Gruben's Transport Ltd. will provide and/or support includes both formal and informal training, on-the-job and classroom training, safety-specific and skill-specific training.

Training and skills-assessment will begin on hiring. New employees will receive basic orientation on safety standards and procedures which are standard procedures for company operations.

Basic Safety Program training, WHMIS, First Aid and TDG programs will be carried out periodically in house as required. As well, programs in Safety Program Supervision, Hazard Identification and Control and Incident Investigation will be provided to supervisory personnel at minimum, in order that such information and developed procedures can be passed down to all personnel through safety meetings.

Programs such as Oil Field Swamper, Oil Field Hauler, Light Duty Vehicle Operator, Heavy Equipment Training, Class 3 and Class 1 Driving Courses, Contaminated Soils and PCB Hauling, and Asbestos Abatement Courses have been and will be offered as operations require.

Many subjects related to new tasks and procedures, or to address newly identified hazards, will be addressed at safety meetings and daily tailgate meetings.

Much of the training which takes place falls under the general heading of "On the Job Training."

6.1 Safety Training Certificates

1. DRIVERS LICENSE
2. FIRST AID/CPR
3. TDG
4. H2S ALIVE/AWARENESS
5. WHMIS
6. TRUCK DRIVING
7. AIR BRAKES
8. GENERAL OILFIELD DRIVER IMPROVEMENT
9. OIL FIELD HAULER
10. LIGHT DUTY VEHICLE
11. OIL FIELD SWAMPER
12. HEAVY EQUIPMENT
13. WELDING
14. ENVIRONMENTAL AWARENESS
15. GENERAL SAFETY
16. POWER LINE SAFETY
17. ASBESTOS REMEDIATION
18. HAZWOPER 40 Hour Course
19. ACCIDENT INVESTIGATION
20. HAZARD IDENTIFICATION
21. SUPERVISORS HEALTH AND SAFETY PROGRAM

6.2 Employee Files

Employee files should contain records and copies of all training certificates and licenses, both those issued by E. Gruben's Tranport Ltd. for in-house training, and also licensing and certification provided by government agencies, training institutions and regulators. Employee files should contain personal information including:

1. Payroll related personal information.
2. Driver License Information (including copy of driver's license)
3. List of Personal Training Certificates (copies of those certificates)
4. Personal Medical History (this may remain sealed in an envelope and returned at end of employment term)
5. EGT Tuk Base Rules & Policies – Sign off
6. EGT Vehicle Policy – Sign off
7. Drug & Alcohol – Sign off
8. HSE Hand book – Sign off
9. Safety Orientation Acknowledgement Form

Employees receive from E. Gruben's Transport Ltd.:

1. Drug & Alcohol Policy
2. Vehicle Policy
3. EGT Camp Rules
4. Emergency Information
5. HSE Handbook
6. Copies of any certification for any training programs arranged by or conducted in-house by E. Gruben's Transport Ltd.

6.3 On the Job Training (OJT)

The purpose of on-the-job training (OJT) is to address the development of on-going job skills. With a disciplined approach to OJT, the worker is provided with the practical knowledge and skills required to perform a job task in a safe, efficient manner that complies with company procedure.

6.3.1 OJT Procedures

OJT must be provided as a means of transferring task knowledge from competent workers to workers who do not have operational experience to conduct the task safely.

Personnel competent in work site and related job tasks must provide on-the-job training as prescribed in documented procedures.

Basic Steps for OJT include:

- Provide written procedures and demonstrate to the trainee how you want it done;
- Observe the trainee as he/she does the task;
- Correct any mistakes made by the trainee in a professional manner – be patient;
- Have the trainee repeat the task until he/she does it right – to your satisfaction; and,
- Have the trainee do it one more time for good measure to reinforce the memory of how to do it correctly.

6.3.2 OJT Topics

Some types of skills are well suited for workers to learn through OJT. Below is a list of appropriate OJT topics:

Approved work procedures:

- Critical tasks;
- Equipment operation;
- Proper use of tools;
- Understanding signage and warning symbols;
- Hand signals; and,
- Personal Protective Equipment.

OJT can also be an effective follow-up to reinforce classroom instruction.

6.3.3 OJT Record Keeping

A record of OJT must be signed by a supervisor and the worker to acknowledge task competency and is maintained on file within the company.

See a sample "Checklist for Developing and OJT Program" on the following page

6.3.4 Mandatory Certification Training

Federal, Provincial and Territorial legislation stipulates mandatory certification training requirements for operations under their specific jurisdiction. The following outlines requirements for Transportation of Dangerous Goods (TDG) and Workplace Hazardous Materials Information System (WHMIS) training.

Other mandatory training specific to your operation may be required. Refer to the pertinent legislation that applies to your operation to ensure compliance to legislated training requirements.

6.3.5 Workplace Hazardous Materials Information System (WHMIS)

The aim of WHMIS is to reduce accidents and injuries in the workplace through a system of hazard communication. Its focus is the handling, storage, use and disposal of hazardous materials. It is the employer's responsibility to convey required information to workers through labels, material safety data sheets (MSDS), and worker education.

Under WHMIS legislation, suppliers of controlled product and employers who handle controlled product are responsible for putting WHMIS into effect. Employer's whose workers use, handle, store and dispose of controlled products, and are thereby exposed to the potential hazards of those products, must provide appropriate training.

WHMIS training provided to workers includes the following topics:

- Hazardous chemicals;
- Labelling and hazard symbols;
- Safe Handling, storage, use and disposal measures;
- Material Safety Data Sheet (MSDS); and,
- Personal Protective Equipment (PPE)

WHMIS worker training also includes:

Acquisition of knowledge so workers know about WHMIS, what they need to know and why they need to know.

Learning of procedures so workers know how they are to use, handle, store and dispose of hazardous materials; and

Learning how those procedures get applied on the job.

The employer must keep a copy of any WHMIS certificates of training issued. Certificates must be kept valid and confirmed by current employer.

6.3.6 Transportation of Dangerous Goods (TDG)

In 1992, the Federal Government of Canada passed the Transportation of Dangerous Goods (TDG) Act to promote public safety in the handling, shipping, transportation and receiving of dangerous goods by air, rail, road and marine modes.

The regulations deal with four main areas.

Classification;
Documentation;
Safety marks; and,
Training

Anyone shipping, transporting, receiving or otherwise handling dangerous goods for the purpose of transporting them must be trained or working under the direct supervisor of someone trained and certified.

The certificate of training must include the data of the initial training, the date of expiry and the aspects for which the person was trained. The certificate is valid for a 36-month period then must be renewed. Anyone offering, handling or transporting dangerous goods must be able to produce a "Certificate of Training" if asked to do so by an officer.

The TDG training provided includes the following topics:

- Classification, documentation and safety marks;
- Special provisions;
- Dangerous occurrence reporting.
- Emergency response actions;
- Special equipment requirements; and,
- Use of safety equipment.

The employer must keep a copy of any training certificates issued.

6.3.7 Recommended Training

Employees and contractors must be trained in safe work practices. The training required varies depending upon the location and the type of work being performed.

A sample of basic training requirements for a worker includes:

- First Aid/CPR
- H2S Alive (or equivalent);
- Fire fighting;
- Chemical handling (WHMIS/TDG);
- Equipment operation; and,
- Environmental awareness.

Proof of certification must be available onsite prior to commencing work.

6.3.8 Training Summary

Companies are responsible for meeting health standards, worker safety, and ensuring the preservation of the environment while conducting their work. Worker training is an investment in achieving these goals.

Establishing programs to enable workers to learn and apply the knowledge they need into their daily routines has many benefits:

- Companies can demonstrate due diligence in meeting legislation requirements;
- Training helps to facilitate reliable communication; and,
- Workers gain confidence to perform their jobs properly and safely.

The petroleum industry requires companies to develop competence in their work force by:

- Assessing training requirements.

7.0 COMMUNICATION

7.1 Role of Communication

The important role that communication plays in health, safety and environmental protection cannot be overemphasized.

Important messages need to be communicated numerous times in different ways to ensure the people hear and understand. To make communication effective, our organizational climate must encourage people to share ideas and to listen actively. This means encouraging people to check their interpretations, ask when they do not understand, voice their opinions, and let people know they have been understood.

Being a good corporate citizen is supported by the practice of open and honest communication with our workforce, the local communities and our business partners.

This section emphasizes two critical communication areas:

1. Management communication; and,

2. Company Safety Meetings such as:
   Regular weekly management meetings
   Regular monthly management meetings
   Daily health, safety and environment meetings
   Daily tailgate meetings

The more employees and contractors know about the HSE program, the better able they will be to support it.

In initiating communications, management will make itself more accessible to others working for the company. This will ultimately result in greater participation of workers, contractors and subcontractors in the development and maintenance of HSE programs. It will also lead to higher morale and improved health, safety and environmental performance, along with improved workplace productivity.

7.2 Communication Frequency

Regular communication with employees, contractors and subcontractors should include describing the company's commitment to HSE performance and explaining why HSE is important and whom it affects.

Hold meetings for these communications where senior managers and the majority of employees, contractors and subcontractors are present.

It is important for management and supervisors to tour work-sites to observe work practices and talk to workers about HSE issues. The frequency of tours will vary according to the type of operations and locations of our sites.

The communication process includes conducting safety orientations, providing experienced guidance, giving instruction and meeting mandatory training requirements.

In addition, the implementation of special programs like the new worker program, specialized training and information sessions demonstrate the commitment EGT has for their workers, the environment and the communities in which we work.

7.3 Management Communication

Management will communicate clearly and regularly the company's commitment to excellent HSE performance to all workers, contractors, subcontractors, suppliers, clients, and other stakeholders.

7.4 Communication of Expectations

Establishing expectations with people requires regular communication of the following topics:

- HSE program goals and performance expectations;
- Why HSE is important and who it affects;
- Hazardous conditions and corrective measures;
- Allocation of HSE responsibilities;
- Best practices;
- Incident and accident reporting procedures; and,
- Regulatory issues.

7.5 Types of Communication

To communicate company commitment to health safety and environmental excellence, management will do the following:

- Go to work sites to observe operations and engage workers in discussions of HSE matters;
- Send motivational letters or memos to employees;
- Participate in committees and meetings;
- Include HSE topics as regular agenda items in meetings;
- Highlight HSE accomplishments at company functions;
- Provide detailed job instruction for new, transferred or temporarily assigned personnel;
- Hold regular safety meetings for all staff;
- Recognize workers who work safely; and,
- Provide regular feedback to all employees on safety performance or concerns.

8.0 MEETINGS

Bringing people together on a regular basis to hear and talk about the different HSE programs, procedures, and topics helps to set clear expectations and fosters commitment to incorporate what they learn into their day-to-day work.

The communication guidelines contained below are not intended to be exhaustive, but are the basis of what EGT will do.

8.1 Regular or Start-Up Health, Safety & Environmental Meetings

All operator work groups engaged in northern operations shall participate in regularly scheduled safety meetings at least monthly or weekly for construction. Additional specific meetings are called as required (i.e. pre-job and tailgate meetings).

It is essential that site leadership attend and participate in as many safety meetings as possible.

Safety meetings are held to ensure that all personnel understand the operational steps and protective measures pertaining to the potential hazards of the job. The specific purposes of these meetings can include:

- Comprehensive identification of safety issues;
- Pre-job and/or task analysis for hazard prevention;
- Establishing protocols; and,
- Emergency response requirements at the beginning of a project or scope of work.

8.1.1 Meeting Details:

1. To help ensure the meeting makes effective use of time and accomplishes its goals, prepare an outline or agenda. This can be an informal list of items to discuss. Examples of topics on the agenda could include:
   - Purpose of meeting;
   - Organizational announcements;
   - Progress reports;
   - Objectives;
   - Accomplishments;
   - Assistance or resources needed;
   - Incidents and Near Miss occurrences;
   - Areas of concern and opportunities for improvement;
   - Review of hazards and potential risks;
   - Identify "next steps";
   - Set time and date for next meeting; and,
   - Identify possible issues to be covered in the next meeting.

2. Ask participants to share their HSE experiences since the last meeting. Focus on the positives. Encourage proactive thinking about HSE.

3. Effectively manage the time used in the meeting.

4. Start and end at designated times; and,

5. Keep the meeting focused by having a facilitator or chairperson.

A sample general meeting agenda can be found on the next page.

8.2 Pre-Shift Meetings

Pre-Shift Meetings shall be held before:

- Starting work each morning;
- Starting a new shift; and,
- Undertaking of non-routine jobs.

Additional meetings are also held when:

- There has been a significant change in the way work is being carried out; and
- The supervisor deems it appropriate.

The objectives of the pre-shift meetings are to:

- Keep all members of the work team informed of the day-to-day opportunities and challenges of working safe;
- Inform workers of the forecasted days activities;
- Identify the unique hazards and required control measures to prevent injuries;
- Review basic safe work practices;
- Inform workers of the activities of the other workers and how their activities will interact; and
- Allow a shift supervisor to assess the emotional and physical capacity of crew and ensure all are prepared for work.

The pre-shift meeting allows the shift supervisor to:

- Ensure all onsite personnel are appropriately trained to carry out their assigned duties;
- Ensure certifications and permits are valid and current;
- Identify possible human hazards such as:
    1. Physical and/or emotional fatigue;
    2. Use of medication;
    3. Stress;
    4. Emotional distress; and
    5. Effects of drugs or alcohol.;
- Identify interpersonal issues between team members;
- Manage new or green workers in order to identify to the rest of the crew;
- Ensure that new workers have completed pre-job orientations and required safety training; and
- Identify and control work site visitors.

8.2.1 Review of Basic Work Practices

The pre-shift meetings allow for the review and reinforcement of basic safe work practices and can include the following topics:

- The importance of a proactive approach to safety;
- The necessity of teamwork to ensure a safe work environment for everyone;
- The right and legal obligation of a worker to stop work if the conditions are unsafe or there is a potential for a safety issue to arise;
- Procedures for working alone;
- Basic radio communication;
- Understanding limits of worker responsibility, training limitations and competency;
- The importance of reporting unsafe conditions or practices to the supervisor such as:
    a) Poor housekeeping;
    b) Blocked walkways;
    c) Improper or damaged PPE;
    d) Slippery floors; and
    e) Exposed electrical wires.

- Unsafe acts relevant to the work being conducted such as:

  a) Improper use of chemicals;
  b) By-passing safety devices;
  c) Not using PPE;
  d) Improper lifting;
  e) Non-clean-up of spills; and
  f) Working alone without controls.

8.2.2 Position Handover Duties

The pre-shift meeting creates the opportunity for necessary cross shift information to be communicated. Each employee coming off a shift will ensure that their cross shift or relief worker is fully informed of any information that relates to their position including:

- Current activities being performed;
- Outstanding work permits;
- Current lockout;
- Wildlife cautions;
- Work status;
- Known hazards.

8.2.3 Emergency Response Procedures

During the pre-shift meeting emergency response procedures are reviewed including:

- Current activities;
- Meeting area in case of an emergency;
- Procedures to account for all employees, visitors and contractors;
- Assigned roles of all personnel;
- Response protocol specific to the area of activity;
- Location of safety stations onsite (firefighting equipment, first aid, eyewash, and communications)
- Emergency escape procedures and routes;
- Shut down procedures;
- Rescue and medical duties for assigned employees; and,
- Procedures for reporting an emergency.

8.3 Tailgate Meetings

Tailgate meetings occur as and when needed and are the responsibility of all workers.

Supervisors or workers can initiate tailgate meetings when the need arises in order to identify a safety issue or review the appropriate work or safety procedure associated with a work assignment. Tailgate meetings should be called whenever the conditions of the job change (for example, for changing weather, different available equipment, change in personnel) or whenever the task itself changes. They should be called when new potential hazards are identified. They should also be called whenever workers or supervisors feel that more complete communication and understanding of the task-at-hand is desirable.

8.4 Orientations

Pre-job and pre-employment orientations provide the opportunity to present an overall picture of the company's HSE program and commitment, the rights and responsibilities of both workers and management, the company's expectations and policy's, as well as details of particular contracts and clients' requirements. This also provides the opportunity for new employees to complete employment sign-up procedures and the gathering of required employee information for employee files.

The orientation, because of its in-depth approach, can set the overall tone for the entire term of a new employee's employment, as well as reinforce attitudes and policies for returning employees, and introduce new procedures and policies.

The orientation may be the first opportunity the company has to thoroughly indoctrinate and thoroughly warn an employee about the work situation he or she is entering.

It is critical that all new employees should receive an orientation and that all long-term employees should receive a new orientation at the beginning of every major work season.

The subjects which will be addressed in the E. Gruben's Transport Ltd. orientation include those on the following Safety Orientation Checklist and Sign Up Form, as well as any conditions particular to individual client jobs.

8.4.1 SAFETY ORIENTATION CHECKLIST AND SIGN UP FORM

I, _____ have participated in the E. Gruben's Transport Ltd. Orientation, which outlines company policies, safety procedures, alcohol and drug policy, and responsibilities of employees and subcontract personnel.

The Orientation covered the following topics:

- ☐ Management and Staff Emergency Contacts
- ☐ Emergency Contact Numbers – Non-Company
- ☐ Emergency Response Chart
- ☐ Company Reporting Organization
- ☐ HS&E Guiding Principles
- ☐ Workers' Responsibilities
- ☐ Subcontractor Responsibilities
- ☐ Enforcement of Rules and Procedures
- ☐ Alcohol and Drug Policy
- ☐ General Safety Rules
- ☐ Personal Protective Equipment
- ☐ Tuk Base Camp Rules
- ☐ Small Vehicle Policy
- ☐ Journey Management Procedures
- ☐ Abandoned Vehicle Protocol
- ☐ Establishment of the Roadside as a Workplace Protocol
- ☐ Ice Road Safety
- ☐ Emergency Radio Procedures
- ☐ Spill Response Procedures
- ☐ Emergency Response
- ☐ Hazard Identification
- ☐ Near Miss and Incident Reporting
- ☐ Accident Reporting and WCB Requirements
- ☐ Accident and Incident Investigation Summary
- ☐ Right To Refuse Unsafe Work
- ☐ Meetings
- ☐ Job safety Analysis
- ☐ Completion of Administrative Forms:
  - Medical History
  - Training Certificates
  - Driver's License and Driver's Abstract Form
  - Payroll Information Form
  - TD1 and TD1 NT Income Tax Form

I certify that I understand and accept my responsibilities and company rules as outlined in the Employee Orientation Presentation.

I acknowledge that I understand and accept the terms of the company Drug and Alcohol Policy, including the requirements for Pre-Employment, Post-Incident and Reasonable Cause Testing.

I acknowledge that I understand and accept the terms of the company Tuk Base Camp Rules, including the possible requirement for searches of rooms and personal effects.

Signature: _____

Witness: _____ Position: _____

Date: _____

9.0 ACCIDENT/INCIDENT INVESTIGATION & REPORTING

9.1.1 Introduction

All incidents are to be reported immediately to the respective work area's supervisor. It is the responsibility of all employees to ensure that they report these incidents as soon as possible after an incident has taken place. Incident reports should be completed by those individual(s) who have been directly involved in the incident. Incident reports are to be completed and sent into the safety department by the end of the same work shift that the incident took place on, unless otherwise stated by a representative of the safety department. Where an individual is unable to complete an incident report (due to injury, hospitalization, etc..) and would also then be unable to file it by the end of that day's shift with the safety department, it would then be the responsibility of that person's site supervisor to contact the safety department and ensure that the required information concerning the incident is forwarded to them.

All incidents are to be investigated. Once the appropriate incident report has been completed, the incident investigation report should then be initiated. It is important to look beyond the immediate and superficial explanations to find the true basic causes of the accident. This doesn't mean that temporary action should not be taken to remove the immediate hazard. But the investigation should continue until all the contributing factors and the root cause have been identified.

The first priority is to provide first aid or medical response for anyone who was injured in the accident. The employer or supervisor is responsible for ensuring that the accident scene is secured so that there is no risk of further injury. Securing the scene also preserves evidence that may be important in the investigation. If a workplace accident results in a death or critical injury, the Act states that an inspector's permission is required before the scene can be disturbed. Until such permission is received, no person may interfere with, disturb, destroy, alter or carry away anything at the scene of, or connected with, the occurrence. There are exceptions for the purpose of saving life, relieving suffering, maintaining an essential service or utility or preventing unnecessary damage to equipment or property. If the accident is serious, senior management must be informed immediately. They are responsible for contacting the families of injured workers and initiating the investigation procedures. Management is also responsible for reporting the accident to the appropriate authorities.

