

Myers Industrial Construction Co., Inc.

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***“SERVING GEORGIA’S INDUSTRIES”***

**SAFETY  
AND  
CONDUCT  
HANDBOOK  
FOR GEORGIA POWER  
PLANT SCHERER**

Myers Industrial Construction Co., Inc.

**EMPLOYEE ACKNOWLEDGEMENT**

**OF RECEIPT OF HANDBOOK**

<b>EMPLOYEE:</b>			
<b>MYERS INDUSTRIAL CO. REPRESENTATIVE:</b>			
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<i>I acknowledge that I have received a copy of the Myers Industrial Construction Co., Inc. Handbook. I understand that the sole purpose of the handbook is to provide information about Myers Construction Co., Inc., and its policies and procedures.</i>			
<b>EMPLOYEE SIGNATURE</b>			<b>DATE</b>

# Myers Industrial Construction Co., Inc.

## *Introduction*

### **1. PURPOSE OF CONTRACTOR MANUAL**

This contract manual is provided to assist personnel in complying with the safety policies and procedures of Myers Industrial Construction Co, Inc. The safety of all employees is our highest priority. It is the Employee's responsibility to read and become familiar with this manual, and to comply with its contents.

**It is important to remember that no set of rules can cover all situations and therefore the rules contained in this manual must be interpreted as being only minimum guidelines. In some situations, more stringent procedures may need to be followed.**

If there are any questions regarding the interpretation or application of these rules or if there should be a situation not covered by these rules, discuss it with your supervisor or member of management.

### **2. MANAGEMENT CONTACTS**

Kenneth Kimsey	678-986-0689 or 770-550-9494
Martin Myers	770-550-9894 or 478-397-7344
Tommy Dean	478-954-1493 or 770-550-6544
Tim Hughes	770-550-6264

## *Security*

### **3. CONTRACTOR BADGE PROCEDURE**

1. New employees will be issued a badge when entering plant site on first day of employment. New employees will be required to show a picture ID (driver's license, etc.) to Security before a Badge will be issued. Employment will be verified by a list of employees of Myers Industrial Construction Company.
2. All Myers employees are required to badge in and out with a contractor ID badge.
3. When a Contractor badge is issued, it is the responsibility of the employee to have his/her badge when entering and departing site. Badges are a permanent issue and employees must have this badge with them any time they return for employment at a site.
4. The Contract employee will sign a form stating if he/she loses their badge, they will pay a replacement fee to obtain a new contractor badge. No Contract employee may start work without being processed and issued a contractor badge by the Security Department.
5. When a Contract employee who has been issued a contractor badge does not have his/her badge when entering plant site Gate #3, they will have two (2) options. They can either leave the Plant to get their badge or they may pay a \$20 fee to have another badge made.
6. As soon as possible, in the event of a derailment or other emergency, Myers Industrial will provide Security with a list of additional employee names (to include social security numbers) of employees who will be reporting to work.

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7. The Myers Superintendent will have to authorize all new or reactivated badges. Personnel listed on the Southern Company Barred List will not be allowed entry.
8. Loss of security badge may result in termination.

### **4. PLANT ACCESS**

1. Myers crew trucks will park in railroad maintenance crew lay down yard. All other contract personnel will park in the Contractor parking lot unless given permission to park in an alternate area.
2. On site driving passes will be issued by the Security Department. On site driving passes will be kept to a minimum.
3. Myers Industrial employees shall offer all packages, lunch boxes, coolers, etc. to the officers when requested for inspection. This applies to both in-coming and outgoing articles. Vehicles may be searched at any time on Plant Site.
4. Myers employees must adhere to all posted traffic signs on the plant premises.
5. Myers Employees must park vehicles only in designated parking spaces.

