



**HEALTH AND SAFETY PLAN
DALLMAN AND LAKESIDE ASH PONDS**

**OFFICE OF PUBLIC UTILITIES
ENVIRONMENTAL HEALTH & SAFETY OFFICE
CITY OF SPRINGFIELD, IL**

OCTOBER 2025

HEALTH AND SAFETY PLAN DALLMAN AND LAKESIDE ASH PONDS ACKNOWLEDGEMENT AND AGREEMENT FORM

This Health and Safety Plan (HASP) has been developed for the purpose of proactively aiding City Water, Light and Power (CWLP) employees, contract workers and third-party contractors in identifying, understanding, and mitigating the risks/hazards they are likely to encounter at the site. This HASP may also be used as a guidance document by properly trained and experienced CWLP employees, contract workers and third-party contractors. The CWLP Environmental Health & Safety Office (EH&S) is readily available to assist contract workers and third-party contractors in identifying and addressing their own employees' risks. However, contract workers and third-party contractors at the site must develop their own HASP to address the hazards faced by their own employees.

Your signature below confirms the following: you have read and understand the hazards and associated mitigation measures discussed in this HASP; you have received training required pursuant to this HASP; you understand that contract workers and third-party contractors must develop their own HASP for their employees; and you understand that you could be prohibited by CWLP personnel from working on this project for not complying with any aspect of this HASP.

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A: Site Plan

B: Job Hazard Analysis Form – Completed Job Hazard Analyses

C: Safety Data Sheets

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1.0 Introduction

This HASP has been prepared to assist CWLP employees, contract workers and third-party contractors in identifying, understanding, and mitigating the risks/hazards they are likely to encounter at the Coal Combustion Residuals (CCR) facility owned and operated by the City of Springfield, Office of Public Utilities, formally known as the Dallman and Lakeside Ash Ponds.

Title 35 of the Illinois Administrative Code Part 845.530 requires the owner or operator of a CCR facility to inform employees, contract workers and third-party contractors of the development of the HASP, to conduct on-going worker hazard analysis and to ensure all parties are aware of said analysis. The HASP shall be updated at least annually and as needed based on worker hazard analysis. Additionally, the plan and all amendments shall be placed in the facilities operating record and placed on the owner/operators publically accessible internet site.

All CWLP employees, contract workers and third-party contractors are required to successfully complete a training program that informs them of the hazards at the facility prior to undertaking any activity to construct, operate or close a CCR Surface Impoundment. An outline of the training program that is used as well as a description of the training program updates must be maintained at the facility.

At a minimum, the training program is designed to ensure that employees, contract workers and third-party contractors understand and are able to respond effectively to the following:

- Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment;
- Communications and alarm systems
- Response to fires or explosions;
- Response to a spill or release of Coal Combustion Residuals
- Occupational Safety and Health Standards in 29 CFR 1910.120, 1926.65 and OSHA 10-hour or 30-hour construction safety training;
- Information about chemical hazards and hazardous materials at the site; and
- Use of engineering controls, administrative controls and personal protective equipment.

2.0 Health and Safety Plan Administration

The CWLP EH&S will be responsible for the management and administration of the HASP.

2.1 Organization and Responsibilities

Although CWLP EH&S directs and supervises the overall HASP for the Dallman and Lakeside Ash Ponds, the responsibility for Health and Safety extends to all CWLP employees, contract workers and third-party contractors. For this reason, it is each person's duty to immediately notify CWLP personnel and/or their respective supervisors of hazardous conditions that are identified. In the event the hazardous conditions represent and immediate threat to life or health, any personnel are authorized to stop work until the condition can be corrected.

The following personnel are responsible for the day to day implementation of this HASP:

CWLP

Eric Staley Technical Specialist 217-757-8610 ext. 1102
 Bill Antonacci Technical Specialist 217-757-8670 ext. 2583

Subcontractor

To be determined

Third party contractor

To be determined

2.2 Location of the Health and Safety Plan

The HASP will be maintained by the CWLP EH&S Office at 3100 Adlai Stevenson Drive. Copies of the plan will be kept at various locations, including construction trailers and/or break rooms at the Dallman and Lakeside Ash Ponds. Additionally, an electronic copy of the current HASP will be maintained on the publically accessible internet site at <https://www.cwlp.com/IllinoisCCRCCompliance.aspx>.

2.3 Plan Review and Updates

The HASP will be reviewed and updated as needed and no less frequently than on an annual basis. CWLP employees, contract workers and third-party contractors will be included in the regular review and updates. All updates and/or changes to the HASP will be logged herein.