Analysis is an organized method of solving a problem by breaking it down into its constituent parts. The immediate "cause" of the accident may already be apparent. The purpose of an analysis is to find all of the contributing factors. An analysis systematically reviews all of the factors that could contribute to an accident. There are a number of ways of classifying the factors that can contribute to an accident.
For example:

- human factors;
- material factors;
- equipment factors;
- environmental factors;
- process factors.

Each factor must be carefully checked against the facts to see if it could have played a role in the accident. This is easier to do if the facts are first grouped into categories. For example, an investigation might have assembled the statements of witnesses, photographs, physical evidence and written evidence such as work procedures.
When all of the factors that might have contributed to the accident have been identified, the sequence of events can be reconstructed. At each step, the suspected cause can be checked against the facts.

Investigation and reporting are critical steps in preventing a similar incident or accident from recurring. The investigation is intended to determine the root cause or causes of an incident or accident as opposed to finding fault.

Incident and accident reporting is also useful because it helps identify:

- Training Needs;
- Problems with work procedures;
- Problems with work site conditions;

- Needs for Personal Protective Equipment PPE, Safety & Emergency Equipment;
- Failures in communication

It also helps collect information necessary for completing insurance reports, for complying with regulatory requirements and for gathering statistical information used to calculate statistics and identify incident trends so that the effectiveness of the HSE program can be measured.

The steps in developing an investigation analysis procedure should include:

- Implementing an incident reporting system;
- Preparing investigation procedures;
- Establishing a progress to ensure required corrective actions are completed; and
- Sharing the lessons learned from the incident investigations with workers to prevent a recurrence.

9.1.2 Types of events to investigate and report include

Incidents that have taken place will fall into four (4) different types. These four types are as follows and each has specific information, which must be gathered and documented.

1. Personal Injury – Includes:
   - On-site first-aid
   - Non-emergency professional medical services required
   - Emergency professional medical services required
2. Damage to Equipment Or Worksite – Includes:
   - Collisions between equipment and facilities
   - Collisions between equipment and other pieces of equipment
   - Theft of items from worksite
   - Vandalism
   - Release of fluids from equipment or vehicles
   - Material spills
3. Vehicle Collision or Damage Includes
   - Single vehicle collisions (including collisions with wildlife)
   - Multiple vehicle collisions
   - Stolen vehicle
   - Vandalism
   - Theft of property from the vehicle
4. Non-Compliance – Includes:
   - Contravention of legal requirements (Environmental, Health & Safety and Transportation)
   - Contravention company rules / policies

Supervisors will manage the response to the event and notify the appropriate authorities where necessary.

9.1.3 When to prepare reports

Reports of an incident should be prepared immediately after the event has occurred and kept on file to ensure requirements for regulatory compliance have been met.

In the case of serious accidents and environmental incidents, the accident/incident scene should be preserved to ensure important evidence is not lost or disturbed and details are not forgotten. The law mandates this for a serious injury accident or fatality.

To ensure incident reporting is consistent, appropriate report forms should be available at all work sites as required by regulatory agencies and company policy.

9.1.4 Implementation

All E. Gruben's Transport Ltd. personnel must be encouraged to report all incidents and must be informed that this is part of their responsibilities as employees. Working safely is a condition of continued employment.

E. Gruben's Transport Ltd. has developed incident report forms and has provided training for senior management and job supervisors to complete investigations and complete the required paperwork. Written procedures follow this section and report forms are included in the forms appendix of this manual.

9.1.5 Incident Investigation and Follow-Up

Incident investigation and follow-up assists in determining root causes of incidents and helps prevent incidents from recurring. This can only be done with proper investigation and analysis.

Job Supervisors are initially responsible for the investigation of all incidents, regardless of their severity. Depending on the actual or potential severity of the incident an alternate investigation leader may be appointed. The E. Gruben's Transport Ltd. Safety/Loss Control Officer will provide assistance as required, as will any members of the senior management team. Senior management will also review all Incident Investigations.

Findings from investigations may lead to the recommendation that changes be made to work procedures, methodologies, management systems and corporate policies.

9.1.6 Training

Superior quality can be delivered to an investigation if the investigation team leader has been trained in investigation techniques. Depending on the severity of the incident, insurance investigators or government authorities may also be required to conduct an investigation and/or may require information provided by in-house investigations.

There is a benefit in training work site supervisors in investigation techniques and providing them with a logical approach in determining the underlying or root causes of incidents. E. Gruben's Transport Ltd. has provided Incident Investigation training to all its senior management and job supervisors, and will continue to provide training as new supervisors come into the system. These skills are transferable and can be used to evaluate hazardous job site situations to prevent incidents.

9.1.7 Investigative Purpose

The purpose of investigations is to identify direct and underlying factors that contributed to an incident and the root causes behind those factors.

For example, a worker driving a vehicle has a tire explode. He panics, loses control of the vehicle, and is seriously injured. Both the exploding tire and the panicked reaction of the driver to the explosion are contributing factors to the incident.

The root causes behind these factors may be:

- An excessive workload, causing driver fatigue which impaired his ability to respond effectively;
- Inadequate purchasing controls, which allowed tires to be purchased that were undersized for the truck's weight;
- Inadequate pre-tip inspection procedures, which prevented the driver from noticing the tires were under-inflated; and/or,
- Overloading the vehicle.

9.1.8 Investigative Procedure

Regardless of any specific system that might be used in a workplace, there are a number of key steps to an accident investigation. These Steps are as follows:

- **Survey The Accident Scene** - The first step is to survey the accident scene. The investigator should itemize the things that need to be explained and make a list of people who were present at the site of the accident who should be interviewed. This is the time to take photographs and measurements and write down the immediate facts. If the accident resulted in critical injuries or fatalities, the accident scene must be preserved in accordance with the Act.

- **Interview Witnesses** - Everyone who has information relevant to the investigation should be interviewed. This includes eyewitnesses, workers on other shifts, technical experts and, sometimes, equipment designers or suppliers. Eyewitnesses should be interviewed first, while the details are still fresh in their minds. Detailed notes should be kept for later analysis.

- **Physical Investigation** - Physical evidence includes details of equipment damage, breaks, rips, burned materials, skid marks and signs of impact. Photographs and diagrams or measurements are often important. Details of the work environment, such as visibility, noise level, temperature and exposure to hazardous materials should be noted. At this stage, documents such as equipment specifications, maintenance schedules and work procedures may also be taken into account.

- **Organize The Facts** - All information should be organized and subjected to a thorough analysis. Where possible, separate the facts from opinions. Identify gaps in the information and re-interview witnesses and confirm facts. Ask the questions: Who? What? When? Where? Why? & How?

- **Prepare The Report** - The incident investigation report should explain the circumstances of the incident itself; identify the causes and recommend controls to prevent a recurrence. The report should be submitted to senior management and the joint health and safety committee. In most cases, the government department responsible for health and safety must also receive a report on the findings of the investigation.

After being notified of an incident, the on-site supervisor should survey the area to determine if the work must be stopped to prevent injuries and preserve evidence. The on-site supervisor notifies his management and an investigation leader is appointed. The following decisions must be made:

- Determine if government authorities and insurance investigators should be called; and
- Determine if legal advice is required;

The investigation leader directs the gathering of evidence, which is to include:

- Interviewing witnesses and the people involved;
- Photographing the site to record evidence and damage; and
- Creating scale drawings and diagrams.

If insurance investigators or government or other regulatory authorities are called in, the investigation leader will assist them as required.

Once evidence has been collected, then the investigator can complete the investigation process, which includes:

- Determining the immediate and root causes of the incident;
- Completing the investigation report;
- Developing recommendations to prevent a recurrence;
- Prioritizing a list of corrective actions identifying responsible parties and target dates for completion;
- Submitting completed reports and recommendations to management and, if required, to the insurance company and government;

- Discussing the report and recommendations with everyone who was working on the site at the time of the incident and with all other employees that are affected by the incident; and, consideration should also be given to circulating any learning and recommendations throughout industry.

Individuals who are assigned action items then carry out the investigator's recommendations and provide feedback to management on a monthly basis until all actions are completed and signed off. Only after there is verification that all recommended corrective actions have been completed will the incident report be closed out.

9.1.9 Incident Statistics

Incident statistics are compiled for use in the company's HSE performance assessment and for third party use.

Frequency of lost-time injury incidents (including fatalities) and severity of lost-time injury incidents are calculated quarterly.

Calculations are based on the following:

Lost Time Injury Frequency = Number of lost-time injuries x 200,000/Number of hours worked.

Recordable Injury Frequency = Number of lost-time injuries + Number of medical aid injuries Number of restricted work injuries x 200,000/Number of hours worked.

Injury severity = Number of lost days x 200,000/Number of hours worked.

Rates are a better measure than simply counting the number of incidents because they take into account the level of worker activity. Therefore, a comparison of performance between time periods is valid.

9.1.10 Incident Reporting & Investigation Summary

Proper incident reporting and investigation processes will ensure that E. Gruben's Transport Ltd. is:

- Accountable for any actual or potentially serious events;
- Better able to determine the root cause of the incident; and
- Enabled to make the changes necessary to avoid any re-occurrences.

This process also enables the company to demonstrate its responsibility to the workforce, their families, and the communities in which we work.

9.2 Accident/Incident Investigation Procedures

Accident/incident investigation is a vital part of E. Gruben's Transport Ltd. Health and Safety Program. No other activity produces such quick results as the prompt reporting and investigation of accidents and "near miss" incidents. Therefore, we provide the following written procedures and guidelines for use in the completion of Accident/Incident Investigations

Investigation of an incident or accident involves much more than filling out a report form. It is a process of gathering factual information and drawing conclusions; the repot form is only the documentation and the summary of that process.

The purpose of an accident investigation is to determine the causes and put corrective measures in place to prevent a recurrence. It is not to find fault of fix blame. Serious accidents or incidents with a high potential for injury or damage will require an in-depth investigation but every incident is a signal of problems that need to be corrected.

9.2.1 Understanding Accidents

Many theories and models exist that explain how accidents happen. How an accident investigation is conducted will, in many cases, depend on the investigator's beliefs about the causes of accidents. A particular accident theory can strongly influence the organizations investigation process and can provide direction to its entire occupational health and safety management system. It is important therefore to explore our understanding of accident causation.

9.2.2 Incident Sequence Model

In the early days of occupational health and safety, most methods used to prevent accidents and injuries tended to focus on the worker and "fixing the worker". Today, we feel that a much broader approach is required. This broader approach looks at supervision and worker involvement.

The Incident Sequence Model is a management system based model of accident theory. It is a modification of accident "domino" theories and says that incidents occur much like dominos falling in sequence. The sequence starts on the left with each "domino" knocking over the one to the right.

To use the model in conducting an investigation, we will start on the right and move left in reverse sequence.

9.2.3 Effect

This is the result of consequences of the incident: injury or illness, damaged tools, equipment or machinery = the loss. In the case of a near miss or close call, there is no loss. The severity of the loss varies and is largely the result of chance (luck).

9.2.4 Incident

In order to better understand the investigation process, it is important to clarify our definition of the terms "accident" and "incident". These can include:

- Injury, illness or disease or fatality;
- Damaged tools, equipment or machinery; and
- Damaged material or property, including environmental damage.

This differs from dictionary definitions of "accident" which tend to emphasize factors such as "happening without observable cause," "arising from unknown causes" etc. This leaves the perception that accidents just happen and that they cannot be prevented.

In health and safety, the term "incident" is used in a broad sense to include accidents and other unplanned events which, under slightly different circumstances, could have resulted in harm to people or damage to equipment, machinery or property. These are often referred to as "near misses" or "close calls".
This then is the unplanned event that precedes the loss or close call. It is the exposure to the hazard or the contact that could result in harm or damage. Incidents are commonly classified as follows:

- Struck against (running or bumping into);
- Struck by (hit by a moving object);
- Fall to lower level (either the body falls or the object falls and hits the body);
- Fall on same level (slip and fall, top over);
- Caught in (pinch and nip points);
- Caught on (snagged, hung);
- Caught between (crushed or amputated);
- Contact with (electricity, heat, cold, radiation, caustics, toxics, noise); and
- Overstress/overexertion/overload

9.2.5 Immediate Causes

These are the hazards that existed immediately prior to the occurrence of an incident or accident. A hazard is defined as any unsafe practice or unsafe condition that has the potential to cause injury, illness, disease or damage to property, equipment and the environment. Immediate causes are usually easily identified and they are broken down into two types.
These are: Unsafe Practices and Unsafe Conditions.

9.2.6 Unsafe Practices

These are the hazardous practices and behaviors that permit the occurrence of an incident, for example, failure to lock out equipment, failure to wear eye protection, overloading, poor driving practices, etc.

9.2.7 Unsafe Conditions

These are hazardous conditions that permit the occurrence of an incident, for example, inadequate guards or barriers, defective tools, poor housekeeping, weather conditions, etc.

Many investigators have a tendency to focus only on the immediate causes of an accident. But in order to prevent a repetition of what happened, it is necessary to dig deeper. It may be tempting to pin the accident on something a worker did or did not do and let it go at that. However, there is rarely, if ever, a single cause behind an incident or accident. Even the simplest incidents occur from a combination of causes.

Immediate causes are also called direct causes. They are the symptoms of deeper problems and the investigation must go beyond the immediate causes to identify the underlying causes.

9.2.8 Underlying Causes

These are real causes behind the symptoms; the reasons why the immediate causes existed. The underlying causes are not as apparent as the immediate causes. They are also referred to as root causes, basic or indirect causes.

Underlying causes can be identified by asking probing questions about the unsafe practices and unsafe conditions identified as the immediate causes. Here are some examples:

- Why was the equipment not locked out? Is there a lockout/tag-out procedure in place? Are workers aware of the procedure? Are workers trained in using the procedure?
- Why did the worker not wear eye protection? Is eye protection available? Is the wearing of eye protection enforced by the supervisor? Was the worker aware of the need for eye protection?
- Why did the worker remove the guard? Was there a lack of maintenance? Is the machine poorly designed? Was the worker aware of the hazard?
- Why was debris on the floor? Was this a rushed job? Is there any individual accountability for clean-up?
- Analysis of the answers to these probing questions will lead to the identification of underlying causal factors in two main categories – personal and work environment:

9.2.8.1 Personal Factors:

- Inadequate physical capability
- Inadequate mental capability
- Physical stress
- Mental stress
- Lack of knowledge
- Lack of skill
- Improper motivation

9.2.8.2 Work Environment Factors:

- Inadequate leadership/supervision
- Inadequate engineering
- Inadequate purchasing
- Inadequate maintenance
- Inadequate tools and equipment
- Inadequate work standards
- Wear and tear
- Abuse/misuse

9.2.9 Management System Defects:

Underlying causal factors can be linked to defects in the health and safety management system. There are three key areas to consider:

- System Components: The system may be lacking some important elements.
- System standards: The standards are not clear or specific enough. They may be inappropriate.
- Conformance with System Standards: People in the organization are not following or complying with the established standards.

9.3 Applying the Incident Sequence Model:

The Incident Sequence Model has been applied to a simplified form called the Incident Analysis Worksheet. The work sheet can be used during an investigation to record information related to each key element of the model. This information forms the basis for the final Incident Investigation Report.

9.4 Why Investigate?

Accidents are caused. They don't just happen. The causes of accidents can be determined through proper investigation; therefore injuries can be prevented if the causes of accidents are corrected. Unless the causes are corrected, the same thing will happen again and again.

The most important reason for investigation accidents is to prevent injury and illness to workers. There are other reasons to consider such as the costs of accidents and the legal requirements to investigate.

9.5 Costs

The prevention of accidents through effective investigations can result in considerable savings in both direct and indirect costs.

Direct costs include the insured costs of Worker's Compensation payments to an injured worker while away from work and medical expenses incurred from the worker's injuries.

Indirect costs are other hidden costs of an accident and are most often uninsured. Indirect costs account for a large amount of the true cost of an accident and it is estimated that on average they exceed direct costs by a 4:1 ratio. Indirect costs may include:

- Repair of damage to material/equipment or replacement cost;
- Wages paid for time lost by the injured worker, other than Worker's Compensation payments (ie. medical appointments after returning to work);
- Wages paid for time lost by other workers (i.e. those who stopped working to assist following the accident or who took part in the investigation, or who could not work without the damaged equipment or material);
- Overtime work necessitated by the incident;
- Wages paid for the time of the supervisor(s) investigating the incident;
- Time spent by management and administrative staff on accident-related activities;

- Decreased output when the injured worker returns to work;
- Reduced productivity during a replacement workers learning period;
- Uninsured medical costs (on-site medical and first aid services); and
- Miscellaneous costs such as public liability claims, legal fees, equipment rental costs, etc.

9.6 Legal Requirements

9.6.1 Occupational Health and Safety Act:

The Occupational Health and Safety Act apply whenever there is a serious injury on a worksite, or an incident that has the potential for causing serious injury to occur. If an injury or incident listed below occurs at a worksite, the employer responsible for the worksite must notify a Labour OH&S Director of Inspection or WCB Inspector as soon as possible. Examples include:

- An injury or accident that results in death;
- An injury or accident that results in a worker being admitted to an unplanned or uncontrolled explosion, fire or flood that causes a serious injury or that has the potential of causing a serious injury;
- The collapse or upset of a crane, derrick or hoist; or
- The collapse or failure of any component of a building or structure necessary for the structural integrity of the building or structure.

In addition, the employer is required to investigate any other serious injury or any other incident that has the potential for serious injury. Since these "other" serious injuries and incidents are not defined in the Act it is important that the E. Gruben's Transport Ltd. investigation policy clearly identify them.

9.6.2 Workers' Compensation Act

While E. Gruben's Transport Ltd. will be dealing primarily with the Occupational Health and Safety Act or Safety Act, there are other obligations and responsibilities under the Workers' Compensation Act whenever a worker suffers personal injury on the worksite, or is entitled to medical aid as a result of an accident. If the accident is likely to disable the worker for more than the day of the incident, E. Gruben's Transport Ltd. is required to:

- Report the accident to the Worker's Compensation Board within 72 hours;
- Notify the Board within 24 hours of learning that the worker has returned to work or is able to do so;

The Safety Act or Worker Compensation Act contains additional details about what E. Gruben's Transport Ltd. is required to do, and to make available in regard to accident investigations. E. Gruben's Transport Ltd. must be familiar with the Safety Act or Worker Compensation Act depending on the jurisdiction the accident occurred to determine what is expected in case of an accident.

9.7 Other Benefits of Accident/Incident Investigation:

- Providing accurate, unbiased descriptions of what happened. A summary of the incident is useful for communicating with employees, family members or third parties like insurance companies
- Revealing hazards not discovered through hazards assessments and inspections
- Identifying trends
- Tracking accidents/incidents
- Improving morale of employees

9.8 What Will Be Investigated?

It is obvious that accidents resulting in death or serious injury must be thoroughly investigated.

However, studies show that for every accident resulting in death or serious injury there were a large number of similar accidents and incidents (unplanned events) resulting in property damage, minor injuries with no injuries at all.

Therefore, minor injury accidents, near-miss incidents and property damage accidents with the potential for serious injury will be investigated to identify and correct root causes.

9.9 Who Should Investigate?

The supervisor will investigate the accidents and incidents in his or her area of responsibility. As discussed earlier, E. Gruben's Transport Ltd. as an employer has a legal requirement to investigate those incidents defined in legislation. A definition of employer in the Act is "any person designed by an employer or his representative". This could be the foreman, the lead hand, the superintendent, etc.

A team approach is recommended and whenever possible the supervisor should be assisted in the investigation by a safety committee member, the corporate health and safety coordinator or their designate. Safety is a line function; therefore the prime responsibility for accident/incident investigation lies with the supervisor.

9.10 Reporting of Accidents/Incidents

Prompt reporting of an accident/incident to the supervisor is essential. This enables the supervisor to carry out an investigation while the events are still fresh in the minds of those involved.

9.10.1 Failure to Report an Accident/Incident

Workers fail to report accidents or incidents for some or all of the following reasons:

- Fear of discipline;
- Concern for their own safety record;
- Concern for reputation;
- Fear of medical treatment and/or medical personnel;
- Desire to avoid work interruption;
- Desire to keep a clear record;
- Desire to avoid "red tape";
- Concern for the reaction of other workers (peer pressure); and
- Lack of understanding of the importance of reporting.