### **5. GENERAL SECURITY RULES**

1. Georgia Power locker rooms, restrooms, break rooms, cafeteria and electrical switchgear rooms are off limits to Contractors unless the work being performed is actually in these areas.
2. Contractors and their subcontractors are expected to remain in the vicinity of their work area unless official business requires them to be elsewhere.
3. The refusal of a Contractor employee to identify himself to Georgia Power Management or Security Officer when such a request is made will be construed as insubordination, and can be grounds for the employee's removal from Georgia Power's property.
4. Georgia Power Company is not responsible for lost or stolen items.
5. Any illegal activity coming to the attention of a Contractor or Visitor is to be reported to Georgia Power for investigation and documentation.
6. Contractor's hardhats, toolboxes or equipment **shall not display any decals or banners** with the exception of employee's name and number, company name or union affiliation or US flag.

### **6. DRUGS AND ALCOHOL POLICY**

1. Employees shall not use, possess, or distribute in any fashion any controlled substances.
2. Employees shall not come upon plant property under the influence of alcohol or any controlled substance.
3. All new employees must submit to drug testing prior to first day of employment.
4. Random drug testing will be done no less than, but not limited to, two times per year.
5. Failure of any drug test will result in immediate termination of employment.
6. Any incident or accident that leads a supervisor to suspect drug or alcohol use will cause the employee to be tested. A positive test will result in immediate termination.

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7. If, during a search by plant security, any alcohol or drugs are discovered, the employee will be fired on the spot with possible arrest to follow.
8. Employees taking prescription medication must notify their supervisor if the drug has warnings concerning ability to work or operate equipment.
9. While alcohol is acceptable for personal use at home and away from work, it is strongly advised that employees use moderation so that the effects do not spill over into the next day at work.
10. Employees, while on call, should not consume alcohol.

### *Warehouse*

#### **7. WAREHOUSE PROCEDURE**

1. No Contract personnel are allowed in warehouse.
2. To be issued parts, Contract employee must have a work order number.
3. Any material to be returned must have Material Return Slips filled out.

### *Safety & Health*

#### **8. GENERAL RULES OF CONDUCT AND SAFETY**

1. Work sites shall maintain an atmosphere free of harassment. **Myers Industrial Construction Co. shall not condone any hostile or offensive behavior such as hangmen's nooses; confederate flags, gang signs, racial or ethnic graffiti or offensive acts related to gender, religion or national origin.** All employees shall be "fit for duty."
2. No conduct, whether listed or not, will be tolerated if it is inconsistent with local, state, or federal law, federal regulations.
3. The general rules of conduct and safety are applicable to all construction projects and maintenance work.
4. Any person who violates any rules of conduct or safety rules is also subject to prosecution under state or federal law, where applicable.
5. There may be other unforeseen circumstances that would constitute a person being terminated or barred from the work sites. These will be looked at on an individual basis. Each case will be judged on its own merit.
6. Each plant has its own set of rules and regulations that all new employees must read and sign. These rules are consistent from plant to plant.
7. Absolutely no fighting. Any employee instigating a fight will be fired on the spot and escorted off plant site. If employee is asked to leave and refuses, plant security will escort individual away from plant with possible arrest to follow.

#### **9. MANLIFT POLICY**

1. The manlifts at Plant Scherer are to be used for transporting personnel only. Personnel using the manlifts must be trained in manlift operation and use.

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2. No tools, packages, or material of any kind shall be carried on the manlifts.
3. All persons riding the manlift must face the belt and use the handholds.
4. To stop the manlift, in an emergency, pull the rope in the direction of travel.
5. Always get on and off the manlift when the step is level with the floor.
6. Always ride the manlift facing the belt, holding the handle with both hands.
7. No horseplay is allowed while riding the manlift.
8. If the manlift stops, use emergency stop rope to insure the manlift does not start while you are climbing onto the emergency exit ladder.