Table 1-2 HASP Review Log

By	Date	Activity	Comment
Eric Staley	10/3/22	Review for updates	No updates needed
Eric Staley	10/16/23	Review for updates	Updated contact information, site plan and training document, updated sections 5.0 and 7.5
Eric Staley	10/16/24	Review for Updates	Update background information to indicate cessation of sluicing materials Correct typographical errors

Eric Staley	10/2/25	Review for Updates	No Updates Needed

3.0 Background Information

CWLP is a municipal electric and water utility that owns and operates two existing coal combustion residual CCR surface impoundments, operating as a single multi-unit system for purposes of groundwater monitoring and closure. These CCR surface impoundments are identified as the Lakeside Ash Pond and the Dallman Ash Pond and are located northeast of the power plant complex in Springfield, Illinois. All material going to these ponds are wet-generated, not dry.

The Lakeside Ash Pond was placed in service prior to 1958 and ceased receiving ash in 2009. The 35 acre pond has been divided into four separate ponds; three lime sludge ponds and one settling pond. The Lakeside Ash Pond historically received lime sludge from the CWLP Water Purification Plant, scrubber wastewater treatment plant clarifier blowdown and water from miscellaneous floor drains.

The Dallman Ash Pond was placed into service in 1976 and is approximately 34.5 acres. Historically, Dallman Ash Pond received fly ash and bottom ash, which were sluiced with raw lake water, industrial wastewater treatment plant clarifier blowdown and landfill leachate.

Both Dallman and Lakeside Ash Ponds ceased receiving waste streams in December 2023.

A general facility detail is provided in Appendix A.

4.0 Scope of Health and Safety Plan

This HASP is intended to cover daily operations by CWLP City employees, contract workers and third-party contractors at the facility for activities including, but not limited to:

- Operation of heavy equipment
- Loading of trucks with CCR material
- Excavation of lime and ash ponds
- Grading of placed material
- Maintenance of berms, ditches and other structures

This Health and Safety Plan does not cover closure construction activities. Before construction activities for impoundment closure commence, this HASP will be updated to address the additional hazards that CWLP employees, contract workers and third-party contractors will be exposed to.

Contract workers and third-party contractors may also be subject to their respective employers' Health and Safety Plans while engaged in work at the facility.

5.0 Hazard Analysis

CWLP employees, contract workers and third-party contractors may be exposed to certain physical, environmental and chemical hazards while working at the site. Hazard communication signs required by 35 IAC 845.530(f) are located in the employee break room.

5.1 Physical Hazards

Physical hazards associated with work at the site include:

- Slips, trips and falls
- Pinch points
- Struck by/caught between
- Exposure to vehicle traffic
- Manual handling of materials
- Exposure to heavy equipment
- Noise exposure

5.2 Environmental Hazards

Environmental hazards associated with work at the site include:

- Cold weather and related effects (frost bite)
- Hot weather and related effects (heat stroke, heat exhaustion, dehydration)
- Severe weather such as heavy rains, tornados, lightning
- Spill or release of CCR material

5.3 Chemical Hazards

Potential exposure to chemicals and chemical substances at the site include:

- Airborne/Respirable dust
- Exposure to CCR materials
- Exposure to landfill leachate
- Exposure to CCR surface water
- No RCRA hazardous chemicals or materials at the facility

5.4 Job Hazard Analysis

To reduce exposure to certain hazards, a Job Hazard Analysis (JHA) will be conducted to identify necessary engineering controls, administrative controls and Personal Protective

Equipment (PPE) to be utilized by CWLP employees. As needed, Industrial Hygiene Audits may be conducted to determine and quantify potential worker exposure to job site hazards such as respirable dust, noise exposure, etc. CWLP has previously conducted industrial hygiene audits on workers operating heavy equipment at the Dallman and Lakeside Ash Ponds for exposure to respirable dust. The results of these audits indicated exposure to respirable dust and crystalline silica were below the limits of detection.

The results of the JHA and/or new Industrial Hygiene Audit will be shared with employees, contract workers and third party contractors prior to the initiation of work.

Completed JHAs that document protective measures to reduce or eliminate worker exposure to identified hazards are provided in Appendix B. As new hazards or tasks are identified, Appendix B will be updated with a new JHA. Employees, contract workers and third-party contractors will be made aware of a new JHA no later than the next work day.

Contract workers and third-party contractors may be subject to their respective employers' JHA requirements.

5.5 Minimum PPE

CWLP employees, contract workers and third-party contractors engaged in work at the facility will be required to wear, at a minimum, OSHA defined Level D PPE, which includes a work uniform of long sleeves and long pants, safety footwear that meets ASTM F2431-11, hard hat, safety glasses and leather or heavy cloth gloves as needed.

CWLP employees covered under the Respiratory Protection Program will be provided with negative pressure respirators and appropriate cartridges. Contract workers and third party contractors must be covered by their respective employers' respiratory protection program.

Any additional PPE identified as warranted by a JHA will be provided to CWLP employees. PPE for contract workers and third party contractors must be provided by their respective employers.