Supervisors can encourage reporting by:

- Reacting positively to the report;
- Training employees in reporting procedures and emphasizing its importance;
- Acting promptly on the report;
- Providing feedback; and
- Following up with corrective measures.

9.11 Investigation Preparation

Preparation for an investigation begins with the development of an investigation process described in E. Gruben's Transport Ltd. investigation policy. The policy outlines the intent of the investigation and the procedures E. Gruben's Transport Ltd. intends to use in reporting an accident or incident and proceeding with investigation. Areas that are included in the policy are:

- What types of incidents and accidents are to be investigated;
- Notification procedures and contact list (i.e. WCB, OH&S, Emergency Response, family members, etc.);
- People involved in the investigation team;
- What report form(s) are used for various investigations; and
- The review process after the investigation is complete.

Most supervisors do not conduct many investigations in their career, which makes the investigation procedures a seldom performed task within many organizations. A regular review of the corporate investigation policy and procedure will assist in prompt and correct response by front line supervisors at the worksite.

Before undertaking an investigation, the supervisor must have the necessary tools to do the job, including:

- Training in accident investigation techniques;
- Safety equipment clothing for the area(s) likely to be entered;
- Required permits and notification forms;
- An Investigation kit which should include the following
    1. Investigation Report Forms
    2. Investigation guide or checklist
    3. Writing material for notes, statements, sketches, etc.
    4. Pencils, pens
    5. Photographic or video equipment, if appropriate (cannot be used in an explosive atmosphere)
    6. Testing equipment
    7. Measuring tape
    8. DO NOT ENTER tape

9.12 The Investigation Process

The investigation process involves four phases:

1. Gathering facts - investigation techniques and methods are designed to produce facts. A fact is something that actually exists or has actually occurred; something known by observation or examination to be true or real.
2. Analyzing and evaluating the facts - this is a systematic and thorough study of the facts to determine causes and recommend corrective measures.
3. Documenting findings - a written report is necessary to communicate the findings of the investigation to management and affected employees and to ensure proper follow-up takes place.
4. Following-up - this is essential to ensure that corrective actions are taken to prevent recurrence and that the recommended controls, measures, practices, etc. are working effectively.

These phases should not be thought of as being separate and distinct but can occur concurrently. Analysis and evaluation begins while the facts are being gathered (i.e. while getting an overview of the incident) and can continue well into the documenting of findings. The investigator must be careful not to let early analysis lead to premature conclusions.

9.12.1 Carrying out an investigation:

When a serious accident occurs, the immediate response is to contact emergency services and take control of the situation. This is necessary to ensure that:

- No further injury or damage occurs by identifying and controlling imminent danger hazards.
- Injured persons are properly cared for.
- The scene of the incident/accident is secured and physical evidence is not disturbed before the investigation team, the police and/or WCB or OH&S Officer arrive.

A complete investigation involves the following activities in each of the phases of the investigation process.

9.12.2 Gathering Facts

Get an overview. Basic information about who was involved in the incident or accident and the general conditions at the time of the occurrence will help you decide on the scope of the investigation and who or what may be required to provide further information. An overview of the incident often uncovers the unsafe acts or conditions which directly contributed to the incident. Continuing the investigation will allow you to uncover the underlying or root causes.

Gather information at the scene. Make notes of what you observe and also take photographs and/or draw diagrams, sketches, etc. Look for things such as:

- Positions of injured workers;
- Condition of equipment and material;
- Where objects are in relation to each other;
- The angle something came from or the force behind an object;
- Safety devices that were in use and their positions;
- Housekeeping in the area;
- Noise and lighting levels.

Once the details of the scene have been carefully recorded, broken equipment or samples of materials may be moved for later analysis by experts. Before removing anything, ensure that the authorities having jurisdiction (police, fire, labour, etc.) have authorized this move.

9.12.3 Interview Witnesses

The interviewing of witnesses is your biggest challenge in conducting an investigation. It can be hard to get all of the information you need, or to sort out what really happened from the conflicting descriptions you get. A certain amount of distortion is natural because:

- Different people have different perceptions;
- Information may be overlooked because the witnesses are under emotional stress;
- People may "cover for" themselves or each other in an attempt to avoid further trouble.

Exactly which questions you should ask will depend on the circumstances of the incident. You should know what they are if you keep an open mind and follow-up on whatever seems relevant as you proceed. However there are seven basic questions you should include in any interview:

1. Where were you when the accident happened?
2. What were you doing at the time?
3. What was (were) the injured worker(s) doing at the time?
4. What did you see and hear?
5. What were the environmental conditions like at the time?
6. What do you think caused the accident?
7. How do you think we could prevent a similar accident in the future?

The following techniques can help your interviews be more effective:

- Conduct the interview at the scene if possible, or in a comfortable place such as a private office;
- Interview one person at a time and privately;
- Keep the interview positive and try to put the person at ease;
- Allow the person to tell their story about the accident;
- Ask open-ended questions, not leading questions;
- Do not talk down to the person or rush them to answer quickly;
- Paraphrase what people tell you to make sure you understand;
- Make notes of key points;
- If needed, obtain a written statement from the witness;
- Thank the person and ask them to come back to you if they think of anything else;

9.12.4 Analyze and Evaluate Facts to Determine Causes

Analysis of the factual information you have gathered is necessary to determine the causes of the accident or incident. There are two types of causes to identify: immediate and underlying.

9.12.5 Recommend Corrections

To prevent a recurrence of the accident or incident, specific corrective action must be applied both to the immediate causes and the defects identified in the management system. Corrective action for the immediate causes will usually be short-term; those for the defects in the management system, long-term.

9.12.5.1 Short-Term Corrections

Corrective actions for immediate causes often can be implemented quickly and are usually short term. The focus is on the control or elimination of hazards. Some hazards can be eliminated but most will need to be controlled.

There are three approaches to hazard control:

1. Engineering Controls: These are "hard" controls such as installing guards around moving machinery parts; ventilation systems to remove toxic fumes and vapors; fitting heavy equipment with rollover protection, etc.

2. Administrative Controls: These are "soft" controls such as policies, safe work practices, job procedures, training, job scheduling, rotation of workers, etc.

3. Personal Protective Equipment (PPE): PPE is the "last" line of defense against hazards and should be used only to supplement engineering and administrative controls. PPE includes respiratory, head, eye, hearing, foot, limb, body and fall protection.

9.12.5.2 Long-Term Corrections

Correction of the organization's management system defects will normally take longer. The failures or weaknesses in the management system must be corrected in order to reduce the probability of similar incidents occurring in the future. Each corrective action, whether short-term or long-term, should be assigned a target date for completion. The corrections may be implemented in stages, depending on hazard priority, training requirements, budget, and so on.

9.12.6 Determine Cost

Whenever you can, determine both the direct costs and the indirect hidden costs. The true costs of an accident will be important in helping management determine which recommendations will be implemented and in what order. While these costs reflect the financial burden of the company that experienced the accident, the cost to the worker from the effects of an injury or illness and disruption of lifestyle is immeasurable.

9.12.7 Document the Findings of the Investigation

Write the Investigation Report. The report is a comprehensive summary of the findings of the investigation. We have tailored simple report forms to our general needs at E. Grubens's Transport Ltd. However, more complicated reporting may be required if the seriousness of the incident warrants it. For example, a fatal accident investigation will contain more detail than a "standard report form" will allow.

Completed reports are distributed to senior management and are discussed at our regular management meetings. We also discuss relevant information at our safety meetings and post some investigation results.

9.12.8 Follow Up

Once the report is complete and the corrections determined, it is essential to follow-up and see that the corrective actions take place as scheduled, particularly if the correction will involve action at several different stages. It is important not to rely on memory or to assume that other persons will take care of the action assigned to them. Check to make sure that the specified action is working effectively to correct the problem.

Involve other people in the follow-up when appropriate. Follow-up information should be documented along with the original report.

9.12.9 Summary

An accident or a near-miss is not something that just happens out of the blue. It is a signal that something is out of order with the management of health and safety. An investigation is necessary to find out what that "something" is.

It should be a thorough examination that tells you not only what happened, but why it happened. The goal is not to find someone to blame for what happened, but to prevent it from happening again. With thorough reporting and analysis over time, investigations can reveal important trends and interrelationships, and can lead to valuable corrective actions.

An investigation, therefore, is not just a reaction to a specific incident. It has a much broader role in improving the quality and effectiveness of a health and safety program.

10.0 Right to Refuse Unsafe Work

All employees of EGT have the right, and in some provinces the obligation to refuse what is deemed to be hazardous work. When an employee refuses work which they believe is likely to endanger them, they must immediately report the problem to their supervisor, who in turn must report it immediately to the safety office. Under no circumstances will that specific work continue until a solution to the problem has been put into place. The worker who originally refused to perform the work can be placed in another work situation until the original situation has been rectified. The worker who originally refused to perform the work cannot be replaced by another worker for this work task until the original situation has been rectified.
All employees have the legal right to know about the hazards of their workplace. As an employer, EGT has a legal obligation to fully train their employees in all of the hazards of the job those same employees are expected to perform and how to avoid those same risks from having an adverse effect on them.

In all Canadian provinces, territories and in the federal jurisdiction, workers are protected by the Workplace Hazardous Materials Information System. This WHMIS law requires employers to:

- Label containers of hazardous materials;
- Provide Material Safety Data Sheets (MSDS) with additional information;
- Provide education and training so that you will understand the hazards of the substances you are expected to work with.

11.0 Return to Work Policy and Procedure

Return to Work /Modified Work

Purpose

The purpose of this policy is to provide continued employment to injured workers in a joint effort to eliminate interruptions of earnings and reduce the impact of WCB Premium increases due to work-place injuries, without aggravation or delays to a full recovery. It is recognized that not all injuries facilitate the performing of modified work duties and will be accepted as lost time accidents.

Policy

An EGT representative will accompany any injured worker who requires medical aid. The representative will advise the treating physician of the modified work program options available. When possible, the injured person will be returned to perform a useful task within their capability, which will not adversely affect his or her ability to recover from that worker injury. The worker will be returned to work as soon as possible after receiving medical clearance from their physician. It is the intention of this policy to work closely with the employee during recovery and rehabilitation to facilitate a smooth transition back into the workforce.

Responsibilities

Managers

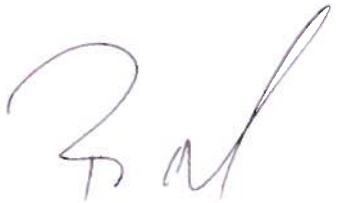
Oversee the operation of the program.
Complete the Employers Report and submit to WCB.
Ensure workers are contacted weekly until they are returned to work and advise WCB immediately when they have assumed fully duties.

Superintendents

Ensure that employees are aware of our modified work program
Making available a company representative to accompany injured worker to medical facility.
Ensure that suitable work has been made available to the injured within the limitations of the injury as indicated by the attending physician.

Employees

Communicate to the physician that modified work is available and, with the physician's approval, participate in the program.
Present the modified work report form to physician and return the completed form and WCB physician's first report to EGT.
Complete and submit to EGT the WCB worker's report.



Russell Newmark
Chief Executive Officer

Sept 2009

Modified Work Program Form

It is EGT intention to keep employees working, or return them back to work as soon as possible after an injury. We see this as mutually beneficial. The modified work program may include, but not limited to the following:

Light truck driver	hot shot, parts pickup, vehicle delivery, pilot car, expediting
Office duties	assembling safety manuals/hand books, updating MSDS, new employee orientations, filing and phone duties, front end office work, follow up on WCB back to work incidents
Warehouse duties	stocking shelves, inventory, collection of and ordering of materials, updating project paperwork and data entry
Light construction duties	sign making, monitoring, testing, flagging, cleanup, camp maintenance and vehicle cleaning
Security	day and night security, fire extinguisher checks, inspections, safety checks, audits

A list of physical demands for jobs is available.

If there are any restriction to movement or use of limbs please specify:

I hereby give my consent to release the above medical information, and agree to accept modified work.

I understand by signing this I do not give up my rights to claim WCB.

Employee name _____

Employee signature _____

Doctor's name _____

Doctor's signature _____

12 APPENDICES

1. Safety

    1. Safety Orientation
    2. Daily Tool Box Meeting
    3. Job Safety Analysis Form
    4. Supervisor Safety Responsibility Checklist
    5. Hazard/Risk Identification and Assessment
    6. Truck Driver Hazard Assessment
    7. Accident/Incident Investigation
    8. Investigation Analysis Process
    9. Action Plan to Correct and Identified Hazard
    10. Initial Claim Report

2. Meetings

    1. General Safety Meeting Agenda
    2. Pre-shift Daily Tailgate Meetings
    3. Health, Safety and Environment Monthly Meetings

3. Training

    1. Developing On-The-Job Training Programs
    2. Personal Certification and Training Records

4. Personal Information

    1. Driver's License Information
    2. Authorization for Driver information
    3. Personal Medical History

5. Maintenance

    1. Worksheet for Indentifying Regulatory Requirements
    2. Operator's Request for Maintenance and Repair
    3. Maintenance Record
    4. Monthly Inspection HD Trucks
    5. Monthly Trailer Inspection
    6. Shop Monthly Checklists
    7. Shop Crane Maintenance and Service Log
    8. Fire Extinguisher Inspection – Monthly Checklist

E. GRUBEN'S Transport Ltd.

Safety Orientation

New Employee Orientation Acknowledgement

I, _____ have participated in the New Employee Orientation which outlines Company policies, safety procedures, alcohol and drug policies and responsibilities.

Orientation covered the following topics (please check those that apply)

_____ In-house Procedures and Work Systems	_____ Hours of work
_____ Company Policies, Ethics and Principles	_____ Drug and Alcohol Policy
_____ General Safety Policies	_____ Local Practices and Standards
_____ Personal Protective Equipment	_____ Driving and Vehicle Policies
_____ *(includes selection and maintenance)*	_____ Worksite and Job Hazards
_____ Incident and Accident Reporting	_____ First Aid Stations
_____ *(incident includes near misses)*	_____ Alarms, Evacuations and Safe Havens
_____ Fire Extinguisher Location and Operation	_____ Permits
_____ Restricted Areas	_____ Safety Meetings
_____ Off-the-job Safety	_____ Worksite Safety Committee
_____ Award Program	_____ Site Evacuations
_____ On-the-job Training	_____ Ice Road Safety
_____ Abandoned Vehicle and Roadside Protocol	_____ Responsibility to Refuse Unsafe Work
_____ Base Camp Rules and Policies	_____ HSE Handbook

I understand and accept my responsibility as outlined in the New Employee Orientation

_____ Employee Signature

_____ Position

_____ Witness

_____ Position

_____ Date (dd/mm/yy)

_____ Date (dd/mm/yy)

E.Gruben's Transport Ltd.

Daily Safety Meeting Document

Date: _____ **Location:** _____

Supervisor: _____ | _____

Print Name Signature

General:
__PPE (Hardhat, Boots, Vest, Glasses,etc.)
__Pinch points (what are they)
__Eye to Eye lockout
__Buddy System
__Ask if you don't understand
__Lifting
__3 Point Contact
__Communication
__Footing (changing Conditions)
__Documentation
__Working alone
__Journey Management

Shop:
__Housekeeping (Floor, Hoses, Cords,etc.)
__Tools (Powertools, Handtools)
__Equipment(Hoist, Jacks, Welder etc.)
__Blocking
__Hazardous Materials

Warehouse & Yard
__Housekeeping (Floor, Hoses, Cords, etc.)
__Shelving & Isles
__Hazardous Materials
__Equipment (Inspection, Operation)
__Suspended Loads
__Driving(obey Signs, Speed)
__Backing (Area is clear)
__Driving (Truck, Pickups, obey signs)
__Signaling (know your signals)
one Signaller
__ Load Securement--Trucks, Loaders,etc.
__Riding on Equipment
__Near Miss Reports
__Hazard ID Reporting
__Incident Reporting

Environmental:
__Tundra Damage
__Garbage Disposal
__Oil Drips & Spills

Other Issues:

Attendees:

Name	Signature	Name	Signature

E. GRUBEN'S Transport Ltd.

Job Safety Analysis Form

JOB NAME: _____

LOCATION: _____ **DATE:** _____

ANALYSIS MADE BY: _____ **ANALYSIS REVIEWED WITH:** _____

PERSONAL PROTECTIVE EQUIPMENT REQUIRED/RECOMMENDED:

_____

STEP NO.	SEQUENCE OF BASIC JOB STEPS	POTENTIAL INCIDENTS OR HAZARDS	PROTECTIVE MEASURES FOR EACH HAZARD

E. GRUBEN'S Transport Ltd.

Supervisor Safety Responsibility Checklist

SUPERVISOR NAME: _____ **DATE:** _____

Check off Safety Tasks completed each week. Submit to Safety Supervisor at month-end.

Supervisor Inspections	Week 1			Week 2			Week 3			Week 4		
Tasks	Yes	No	N/A	Yes	No	N/A	Yes	No	N/A	Yes	No	N/A
1												
2												
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												

SCOPE OF SAFETY TASK TO BE CHECKED OFF:

1. Site Specific Orientation
2. Training on Safe-Work Procedures
3. Proper Use and Maintenance of PPE
4. Pre-Task Safety Meeting and Hazard Assessment with Workers
5. New Worker Supervision
6. Work Site Physical Condition Inspection
7. WHMIS Legislation Discussion
8. Work Stoppage Under Unsafe Conditions
9. Emergency Response Procedures
10. Reporting and Investigating Incidents and Accidents
11. Waste Disposal Regulated Practices
12. Other

E. GRUBEN'S TRANSPORT LTD. - JOB HAZARD ANALYSIS

Supervisor:	Location:	Date:
Job Description:		

STEPS	TASKS	HAZARDS	PLANS TO ELIMATE/CONTROL

Worker Name and Signature (Below)		Worker Name and Sigature (Below)	

HAZARDS TO CONSIDER

1) ADJACENT OPERATIONS, SURFACES
2) FLAMMABLE PRODUCTS
3) EXTREME TEMPERATURES
4) GROUND CONDITIONS
5) SLIPPERY
6) TRAFFIC CONGESTION EQUIPMENT
7) POOR LIGHTING
8) WORKING ALONE
9) OPEN EXCAVATION
10) HOURS OF WORK

SAFETY EQUIPMENT REQUIREMENTS

1) PROTECTIVE CLOTHING
2) HARD HATS
3) SAFETY FOOTWEAR
4) SAFETY GLASSES
5) GOGGLES
6) FACE SHIELDS
7) SAFETY HARNESS
8) HIGH VISIBLITY TEST
9) FIRE RETARDANT CLOTHING
10) SPECIALTY GLOVES
11) LOCKS AND TAGS
12) FIRE EXTINGUISHER
13) SAFE WORK AGREEMENT
14) MATERIAL SAFETY DATA SHEETS
15) OTHER_____

E. Gruben's Transport Ltd.

TRUCK DRIVERS HAZARD ASSESSMENT

YOU HAVE THE LEGISLATED OBLIGATION TO REFUSE UNSAFE WORK
ALL INJURIES TO BE REPORTED IMMEDIATELY TO YOUR SUPERVISOR
CHECK OFF ALL HAZARDS THAT APPLY TO THIS JOB AND IDENTIFY PLANS TO CONTROL THEM

ENVIRONMENTAL/WORK SITE HAZARDS		HAZARDS	PLANS TO ELIMINATE/CONTROL
Weather Conditions			
Road Conditions			
Side Roads			
Worksite Roads			
Condition of Site			

ERGONOMIC HAZARDS			
Awkward body position			
Over extension			
Prolonged twisting/bending motion			
Working in tight area			
Lift too heavy/awkward			
Parts of body in line of fire			
Repetitive motion			
Working above your head			

PERSONAL LIMITATIONS/HAZARDS			
Procedure not available for task			
Do I understand			
Proper training for tasks or tools to be used			
First time performing task			
Fatigue			

Permit required? Yes No	
Permit required? Yes No	
Permit #	

Specialized PPE required for the task? Yes No	
What?	
Any hazards remaining? Yes No	
What?	
Control	

Is worker working alone? Yes No	
Emergency Contact:	

Contact Phone Number:	

It is important that all hazards have plans to eliminate them and the plans are put in place!
Ensure all required permits are in place!