**These safety requirements must be followed by all personnel.**

### **10. ACCIDENT INVESTIGATION PROCEDURE**

An accident Investigation Report **must** be completed when an employee suffers an OSHA Recordable Injury -- either *Medical Treatment* cases or *Lost Workday* cases. All Accident Investigation Reports must be completed and sent to the Myers Supervisor within 48 hours of the incident.

### **11. MORNING BRIEFING & SAFETY MEETING**

Employees are required to meet each morning to discuss plans for the days work. Topics of discussion during these meetings may include: safety equipment, safe work practices, housekeeping and any safety problems that have occurred during the course of the job. Employees may also be given an opportunity to discuss any safety concerns they may have regarding their personal safety or the safety of others.

### **12. TRACK LOCKOUTS**

Mandatory for all track work:

When working on track or track ROW employees are required to lockout both ends of the section of track being worked on at the nearest switch. When switches aren't available the crew has the option of installing temporary de-rail devices or simply maintaining constant radio contact with TSI / Railcon and trestle tower. Locations of work site for the day will either be posted or verified by radio contact with proper rail officials at plant prior to work commencement.

### **13. HOUSEKEEPING**

1. All work sites are to be maintained in a clean, safe, and orderly fashion.
2. All materials, tools and equipment must be stored in a stable manner (tied, stacked, or chocked) to prevent them from rolling or falling.
3. Hoses, electrical cords, welding cables and the like must not be left on stairs, ladders, or walkways, nor may they be left in any place which causes a hazardous condition.

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4. The area used by contractors for lunch and breaks must be cleaned daily of all cans, bags, and other debris. GPC break rooms, electrical substations, transformer rooms, control rooms, etc. are not to be used by contract employees for lunch or break areas.

### **14. PROPER APPAREL**

#### **REQUIRED – NO EXCEPTIONS:**

Steel toed boots – furnished by employee  
Hard hats – furnished by Myers Industrial Co.  
Florescent safety vest – furnished by Myers Industrial Co.  
Gloves – first pair (every six months) by Myers Industrial Co.  
Safety Glasses – first pair (every six months) by Myers Industrial Co.  
Ear Plugs – furnished by Myers Industrial Co.

#### **FORBIDDEN – NO EXCEPTIONS:**

Loose clothing, jewelry – excluding wedding rings

### **15. EQUIPMENT CLEARANCES**

All plant equipment clearances are issued and obtained through plant Shift Team Leaders, Coal Handling Team Leaders, or Laboratory Team Leaders. Sub clearances on an equipment clearance are issued to the **Contractor's Coordinator** requesting the clearance. Contract Maintenance foreman/personnel will work under these stated sub clearance holders.

**NO WORK IS TO BE PERFORMED IN/ON EQUIPMENT**

**UNLESS THAT EQUIPMENT IS COVERED BY**

**AN EQUIPMENT CLEARANCE SHEET & THE PROPER SUB CLEARANCE IS OBTAINED.**

### **16. CONFINED SPACES**

1. Prior to beginning work in a permitted confined space, the Myers Industrial Supervisor shall obtain an Evaluation Worksheet from a Georgia Power Company representative.
2. Myers Industrial must coordinate all permit required confined space entry with a Georgia Power Contractor Coordinator. The contractor will inform Georgia Power of the permit space entry program that the contractor will follow. This program must meet OSHA 1910.146 guidelines.

### **17. EMERGENCY EVACUATION**

Each plant site has evacuation procedures and alarm sounds for different types of emergencies and disasters, i. e. ammonia leaks. All employees are required to read and sign explanation sheets regarding these procedures upon initial entry to plant. In the event of an evacuation, all employees of Myers Industrial Construction Co. are to meet at a predetermined location outside of the plant. Most of these meeting points are the nearest commonly frequented store where ice and fuel are purchased outside of the plant.

## **18. FIRE EXTINGUISHERS**

Fire extinguishers will be maintained in all vehicles and equipment.