6.0 Emergency Response

At CWLP, the Supervisor of Generation (SOG) is the primary contact in the event of any emergency and will serve as the Incident Commander. All SOGs are trained in hazardous materials response and the National Incident Management System to allow our personnel to work in conjunction with local emergency responders. A SOG is present at the Generating Facility 24-hours per day, 365 days per year.

In Springfield, IL, all requests for emergency responders such as the fire department, police department or private ambulance services are handled through the 911 system. In the event of an

emergency situation at the Dallman and Lakeside Ash Ponds, CWLP encourages our employees to contact 911 immediately and relay as much information as possible to the 911 dispatcher. It is of utmost importance that the reporting employee then contact the SOG as soon as possible with information pertaining to the location and nature of the emergency. The SOG or designee can then send appropriate personnel to assist in the response and/or to direct emergency responders. The SOG or designee shall contact the EH&S 24-hour contact line. It is the responsibility of the EH&S to contact any state or federal regulatory agencies, environmental response contractors, or other pertinent state and local officials.

CONTACT	TELEPHONE #
Police Department	911
Fire Department	911
Ambulance Services	911
Supervisor of Generation – 24 Hour	217-741-1938
Environmental Health & Safety Office – 24 Hour	217-652-6864

Specific responses to emergencies that may arise at the facility are covered under the site specific Personnel Training Program.

7.0 Personnel Training Program

CWLP will provide the minimum training required under this HASP to contract workers and third-party contractors. These employees will also be subject to their respective employers' site-specific HASP programs and procedures while engaged in work at the facility. The training Power Point is provided in Appendix D.

At a minimum, the site-specific training to all workers will include:

- Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment;
- Communications and alarm systems
- Response to fires or explosions;
- Response to a spill or release of Coal Combustion Residuals
- Occupational Safety and Health Standards in 29 CFR 1910.120, 1926.65 and OSHA 10-hour or 30-hour construction safety training;
- Information about chemical hazards at the site; and
- Use of engineering controls, administrative controls and personal protective equipment

Visitors to the facility, who are otherwise not engaged in the construction, operation or closure of the CCR Surface Impoundment may be trained on portions of this HASP which are specific to their

work at the facility. Such visitors will be escorted at all times by a CWLP competent person who has undergone the complete training designated by CWLP EH&S or the construction contractor.

7.1 Using, Inspecting, Repairing and Replacing Facility Emergency and Monitoring Equipment

It is anticipated that emergency and monitoring equipment used at the facility will evolve as the nature of work being conducted progresses from routine operation and maintenance to closure activities.

As monitoring equipment such as instruments that measure pressure, seepage, internal movement, vibration and air quality are introduced at the facility, this HASP will be updated to include procedures and training for inspecting, repairing and replacing these types of equipment.

CWLP employees have been trained on the inspection and replacement of emergency equipment such as Automated External Defibrillators and fire extinguishers. A monthly inspection of these devices owned by CWLP will be conducted and documented.

Contract workers and third-party contractors at the facility shall be responsible for training their employees on using, inspecting, repairing and replacing such equipment owned by their respective employers.

7.2 Communications and Alarm Systems

The nature of work conducted at Dallman and Lakeside Ash Pond will often require employees to be working in heavy equipment or outside and away from fixed buildings or construction trailers. For this reason, communications and alarm systems shall consist of two-way radios, CB radios and cell phones. The EH&S Office shall ensure that CWLP employees have the proper equipment and cell phone numbers to communicate in this manner with contract workers and third-party contractors.

7.3 Emergency Evacuation

CWLP Employees are trained on the Generating Facilities Emergency Evacuation Plan ADM 82.002 on an annual basis. Evacuations can be declared for a variety of reasons. The most obvious reason is the traditional sense of using an evacuation as a way to prevent employees from becoming harmed or injured. Even though many incidents such as a fire, flooding, spill or release of coal combustion residuals, severe weather or medical emergency may only affect a portion of the facility, it may be prudent to declare an emergency evacuation so that all personnel that are on site can be accounted for. We do not want to jeopardize rescue personnel to save someone that doesn't need to be saved.

All CWLP employees, contract workers and third party contractors should maintain awareness of potential or possible hazardous conditions for all areas of the facility, be

knowledgeable in what constitutes normal operating conditions and where primary and secondary escape routes are located for your work area and be alert to any signs or indications suggesting abnormal conditions.

Given the size of the facility, nature of work and absence of a readily available paging system, communication of an emergency evacuation will be relayed through two-way radios, CB radios and cell phones. CWLP employees, contract workers and third-party contractors will ensure these means of communication are maintained and readily available to all employees on site.

In the event an emergency evacuation is declared, all employees on site should immediately report to their designated assembly areas. For CWLP employees, contract workers and third-party contractors, the designated assembly area shall be the nearest fixed building or construction trailer on site.