REMEMBER: STOP AND THINK!! SEE IT AGAIN FOR THE FIRST TIME!!

ACCIDENT INVESTIGATION REPORT

E. Gruben's Transport Ltd.
P.O Box 177 Tuktoyaktuk NT X0E 1C0
PH (867) 977-7000 FAX 977-7040

Company: **E.GRUBEN'S TRANSPORT LTD.** **Name:** **Unit#**
Location: **Date of occurrence:** **Time:** _am__pm
On Employers Premises: ___Yes ___No **Date Reported:**

PERSONAL INJURY OR ILLNESS

NAME:
OCCUPATION: **AGE:**

NATURE OF INJURY OR ILLNESS
(INCLUDE RESTRICTED WORK)

PROPERTY DAMAGE

PROPERTY DAMAGE:
ESTIMATED COST $ **ACTUAL COST $**

NATURE OF DAMAGE

DESCRIPTION

DESCRIBE CLEARLY WHAT TOOK PLACE, INCLUDE THE MATERIALS, EQUIPMENT AND OTHER CONTRIBUTIONG FACTORS. IF VEHICLE ACCIDENT COMPLETE DIAGRAM

WITNESSES 1: **2:** **3:**

ANALYSIS

USING THE GUIDE, QUESTION (WHY-WHAT-WHERE-WHEN-WHO-HOW) EACH OPERATING FACTOR AND THE MANAGEMENT CONTROLS INVOLVED. DESCRIBE EACH MANAGEMENT DEFICIENCY TO THE LOSS.

PREVENTION

MOTOR VEHICLE ACCIDENT: ____N/A ____PREVENTABLE ____NON PREVENTABLE

INVESTIGATED BY: **DATE:** **REVIEWED BY:** **DATE:**

MOTOR VEHICLE DIAGRAM

PLEASE SKETCH A DIAGRAM SHOWING DIRECTION AND POSITION OF VEHICLES INVOLVED

UNSAFE ACT (Check all that apply)	UNSAFE CONDITION (Check all that apply)
_____ Eyes not on directon of travel	_____ Equipment/System failure or malfunction
_____ Failure to follow procedures/instruction	_____ Hazardous environment facility related
_____ Failure to follow safe practices	_____ Defective tools
_____ Failure to request/obtain assistance	_____ Inadequate training/skills/experience
_____ Improper use of material/equipment	_____ Hazardous environment, emergency condition
_____ Improper/inadequate/failure to usePPE	_____ Inadequate or lack proper tools available
_____ Eyes not on work/hands	_____ Poor maintenance of equipment/systems
_____ Horseplay	_____ Inadequate of lack of procedure
_____ Poor tool selection	_____ Inadequate signage of identification
_____ Repetitive motion	_____ No or improper procedure
_____ None	_____ Poor housekeeping/disorderly work area
_____ Other	_____ Inadequate/missing guards or barriers
	_____ Inadequate ergonomic design
	_____ None
Deviation from usual Procedure:	
Root cause description:	

HAZARD	JOB TRAINING
_____ The hazard was not foreseen	_____ Safety training not adequate for task performed
_____ The hazard was not fully understood	_____ Safety training did not address all hazards
PLANNING / PROCEDURE	_____ Safety training not followed
_____ Sufficient job safety planning not conducted	_____ Employees did not receive job safety training
_____ Policies/procedures not adequately addressed	**FACILITIES/EQUIPMENT/TOOLS**
_____ Policies/procedures/plans were not followed	_____ Inadequate facility constructed
COMMUNICATION	_____ Improper facility maintenance
_____ Poor communication between employees	_____ Inapropriate equipment used for the job
_____ Poor communication between supvr. & employees	_____ Improper built or maintained equipment
_____ Inadequate communication from past incidents	**MANAGEMENT**
REPETITIVE MOTION	_____ Personal assigned to activity were not qualified
_____ Lack of employee/job rotation	_____ Management was not aware of hazard
_____ Inadequate eronomic design	_____ Schedule or cost priorities implied
_____ Poor work posture	_____ Safety training principles not enforced
_____ Inadequate rest breaks	

Check required PPE for the task involved at the lime of the incident and if if was worn at such time									
Face	_____	Glasses	_____	Chem. Goggles	_____	Face Shield	_____	Worn?
Gloves	_____	Thermal	_____	Chemical	_____	Abrasion/Cut	_____	Worn?
Head	_____	Hardhat	_____	Bump Cap	_____	Hood	_____	Worn?
Resperator	_____	Air Purifier	_____	Supplied Air	_____	SCBA	_____	Worn?
Footwear	_____	Steel Toes	_____	Chem. Resistant			_____	Worn?
Hearing	_____	Ear Plugs	_____	Ear Muffs			_____	Worn?
Clothing		Chem. Resist.		Thermal				Worn?
Other:									

Was a job hazard analysis/assessment completed prior to the incident? If one was completed, describe briefly:

Corrective Actions to prevent this and similar incidents:			
Date to be accomplished:	1 _____	2 _____	3 _____
Work order # (if appl.)	1 _____	2 _____	3 _____
Investigating Team:			Ext.
			Ext.
			Ext.
			Ext.

Date Investigation completed:

E. GRUBEN'S Transport Ltd.

E. Gruben's Transport Ltd.
Box 177
Tuktoyaktuk, NT
XOE 1CO
867-977-7000; fax 977-7040

Investigation Analysis Process

INCIDENT	ACTION	INITIAL REPORTING	ANALYSIS	SYSTEM IMPROVEMENT
Contact with Energy resulting in undesired event	-Protect crew -Care for injuries -Contain incident -Preserve the scene -Notify Superintendent -Mobilize support -Recovery	Immediate causes: -Acts -Substandard conditions -Contributing factors	Investigation leader chosen depending on incident or severity: Identify basic or "root" cause(s): -Personal factors -Job/system factors (controls that failed)	Corrective actions to prevent recurrence: -Assign responsible person(s) for implementing corrective action -Set time to completion -Track progress -Communicate lessons learned to others

E. Gruben's Transport Ltd.
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Tuktoyaktuk, NT X0E 1C0
TELE: (867) 977-700 FAX: (867) 977-7040

Action Plan to Correct an Identified Hazard

Source of Hazard Report: (check applicable item)

Safety Meeting	_____	Inspections: Worker Observation:	_____
Accident Investigation Report	_____	Work Site Conditions:	_____
Supervisor Checklist	_____	Yard:	_____
		Shop:	

DATE: _____

LOCATION: _____

HAZARD: _____

_____

NAME: _____ **SIGNATURE:** _____
(print)

Corrective Action Taken: _____

To be completed by: _____ **Date:** _____

By whom: _____ **Completion Date:** _____

Benefits: _____

Estimated Cost: _____

Acknowledged by: _____
Supervisor
Safety Supervisor
Senior Administration

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Initial Claim Report

SUPERVISOR: _____ CLAIM NO.: _____

NAME: _____ POSITION: _____

UNIT NO.: _____ DATE: _____ TIME: _____

PREVENTABLE: _____ NON-PREVENTABLE: _____

CLIENT: _____

CLIENT REPRESENTATIVE: _____

LOCATION OF INCIDENT/ACCIDENT: _____

WEATHER CONDITIONS: _____ TEMPERATURE: _____

JOBSITE CONDITIONS: _____

ROAD CONDITIONS: _____

INJURY/ILLNESS: _____

BODY PARTS AFFECTED: _____

NATURE OF INJURY: _____ ILLNESS: _____

OBJECT/EQUIPMENT/SUBSTANCE INFLICTING INJURY: _____

PROPERTY/EQUIPMENT DAMAGE (please check)

Company Unit _____ Cargo _____ Auto _____ Property _____ Liability
_____ Other

NATURE OF DAMAGE: _____

ITEMS DAMAGED: ESTIMATED COST:

BRIEF ACCOUNT OF INCIDENT OR ACCIDENT:

WITNESS: _____

1 Signature Name (Print) Date:

_____

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General Safety Meeting Agenda

DATE: _____ **LOCATION:** _____

START TIME: _____

1. Last Meeting's Key Decisions and Follow-up

2. Continuing Concerns:
   - (a) Unsafe Conditions
   - (b) Hazards
   - (c) Required Training

3. Recent Incidents
   - (a) Corrective Measures Taken

4. Safety Precautions (to prevent a reoccurrence)

5. Upcoming Training Opportunities

6. New Safety and/or Work Procedures

7. Equipment Demonstration(s)

8. New Policy(ies)

9. Guest Speaker(s)

10. Safety At Home

11. Open Discussion

12. Other

MEETING ADJOURNED BY: _____ POSITION: _____

TIME SAFETY MEETING ENDED: _____

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Pre-Shift Daily Tailgate Meetings

DATE: _____ **LOCATION:** _____

SUPERVISOR: _____ _____
(Print Name) (Signature)

General

_____ PPE (Hardhat, Boots, Vest, etc.)
_____ Pinch Points (what are they?)
_____ Eye-to-eye Lockout
_____ Buddy System
_____ Ask if you don't understand
_____ Lifting
_____ Three Point Contact
_____ Communication
_____ Footing (Changing Conditions)
_____ Documentation
_____ Working Alone

Shop

_____ Housekeeping (Floor, Hoses, Cords, etc.)
_____ Equipment (Power Tools, Hand Tools)
_____ Equipment (Hoisting, Jacks, Welder, etc.)
_____ Blocking
_____ Hazardous Materials

Warehouse & Yard

_____ Housekeeping (Floor, Hoses, Cords, etc.)
_____ Shelving and Isles
_____ Hazardous Materials
_____ Equipment (Inspection, Operation)
_____ Suspended Loads
_____ Driving (Obey Signs, Speed)
_____ Backing (Area is clear)
_____ Driving (Truck, Pick-ups, Obey Signs)
_____ Signalling (Know your Signals)
_____ One Signaller
_____ Load Securement (Trucks, Loaders, etc.)
_____ Riding on Equipment

OTHER ISSUES:

ATTENDEES

NAME	SIGNATURE	NAME	SIGNATURE

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867-977-7000; Fax 867-977-7040

Health, Safety and Environmental (HSE) Monthly Meeting

LOCATION: _____ **DATE:** _____

ATTENDEES: _____

_____

CO-CHAIR: _____ **CO-CHAIR:** _____

OTHER ATTENDEES: _____

_____

_____

1. Business Arising from Previous Minutes:

Any recent key decisions affecting old business and/or unfinished business if applicable.

1.

2.

2. Action Plan Follow-Up from Previous Meeting(s):

By:

Date Completed:

Deadline for Completion Date:

Details of Follow-up:

3. New Business:

1. Recent Accidents or Incidents

a. Description

b. Corrective Measures Taken

c. Action Plan In Place to Prevent Future Recurrence

2. Work Site Hazard Identification

a. Worker At-Risk Behaviour Hazard

1. Number of Workers At-Risk Behaviour Observations:

2. Most Frequent Reported At-Risk Behaviours:

3. Other At-Risk Behaviours Causing Concern:

4. Action Plan to Eliminate/Reduce At-Risk Behaviour:

5. Person Responsible for Action Plan:

6. Action Plan Completion Date Deadline (provide date):

3. New Business: cont'd

2. Work Site Hazard Identification cont'd

b. Work Site (Physical) Conditions Hazard Identification

1. Number of Work Site Inspections:
2. Most Frequent Reported Hazard:
3. Other Hazards Causing Concerns:
4. Action Plan to Eliminate/Reduce Hazard:
5. Person Responsible for Action Plan:
6. Action Plan Completion Deadline (provide date):
7. Action Plan Completed:

4. New Safety Information:

Policy, safe work procedures, industry (hazard) alerts, equipment demonstrations, safety at home, guest speakers or other incoming information relevant to safety.

5. Other New Business:

Each Meeting: Discuss a minimum of one item from the N.W.T. Safety Act/Regulations. If possible, relate it to a recent operation or hazard, which occurred on an Beaufort Oilfield Support Services Ltd. work site.

6. Motion for Adjournment:

Moved by: _____ Second by: _____

First Co-Chair Signature _____ Second Co-Chair Signature _____

_____ hrs _____ mins

Length of Meeting

COPY OF MINUTES DISTRIBUTED TO:

President: Russell Newmark

Operations Manager: Willie Moore

Bulletin Board Posting:

Other:

Recording Secretary _____ **E. Gruben's Transport Ltd.** _____

E. Gruben's Transport Ltd.

Checklist for Developing an On-the-Job Training (OJT) Program

1. Prioritize Jobs Needing OJT

_____ List all jobs for each work site
_____ Identify most hazardous jobs
_____ Identify most important jobs
_____ Finalize list of jobs needing OJT

2. Develop Standards for Each Job

_____ Determine regulatory requirements
_____ Check Manufacturer's Standards/
_____ Industrial Practices
_____ Set Time Frame to Perform Job
_____ under Normal Conditions
_____ List Special Conditions

3. Develop Procedures

_____ Include Job Standards and Critical Tasks
_____ List Tools Required
_____ List Job Steps
_____ Identify Hazard Points and Controls
_____ Choose Critical Check Points
_____ Schedule Testing of Critical Check Points

4. Demonstrate Job to Worker

_____ Lay-out Procedures
_____ Lay-out Tools
_____ Explain Procedures
_____ Explain Hazards and Controls
_____ Explain each Action as you Perform it
_____ Respond to Questions
_____ Test Worker

5. Observe Worker doing the job the first time

Review procedures _____
Review critical tasks _____
Observe and coach _____
Discuss observation with worker _____

6. Coach and Train as Needed

Test Progress with Questions _____
Perform Critical Point Checks _____
Conduct Review _____

7. Observe Worker Doing the Job Independently

Allow Minor Errors _____
Stop Only if Critical _____
Review, Reinforce, Evaluate _____
Correct Minor Errors _____
Question Understanding of Procedures _____

8. Set Schedule for Review

Follow-up Commitment _____
Spot Check _____
Set Performance Objectives _____
Question Understanding of Procedures _____

9. Continue Communication

Communicate Effectively _____

NAME OF EMPLOYEE: _____
(Surname, First Name, Initial)

POSITION: _____ **SUPERVISOR:** _____
(Print) **(Signature)**

_____ **DATE:** _____
(Signature) **(dd/mm/yy)**

E. GRUBEN'S Transport Ltd.

Personal Certification and Training Record

NAME: _____

DATE OF BIRTH: _____

DATE HIRED: _____

LICENSE (DD/MM/YY) _____ CLASS: _____ PROV/TERRITORY: _____

APPROVED EQUIPMENT OPERATED: _____

DATE	DESCRIPTION	CERTIFICATE	CERTIFICATE NO.	CLASS	ISSUER	EXPIRY	FILE COPY	COMMENTS

**Copies of all licenses and certificates to be attached to this Certification and Training Record*

Driver's License Information

(Permission to Obtain Driver's Abstract)

NAME: _____

DRIVER'S LICENSE NO.: _____

CLASS: _____

PROVINCE/TERRITORY: _____

EXPIRATION DATE: _____

_____ _____

Signature (approval to obtain Driver's Abstract) **Date (dd/mm/yy)**

**Photocopy of Driver's License must accompany form*

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E. Gruben's Transport Ltd.
Box 177
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TELE: (867) 977-9700 FAX: (867) 977-7040

Authorization for Driver Information

BROKER: _____ POLICY NO.: _____

FULL NAME AND ADDRESS OF APPLICANT/INSURED:

NAME: _____

ADDRESS: _____

_____

POLICY PERIOD: _____ TO: _____

We, the undersigned, hereby authorize our employer and/or insurance company to obtain Driver's Abstract's on their behalf:

DRIVER'S NAME (Please Print)	DATE OF BIRTH (yy-mm-dd)	LICENSE NUMBER	SIGNATURE

E. GRUBEN'S Transport Ltd.

Personal Medical History

(Confidential for Medical Personnel Only)

NAME: _____

ADDRESS: _____

DATE OF BIRTH: _____ **HEIGHT:** _____ **WEIGHT:** _____

HEALTH CARE NUMBER: **PROVINCE/TERRITORY:**

Have you been diagnosed with any of the following medical conditions?

Diabetes?	Yes	No	When?	**Do you take Insulin?**	Yes	No
Asthma?	Yes	No	Medication?	**Frequency?**		
Angine?	Yes	No	Medication?			
Heart Disease?	Yes	No	Medication?			
Epilepsy?	Yes	No	Medication?			
Hypertension?	Yes	No	Medication?			
Thyroid Disorder?	Yes	No	Medication?			

Other Medical Conditions not Mentioned Above? _____

Other Medications? _____

Allergies (please list) _____

Emergency Contact _____

Emergency Phone _____

Worksheet for Identifying Regulatory Requirements

JOB NAME: **MANAGER:**

LOCATION: **DATE:**

	Applicable Legislation	
JOB TASK	**Act and Section No.**	**Requirement**

E. GRUBEN'S Transport Ltd.

Operator's Request for Maintenance Repair

DATE: _____

UNIT: _____ **UNIT NO.:** _____ **KM:** _____ **HRS:** _____

BOOKING OFF? **YES** **NO** **OPERATOR:** _____

DATE UNIT REQUIRED BY: _____

COMMENTS:

NOTE: Provide as much detail as possible

E. GRUBEN'S Transport Ltd.

Maintenance Record

UNIT DESCRIPTION _____

UNIT NO.: _____

OPERATOR	MAINTENANCE REQUEST	MAINTENANCE PERFORMED/COMMENTS	DATE	MECHANICS SIGNATURE

E. GRUBEN'S Transport Ltd.

Monthly Inspection HD Trucks

(Completed every service)

VEHICLE:	
LICENSE:	
DATE:	

TRANSMISSION

- Check Oil Level
- Check for Leaks
- Clean Vents
- Tighten Transmission Mounting & Bell Housing Belts

DIFFERENTIAL

- Check Oil Level
- Check for Leaks
- Clean Vents
- Tighten Differential Mounting
- Check Backlash
- Inspect Universal Joints, Hangers, Bearings, Slip Joints, etc. for Wear
- Check Power Divider Operations and Light

RADIATOR

- Check Coolant Level (add if necessary)
- Record Coolant Added
- Record Anti-Freeze
- Check Hoses
- Check Fan Hub for Grease
- Check Fan Belts
- Check Idler
- Check Fan Shroud
- Check for Leaks
- Change Water Filter

BATTERY

- Check Electrolyte Level
- Check Terminals and Clean
- Check Cables to Starter
- Check Hold-Down Straps

STEERING

- Change P/S Filter
- Check Reservoir Oil Level
- Inspect Springs, Shackles, Centre Bolts Pints, Pitman Arm
- Inspect Tire Wear
- Check for Oil Leaks

CLUTCH

- Check Pedal Clearance (Adjust as necessary)

ELECTRICAL

- Check all Lights
- Check Dash Lights
- Check Dash Gauges
- Check all Wiring Loom, etc. for Wear
- Check Operation of Heater, Defroster
- Check Windshield Wiper Operation
- Check Windshield Washer Operation
- Test Block Heater
- Check Trailer Cord

E. GRUBEN'S Transport Ltd.

Monthly Trailer Inspection

Trailer No.: _____

Mileage: _____

Date: _____

DAILY REPORTS
- Lubricate Chassis
- Wheels Oil Level
- Oil Leaks

LIGHTS
- Tail
- Clearance
- Reflectors
- Wiring
- Trailer Cord

BRAKES
- Slack Adjusters
- Boot on Air Pots
- Relay Valve
- Air Lines
- Adjust
- Brake Lining (Good/Fair/Poor)

BODY
- Springs
- King Pin
- Floor or Deck
- Pick Up Plate
- Underframe Crossmembers
- License Plate
- Mud Flaps
- Trailer Number
- Dollies

LANDING GEAR
- Legs
- Shoes
- Braces

TIRES
- Bias Ply 85 lbs
- Radial 100 lbs
- Miss-match
- Good/Fair/Poor

Inspected by: _____ **Foreman:** _____

(Print) **(Print)**

COMMENTS: _____

E. GRUBEN'S Transport Ltd.

Shop Monthly Checklist

	Yes	No
1. Previous month inspections all accounted for?		
2. Picker certifications all up-to-date?		
3. Is list made up for this month's inspections?		
4. Are out-of-service units flagged and accounted for?		
5. Are shop inspection forms filled out for the month?		
6. Has yard been checked for debris lately?		
7. Is shop clean and tidy?		
8. Is shop time account for?		
9. Have previous month's work orders been closed off?		
10. Have back order parts been installed?		
11. Are shop tools and equipment in good working order?		
12. Have wate oil containers been dumped?		
13. Parking areas clean?		
14. Have floors been steamed recently?		
15. Security gate functioning properly?		
16. All first aids documented?		
17. All outside repairs completed?		
18. All PPE and signage OK?		
19. Fire extinguishers checked recently?		
20. Has all equipment abuse been documented?		
21. Any internal problems?		
22. Any external problems?		
23. Are we using the right equipment for the job?		
24. Any internal comebacks?		
25. Has any impending work been reviewed?		