## **19. FIRE EMERGENCY**

Everyone working at work sites is responsible for reporting fires and other emergencies. On detecting a fire emergency **IMMEDIATELY** get out of danger and report fire location.

The fire emergency alarm is a siren type sound broadcast over the plant public address system. If a fire emergency is such that a plant evacuation is required, the emergency evacuation alarm will be activated and voice instructions will instruct plant personnel to report to their assigned safe refuge area (probably outside). In a *Fire emergency* if you are in the area, move to safety.

## **20. FIRE PROTECTION PROCEDURES**

- When welding and cutting permits and log sheets are removed from work area they should be logged back into the appropriate welding and cutting permit logbook.
- Fire blankets must be used to prevent sparks or molten metal from falling below.
- Welding rods must be kept in a proper container and used welding rods should be put in a bucket or can and not allowed to fall through the grating.
- Welding areas must be kept free of any aerosol cans.
- All oxygen and acetylene hose shall have flash arrestors installed on gauges and torch.

**NOTE:** *This will not be necessary if torch s/n has a "C" designation after it. This means the check valves are built-in.*

- All possible precautions must be taken to prevent fire and slag from falling below the work area. Cable trays must be located and protected.
- Fire hose and standpipes are for fires only, and not to be used on any other assignment.
- All hot work permits are to be followed by an 8 hour fire watch

## **21. BARRICADING PROCEDURE**

The following procedures shall be followed in roping-off, barricading or safeguarding hazardous areas, operations, or pieces of equipment such as:

### 1. Working Overhead:

Where working overhead creates a hazard to passers-by due to the possibility of falling material or tools. The affected areas shall be barricaded with barricade tape and a person stationed in the area to assure non-admittance of unauthorized personnel.

### 2. Overhead Material Handling:

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When using cranes to handle material while over doorways, roads, etc. The affected areas shall be barricaded with barricade tape and a person stationed in the area to assure non-admittance of unauthorized personnel.

### 3. Hazardous Areas or Equipment:

Acid cleaning, chemical leaks, equipment with guards removed, etc. These areas shall be barricaded with barricade tape and a person stationed in the area to assure non-admittance of unauthorized personnel.

### 4. Hazardous Conditions:

Where grating is removed, or where there are open manholes, excavations, x-ray operations, or the like, the surrounding area shall be barricaded. Where there is a danger of a person falling through an opening, the surrounding area shall be barricaded so as to prevent an average-sized person from falling through the opening.

If a barricade must be removed to perform a task, a person must be stationed in the area to assure non-admittance of unauthorized personnel.

Contractors shall limit barricaded areas as much as is safely possible so as to minimize the impact to plant operations. Barricade tape is stocked in the tool room.

All unattended barricades must be labeled with responsible department / contractor placing the barricade, date, reason, and estimate of date to be removed.

## **22. COMPRESSED AIR**

Contractors shall ensure that their employees use compressed only for the purpose for which it was designed to be used. Do not use open ended air hose for blowing off clothing.

## **23. COMPRESSED GAS CYLINDERS**

1. All gas cylinders *must be* clearly labeled.
2. *Do not* remove the valve protection cap from the cylinder until ready for use.
3. Cylinders *must be* properly secured while in storage, transit or use.
4. Cylinders *must be* stored in the upright position.
5. Non-flammable gases *must be* separated or protected from flammable gases in storage.
6. *Never* use or transport an acetylene cylinder in the horizontal position.
7. All oxy-acetylene regulators *must be* equipped with reverse flow check valves connected to the regulator.
8. At the end of each workday, oxygen and acetylene cylinders that are on carts and are being used daily need *not be separated*. However, they must be stored in a safe area away from other stored cylinders.