Once all employees have assembled at each area, the SOG or designee will contact each respective location to ensure all employees are accounted for. It is the responsibility of each contract worker and third-party contractor to designate their own person/supervisor that will have a daily working knowledge of their staff on site that will communicate with the SOG or designee. Employees should remain at the designated assembly areas and await further instruction from the SOG or designee.

If an emergency should occur where it is determined that all CWLP employees, contract workers and third party contractors must evacuate the facility, the designated assembly area shall be the parking lot of the CWLP Property Management Center located across the road at 200 E Lake Shore Drive. Once all employees have assembled at the off-site assembly area, the designated CWLP employee will contact the SOG or designee with an accounting of all employees assembled at the off-site location.

7.4 Response to Fires or Explosions

CWLP Employees are trained on the Generating Facilities Emergency Procedure for Fire ADM 82.003 on an annual basis. The purpose of the Emergency Procedure for Fire is to maintain a workplace free of uncontrolled hazards that may cause fire, and in case of fire, how to respond to protect personnel and property. As with any safety subject, the first line of defense will be prevention. CWLP employees are to engage only in firefighting activities when the event can be contained with their level of knowledge and equipment available.

Given the nature of work at the facility, any fire would likely be limited to an individual piece of equipment or a specific area such as a construction trailer. Fire extinguishers will be located at fixed buildings at the facility and on pieces of individual equipment.

In the event of a large and uncontrolled fire, call 911 for the Fire Department and then contact the SOG with information pertaining to the location and status of the scene. Otherwise, notify the SOG and the SOG or designee will notify the Fire Department of the

situation. The SOG or designee will then notify Security at 757-8600 so they can provide an escort for the response vehicles.

In the event of a small and/or contained fire, employees may choose to extinguish the fire based on their level of training. If at any time it becomes apparent that the small and/or contained fire cannot readily be extinguished, employees should evacuate the area and call 911 for the Fire Department and contact the SOG with information pertaining to the location and status of the scene.

7.5 Response to a Spill or Release of Coal Combustion Residuals

In the event of a catastrophic failure of an impoundment resulting in a large spill or release of coal combustion residuals into the environment, all employees shall evacuate the area immediately, report to their designated assembly areas identified under the emergency evacuation plan and notify the SOG with information on the location and nature of the spill or release of coal combustion residual materials.

Contract workers and third party contractors should remain in their designated assembly areas and await further instructions from the SOG or other CWLP personnel.

CWLP has developed an Emergency Action Plan for Lake Springfield, Dallman and Lakeside Ash Ponds. The emergency response procedures under the Emergency Action Plan will be implemented by CWLP employees and administration.

Cleanup after a spill or release of coal combustion residuals materials will be incident specific and will be completed by CWLP employees and contracted employees. Such a response will require extensive mobilization of personnel and equipment and will not commence without a written response plan. The written response plan will include amongst other elements information on the physical and chemical hazards associated with the response, communications during the response, proper selection of PPE during the response, use of engineering and administrative controls during the response and any additional training deemed relevant to the response.

7.6 Response to a Medical Emergency

CWLP Employees are trained on the Generating Facilities Responding to a Medical Emergency Procedure ADM 82.004 on an annual basis. The purpose of the Responding to a Medical Emergency Procedure is to provide guidelines for CWLP employees to respond to a medical emergency within their scope and level of training.

A medical emergency may result for many reasons. Incidents may range from work-related failure of equipment and processes to heart attacks or even major catastrophes. Each incident will possess its own challenges. In the event of a medical emergency, it is imperative that EMS be contacted immediately. Employees helping the victim should stay calm and assist in the situation as best as possible.

In the event of a medical emergency, call 911 for the Fire Department and ambulance and then contact the SOG with information pertaining to the location and status of the scene. Otherwise, notify the SOG and the SOG or designee will notify the Fire Department of the situation. The SOG or designee will then notify Security at 757-8600 so they can provide an escort for the response vehicles.

First Aid Kits and an Automated External Defibrillator will be kept at the CWLP trailer. Contractor workers and third-party contractors may also have these items in their company vehicles or trailers.

7.7 Occupational Safety and Health Standards in 29 CFR 1910.120, 1926.65 and OSHA 10-hour or 30-hour construction safety training;

CWLP employees engaged in the operation, maintenance, construction and closure of the Dallman and Lakeside Ash Ponds have received the HAZWOPER training under 29 CFR 1910.120 for General Industry. CWLP is not regulated under 29 CFR 1926.65. Additionally, these employees have received the 10-hour Construction Safety and Health training.

It is the responsibility of the employers of contract workers and third-party contractors to provide and document that their respective employees working at the facility have received the required OSHA training.