COMMENTS:

E. GRUBEN'S Transport Ltd.

Shop Crane Maintenance and Service Log

Unit No.: ____________________ Month: ____________________

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31

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Fire Extinguisher Inspection - Monthly Checklist

SHOP/CAMP/WAREHOUSE/UTILITY BUILDING: _____

EXTINGUISHER NUMBER	LOCATION ID	DATE CHECKED	INSPECTED BY	COMMENTS

Submitted by: _____ Date: _____

Employee Signature: _____

E. GRUBEN'S TRANSPORT LTD.

P.O. BOX 177, TUKTOYAKTUK, N.W.T. X0E 1C0

PHONE: [867] 977-7000 FAX :(867) 977-7040

ORIENTATION PACKAGE

This orientation package has been prepared so that all personnel and subcontract personnel working on E. Gruben's Transport Ltd. projects, job-sites and client job-sites can quickly be provided with the basic information they will need to become sufficiently familiar with some of the most common and important administrative, operational and safety-related issues affecting E. Gruben's Transport Ltd. daily operations. Other project and task specific information will also be provided as required for particular projects and tasks.

It is also important that E. Gruben's Transport Ltd. gather information for our own records for payroll and payment, for proof of certification, for our safety records, to satisfy regulatory requirements, and to ensure that we are satisfied that all personnel working with us on our projects are familiar enough with our standards and procedures that operations can be conducted to the highest possible levels of safety, efficiency and environmental responsibility.

At E. Gruben's Transport Ltd., we are making concerted efforts to improve the quality of our work, the quality of the services which we provide to our clients and the quality of the work environment which we provide to all personnel working with us.

We believe that by openly communicating operational information amongst all levels of personnel and by promoting active participation by all levels of personnel in our safety program, we can achieve the goals we have set for constant improvement in quality and safety standards.

We thank you for taking the time to become familiar with the information in this package and for providing us with the information we require. We will be happy to provide you with any other information you feel you need which is not included in this orientation presentation. At any stage of your employment or involvement with E. Gruben's Transport Ltd., we want you to ask questions of your supervisors if you have any safety concerns or are unsure of directions or procedures.

June 2009

EMERGENCY CONTACT LIST - EGT MANAGEMENT & STAFF

Tuk Base Camp and Night Security (24 hours/day)	**TEL:**	**867-977-7000**
	FAX:	**867-977-7040**
Safety Manager	**T EL:**	**867-977-7014**
Randy G. Hein	**CEL:**	**403-638-9636**
Superintendent of Operations	**TEL:**	**867-977-7017**
Doug Saunders	**CEL:**	**867-678-0045**
Project Manager/Engineer	**TEL:**	**867-977-7011**
Petr Semichev		
Senior Project Superintendent	**TEL:**	**867-977-7010**
Bob Stefure	**CEL:**	**867-678-0053**
Chief Executive Officer	**TEL:**	**867-977-7008**
Russell Newmark	**CEL:**	**867-678-0042**
EGT Vice President	**TEL:**	**867-977-7004**
Merven Gruben	**CEL:**	**867-678-0044**
EGT Inuvik Office	**TEL:**	**867-777-6625**
	FAX:	**867-777-6633**
Grace Loreen	CEL:	867-678-0030
EGT Inuvik Expediting	**TEL:**	**867-777-4678**
	FAX:	**867-777-2302**
Bert Bullock	CEL:	867-678-0036
EGT Devon Office	**TEL:**	**780-987-5708**
	FAX:	**780-987-5715**
Alan Reimer	**CEL:**	**780-298-5735**

EMERGENCY RESPONSE CONTACT LIST – OUTSIDE AGENCIES

Tuk Health Centre	**TEL:**	**867-977-2321**
Tuk RCMP	**TEL:**	**867-977-1111**
Tuk Fire Department	**TEL:**	**867-977-2222**
Inuvik Hospital	**TEL:**	**867-777-8000**
Inuvik RCMP	**TEL:**	**867-777-1111**
Inuvik Fire Department	**TEL:**	**867-777-2222**
Inuvik Renewable Resources	**TEL:**	**867-777-7230**
Workers' Compensation Board – Accident Reporting	**TEL:**	**1-800-661-0792**
Northwest Territories Spill Line	**TEL:**	**867-920-8230**

Emergency Response Chart

Injury to Worker
Duties of the
First Person on Scene

Serious Injury
Work Ceases and Scene is Protected

Minor Injury
Work may Continue; However Scene is Protected

CALL / ADVISE
Area Code (867)

Office	977-7000
Doug Saunders	977-7017
Doug's Cel.	678-0045
Night Security	977-7000
Safety Manager	977-7014
Randy G. Hein	403-638-9636
Petr Semichev	977-7011
Bob Stefure	678-0053
Tuk Nursing Station	977-2321
Tuk RCMP	977-1111
Tuk Fire Dept.	977-2222
Inuvik Hospital	777-8000

Request First Aid
Or Medic
All First Aiders in the Area
Are to Respond

Assess the Situation

Administer First Aid
Arrange for Transportation
to Medical Facility

First Aid Applied by Self
Or First Aider

Injured Worker
Transported to Hospital

Record Incident
In the First Aid Book

Advise:

Doug Saunders
867-977-7017

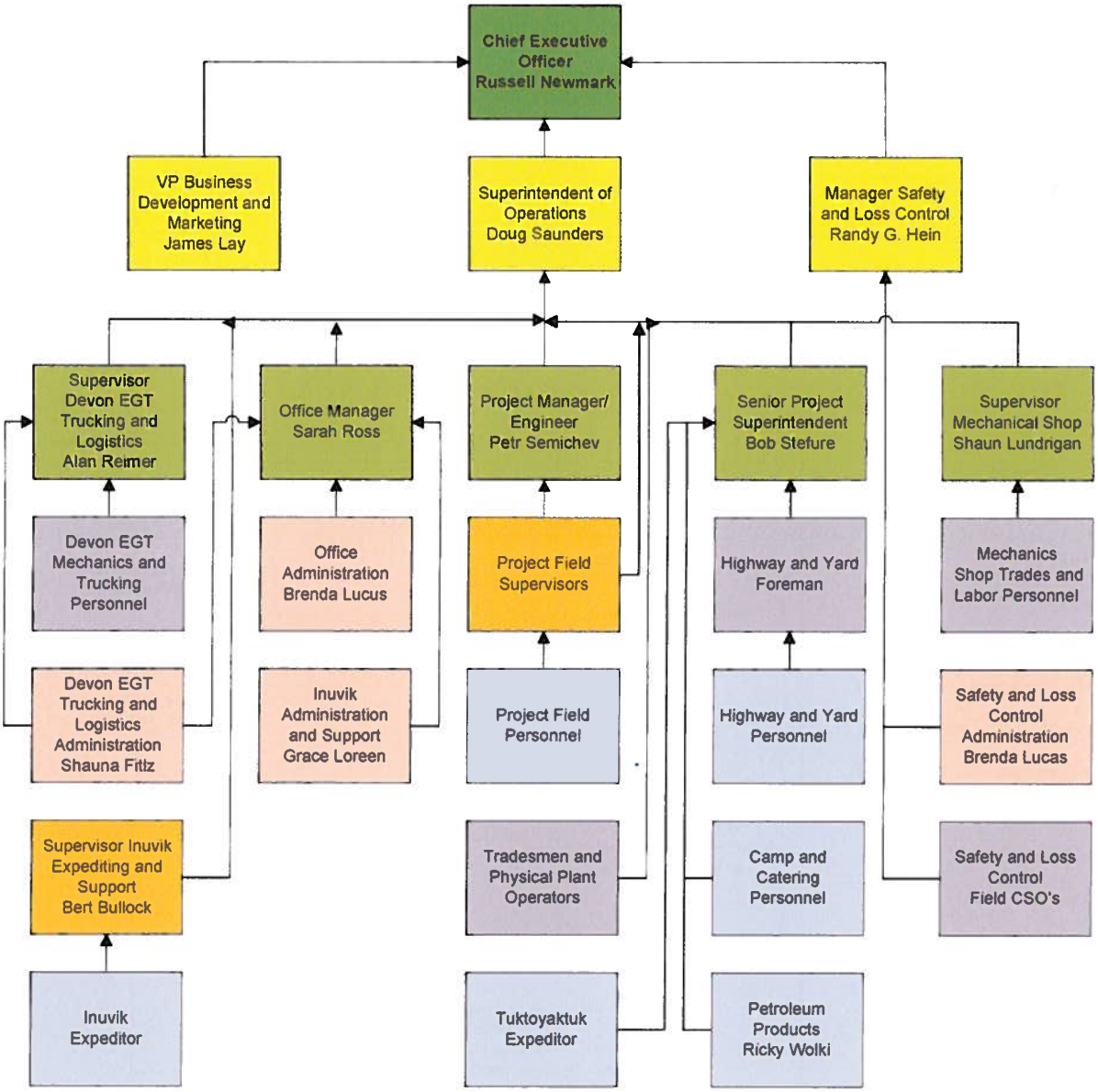
Randy G. Hein
867-977-7014

Bob Stefure
867-977-7010

Complete Investigation
Submit Incident Report
Ensure Worker and Employer
WCB Forms or Completed and
Submitted

E. GRUBEN'S Transport Ltd.

OPERATIONAL CHART



ALCOHOL AND DRUG POLICY

E. Gruben's Transport Ltd. is committed to the health, safety and productivity of its personnel, sub-contractors, customers and the communities in and through which it operates.

The Company recognizes that the use of illicit drugs and the misuse of alcohol and medications can limit an employee's ability to properly perform his/her job and can have a serious negative impact on the health and safety of themselves and others. Therefore, as part of our overall safety policy, we have instituted this policy.

The following standards apply to all E. Gruben's Transport Ltd. personnel, Sub-Contractor personnel, and any visitors while being transported to or from or while at any project site or premises:

- The use, possession, distribution or sale of alcoholic beverages on worksites or in company owned, rented or leased equipment and facilities are strictly prohibited.
- The use, possession, distribution or offering for sale of illegal and performance impairing drugs or drug paraphernalia is strictly prohibited.
- The possession, distribution or sale of prescription medications obtained illegally and the presence on the body of illegal drugs is strictly prohibited.
- If personnel have any concerns as to their ability to perform their jobs while taking a prescription drug or other medication, they have an obligation to report the use of the drug to a company health professional, or to their supervisor. This may result in modified work or temporary reassignment.
- All persons employed by E. Gruben's Transport Ltd. and/or by any Sub-Contractor who violate these policies will be immediately removed from the worksite.
- The company will institute testing for illegal drugs and/or alcohol, if deemed necessary. All personnel shall acknowledge the company's policy and note that a positive test shall be cause for immediate removal from the worksite. Testing will be performed by an approved third party firm and all results shall remain confidential. Testing may include Pre-Employment testing, Post-Incident testing and Reasonable Cause testing, depending upon the safety sensitivity of the position of the individual and as deemed necessary by E. Gruben's Transport Ltd. management. Reasonable Cause testing will take place when the company supervisors and/or management determine that the behaviour or appearance of an individual while on duty indicates probable alcohol or drug use.
- E. Gruben's Transport Ltd. will review every previous Drug and/or Alcohol related violation on a case-to-case basis to determine if entry to E. Gruben's Transport Ltd. camps or worksites is appropriate.
- Further information can be obtained from E. Gruben's Transport Ltd. management.

May 2009

Russell Newmark -- Chief Executive Officer

HEALTH, SAFETY & ENVIRONMENTAL GUIDING PRINCIPLES

E. Gruben's Transport Ltd. will integrate the following principles into all aspects of operations:

- All occupational injuries and illnesses are preventable;
- All work shall be conducted in compliance with applicable laws and regulations;
- Safe work performance and protection of the environment in which we work are fundamental values integrated into our business;
- Operations in the Beaufort Mackenzie Delta area shall be conducted with emphasis on actively protecting the health and safety of our people and the environment;
- Systems and resources are in place to ensure work is conducted safely;
- All personnel, throughout the company, have a personal responsibility to perform their work safely and to protect the environment;
- Everyone has the obligation to stop work when an unsafe act or condition is identified. Corrective action shall be taken to ensure conditions are safe before resuming plans;
- E. Gruben's Transport Ltd. will participate with industry to develop and implement effective emergency response plans;
- E. Gruben's Transport Ltd. will identify and implement improvement opportunities for the health, safety and environment program.

These Guiding Principles will be reviewed as part of employer & contractor orientations, training programs and at regular safety meetings.

The success of the company's Health, Safety and Environmental Program depends upon the participation and involvement of everyone in the company.

SUPERVISORS' RESPONSIBILITIES:

We are required by law to provide workers with instruction, training and supervision by a competent supervisor to ensure that work is carried out in a healthy, safe and environmentally responsible fashion. Our Job Supervisors will be experienced and knowledgeable in the following areas of duty:

- Informing all workers of E. Gruben's Transport Ltd. HSE program requirements and ensuring that these requirements are followed;
- Ensuring workers are informed of their rights and responsibilities under Occupational Health and Safety legislation, including their right to refuse unsafe work;
- Providing new workers with a site-specific orientation when they arrive on location;
- Providing instruction and training on safe work procedures for assigned tasks, including rules from relevant safety legislation;
- Ensuring the availability and proper use and maintenance of Personal Protective Equipment for all personnel;
- Conducting and recording pre-task safety meetings and hazard assessments with workers;
- Ensuring new workers are directly supervised by a competent worker until they have demonstrated the ability to perform an assigned task safely;
- Ensuring only properly trained workers operate equipment or machinery;
- Regularly inspecting the work site to ensure safe work practices and OH & S regulations are being followed;
- Identifying hazards, informing personnel at work site of identified hazards and taking steps to remove, avoid and/or mitigate these hazards;
- Identifying hazardous materials on the work site and providing instruction to workers as required by WHMIS legislation;
- Stopping work when unsafe conditions or activities are present and taking action to remedy such conditions or activities prior to resuming work;
- Ensuring adequate emergency response procedures and equipment are in place and understood by all

personnel;
- Reporting and investigating any accidents or near misses and reporting these findings to E. Gruben's Transport Ltd. Safety Officer;
- Use practices, procedures & enclosures that maximize protection of the environment;
- Store, Transport & Dispose of wastes in accordance with accepted industry & regulated practices.

WORKERS' RESPONSIBILITIES:

- Show up for each shift physically and mentally able to perform their duties responsibly and safely;
- Follow company safety policies;
- Follow company job procedures;
- Use and maintain any Personal Protective Equipment (PPE) required for general use and for specific tasks at hand, and report and replace defective or damaged PPE;
- Maintain work-site in a clean and orderly state;
- Inspect and maintain equipment and tools according to recommended procedures and maintenance schedules, removing from service any unsafe equipment or tools and reporting and/or repairing damaged equipment and tools prior to placing then back in service;
- Report and, where possible, correct any unsafe condition of practice which may exist;
- Eliminate identified hazards or mitigate the hazardous conditions such that an accident cannot occur;
- Stop work when an unsafe act or condition is identified and take steps to ensure conditions are safe before work is resumed;
- Ask the supervisor for instruction and direction if the employee does not have the skill or adequate information to conduct the task competently;
- Report all injuries, incidents and near misses, whether or not medical treatment is required or physical damage;
- Actively participate in safety meetings and job planning meetings.

SUBCONTRACTOR RESPONSIBILITIES:

- All companies and individuals contracted to work for E. Gruben's Transport Ltd. will be required to be fully aware of E. Gruben's Transport Ltd. HSE Policy and Program and will be expected to comply with the conditions therein;
- As an integral part of the process of selecting subcontractors, E. Gruben's Transport Ltd. will consider past safety and environmental performance of subcontractors, comprehensiveness of subcontractors' own HSE programs and willingness to comply with E. Gruben's Transport Ltd. HSE program;
- E. Gruben's Transport will make every effort to clearly communicate these HSE requirements to sub-contractors and will continue to include subcontractors and their personnel in E. Gruben's Transport Ltd. operated training programs and HSE development programs;
- Subcontractors personnel will be expected to participate in the E. Gruben's Transport Ltd. HSE program and will have the same responsibilities as are described in Supervisors' Responsibilities and/or Workers' Responsibilities sections above, according to the role they have been contracted for;

ENFORCEMENT OF SAFETY RULES

E. Gruben's Transport Ltd. will hold employees accountable for adherence to all rules, practices and procedures. Supervisors will promote and enforce rules and safe work practices.

Employees must be aware of penalties and the increasing consequences for their actions.

At E. Gruben's Transport Ltd. a progressive discipline system is in place for general disciplinary cases and may be used in the following format in regard to disciplinary action:

First Offence: A verbal warning that is accompanied by a dialogue between the employee and the supervisor shall be given. The supervisor will explain the reason for the warning and how the employee must act or perform in the future. The warning will be recorded so that a record of it exists in the employee's personnel file.

Second Offence: A written warning shall be given. The supervisor will review the facts with the employee as well as the previous warning. They will agree on a resolution to the problem before the employee returns back to work. The supervisor will follow up with a memo to the employee and a submission to his/her file.

Third Offence: A suspension of the employee (with or without pay) shall be given. The supervisor will be firm in asking the employee about their wishes for further employment in the company. The time off will give the employee a chance to consider their actions as well as their intentions for the future.

Fourth Offence: No further warnings – immediate dismissal.

E. Gruben's Transport Ltd. reserves the right to depart from all or a portion of this format in the event that E. Gruben's Transport Ltd. deems it necessary, due to unique circumstances involved in the disciplinary case. Particularly egregious offences may be dealt with more severely.

GENERAL RULES POLICY

General rules apply to most situations and conditions present during project construction phases. Specific "safe work practices" will cover special situations and hazards on individual projects, and procedures maintained on each job site.

1. Equipment will be stored in a neat and tidy manner, with all unused materials and equipment to be stored in designated areas.
2. Oily and greasy rags must never be left lying around with spills cleaned up immediately, walkways to be kept free of obstacles ice and snow.
3. All incidents, whether property, personal, environmental or "near misses", regardless of their nature, will be promptly reported to supervisors. Workers not promptly reporting incidents will be subject to disciplinary actions, up to and including immediate dismissal.
4. Any worker, company or contractor, abusing or causing willful damage to any company, client, or public property is subject to disciplinary actions up to and including immediate dismissal.
5. Except inside office facilities or control cabs, workers will use appropriate PPE at all times, including hearing and hand protection.
6. All jewelry will be worn in a manner to prevent entanglement in moving equipment, or to interfere with respiratory equipment.
7. Smoking is in areas indicated by signs or where specifically indicated in pre-job meetings, with strike "anywhere" matches and disposable lighters prohibited.
8. Equipment, including hand tools and PPE, will only be used for their intended purpose, with damaged or worn out equipment, being promptly tagged and removed from service.
9. Only authorized workers are permitted to operate power equipment and tools, which will be operated as per manufacturer instructions, including grounding or double insulating all electrical hand tools.
10. Garbage and rubbish will be cleaned up, collected and disposed of as per directions in the EGT environmental policy, with burning permitted through an agreement between EGT designate, the customer and, when necessary, regulatory bodies.
11. Compressed gas cylinders shall be stored and transported in an upright position, labeled as per dangerous goods legislation and capped when not in use. Oxygen may be stored or transported in a horizontal position when secured.
12. Employees are only allowed to ride in carriers designed for human transport, and which includes designated seating and a personal restraint system. Workers will not ride in or on hooks, hoists, tailgates, fenders or other material handling equipment.
13. Horseplay, fighting, and or firearms except for designated personnel are strictly forbidden, and are grounds for disciplinary action, up to and including immediate dismissal.
14. Being in the possession of, or under the influence of illegal substances or alcohol, is strictly forbidden, and constitutes grounds for disciplinary actions, up to and including immediate dismissal. Workers using prescription medication are to inform their immediate supervisor prior to traveling to the worksite.
15. All workers will attend and participate in safety meetings and worksite orientations, and participate in the company hazard assessment and identification process. This includes a review of site-specific hazards and

the safe practices necessary to perform it.