## **24. ELECTRICAL EQUIPMENT**

(*Electrical cords, welding, leads, etc.*)

1. Electrical cords or cables furnishing power to portable electrical equipment shall not contain splices or damaged insulation

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2. Do not leave cords or cables in areas where they could be damaged or would present tripping hazards (e.g., on stairways, aisles, doorways, or where heavy objects rest on or could fall on the cord).
3. Do not allow cords or cables to lie in puddles of water.
4. Temporary lighting shall be suspended high enough off the floor to provide sufficient clearance to accommodate individuals and any tools or equipment they may be carrying.
5. Temporary electrical wiring, extension cords, and welding leads shall either be covered or elevated to protect them from damage.
6. Ground fault circuit interrupter (GFCI) should be used with extension cords.

## **Environmental**

### **25. Hazard Communication Plan**

Myers Industrial is licensed by the Georgia Dept. of Agriculture as a Right of Way (ROW) pesticide applicator operating under the license of Martin (Marty) G. Myers, License # 03176 effective date 8/11/2003 thru 8/11/2008. Marty Myers has been designated at the Hazard Communication Program Coordinator for Myers Industrial. Tommy Dean has been designated as the Plant Scherer specific coordinator reporting directly to the program coordinator.

#### **A. Chemical Inventory**

1. All work areas will keep a current and up-to-date chemical inventory of chemicals used or stored.
2. Inventories will be updated annually, at a minimum, or more frequently if quantities or operational uses change significantly.
3. The information will include: The name of the chemical (as it appears on the MSDS); quantity on hand; and if the MSDS is on file.
4. A copy of the current inventory from each work area will be given to the Plant Scherer Health and Safety Officer for incorporation into the plant-wide chemical inventory.

#### **B. Container Labels**

1. All chemicals will be stored in original containers with the manufacturer's label attached.
2. Small quantities intended for immediate use may be placed in a container without a label, provided the individual using the unmarked container keeps it in their possession and the product is used up during the work shift or properly disposed of at the end of the work shift.
3. Manufacturers' labels are to be maintained on all containers. In the event a label becomes damaged, removed, or unreadable, the container will be labeled immediately with the contents of the container, the manufacturer's name and address, and a statement of health effect of overexposure. The MSDS will be used to aid in correct and complete labeling.
4. Unmarked containers will be brought to the attention of the Supervisor or Health and Safety Officer, and may not be used.

#### **C. Material Safety Data Sheets**

1. MSDS will be available to all employees during their normal working hours in their work areas and at a central location with Plant Security, Health and Safety Officer, and Central Purchasing.
2. Whenever chemicals are ordered, whether for restocking or new procurement, the MSDS will be requested on the purchase order.
3. The MSDS of restocked chemicals will be reviewed against MSDS on file for any information change. If there is a change in information, the most current MSDS will be copied, filed as required, and the outdated MSDS removed and disposed.

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4. Incidental purchases will include a request for the MSDS and copies will be provided, when received, to the work area, Health and Safety Officer and the master file at Plant Security and Central Purchasing.

### **D. Employee Training**

1. Employee training will be conducted annually.
2. New hires will be given HAZCOM training as part of their orientation and indoctrination. Session to be available monthly.
3. Training for Supervisors will be conducted quarterly.
4. Employee training will consist of but not be limited to:
  - o Goals of the Right-to-Know/Hazard Communication Standard
  - o Definition of a hazardous substance.
  - o Identifying hazardous substances.
  - o What is a chemical inventory list?
  - o How to read a Material Safety Data Sheet.
  - o Appropriate work practices.
  - o Emergency procedures.

## **26. HIGHLY HAZARDOUS CHEMICALS**

### **System Overview**

The process that uses highly hazardous chemicals currently includes Georgia Powers's chlorine system for application in the service water and the water treatment plant. The chlorine is used as a biocide for the service water system, water treatment plant, 1&2 circulating water system and 3&4 circulating water system. Chlorine gas is heavier than air and travels as a green cloud in high enough concentrations. This gas is a respiratory irritant and can be detected by odor in concentrations as low as 1-3 ppm. Large concentrations cause a severe irritating effect on the respiratory system, eyes and skin. An MSDS may be accessed through 3E or by contacting the Plant Compliance Team.