7.8 Information about Chemical Hazards at the Site

Dallman and Lakeside Ash Ponds are CCR surface impoundments that have been historically operated to store bottom ash, fly ash and flue gas desulfurization wastes. These materials can be encountered at the facility in solid form, as airborne dust or in waters that have come in contact with the CCR.

Coal ash, both bottom and fly ash, can contain heavy metals including arsenic, lead, mercury, cadmium, chromium and selenium, as well as aluminum, antimony, barium, beryllium, boron, chlorine, cobalt, manganese, molybdenum, nickel, thallium, vanadium, zinc and respirable crystalline silica. Based upon exposure and route of entry, these substances have the potential to cause illness and disease.

Flue gas desulfurization wastes can contain arsenic, lead, mercury, cadmium, chromium and selenium, as well as aluminum, antimony, barium, beryllium, boron, chlorine, cobalt, manganese, molybdenum, nickel, thallium, vanadium, and zinc. Based upon exposure and route of entry, these substances have the potential to cause illness and disease.

Safety Data Sheets have been developed for bottom ash, fly ash and flue gas desulfurization wastes and are provided in Appendix C.

Exposure to these materials can be reduced and/or eliminated through the use of engineering controls, administrative controls and personal protective equipment as discussed below.

7.9 Use of Engineering Controls, Administrative Controls and Personal Protective Equipment

CWLP has developed several controls to reduce and/or eliminate employee exposure to contaminants in the work place.

Engineering Controls

Engineering controls are used to control potential hazards at the source or to design the work area to eliminate hazards and reduce employee exposure to such hazards. Common engineering controls consist of process control, encapsulation, isolation, shielding, and ventilation.

The most common type of engineering controls used at the facility for operation and maintenance are the use of water to limit air born dust, the natural moisture content of the CCR material, speed limits of 10 miles per hour on the roadways and termination of work if conditions exist for air borne dust to be carried beyond the work area or facility boundaries.

JHA's conducted for work at the facility will aid in determination of any additional engineering controls warranted as the scope of work changes from operation and maintenance to closure activities.

Administrative Controls

Administrative controls are changes in work place procedures, policies, rules, supervision and training with the goal of reducing the frequency, duration and/or severity of employee exposure to hazardous situations or chemicals. CWLP has developed several administrative controls to reduce employee exposure to potentially harmful contaminants.

All CWLP employees engaged in work at the facility have received training on the following CWLP programs and procedures:

- CWLP Safety Manual
- Emergency Procedures for Fire
- Hazard Communication Program
- Respiratory Protection Program
- Arsenic Compliance Program
- Beryllium Compliance Program
- Respiratory Crystalline Silica Compliance Program
- Hexavalent Chromium Compliance Program
- Lead and other Heavy Metals Compliance Program

These programs and administrative provide guidelines for housekeeping, work practice controls, respiratory protection and proper selection of personal protective equipment to further reduce employee exposure to hazardous conditions.

Contract workers and third-party contractors will be required to follow their respective employers' administrative controls while engaged in work at the facility.

Personal Protective Equipment

CWLP employees, contract workers and third-party contractors shall wear at a minimum OSHA Level D PPE while engaged in work at the facility. Level D PPE includes long sleeves and long pants, safety footwear that meets ASTM F2431-11, hard hat, safety glasses and leather or heavy cloth gloves as needed. Respiratory protection will be provided to CWLP employees covered under the Respiratory Protection Program that is appropriate for the work being conducted. Additional PPE identified as warranted through a JHA or industrial hygiene audit will be provided and required for use while engaged in those specific work activities.

Contract workers and third party contractors must be covered by their respective employers' respiratory protection program.

Health and Safety Plan

Dallman and Lake Side Ash Ponds



HASP Purpose

- Proactively aid CWLP employees, contract workers and third party contractors in identifying, understanding and mitigation the risks and hazards associated with the facility.
- Covers historical use of the facility and response plans
- Intended to be continually updated as facility moves from current operations to closure activities

HASP Administration

- Environmental Health and Safety Office
- Day to day implementation of HASP
 - Eric Staley
 - Bill Antonacci
- Official Copy kept at EH&S Office
- Copies at various trailers at facility
- Electronic copy on CWLP intranet
 - <https://www.cwlp.com/IllinoisCCRCompliance.aspx>
- Updated as needed but no less frequently than annually
- Contract workers and third-party contractors subject to respective HASP as well

Illinois Rule: 35 IAC 845.530 HASP

- Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment;
- Communications and alarm systems
- Response to fires or explosions;
- Response to a spill or release of Coal Combustion Residuals
- Occupational Safety and Health Standards in 29 CFR 1910.120, 1926.65 and OSHA 10-hour or 30-hour construction safety training;
- Information about chemical hazards and hazardous materials at the site; and
- Use of engineering controls, administrative controls and personal protective equipment