16. Signs will be maintained in good condition, and when erected for temporary purposes, be removed when they are no longer needed.
17. The use of cell phones is prohibited when operating equipment. The use of hands free cell phones will be permitted in vehicles while in motion.
18. The use of any type of audio headphone equipment is strictly prohibited on the worksite.
19. Within the confines of the ROW, speed will be limited to a maximum of 30 km/h and dead slow when passing workers.
20. Employees around moving machinery or equipment will not wear baggy or ragged clothing.
21. Do not open or close valves unless authorized. Do not activate any electrical switches unless authorized.
22. Barricade all open excavations as necessary
23. All barricades or warning signs that are temporarily removed must be replaced before crew leaves area.
24. No trespassing off row or worksite.
25. No animals will be allowed on any worksite or in any vehicles unless used in the course of work.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Engineering design, improved work practice and administration controls are the preferred means of reducing or controlling hazards which may endanger the health and safety of workers. However, residual risks require the use of PPE following the rules listed below:

Workers shall be responsible for the proper care, maintenance, cleaning and use of PPR that is assigned or loaned to them;
Supervisors are responsible for ensuring that workers are adequately trained in the proper use of, and responsibilities for the PPE;
Workers shall not use PPE that is defective or unsafe. Such articles shall be taken out of service and reported to the supervisor and replaced immediately.
Visitors to operating areas of work sites will be required to wear all applicable PPE that is required for the work site.

Head Protection: CSA approved hard hats shall be worn by all personnel while engaged in activities where a risk of injury to the head may exist. In addition:

A hard hat shall never be worn without a properly adjusted suspension;
Metal hard hats are not permitted due to electrical conductivity and inferior impact resistance to sharp objects; and,
Off-road helmets must be worn when operating quads and snowmobiles.

Foot Protection: CSA approved safety-toed boots shall be worn by all workers while engaged in activities where a risk of injury to the feet exists. Also note:

There may be additional requirements for wet, slippery and winter conditions; and,
Running shoe style low-cut safety footwear is not acceptable.

Eye & Face Protection: All employees while engaged in activities where a risk of injury to the eyes or face may exist shall wear CSA approved eye and face protection. Eye and face protection also means:

Face shields shall be worn in addition to eye protection while using grinding, buffing or striking tools.
Face shields shall be made available whenever they may be required;
Goggles shall be worn when handling liquid or powder chemicals where there is a risk of splash hazard;
In some situations, a face shield shall be used in conjunction with the goggles for additional eye and face protection; and,
Face shields and goggles shall be provided as required.

Hearing Protection: All work areas where noise levels exceed 85dBA shall be identified by the display of appropriate signs indicating the high noise area and ***"Hearing Protection required".*** Additional hearing protection includes:

All workers entering or working in areas that are marked as high noise areas shall wear CSA approved hearing protection devices;

Supplied hearing protection devices may be either of the plug or muff design and shall be supplied.

Limb & Body Protection, including High Visibility Outer-Wear: All workers shall wear suitable clothing for the existing conditions and the work being performed. This means:

Where a potential fire and explosion hazard exists, Fire Retardant Clothing (FRC) shall be worn;
Approved cold weather clothing shall be worn by all personnel working in the Mackenzie Delta or while being transported via air transport;
A luminous vest or reflective tape on front or back of outer garments shall be worn; and,
Workers shall wear appropriate gloves or mitts to protect their hands from workplace hazards.

Basic required PPE for use at all times includes:

1. **Approved steel-toed work-boots.**
2. **Coveralls**
3. **Appropriate work-gloves**
4. **High-visibility vest or striping on outer garments**
5. **Safety Glasses**
6. **Approved hardhat**

TUK BASE CAMP RULES

All personnel should familiarize themselves with the camp layout and the facilities available, and familiarize themselves with the emergency exits. If everyone does their part to keep the camp clean and in good condition it will ensure continued availability of the various amenities.

E. Gruben's Transport Ltd. is not responsible for personal belongings. Please take time to ensure that your personal items are secure. Insuring personal belongings is the responsibility of each individual.

Smoking is permitted in one area of the camp. The coffee room located on the second floor is the selected designated smoking area. Otherwise, smoking is strictly prohibited in the rest of the camp.

The consumption and/or possession of alcohol or non-prescription drugs are strictly forbidden in the camp or on E. Gruben's Transport Ltd. property. A zero tolerance policy is in effect regarding these items and failure to comply may result in immediate removal from the camp. An authorized EGT representative may conduct a search of rooms and personal effects in the presence of the occupant and/or owner.

Coveralls, hard hats, work boots and other work clothing are to be left in the mudroom. Hats may not be worn in the dining room. Bare feet are not permitted outside of the bedrooms or recreational areas.

Please use courtesy and common sense in regards to activity and noise levels in the camp at all times.

Do not tamper with the fire/smoke alarms and do not use the fire exits except in the case of an emergency.

Please make yourself familiar with the fire exits in the building. In the event of a fire please ensure the safety of yourself and others by calmly proceeding to your designated fire exit.

Candles or any other devices that generate open flame are prohibited within the camp.

Visitors are permitted only in common areas and only until 11:00 pm. Guests are not permitted in the dorm area.

E. Gruben's Transport Ltd. vehicles and personnel are not permitted in town during working hours unless authorized by supervisory personnel. When authorized, trips must be done during scheduled coffee or lunch breaks. Supervisors will note time on timesheets for any trips to town outside of these designated periods.

E. Gruben's Transport Ltd. vehicles are not permitted in town after 8:00 p.m. unless authorized by senior supervisory personnel. Personnel wishing to go into town after hours must arrange transportation with Night Security.

Arrangements will be made to pick up personnel at 11:00 p.m. at a designated central location. Night shift security personnel will not make other extra trips into town to pick up personnel and will not make multiple stops in town looking for personnel. Personnel who do not return on the 11:00 p.m. bus and who do not report to work the following morning will be issued a warning and will be subject to the enforcement procedures outlined in this package.

SMALL VEHICLE POLICY

E. Gruben's Transport will provide safe, fully-functioning small vehicles of the best quality that can reasonably be purchased. These vehicles will be used to carry out the company's business and to enhance the public and customer image of the company.

Vehicles designated for out of town and ice-road use will be equipped with the following:

- Two-way radio with, at minimum, company local repeater channels.
- First Aid Kit
- Fire-extinguisher
- Reflective triangles/flare kit
- Rotation beacon
- Emergency Survival Kit
- Spare tire, jack and wheel wrench
- Shovel and tow-strap

E. Gruben's Transport Ltd. small vehicles will be operated in the following fashion:

- All personnel will have the appropriate license required to operate the vehicles.
- Vehicles will be operated in accordance with the Territorial or Provincial Highway Traffic Act.
- All occupants of EGT small vehicles must wear seatbelts at all times.
- EGT vehicles will not be driven in excess of posted speed limits. Road and traffic conditions may dictate lower maximum allowable speeds.
- EGT vehicles must be maintained in clean condition.
- All personnel are responsible for conducting maintenance checks of fuel, all fluids and tire pressure, and for ensuring that required safety/emergency equipment is present prior to departure.
- All operators are to conduct a thorough walk-around of vehicles prior to departure. Windows and mirrors are to be kept clean and free of obstruction.
- All personnel traveling on ice roads must wear or carry adequate winter clothing including insulated winter boots, winter parka with hood, insulated wind pants, gauntlet gloves or mittens and winter head wear.
- All personnel traveling out of town must comply with Journey Management Procedures.

E. Gruben's Transport Ltd. vehicles and personnel are not permitted in town during working hours unless authorized by supervisory personnel. When authorized, personal trips must be done during scheduled coffee or lunch breaks. Supervisors will note time on timesheets of any personal trips to town outside of these designated periods.

E. Gruben's Transport Ltd. vehicles are not permitted in town after 8:00 p.m. unless authorized by supervisory personnel. Personnel wishing to go into town after hours must arrange return transportation with Night-shift Security. Arrangements will be made to pick up personnel at 11:00 p.m. at a designated central location. Night-shift Security will not make other extra trips to town to pick up personnel and will not make multiple stops in town looking for people.

JOURNEY MANAGEMENT PROCEDURES

Responsibility

E. Gruben's Transport Ltd. Tuk Base Camp Manager has overall responsibility and acts as Journey Manager, or appoints a designate. He is responsible for the co-ordination and implementation of all aspects of this procedure.

1. Tuk Base Manager – **Office 867-977-7000, Cell 867-678-0045.**

2. Tuk Base Night Security will carry out Journey Management Procedures as required for trips originating or terminating after 8:00 p.m. Office **867-977-7000, Cell 867-678-0045**.

3. The Inuvik Base Manager will carry out Journey Management Procedures for trips originating and terminating in Inuvik. **Office 867-777-4678, Cell 867-678-0036**

Procedure

1. Check local weather forecast prior to departing for your destination. In the event that severe weather is forecast for the region, delay your travel plans until more favorable conditions exist. If a radio is not available, the local weather office can be contacted at 1-867-777-4183 (Inuvik) or 1-867-977-2564 in Tuktoyaktuk. Weather conditions from Environment Canada are downloaded daily from the internet and posted at the Tuk Base front desk and the Inuvik Airport Road Office. If weather conditions are favorable, you must file a Journey Management plan prior to departure. These are at the front desk at the Tuk Base Camp and at the Inuvik Airport Road Office. A copy is attached below.

2. The driver of the vehicle must submit Journey Management details to the Base Camp Manager, preferably in person. If absolutely necessary, this may be done by telephone or company radio. The Base Camp manager is then responsible for updating the Journey Management Board and document relevant information on the Journey Management form. At remote sites, the duties of the Tuk Base Camp Manager are assumed by the Site Supervisor or the Medic.

   Information required includes:
   - Date of journey.
   - Driver Name.
   - Passenger name(s).
   - Destination.
   - Departure Time & Location.
   - Route Details.
   - Check-in Time(s) and Location(s).
   - Estimated Time of Arrival.
   - Radio frequency and cell phone number.

   In addition, all vehicles operating for E. Gruben's Transport Ltd. must be equipped with the appropriate emergency equipment. This includes appropriate winter clothing with reflective striping, survival kit, road hazard kit, first aid kit and fire extinguisher. A complete check-list for all vehicles traveling on ice roads is attached below in section 4.13.2. These checklists can be found at the Tuk Base front desk and at the Inuvik Airport Road Office. The Journey Manager will verify whether vehicles have all the required equipment prior to departure.

   The driver must, upon arrival at his destination, closeout the journey with the Journey Manager. At this point details are completed on the Journey Management form, which is kept as a permanent record, and are removed from the Journey Management Board.

3. Based on details listed above, the journey will be monitored. Any deviation from original plans, or unforeseen delays, must be reported by radio or telephone to the Journey Manager. The Journey Manager then updates the Journey Management form and board.

4. Certain ice-roads accessing work locations may be radio controlled. All vehicles must be equipped with two-way radios programmed with the frequencies used on that particular road. Procedures applicable to these ice-roads will be followed by E. Gruben's Transport Ltd. personnel.

5. In the event there is an overdue journey (based on estimated time of arrival) the Journey Manager will attempt to contact the driver, and if a significant amount of time has elapsed without contact (over two hours, from E.T.A.), the Journey Manager will enact procedures to find the vehicle.

6. The Journey Management form can also be used to track travel on a job site for audit reasons. A copy of completed Journey Management Forms is to be retained and collected at the end of each job.

7. Some client companies have their own Journey Management systems in place. E. Gruben's Transport Ltd. will ensure its personnel also follow client journey management procedures as required.

CHECKLIST FOR ALL EQUIPMENT TRAVELLING ON ICE ROADS

ALL E. GRUBEN'S TRANSPORT LTD. AND SUBCONTRACTOR VEHICLES AND EQUIPMENT MUST CONTAIN THE FOLLOWING EQUIPMENT PRIOR TO TRAVELLING ON WINTER ROADS:

- ☐ FIRE EXTINGUISHER
- ☐ FIRST AID KIT
- ☐ EMERGENCY SURVIVAL KIT
- ☐ REFLECTIVE TRIANGLES/FLARES
- ☐ SHOVEL
- ☐ TOW STRAP
- ☐ SPARE TIRE, JACK, WHEEL WRENCH
- ☐ TWO-WAY RADIO WITH EGT AND CLIENT FREQUENCIES, AS APPLICABLE
- ☐ DRIP TRAY, IF EQUIPMENT IS TO REMAIN AT EGT OR CLIENT REMOTE SITE

ALL EGT AND SUBCONTRACTOR PERSONNEL MUST CARRY WITH THEM:

- ☐ WINTER GEAR, INCLUDING PARKA, GLOVES, WINDPANTS AND BOOTS
- ☐ EGT REQUIRED PPE, INCLUDING HIGH VISIBILITY CLOTHING

ALL PERSONNEL MUST COMPLETE JOURNEY MANAGEMENT PROCEDURES FOR ANY AND ALL TRIPS OUT OF TOWN
Copies of these checklists can be found in the shop, the Tuk Base Main Office and the Inuvik Airport Road Office.

JOURNEY MANAGEMENT DAILY JOURNAL

DATE: _____

All EGT and subcontractor vehicles travelling should be entered on this sheet.
Clip board should remain on Tuk Base front desk.
Initial that the journey manager at the other end of trip has been notified at start of Tuk-based journeys and at completion of journeys with Tuk as Destination.
Initial confirmation that trips have been completed, and that all necessary notifications have been completed.
Completed sheets to be turned in to the Safety Office.

NAMES (Including passengers)	VEHICLE	ROUTING	DEPART. TIME	ARRIVAL TIME	RADIO/ CELL #s	NOTIFY OTHER END	ALL COMPLETE

ABANDONED VEHICLE PROTOCOL

The following practices and procedures are to be followed by crew personnel in the event of a vehicle remaining on the road for various reasons. These reasons might include but not be limited to the following:

- Vehicle becoming disabled due to mechanical failure.
- Transport Company dropping the vehicle as per directions.
- Vehicle left on the road due to extreme weather conditions.
- Vehicle out of fuel.
- Operator of the vehicle becoming incapacitated.
- Suspension of operations due to an emergency on the site, and
- Following direction of a peace officer, company HSE personnel, client or government representative.

Abandoned Vehicle Protocol Procedures:

Any vehicle (s) left at a location on a roadway will cause the following safety procedures to be undertaken without exception:

- Vehicles left on a roadway because of mechanical difficulty and/or weather related reasons would have the vehicle pulled to the extreme right hand side of the road wherever possible. If there is a critical or sudden breakdown and the vehicle is not optimally situated, every attempt is to be made to place it against the side of the road including towing, pushing or other method suitable to the situation and type of vehicle.
- Notification of the breakdown or abandonment of the vehicle shall be completed with the sight supervisor as soon as practicable. The site supervisor shall ensure that any local work locations such as drill rigs, gas plants; camps, etc are notified of the hazard of the vehicle.
- Every attempt will be made by the site supervisor to ensure that vehicles dropped off by transport trucks are dropped in the best location possible. This will include but not be limited to the following:
- On a long stretch of ice road where a vehicle could reasonably see the equipment and give them adequate warning that an alteration in speed or direction of travel may be required.
- On the extreme right side of the road, and
- Where possible, within the confines of a "push-out" so that vehicles not seeing the obstruction until the last moment will not have their path of travel impeded.
- If the practices and procedures of "establishment of the roadside as a workplace" are not completely attainable for any reason, the repairs are not to be started at any time. This vehicle will remain static until such time as the conditions are met. In addition, personnel shall not interact with the vehicle at any time for any reason. This includes retrieval of equipment, removal of documents, or any other contact with the vehicle.
- All motorized vehicles will have reflective flares, first aid kits and fire extinguishers on board as a minimum standard. Supervisory personnel will conduct risk management on this scenario where exigent circumstances warrant, and where indicated by changing or new conditions.
- The use of reflective triangles will be completed immediately upon parking of the vehicle, and they will be deployed as follows. Behind the vehicle, the triangles shall be erected on the right hand side of the road at distances of 5, 10 and 100 meters, and in position that is in line with the rear outside tire or track of the vehicle. The operator of the vehicle shall ensure that the reflective triangles shall be clean so that oncoming vehicles can properly see the reflective triangles.
- In the event that the vehicle is in a difficult area of the road where a limited view of the vehicle is possible due to bushes, road curves or weather, additional triangles shall be immediately obtained and placed in a manner consistent with other vehicles being able to spot the markers from both directions and in a suitable time to stop or avoid the site.
- If the site is dusty or snowy to a point where the triangles become unsuitable, the site supervisor will utilize other appropriate methods of warning the public of the vehicle's position.

If repairs are not anticipated to be available in a reasonable amount of time the vehicles shall be removed to a more appropriate site, following the procedures established for *"Establishment of the Roadside as a Workplace Protocol".*

During the deployment of reflective triangles or other warning devices, the personnel conducting these tasks shall ensure that they are wearing the proper clothing with proper reflective striping and other appropriate PPE as dictated by the site supervisor.

At no time will workers place themselves between another vehicle and their disabled vehicle to signal or control access to the site.

ESTABLISHMENT OF THE ROADSIDE AS A WORKPLACE PROTOCOL

The following practices and procedures are to be followed by crew personnel in the event that vehicle repairs must be made on a vehicle sitting on a road. The following hazards may be present on the site during these procedures:

- Vehicle traffic from both sides of the road
- Restricted view of the site by other drivers
- Drivers not paying 100% attention due to staring at the scene
- Vehicles ignoring warning signs
- Vehicles too wide for the established passing area, and
- Other drivers misjudging passing area and striking vehicle or workers

Procedures

Workers are to physically ensure that signage in the form of reflective triangles are still in place on the site, and are placed effectively.

Procedures relating to effecting repairs are to be reviewed in the form of a tailgate meeting and are to be followed prior to and during the task.

Warning signs indicating personnel are conducting work ahead must be set in place in conjunction with the previously placed triangles/warning devices. These are to be place in both directions on the roadway in a manner consistent with opposing traffic being able to stop or conduct avoidance maneuvers in a safe manner.

In the event that the crew does not have appropriate signage, properly briefed and outfitted workers will be used as temporary traffic control persons.

All personnel conducting rescue tasks related to the abandoned vehicle will wear complete basic PPE including high visibility reflective clothing.

At no time will any worker place him/her self in a position which physically blocks access to vehicles to the site.

Four-way flashers are to be used on any auxiliary vehicles to ensure increased visibility to the general public. Auxiliary vehicles are to be placed near disabled vehicles in such a manner so the headlights are not to blind the vision of oncoming traffic. In addition, the vehicle will be facing the same direction as the normal flow of traffic, and in a position so, that the width of the road is not unduly reduced by the vehicle.

At no time when the auxiliary vehicle is facing traffic will the high beams of the headlights be engaged.

Workers on the site shall ensure that a tailgate safety meeting is conducted prior to beginning work. In addition, their JSA shall be reviewed to ensure that all steps have been completed prior to exposure to the hazards associated with their tasks.

If at any time the conditions of the site change or deteriorate, the personnel at the site shall re-evaluate the situation and if deemed necessary, the procedures shall be stopped and site vacated until approved by site supervisor to return and complete the task.

ICE ROAD SAFETY

The Construction Supervisor shall be responsible for maintaining safety standards on the ice. He/she has the authority to cease any or all of ice operations should he/she deems it necessary.

When the primary use of an ice road is to facilitate the transport of a drilling rig and associated equipment, personnel must keep in mind that heavy rig modules and associated equipment will have the right-of-way.

Personal Safety

An ice road is a difficult and challenging driving area to begin with. Vehicle breakdowns and sudden changes in the weather can compound the hazard to a critically unsafe condition for ill-prepared personnel. Prevention is the KEY!

- Dress adequately for the weather and ensure that each person in the vehicle has arctic clothing sufficient to wait out an extended period of time in an unheated vehicle.
- Food and water should be taken along when traveling the ice road in case of a breakdown and a delay in being picked up.
- Be sure to use Journey Management Procedures to inform the company of your travel plans on the ice road and include your estimated arrival time.
- Carry communications in the form of a radio and/or telephone, or travel in convoy with vehicles possessing communication equipment.
- Single persons should not venture onto the ice when there is no help at hand.