Only authorized personnel should be in these chlorination areas. If there is an emergency, dial 5555 on any Plant phone to report a problem and the Emergency Response Team will respond. Follow the emergency evacuation procedure in the event of an emergency. Contact the Plant Compliance Team in regards to any questions concerning chlorine on site.

### **Process Safety/ Risk Management Plan**

Due to the quantity of chlorine to be maintained on site, OSHA's Process Safety Management (PSM) of Highly Hazardous Chemicals, 29 CFR 1910.119, applies to the chlorine storage and application system. A site PSM/ RMP program has been developed to comply with all applicable regulations. A copy of the PSM/ RMP Program Document is available in the Environmental/ Compliance Team office for your review upon request.

## **27A. SPILLS: CHEMICAL, HAZARDOUS WASTE, OIL**

All contractors working at plants are responsible for reporting leaks, suspected leaks or spills of ANY volume of oil, lubricants, hazardous materials or chemicals. They are expected to give technical or manual assistance to contain or control a spill until relieved by plant personnel.

In the event of a spill, the individual detecting the spill is to notify their supervisor or a Compliance Team member or plant security and give the following information:

- Individual's name, contractor's name and present location
- Type and location of spill (especially in relation to yard drains)

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- Estimate of quantity or extent of spill

The individual should remain at the spill site until relieved by plant personnel, unless there is a risk of personal safety. If it is not safe to remain at the spill site, they should station themselves in a safe location where they can direct plant personnel to the spill site.

### **27B. HANDLING HAZARDOUS WASTE**

If you deal with hazardous materials, or use products that may become a hazardous waste, please follow these steps, and contact the Compliance Team at any time:

- Ensure that all containers of known materials are labeled to prevent mistaken identity of the material and the possibility of it becoming an unknown hazardous waste.
- It is the goal to keep hazardous waste generation to a minimum. When possible opt for an environmentally friendly product. (i.e. high flash point mineral spirits).

### **28. USED OIL OR PETROLEUM PRODUCTS**

The following may be placed in the used oil tanks: used motor oil, hydraulic fluid, diesel fluid, turbine oil, brake fluid and mineral spirits.

Other materials that could possibly contaminate the oil and render it non-recyclable **SHOULD NOT** be placed in the used oil tanks are: paint waste, gasoline, ethylene glycol (anti-freeze) water, dielectric fluid and chlorinated solvents.

Contact the Compliance Team if you have a question about proper disposal of used oil.

#### **MANAGEMENT OF USED OIL DRUMS**

Contractors who need to store used oil or collect used oil, shall contact a member of the Compliance team at extension 3761 or 3762 for the proper commodity # for the 55 gal. Drum or for a used drum.

**Filling the Drum:** Never completely fill a drum. Leave at least two (2) inches for expansion.

**Labeling:** When oil is first placed in drums, stencil or label the drums "Used Oil". A Used Motor Oil label may be used. Contact the Compliance Team for labels.

**Disposal:** Once drum is full, move the drum to one of the oil storage sites (outside maintenance shop or near pulverizers on Unit 1 & 2 and Unit 4. Contractor should then call the Compliance Team so that the drum can be tested for chlorinated solvents. The Compliance Team will arrange for full drums to be pumped into the mobile tank.

#### **PETROLEUM SPILLS:**

1. Eliminate sources of ignition: open flames, smoking materials, sparking tools, electrical sparks, gasoline engines, etc.
2. Ventilate the area.
3. Keep fire extinguishers available and ready to use.

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4. Stop the source of the spill: shut off equipment, close valve, set container upright, plug leak, etc.
5. Contain the spill:
6. Build a dike or berm using absorbent materials.
7. If material is leaking from a 55-gallon drum, pump the oil into a drum in good condition.
8. If spill is moving rapidly over a large area and cannot be contained, give first priority to protecting drains and waterways.