Background Information

Lakeside Ash Pond

- Placed into service prior to 1958
- Ceased accepting ash in 2009
- Approximately 35 acres in size
- Divided into four lime ponds and one settling pond
- Historically received from Water Purification Plant, FGD WWTP, misc. floor drains
- Ceased receiving all waste streams in October 2023

Background Information

Dallman Ash Pond Ash Pond

- Placed into service in 1976
- Approximately 35 acres in size
- Historically received fly ash and bottom ash from Dallman 31, 32 and 33, GF WWTP sludge, landfill leachate, misc. storm water from FGD Landfill area
- Ceased receiving all waste streams in October 2023

Scope of Health and Safety Plan

- Covers daily operations by CWLP, contractor workers and third-party contractors
 - Operation of heavy equipment
 - Loading of trucks with CCR material
 - Excavation of lime and ash ponds
 - Grading of placed material
 - Maintenance of berms, ditches and other structures

Hazard Analysis

Physical Hazards

- Slips, trips and falls
- Pinch points
- Struck by/caught between
- Exposure to vehicle traffic
- Manual handling of materials
- Exposure to heavy equipment
- Noise exposure

Hazard Analysis

Environmental Hazards

- Cold weather and related effects (frost bite)
- Hot weather and related effects (heat stroke, heat exhaustion, dehydration)
- Severe weather such as heavy rains, tornados, lightning
- Spill or release of CCR material

Hazard Analysis

Chemical Hazards

- Airborne/Respirable dust
- Exposure to CCR materials
- Exposure to landfill leachate
- Exposure to CCR surface water
- No RCRA hazardous chemicals or materials at the facility

Job Hazard Analysis

- JHA will be utilized for routine tasks and as new tasks arise
- Identify necessary administrative or engineering controls
- Identify appropriate PPE
- Identify need for Industrial Hygiene Audit
- JHAs will be shared with all employees
- New JHAs shared by the next work day
- Previous Industrial Hygiene audits conducted
 - Below detection limits for respirable dust and crystalline silica

Personal Protective Equipment

Minimum PPE for CWLP is OSHA Level D

- Long pants
- Long sleeved shirt
- Safety footwear
- Hard hat
- Safety glasses

Additional PPE warranted by JHA will be provided to CWLP employees

- Respiratory protection
- Level B or C PPE

Emergency Response

Do not hesitate to call 911

- Provide as much information as possible
 - Type of emergency
 - Number of people affected

ALWAYS contact the SOG 217-741-1938

- SOGs are trained as incident commanders
- SOGs can send additional resources and support
- Level B or C PPE

Contact EH&S 24-hour on call number 217-652-6864

- EH&S will contact regulatory agencies and appropriate administration

Training

- Using, inspecting, repairing and replacing facility emergency and monitoring equipment;
- Communications and alarm systems
- Emergency Evacuation
- Response to fires or explosions;
- Response to a spill or release of Coal Combustion Residuals
- Response to a Medical Emergency
- Occupational Safety and Health Standards in 29 CFR 1910.120, 1926.65 and OSHA 10-hour or 30-hour construction safety training;
- Information about chemical hazards and hazardous materials at the site; and
- Use of engineering controls, administrative controls and personal protective equipment

Training

Inspecting, repairing, replacing facility emergency and monitoring equipment;

- Anticipate installation of equipment to monitor stability/integrity of ash ponds as closure begins
- Most likely will be overseen by contractors
- CWLP will have AED and Fire Extinguishers at facility trailer
- CWLP will conduct monthly inspections on AED and Fire Extinguishers
- Contractor workers and third-party contractors will be trained by their employers on their specific equipment

Training

Communications and alarm systems

- No fixed buildings to accommodate Gai-Tronics system or other site paging system
- CWLP employees will rely on two-way radios, CB radios and cell phones
- EH&S will ensure pertinent numbers are posted at facility trailer
 - Will ensure contract workers and third-part contractors have all pertinent contacts and numbers
- If and when new types of communications or alarm systems are introduced at the facility, all CWLP employees, contract workers and third-party contractors will be trained in their use

Training

Emergency Evacuation

- Emergency evacuation can be declared for many reasons
 - Fire
 - Flood
 - Spill or release of CCR
 - Medical emergency
 - Severe weather
- Communication limited to two-way radios, CB radios and cell phones