Vehicle Requirements

All vehicles are required to carry the listed required safety equipment listed on page 13, above. As well, remember to:

- Always begin your journey with a full tank of fuel.
- Working headlights, horn, heater and windshield wipers are required.
- Carry food and water and spare clothing

General Ice Road Safety

- Rig modules and heavy equipment have right-of-way.
- All traffic to come to a complete stop at intersections.
- Speed limits are in effect for everyone's safety. Be prepared for speed limits of 60 to 80 km on the ice road with maximum speeds of 25 km and on curves and ice bridges.
- Drive to the conditions, not the speed limit. If visibility or surface conditions are poor, slow down.
- Do not tailgate another vehicle as two vehicles act as a single load which increases stress on the ice road.
- Make a mental note of kilometre markers as you travel in the event of an emergency.
- Do not discard foreign materials on ice.
- Slow down until ride smoothes out, if roads are rough.

First Time Use of Roads

The majority of all ice failure accidents occur when clearing a new section of an ice road. Before any vehicle is allowed on a new section of road, a survey must be done with an ice profiler. Those operating the profiler will be properly trained and experienced.

Communication

- All equipment working on an ice road must be equipped with a two-way radio.
- Personnel must log onto the Journey Management Board and follow all Journey Management Procedures. If an employee forgets to log on before leaving for work/job site, he/she should radio Tuk Base Camp and have someone in administration log on to the Journey Management Board.

- Adequate communications is vital to the safe and efficient operation of an ice road.
- Job Superintendents and the Tuk Base Camp Manager shall be responsible for ensuring that communication between base, the rig, all equipment operators, truck drivers and supervisors is maintained.
- Employees will call their immediate site supervisor every hour to let their supervisors know how they are doing and to ensure that everything is okay.
- Communication among all personnel in the form of regular safety meetings will help ensure a safe and efficient operation on the ice.

Driving Practices

Speeds must be slower on "arctic pavement" than down south.
Braking distances are much greater on ice – do not lock up your wheels.
The snow banks are hard and should one be hit with the vehicle sliding sideways a roll over will likely occur.
Vehicle damage can be expected from a straight-on encounter with a frozen snow bank.
Slow your vehicle before entering a curve or corner.
The ice surface will be very slippery in the spring when the sun starts melting the surface and the road becomes slightly wet.
Use good judgment and don't be lulled into a false sense of security when driving on that smooth, straight, long and wide ice road.

Cold Weather Operating Limitations at –40

Operating equipment and working outside in temperatures of –40C or below can be extremely hazardous to personnel and very hard on equipment. Caution must be exercised and all non-critical work curtailed or cancelled until the weather improves. Management approval must be obtained for all outside work when the temperature reaches –40C. Please refer to the Cold Work Procedures, on page 21 below.

Fresh **Water Ice Thickness Chart**

LOAD	ICE THICKNESS INCHES	CM
250 lbs man	2	5
Snowmobile	4	10
1 ton 4x4 pick-up crew cab	12	30
D6D Cat c/w winch	24	61
D65P Komatsu c/w winch	27	68
D7G Cat c/w winch	29	73
140G Cat grade c/w wing	26	66
670A Komatsu grade c/w wing	26	66
WA250 Komatsu loader	21	53
WA380 Komatsu loader	23	58

NWT Transportation Chart - - Load Bearing Capacity of Ice [see page 20 below].
Note: Load Bearing Capacity of ice will be calculated according to this formula. However, reductions in allowable loading may be required due to thermal stress, fatigue and ice quality cracks, vehicle speeds, snow cover and load duration.

Note: Minimum thickness for any manned vehicle of less than 1000 kilograms is 15 cm.

Safety is of fundamental importance to on-ice operations in the Beaufort Sea due to the remoteness of the work sites, the severe environment and the danger of ice failure. It is the intention of this section of the manual to decrease the risk of accidents occurring due to ice failure by providing guidelines for safe working practices on the sea ice.

Working and Traveling on the Ice Road

Most winter travel in the Mackenzie Delta is on overland ice roads or on the Mackenzie River and its many channels, or on lakes. Extreme cold temperatures, limited daylight and stormy conditions are a potential hazard to all workers throughout the winter season. Safety is of fundamental importance to on-ice operations in the Mackenzie Delta due to the remoteness of the work sites, the severe environment and the danger of ice failure.

The following safety precautions need to be observed when working and traveling on ice roads:

- Winter survival gear should be carried with the worker at all times;
- Arctic boots, parka with hood, wind pants, mitts and face protection. In extreme weather continually check co-worker for signs of frostbite;
- Before departing work site and heading to another work site or community, employee must inform the radio operator or a supervisor of your estimated time of departure (ETD) and estimated time of arrival (ETA) at destination and check back in upon arrival at the destination;
- Make sure your vehicle has adequate fuel, spare tire, survival gear and is in good mechanical condition. Never travel over ice that has not been approved for travel by the GNWT Transportation Department, the company or the client. Never travel over ice whose thickness has not been confirmed by use of an approved ice profiler;
- Drive using extreme caution as ice roads can be slippery, with unexpected curves, intersections and large bumps created by ice cracks, pressure ridges and sand bars.

Recommended safety practices include the following:

The construction supervisor shall be responsible for maintaining safety standards on the ice. He/she has the authority to cease any or all on-ice operations should it deem necessary.

During initial ice checking or snow-ploughing, single persons or single vehicles should not venture onto the ice when there is no help at hand.

Safety meetings should be held daily to keep all workers and supervisors informed of the current conditions of the ice roads and where the equipment will be working that day.

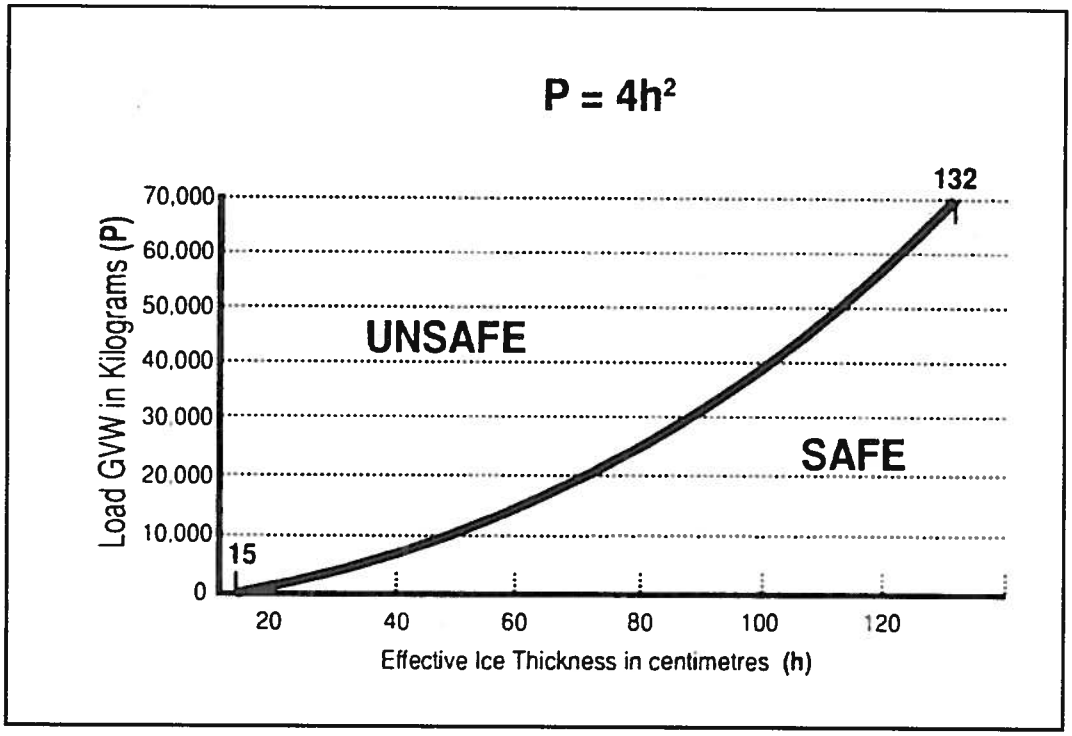
Signs designating the maximum allowable speed and weight shall be posted at the entrance of the ice road and at hazard points.

All heavy equipment operators must be aware of the hazards associated with parking their vehicles near one another for extended periods. Transport trucks should park 100 m/300 ft apart.

Every vehicle should have survival gear and radios. Systematic communication should be established with the construction or transportation supervisor.

During periods of strong winds (30 knots), or periods when the temperature fluctuates by more than 15 Deg C within 48 hours, no vehicle heavier than a pick-up should go on the ice until the ice surface has been inspected by qualified personnel.

Further information on ice conditions, ice failure, safe practices are found in the attached HSE handbook.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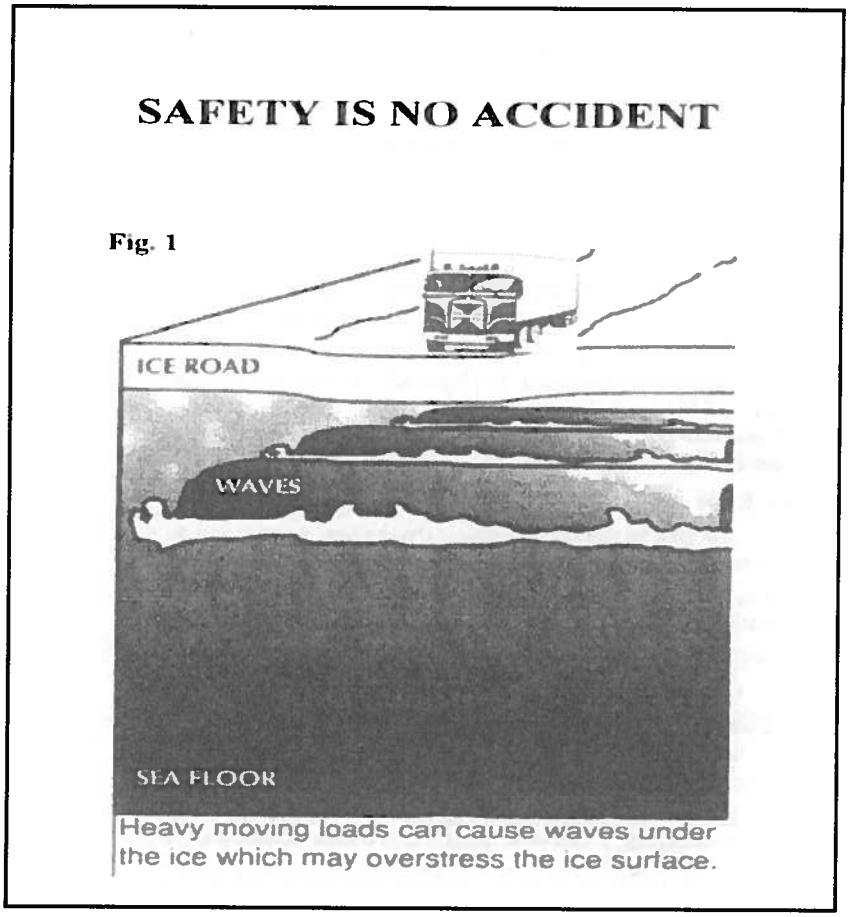

SAFETY IS NO ACCIDENT
Fig. 1
ICE ROAD
WAVES
SEA FLOOR
Heavy moving loads can cause waves under the ice which may overstress the ice surface.

COLD WEATHER OPERATIONS

Extreme cold temperatures are a concern for our winter operations in the Mackenzie Delta. Cold weather is a hazard to exposed workers and is hard on mechanical equipment. We understand that levels of productivity will necessarily decrease due to extreme cold. We are also aware that we must help protect our workers from exposure to extreme cold.

Primary Hazards

Exposure
Poor visibility
Eye sensitivity

Safe Work Procedure

The best method for staying warm in cold weather is to insulate the most exposed parts of the body.
Crew members must watch each other for signs of frostbite, such as skin that starts to freeze (i.e. turns white). Refer to the section on the treatment of frostbite in this manual.
During cold, windy weather, protect the face head and neck. Large amounts of body heat can be lost from these areas even when other parts of the body are adequately clothed.
Commonly exposed parts of the body are feet, knees and wrists. Always insure that socks are pulled up high and that gloves extend well up the forearm. Both must be dry. Coveralls and boots must make a good seal, as must gloves and jackets. Feet and fingers will freeze even in the best of boots and gloves if blood flow is constricted by cold exposure at poorly insulated areas further up the limb.
An example of suitable cold weather foot-wear is good woolen socks in cellular rubber boots and loose insoles of insulating material. An insulated insole is better than extra socks.
Long underwear helps protect the legs from cold.
Little blood flows through the body's joints. This means that they will get cold quickly.
Dress using many layers so that clothing can be added or removed as conditions change.
Avoid tight clothing, which will restrict circulation to the hands and/or feet.
Avoid exertion to levels which cause sweating. Sweat will later cool the body temperature. Wear, closest to the skin, materials which will help wick perspiration away from the body.
Ears can be protected by using a toque or quilted hard-hat liner. Hearing protection may still be required, since liners do not significantly reduce noise.
Never engage controls or equipment when visibility is obscured by steam, snow or ice-fog. Equipment running in extremely cold temperatures will generate large amounts of visible exhaust and ice-fog.
When working in bright sunlight with snow cover, wear tinted safety glasses with UV protection.
Exercise caution when handling diesel fuel and gasoline during cold weather operations. The cold burn resulting from contact with spilled fuel or fuel-soaked clothing can be severe.
It is important that all personnel who are exposed to extreme cold take adequate nourishment throughout the day to ensure they are generating adequate body heat.

WINDCHILL EQUIVALENT TEMPERATURES

Wind Speed (km)	Temperature (Celsius)							
	0	-5	-10	-15	-20	-25	-30	-35
10	-2	-7	-12	-17	-22	-27	-32	-38
20	-7	-13	-19	-25	-31	-37	-43	-50
30	-11	-17	-24	-31	-37	-44	-50	-57
40	-13	-20	-27	-34	-41	-48	-55	-62
50	-15	-22	-29	-36	-44	-51	-58	-66
60	-16	-23	-31	-38	-45	-53	-60	-68

Workers will be provided access to a warm, sheltered environment as a place to warm up in cold weather. The warm environment can be provided by a camp, a heated worksite trailer, a heated vehicle, etc. Workers and supervisors are required to use good judgment in deciding how long to work outside before returning to a warm shelter to warm up, rest and drink some fluids.
Outside work will be suspended when the wind chill equivalent temperature is minus 55 or lower. During suspended work periods, employees will remain on active duty in a sheltered environment until conditions improve.

SMOKING IN THE WORKPLACE

Recent legislation prohibits the smoking of tobacco in the workplace. The *Environmental Tobacco Smoke Worksite Regulation* now deals with controlling the smoking of tobacco products in the workplace.

Smoking is prohibited in the workplace. This includes our offices, shops and warehouses, and most of our camp residences. It also includes all work vehicles.

Smoking can only take place outside of contained work areas, and must take place more than 3 meters (10 feet) from any entrance. It is possible to construct smoking enclosures outside of the workplace. However, a substantial enclosure would need a ventilation system.

Companies can be fined $5,000 dollars for violating this law and individuals can be fined $500.

There are, however, some limited exceptions for residents of remote work camps. In a remote camp an area may be designated as a smoking room as long as it is self-contained, has exhaust fans, and is not heated by forced-air furnaces.

When in doubt, don't smoke!

RIGHT TO REFUSE UNSAFE WORK

It is the right of all employees to refuse to do work which they feel is unsafe. This right is guaranteed by Canada Labour Code Regulation, below.

REFUSAL TO WORK IF DANGER
128.1 Subject to this section, where an employee while at work has reasonable cause to believe that:

(a) the use or operation of a machine or thing constitutes a danger to the employee or to another employee: or
(b) a condition exists in any place that constitutes a danger to the employee,

the employee may refuse to use or operate the machine or thing or to work in that place.

A copy of the Canada Labour Code is in the Safety Office in the Tuk Base Camp.

If you are asked to perform a task which you feel is unsafe, please discuss this with your immediate supervisor. If, after further instruction, changes in procedures or in tools and equipment or introduction of other means of mitigating potential hazards, you are still not satisfied that the task can be completed in a safe manner it is still your right to refuse to proceed with the task. Inform your supervisor or any of E. Gruben's Transport Ltd. management or safety personnel.

You cannot be fired for legitimately refusing to perform a task you feel is unsafe.

HAZARD IDENTIFICATION AND NEAR-MISS REPORTING

A **hazard** can be defined as any unsafe condition or practice in the workplace which could lead to an accident. By identifying hazards and removing and/or controlling these hazards we can make our workplaces safer for everyone

Hazard identification comes from four basic sources:

- Workers' identification of workplace hazards ("Hazard I.D.s").
- Observation of worker behaviour at the worksite.
- Observation of work site physical conditions.
- Inspections

Hazard Identification Reports ("Hazard ID's")

Hazard Identification reports are used by workers to alert site supervisors and fellow workers to any hazardous conditions or unsafe work procedures found by workers and others on the site. The value of observation and involvement of workers in the field cannot be over-emphasized in the identification of hazards.

Hazard Identification reports fill in the gaps between regular company inspections and help enable supervisors and workers to provide a safer worksite. Hazard I.D's allow greater participation of the workers in their own safety as well as enabling them to easily bring to the attention of supervisors unsafe conditions or practices which have been overlooked through the inspection process.

Employees, contractors & subcontractors are to notify the appropriate supervisor of any hazard observed on the company worksite. Hazard I.D. Reports can be given verbally or in writing. EGT has developed simple Hazard/Near Miss Reports for this purpose. A sample is on the next page.

After assessing the hazards, every effort should be taken to eliminate the hazard. In the event the hazard cannot be eliminated, all potentially affected personnel must be informed of the hazard and the hazard must be immediately marked with any of the following hazard indicators, as is appropriate under the circumstances:

- Danger Sign
- Flags
- Lights
- Alarms
- Barricades
- Fences
- Labels
- Placards

Near Misses

A **Near Miss** can be defined as any unusual occurrence in the workplace which could have led to harm to persons or property, had conditions been slightly different.

Near Misses are indications of problems in our workplace procedures and practices. By identifying and reporting near misses when they occur, we can make improvements to these workplace procedures and practices **befo**re they lead to a serious accident.

Near misses are reported on the same forms as Hazard ID's (see next page for sample). Please complete these reports and submit them to your supervisor or the safety officer. These reports will be reviewed and addressed by safety officers and senior personnel. Feel free to use these forms to address any safety or work-quality concerns. They may be submitted anonymously if desired.

E. GRUBEN'S Transport Ltd.

HAZARD/NEAR MISS REPORT

☐ **Hazard Report** ☐ **Near Miss Report**

Location: _____ **Date:** _____

Job Name: _____ **Client:** _____

Reported by (optional) _____

What is the hazard? What happened?

Remedial Action Taken:

Remedial Action Still Required?

Please submit to your supervisor, the Safety Officer or your HS&E representative for follow-up

Sample of Hazard ID/Near Miss Report.

ACCIDENT/INCIDENT INVESTIGATION & REPORTING

Reporting and Investigation of accidents/incidents are critical steps in preventing similar accidents or incidents from recurring. Investigations are intended to determine the root cause or causes of an incident or accident as opposed to finding fault.

Incident and accident reporting is also useful because it helps identify:

- Training Needs;
- Problems with work procedures;
- Problems with work site conditions;
- Needs for Personal Protective Equipment PPE, Safety & Emergency Equipment;
- Failures in communication

It also helps collect information necessary for completing insurance reports, for complying with regulatory requirements and for gathering statistical information used to calculate statistics and identify incident trends so that the effectiveness of the HSE program can be measured.

It is critical that all E. Gruben's Transport Ltd. workers and sub-contractors report all incidents.