### **29. LEAD ABATEMENT PROGRAM**

While the normal maintenance contract Myers Industrial performs for Plant Scherer would not involve contact with surfaces, or more specifically – disturbing surfaces, coated with lead based material.

The following guidance is intended to provide background information about lead based paint hazards in coated surfaces and structures at Plant Scherer

Lead hazards are regulated by the Environmental Protection Agency (EPA) not the Department of Ecology or the EPA's Hazardous Waste Program.

The tests are different than the tests required for lead designation under the dangerous waste rules (the Toxicity Characteristic Leaching Procedure (TCLP) or the Toxic Criteria tests). However, the sample collection guidance together with advice from the laboratory that will be performing the tests may help the dangerous waste generator to develop a representative sampling plan for non-residential wastes.

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#### ***Current EPA Guidance***

##### **The Regulatory Definition of Lead Based Paint**

Lead-Based Paint (LBP) is a term used by the EPA's Toxic Substances Control Act (TSCA) program. It defines paint with lead levels equal to or exceeding 1.0 milligram per square centimeter (1mg/cm<sup>2</sup>) or 0.5 percent by weight. Lead-based paint is not a term used by the Dangerous Waste program because the program only regulates lead if there is to leach 5.0 or more milligrams per liter on a TCLP Test - a different method of measurement. (Section 302(c) of the Lead-Based Paint Poisoning Prevention Act)

##### ***Sampling and Testing Methods***

###### **Dust Wipe Sampling and Testing (Dust Lead Loading)**

Wipe samples have two uses:

- to find the amount of lead in the dust on a surface, and
- as clearance samples to show that surfaces were thoroughly cleaned after a lead abatement or lead disturbance.

Wipe samples can't find or measure lead within a layer of paint - only loose dust.

**Note!** Hazardous and Dangerous Waste regulations don't allow wipe sampling to substitute for the TCLP test or state criteria tests.

Lead levels measured by wipe samples depend on two factors:

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- the amount of collectable dust on a surface, and
- the concentration of lead in that dust.

Wipe methods are not recommended for highly textured surfaces such as brickwork and rough concrete.

### Lab Tests of Dust Samples:

Analyze dust samples using a laboratory recognized by EPA pursuant to Section 405(b) of the Toxic Substances Control Act (TSCA) as being capable of performing analyses for lead compounds in dust samples.

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### Paint Chips Sampling and Testing

Paint chip samples show the amount of lead in paint. There are two tests:

- Atomic Spectrometry shows the volume/or weight of lead in a paint sample, and
- the Toxicity Characteristic Leaching Procedure (TCLP) test determines how the lead would leach out in a landfill.

**Note!** Hazardous and Dangerous Waste regulations don't allow chip sampling by Atomic Spectrometry Techniques to substitute for the TCLP or state criteria tests. However, paint chip test results can be used to screen areas for TCLP or state criteria testing.

There are two ways to sample paint on a substrate:

- collect a paint chip sample and test it in a lab, or
- measure lead on a painted surface on the spot with a portable [XRF instrument](#).

### How to Collect Paint Chip Samples:

A standard method for collecting paint chip samples should be followed. Examples are:

- ASTM E 1729, *Standard Practice for Field Collection of Dried Paint Samples for Lead Determination by Atomic Spectrometry Techniques*
- The paint chip collection protocol in *Appendix 13.2* of the 1995 HUD Guidelines.
- ASTM E 1645, *Standard Practice for the Preparation of Dried Paint Samples for Subsequent Lead Analysis* by Atomic Spectrometry, is a related standard that may also be consulted regarding the preparation of paint chip samples for laboratory analysis.
- Substrate correction should be done when recommended.
- Collect paint chip samples for laboratory analysis where the XRF reading would be suspect or inconclusive.