Training

Emergency Evacuation

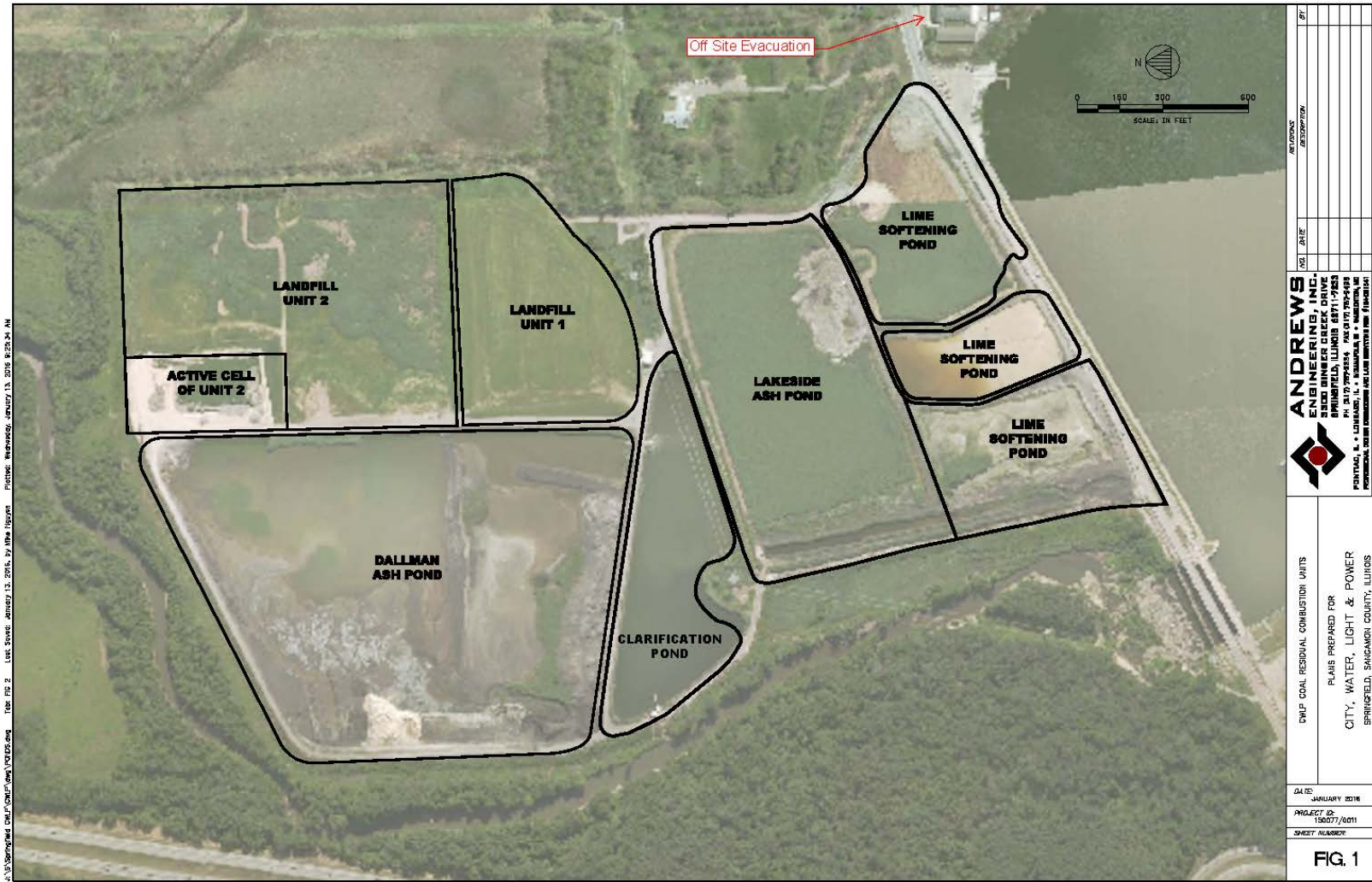
- Evacuation will follow guidelines for Generating Facilities
 1. Immediately evacuate the area and report to designated assembly area
 2. Contact 911 if needed
 3. Contact SOG with information on nature of emergency
 4. Conduct accountability of employees at the facility
 5. Remain in assembly area and await further instructions
- Assembly area shall be the closest fixed building or construction trailer on the site

Training

Emergency Evacuation - Offsite

- Off-site assembly area shall be the PMC parking lot
- 200 E Lake Shore Drive
- Follow the same guidelines
 1. Immediately evacuate the area and report to off-site assembly area
 2. Contact 911 if needed
 3. Contact SOG with information on nature of emergency
 4. Conduct accountability of employees at the facility
 5. Remain in assembly area and await further instructions

Training



Training

Response to fire or explosions

- CWLP employees are trained annually on emergency procedures for responding to fires
- For work at ash ponds, most likely to encounter fire in fixed building or a piece of heavy equipment
- Fire extinguishers are located in fixed buildings and construction trailers
- For large fires
 - Evacuate the area and call 911
 - Second call to SOG with pertinent information
- For small fires
 - Employees may choose to fight fire based on their level of training
 - Always notify SOG incase small fire becomes a large fire

Training

Response to a spill or release of Coal Combustion Residuals

- In the event of catastrophic release of CCR, evacuate the area immediately
 - Emergency evacuation procedures to be followed
- Call SOG immediately with pertinent information
- CWLP has developed an Emergency Action Plan that will be implemented with local and state emergency responders and officials
- EH&S will implement Emergency Action Plan
- For small spills or releases on roadways, CCR may be cleaned up with heavy equipment
 - May also use water truck and hoses to control dust