Types of events to report and investigate include:

- Fatalities;
- Injuries or occupational illnesses that prevent a worker from performing regular tasks;
- Injuries that can be treated at the work site and injuries that require treatment by a medical professional;
- Any emergency or loss, such as a motor vehicle accident, fire, explosion, vandalism;
- Environmental damage or loss; and,
- Near misses;

In the case of a personal injury to a worker, it is important that reporting be done at the time of the accident. The Workers' Compensation Board of the NWT requires that:

> The Worker must tell his employer about the accident and send a Worker's Report of Accident to the Board *as soon as possible.*
>
> The Employer is required to provide first aid to the injured worker and transportation to a hospital or doctor *if it is needed.*
>
> The Worker should ask the doctor to send a copy of his Physician' Report to the Board *within two days.*
>
> The Employer must keep a record of the injury and send an Employer's Report of Accident to the Board *within three days.*

Delays by workers in reporting accidents can lead to the WCB holding up or denying claims. Delays by the company in submitting required forms can lead to fines to the company.

RETURN TO WORK/MODIFIED WORK POLICY

Purpose

The purpose of this policy is to provide continued employment to injured workers in a joint effort to eliminate interruptions of earnings and reduce the impact of WCB Premium increases due to work-place injuries, without aggravation or delays to a full recovery. It is recognized that not all injuries facilitate the performing of modified work duties and will be accepted as lost time accidents.

Policy

An EGT representative will accompany any injured worker who requires medical aid. The representative will advise the treating physician of the modified work program options available. When possible, the injured person will be returned to perform a useful task within their capability, which will not adversely affect his or her ability to recover from that worker injury. The worker will be returned to work as soon as possible after receiving medical clearance from their physician. It is the intention of this policy to work closely with the employee during recovery and rehabilitation to facilitate a smooth transition back into the workforce.

Responsibilities

Managers

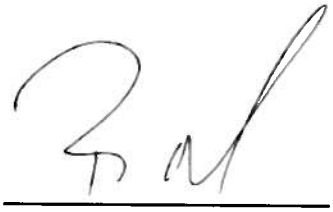
Oversee the operation of the program.
Complete the Employers Report and submit to WCB.
Ensure workers are contacted weekly until they are returned to work and advise WCB immediately when they have assumed fully duties.

Superintendents

Ensure that employees are aware of our modified work program
Making available a company representative to accompany injured worker to medical facility.
Ensure that suitable work has been made available to the injured within the limitations of the injury as indicated by the attending physician.

Employees

Communicate to the physician that modified work is available and, with the physician's approval, participate in the program.
Present the modified work report form to physician and return the completed form and WCB physician's first report to EGT.
Complete and submit to EGT the WCB worker's report.



Russell Newmark
Chief Executive Officer

May 2009

Modified Work Program Form

It is EGT intention to keep employees working, or return them back to work as soon as possible after an injury. We see this as mutually beneficial. The modified work program may include, but not limited to the following:

Light truck driver	hot shot, parts pickup, vehicle delivery, pilot car, expediting
Office duties	assembling safety manuals/hand books, updating MSDS, new employee orientations, filing and phone duties, front end office work, follow up on WCB back to work incidents
Warehouse duties	stocking shelves, inventory, collection of and ordering of materials, updating project paperwork and data entry
Light construction duties	sign making, monitoring, testing, flagging, cleanup, camp maintenance and vehicle cleaning
Security	day and night security, fire extinguisher checks, inspections, safety checks, audits

A list of physical demands for jobs is available.

If there are any restriction to movement or use of limbs please specify:

I hereby give my consent to release the above medical information, and agree to accept modified work.

I understand by signing this I do not give up my rights to claim WCB.

Employee name _____

Employee signature _____

Doctor's name _____

Doctor's signature _____

5.0 EMERGENCY RESPONSE AND SPILLS CONTINGENCY PLAN

5.1 Introduction

The following is a plan of emergency response actions to be initiated when required by staff of EGT, and their contractors, in relation to all work undertaken by EGT. The Emergency Response Plan (ERP) will be reviewed with all workers as part of their orientation before commencing work. Revisions to the ERP will be made as required to accommodate site specific hazards or other unique situations. Worker training will coincide with any changes made to the plan.

5.2 Immediate Response to Emergency Situations

5.2.1 Fire

Secure the scene, "protect yourself and others!"
Have all non-essential personnel clear the area
Notify other workers by voice and alarm
Immediately shut off power, engines, and fuel sources, if safe to do so
If the fire is small, extinguish it with the available firefighting equipment
If you cannot safely fight the fire, evacuate to a safe and secure area
Do a head count to account for all workers, and
Notify Supervision and Management in accordance with the emergency contact list

5.2.2 Vehicle or Mobile Equipment Incident

Secure the scene, "protect yourself and others!"
Shut off equipment and fuel source, if safe to do so
Provide assistance to injured persons
Call for medical assistance, if needed
If injured persons are in imminent danger, the remove injured persons and secure the incident scene
Control any spill or environmental hazard
Notify Supervision and Management in accordance with the emergency list
Record third-party names, addresses, contact number, driver's license, vehicle and license information

5.2.3 Serious Medical Incident

Secure the scene, "protect yourself and others!"
Attend to the injured person(s)
Call for medical assistance, if needed
Notify Supervision and Management in accordance with the emergency contact list

5.2.4 Wildlife Encounters

All workers will avoid situations that could create a wildlife encounter
All food items and domestic garbage should be secured
Garbage will be disposed of at approved sites only
Arctic and red fox may approach personnel to scavenge food. Avoid all contact as they may carry the rabies virus and exposure is through bites or saliva
Operations are usually in areas where bears may be encountered. Proper food handling and garbage disposal procedures will lessen the likelihood of bears being attracted to your operations. Information about bear detection and deterrent techniques can be obtained from the Department of Resources, Wildlife and Economic Development at 867-777-7308 or 867-777-7230

5.3 Spill Contingency Plan

The primary goal is to avoid spills or the unnecessary release of materials. All personnel shall have an environmental orientation prior to starting work. This will include a review of this Spill Contingency Plan (SCP).

In the unlikely event of a spill or release of materials, the objective will be a quick response. The SCP defines the responsibilities of site personnel and the required procedures for a quick response by emphasizing the need to reduce the safety hazards and minimize environmental impacts.

5.3.1 Preliminary Requirements

A copy of this Emergency Response Plan will be available on site during all field operations

Material Safety Data Sheets (MSDS) for each hazardous chemical shall to available on sit during field operations

Maps indicating major roads, access roads, nearby surface water bodies, any Hazardous Material stored on site, slope of land, nearby communities and other important features will be on site and available

All vehicle/equipment shall be equipped with spill kits and shovels. Spill kits, at a minimum, shall include sorbent pads or equivalent, shovels, and a means for containment of contaminated materials (e.g. impermeable tarps, barrels); and

Suitable communication equipment and all emergency numbers will be available prior to commencement of all field activities

5.3.2 Initial Response Procedures

In the event of a spill or a release of materials, the first person on the scene will"

Before attempting to stop the flow, protect the safety of all personnel at the site, and ensure all safety precautions have been taken. If possible, with without further assistance, control danger to human life (remove ignition sources)

Immediately obtain assistance of others by activation the Spill Response Team and begin to assess and contain the spill

Identify the material spilled, assess Material Safety Data Sheets (MSDS) information and implement appropriate safety procedures, based on the nature of the hazard. If the identity is unknown and if identification means further risks, the action must be based on the assumption that the product is extremely dangerous. The crew will not smell, taste, touch or attempt to reach ruptured containers if they are surrounded by contaminate

Assess the dangers and hazards to personnel in the vicinity of the spill. Immediate determinations must be made about the direction of the spills progress, whether downhill, towards water or already in the water

Stop the flow of the spill at the source if possible, when safe to do so

Notify the NWT 24 Hour Spill Report Line (867) 920-8130), if spill volumes exceed the Spill Report Threshold Quantities

Gather information on the status and nature of the situation

When notified of a spill, the Field Supervisor, or person in charge of the emergency response measure will immediately ensure that:

Action is take to control danger to human life

An onsite supervisor is designated, if not already present

In the event that a spill exceeds any of the threshold quantities, the person in charge of the emergency response measures will complete the Northwest Territories (NT) Spill Report Form and then immediately report the spill to:

NWT 24 Hour Spill Report Line (867) 920-8130

Note: For fuel or hydraulic spill this threshold limit on land is 100 liters

The local R.C.M.P. shall be notified if a risk to the public exists

The necessary equipment and personnel shall be mobilized and implemented to stop the source of the spill and commence clean up

5.3.3 General Spill Containment Procedures

Identify the contaminate, stop the source of the spill and when safe, immediately implement measures to limit the spread of the spill and to minimize the impacts to the environment

Prompt containment can reduce environmental exposure and risk. Containment measures may be land or water based. Land based measures include application of sorbents, construction of berms, and diversion/collection trenches. Water based measures could include dams, dykes and floating booms.

If the spill source is a leaking fuel truck, pump tanker dry (into appropriate containers or another tanker)

A shallow depression shall be excavated or a surface berm constructed in the path of the following product to stop and contain the flow. If feasible, without unduly delaying containment efforts, the surface stripping shall be salvaged and stored separate during excavations

Sorbent materials shall be utilized to contain and recover spilled material

Heavily contaminated soil and vegetation, as well as used sorbent material, shall be disposed of at an approved hazardous waste treatment facility

Traffic will be minimized on and around contaminated areas

Attempts will be made to restrict the movements of wildlife near the area affected by the spill, and

Remediation and final cleanup will be conducted until the spill and immediate location has been reclaimed to an equivalent capability prior to the incident

5.3.4 Spill Adjacent to a Water Body

Berms or trenches shall be constructed to restrain spilled products from entering into a water body

Spilled materials shall be recovered as quicly as possible

If spilled material enters an open water body, floating booms, skimmers and sorbent pads shall be deployed, if feasible, to contain and recover the spilled material

If spilled material is released onto a frozen water body, snow and sorbent pads shall be used to contain and clean up the spill. A backhoe, or similar equipment, will remove all materials to prevent future release into a water body

Contaminated areas, including downstream shorelines (non-frozen conditions), shall be cleaned up in consultation with Spill Response Specialists and the appropriate Government Agencies, and

In the event that spilled materials enter a frozen water body through or under the ice flowing or standing water, augering will be conducted to determine the extent of the spill plume. If feasible, a vacuum truck will be brought to the site to skim off the contaminants. As well, the appropriate regulatory agencies will be contacted and a post break-up monitoring and reclamation plan will be implemented to determine the extent of the impacts of the spill on the water body and its banks

5.3.5 Spot Spills

The RWED Environmental Protection Services, (867) 873-7654, is to be contacted soon after a spot spill to determine appropriate methods to remove or restore contaminated soils. Since impacts from small spills can generally be minimized if immediate action is taken, all small spot spills shall be cleaned up immediately

Activities in the immediate vicinity will be suspended until the Department of Transportation or an Inspector from RWED Environmental Protection Services grants permission to resume

Heavily contaminated soil and vegetation, and/or removed contaminated materials will be incinerated, if safe to do so, or disposed of at an approved waste facility

Locations where spot sills have occurred will be flagged and the GPS coordinate location recorded by the Person-in Charge of the spill. Flags shall be removed once the reporting is complete, and

The Person-in-Charge of the spill will document and report all details pertaining to the incident

5.3.6 Spill Reporting

The size of the spill will determine how the spill is reported by a determination of threshold quantities. Whenever the spill exceeds the threshold quantities, then the Northwest Territories (NT) Spill Report Form is to be completed and the spill is to be immediately reported to:

NWT 24 Hour Spill Report Line (867) 920-8130

When calling the NWT Spills Hotline, the person reporting the spill shall provide the following:

- Date and time of spill
- Direction spill is moving (or if it has stopped)
- Name and number of persons close to the location of the spill
- Type of contaminate spilled and the quantity spilled
- Cause of the spill
- Whether the spill is continuing or has stopped
- Description of the existing containment
- Actions taken to recover, clean-up and dispose of spilled contaminant
- Name, address and phone number of the person reporting the spill
- Name of person in charge of management or control at the time of the spill

5.3.7 Reporting Procedure Chain of Events

Worker notices spill

- Is the source of the spill still flowing?
- Can the source be safely shut off?

Worker notifies construction foreman and in sequence EGT Supervisor is informed; then as consequence, since this depends upon the size and severity of the spill, the Operations Manager or Project Engineer

- Estimate Spill reporting threshold quantities and proceed as previous detailed
- Call the NWT Spills Hotline to file a report and request further information

The Supervisor or Operations Manager notifies

- NWT Spills Hotline
- The R.C.M.P, if necessary (danger to public)
- Communities, who could be affected by spill

The NWT Spills Hotline notifies

- NWT Environment and Natural Resources
- Land and Water Board in area of spill
- Department of Indian Affairs and Northern Development
- Department of Fisheries and Oceans

The appropriate personnel arrive on site to contain and clean up the spill

5.3.8 Spill Kits

All vehicles and equipment will be equipped with a spill kit that, at minimum includes the following

Sorbent material (i.e. 10 pads, 2 socks or equivalent)
Disposable container (tarpaulin, pail, barrel)
Safety gloves and goggles, and
Shovel

All fuel and service vehicles will carry a spill kit that includes the following:

A minimum of 10 kg of sorbent material (i.e. 200 pads, 12 socks, 10 pillows, or equivalent)
Sorbent booms
Disposable container (tarpaulin, pails, barrel)
Safety gloves and goggles, and
Shovel

Extra spill kits will be stored at camp or storage locations

5.3.9 NWT Regulatory Agencies

NWT OHS	(867) 678-2301
NWT OHS (Yellowknife)	1-800-661-0792
NWT Forest Fire	1-800-661-0800
24 Hour NWT Spill Report Line	(867) 920-8130
RWED Environmental Protection Services	(867) 873-7654
Environment Canada	(867) 669-4710
Fisheries and Oceans Canada	(867) 777-7520/7521 or
Fisheries and Oceans Canada	(867) 669-4931

Mackenzie Valley Land and Water Board	(867) 669-0506
Gwich'in Land and Water Board	(8670 777-4954

5.3.10 Spill Report Threshold Quantities

Item No	TDGA Class	Description of Contaminant	Amount of Spill
1	1	Explosives	Any amount
2	2.1	Compressed Gas (Flammable)	Any amount of gas from containers with a capacity greater than 100 liters
3	2.2	Compressed Gas (Non-corrosive, Non-flammable	Any amount of gas from containers with a capacity greater than 100 liters
4	2.3	Compressed Gas (Toxic)	Any amount
5	2.4	Compressed Gas (Corrosive)	Any amount
6	3.1,3.2,3.3	Flammable Liquid	100 liters
7	4.1	Flammable Solid	25 kg
8	4.2	Spontaneously Combustible	25 kg
9	4.3	Water Reactant Solids	25 kg
10	5.1	Oxidizing Substances	50 liters or 50 kg
11	5.2	Organic Peroxides	1 liter or 1 kg
12	6.1	Poisonous Substances	5 liters or 5 kg
13	6.2	Infectious Substances	Any amount
14	7	Radioactive	Any amount
15	8	Corrosive Substances	5 liters or 5 kg
16	9.1(in part)	Misc. Products and Substances, excluding PCB Mixtures	50 liters or 50 kg
17	9.2	Environmentally Hazardous	1 liter or 1 kg
18	9.3	Dangerous Wastes	1 liter or 1 kg
19	9.1(in Part)	PCB Mixtures of % or More Parts Per Million	0.5 liters or 0.5 kg
20	None	Other Contaminants	100 liters or 100 kg

Environmental Protection Act, Consolidation of Spill Contingency Planning and Reporting Regulations R.R.N.W.T. 1990. C, Schedule B

Emergency Scenarios for Possible Consideration

E. Gruben's Transport Ltd. operations could potentially involve a variety of possible emergency scenarios, which should be taken into consideration. These could include, but are not limited to:

- Injury or fatality;
- Worker or equipment through ice.
- Vehicle accident;
- Fire or explosion;
- Search and rescue for missing or overdue persons;
- Spill to environment of raw products (oil, salt water) or refined products (diesel, gasoline,);
- Aircraft incident;
- Natural disasters;
- Transportation of Dangerous Goods incident;
- Elevated or confined space rescue;
- Blow out;

SAFETY MEETINGS

Bringing people together on a regular basis to hear and talk about the different HSE programs, procedures, and topics helps to set clear expectations and fosters commitment to incorporate what they learn into their day-to-day work.

All E. Gruben's Transport personnel will be expected to attend and participate in our meetings and the meetings of our clients. Meetings will include the following, at minimum.

Regular or Start-Up Health, Safety & Environmental Meetings

All operator work groups engaged in northern operations shall participate in regularly scheduled safety meetings at least monthly or weekly for construction. Additional specific meetings are called as required (i.e. pre-job and tailgate meetings). Topics will include:

- Comprehensive identification of safety issues;
- Pre-job and/or task analysis for hazard prevention;
- Establishing protocols;
- Emergency response requirements at the beginning of a project or scope of work;
- Project specific and client specific safety issues and requirements

Pre-Shift Meetings

Pre-Shift Meetings shall be held before:

- Starting work each morning;
- Starting a new shift; and,
- Undertaking of non-routine jobs.

Additional meetings are also held when:

- There has been a significant change in the way work is being carried out; and
- The supervisor deems it appropriate.

The objectives of the pre-shift meetings are to:

- Keep all members of the work team informed of the day-to-day opportunities and challenges of working safe;
- Inform workers of the forecasted days activities;
- Identify the unique hazards and required control measures to prevent injuries;
- Review basic safe work practices;
- Inform workers of the activities of the other workers and how their activities will interact; and
- Allow a shift supervisor to assess the emotional and physical capacity of crew and ensure all are prepared for work.

Tailgate Meetings

Tailgate meetings occur as and when needed and are the responsibility of all workers.

Supervisors or workers can initiate tailgate meetings when the need arises in order to identify a safety issue or review the appropriate work or safety procedure associated with a work assignment. Tailgate meetings should be called whenever the conditions of the job change (for example, for changing weather, different available equipment, change in personnel) or whenever the task itself changes. They should be called when new potential hazards are identified. They should also be called whenever workers or supervisors feel that more complete communication and understanding of the task-at-hand is desirable.

Orientations

Pre-job and pre-employment orientations provide the opportunity to present an overall picture of the company's HSE program and commitment, the rights and responsibilities of both workers and management, the company's expectations and policy's, as well as details of particular contracts and clients' requirements. This also provides the

opportunity for new employees to complete employment sign-up procedures and the gathering of required employee information for employee files.

The orientation, because of its in-depth approach, can set the overall tone for the entire term of a new employee's employment, as well as reinforce attitudes and policies for returning employees, and introduce new procedures and policies.

SAFETY ORIENTATION CHECKLIST AND SIGN UP FORM

I, _____ have participated in the E. Gruben's Transport Ltd. Orientation, which outlines company policies, safety procedures, alcohol and drug policy, and responsibilities of employees and subcontract personnel.

The Orientation covered the following topics:

- ☐ Management and Staff Emergency Contacts
- ☐ Emergency Contact Numbers – Non-Company
- ☐ Emergency Response Chart
- ☐ Company Organizational Chart
- ☐ Alcohol and Drug Policy
- ☐ HSE Guiding Principles
- ☐ Supervisor, Worker and Subcontractor Responsibilities
- ☐ Enforcement of Rules and Procedures
- ☐ General Safety Rules
- ☐ Personal Protective Equipment
- ☐ Tuk Base Camp Rules
- ☐ Small Vehicle Policy
- ☐ Journey Management Procedures
- ☐ Abandoned Vehicle Protocol
- ☐ Establishment of the Roadside as a Workplace Protocol
- ☐ Ice Road Safety
- ☐ Cold Weather Operations
- ☐ Smoking in the Workplace
- ☐ Right to Refuse Unsafe Work
- ☐ Hazard Identification and Near Miss Reporting
- ☐ Accident and Incident Investigation and Reporting
- ☐ Emergency Response
- ☐ Meetings
- ☐ Completion of Administrative Forms:
  - Medical History
  - Training Certificates
  - Driver's License and Driver's Abstract Form
  - Payroll Information Form
  - TD1 and TD1 NT Income Tax Form

I certify that I understand and accept my responsibilities and company rules as outlined in the Employee Orientation Presentation.

I acknowledge that I understand and accept the terms of the company Drug and Alcohol Policy, including the requirements for Pre-Employment, Post-Incident and Reasonable Cause Testing.

I acknowledge that I understand and accept the terms of the company Tuk Base Camp Rules, including the possible requirement for searches of rooms and personal effects.

Signature: _____ Date: _____

Witness: _____