### Soil Sampling and Testing

Disturbed soil may release lead into the air and directly contaminate the shoes and clothing of construction workers or neighborhood children who play in the bare soil.

**Note!** Soil does not need to be sampled for Hazardous or Dangerous Waste regulatory purposes unless it will be removed (generated) for off-site disposal during site preparation or excavation.

Only areas of bare soil are considered likely lead health hazards, concrete or sod keeps soil in place unless it is disturbed.

Lead contaminated soil is a major reservoir of lead in the environment. Soil has been contaminated with lead from many years of airborne particulate fallout from automobile exhaust, from industrial sources, and from the extensive use of lead-based paint on residential housing and other structures.

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Lead contamination from weathering of lead painted building exteriors will be concentrated close to the building and along the building perimeter. Lead contamination from airborne sources such as industrial discharges may be spread about the property. Lead from auto exhaust will be concentrated close to past or current traffic areas and will decrease away from the traffic areas.

### **30. EROSION AND SEDIMENT CONTROL**

It is company policy to utilize sound conservation and engineering practices to prevent or minimize erosion and resultant sedimentation in association with all company land-disturbing activities.

### **31. WASTE DISPOSAL**

The following information concerns waste disposal:

#### **55 GALLON DRUMS**

**Empty non-hazardous metal drums should be emptied as completely as possible and labels removed. The drums may then be crushed and recycled as scrap metal; returned to the vendor for credit (example: white C & C Oil Company drums), or reused on site. They cannot be disposed of in our on-site landfill.**

**If you need a drum for used oil or other fluids contact someone on the Compliance Team, and instead of going to the warehouse and getting a new drum, we will help you locate a used drum and give you a proper label.**

#### **PAPER WASTE**

Recyclable paper receptacles are readily available. There are large cardboard boxes outside the warehouse for collection of this paper.

#### **CORRUGATED BOXES**

Break down corrugated boxes until flat. These boxes should be placed in the cardboard baler located on the warehouse loading dock.

#### **WOOD**

Scrap wood is accumulated and stored either at the construction laydown yard below the landfill or pallets may be stored next to the large concrete warehouse. ONLY scrap wood (example: used lumber) should be put on the pile at the laydown yard. No other waste should be disposed of in this area. For access to this area contact the Compliance Team.

**Do not put creosote or pentachlorophenol treated lumber in the scrap woodpile. This lumber cannot be burned. If there are cross ties that cannot be reused they must be disposed of in a special off site landfill.**

#### **METALS**

Scrap metal should be separated and placed in the bins that are provided throughout the plant and between the Unit 1 and 3 precipitators.

#### **ANTI-FREEZE**

Waste anti-freeze must be recycled. Contact a Compliance Team member if you have waste anti-freeze.

#### **ASH, REFRACTORY, COAL BY-PRODUCTS**

## Myers Industrial Construction Co., Inc.

These materials may be disposed of in the ash pond as long as there is no other waste in this material. All other waste material must be removed before disposing of these materials in the ash pond.

### **LEAD-ACID BATTERIES**

These batteries can be returned to the vendor for credit toward the purchase of a new battery. Contact a Compliance Team member.

### **NICKEL-CADMIUM BATTERIES**

Return these batteries to the Compliance Team office for proper disposal.

### **MERCURY OR MERCURY CONTAINING ITEMS**

Return these items to the Compliance Team office for proper disposal.

### **DRAINS OR SEWAGE TREATMENT WASTE (PLANT RESTROOMS)**

Do not flush any of the following materials down any drain or toilet: reinforced paper towels, rag on the roll, cloth rags, ear plugs, women's sanitary products. Sewage disposal system consists of package sewage treatment plants, and they are not designed to handle these waste products.

### **UNKNOWN OR QUESTIONABLE SUBSTANCES OR WASTES**

Contact a Compliance Team member so that substance or waste can be sampled and analyzed to insure proper disposal.