Training

Response to a Medical Emergency

- CWLP employees are trained annually on responding to medical emergencies
- Many are also trained on CPR/AED and First Aid
- Employees should call 911 immediately if emergencies are life threatening
 - Uncontrolled bleeding, unconsciousness, electric shock, etc.
 - CWLP employees should never transport a person with life threatening emergencies to a medical facility
 - Only transport out of the area of the scene is unsafe
- Also must call SOG with pertinent information
- For non-life threatening medical needs, contact SOG with pertinent information and follow accident and reporting procedures

Training

Occupational Safety and Health Standards in 29 CFR 1910.120, 1926.65 and OSHA 10-hour or 30-hour construction safety training;

- CWLP employees engaged in work at the ash ponds have received HAZWOPER training are designated first responders in a HAZMAT situation
- CWLP employees engaged in work at the ash ponds have also received the 10-hour construction safety training
- Contract workers and third-party contractors will be required to be trained under their respective employers' programs before engaging in work at the facility

Training

Information about chemical hazards and hazardous materials at the site

- Surface impoundments have been historically operated to store bottom ash, fly ash and flue gas desulfurization wastes
- These materials are at the facility in solid form, in airborne respirable dust and in waters that have come into contact with CCR
- Can contain heavy metals such as arsenic, lead, mercury, cadmium, chromium and selenium
- Also contain aluminum, antimony, barium, beryllium, boron, chlorine, cobalt, manganese, molybdenum, nickel, thallium, vanadium, zinc
- Based upon exposure and route of entry, these substances have the potential to cause illness and disease.

Training

Information about chemical hazards and hazardous materials at the site

- Flue gas desulfurization wastes can contain arsenic, lead, mercury, cadmium, chromium and selenium
- Also contain aluminum, antimony, barium, beryllium, boron, chlorine, cobalt, manganese, molybdenum, nickel, thallium, vanadium, zinc
- Based upon exposure and route of entry, these substances have the potential to cause illness and disease.

Training

Information about chemical hazards and hazardous materials at the site

- Safety Data Sheets (SDS) have been developed for bottom ash, fly ash and flue gas desulfurization wastes
- SDS provides information on the properties and physical/chemical hazards of these substances
- SDS are available in the CWLP intranet site www.int.cwlp.com
- Hard copies are kept with the HASP
- Exposure to these materials can be reduced and/or eliminated through the use of engineering controls, administrative controls and personal protective equipment

Training

Use of engineering controls, administrative controls and PPE

- CWLP has developed several programs and procedures to reduce and/or eliminate employee exposure to contaminants in the work place
- These programs and procedures provide guidelines for housekeeping, work practice controls, engineering controls, administrative controls, respiratory protection and selection of personal protective equipment to further reduce employee exposure to hazardous conditions
- Contract workers and third-party contractors will be required to follow their respective employers' programs and procedures while engaged in work at the facility

Training

Engineering Controls

- CWLP has developed several engineering controls to reduce and/or eliminate employee exposure to contaminants in the work place
- Include use of water trucks and/or hoses to limit generation of airborne dust when excavating CCR materials
- Use of water trucks to wet roadways
- 10 mile per hour speed limit on roadways
- Authority to terminate work when airborne dust may be carried beyond work area or facility boundary

Training

Administrative Controls

- CWLP has developed several administrative controls to reduce and/or eliminate employee exposure to hazards and contaminants in the work place
 - CWLP Safety Manual
 - Emergency Procedures for Fire
 - Hazard Communication Program
 - Respiratory Protection Program
 - Arsenic Compliance Program
 - Beryllium Compliance Program
 - Respiratory Crystalline Silica Compliance Program
 - Hexavalent Chromium Compliance Program
 - Lead and other Heavy Metals Compliance Program

Training

Administrative Controls

- These programs and administrative provide guidelines for housekeeping, work practice controls, respiratory protection and proper selection of personal protective equipment to further reduce employee exposure to hazardous conditions.
- Contract workers and third-party contractors will be required to follow their respective employers' administrative controls while engaged in work at the facility.

Training

Personal Protective Equipment

- CWLP employees , contract workers and third-party contractors shall wear at a minimum OSHA Level D PPE while engaged in work at the facility
- Includes long sleeves and long pants, safety footwear that meets ASTM F2431-11, hard hat, safety glasses and leather or heavy cloth gloves as needed
- Respiratory protection will be provided to CWLP employees covered under the Respiratory Protection Program
- Contract workers and third party contractors must be covered by their respective employers' respiratory protection program
- Additional PPE identified through a JHA will be required while engaged in those specific work activities

Questions?