

SOIL AND GROUNDWATER REMEDIATION PROJECT SITE SPECIFIC HEALTH AND SAFETY PLAN (HASP)

Prepared for the U.S. Department of Energy
Assistant Secretary for Environmental Management

Contractor for the U.S. Department of Energy
under Contract DE-AC06-08RL14788



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SOIL AND GROUNDWATER REMEDIATION PROJECT SITE SPECIFIC HEALTH AND SAFETY PLAN (HASP)

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1.0 PURPOSE

29 CFR 1910.120, Hazardous Waste Operations and Emergency Response (HAZWOPER), requires the development and implementation of a written Safety and Health Program for employees involved in hazardous waste operations (29 CFR 1910.120(b)). The Price Anderson Amendments Act (PAAA) at 42 USC 2282c directed the US Department of Energy (DOE) to promulgate the regulation at 10 CFR 851 to protect the health and safety of workers employed by DOE contractor companies, and 10 CFR 851.23(a)(3) incorporates by reference the 29 CFR Part 1910 requirements. These requirements are met through CHPRC's Company Level Health and Safety Program, which includes all procedures for Occupational Safety and Industrial Hygiene and aligns with PRC-MP-SH-32219, *10 CFR 851 CHPRC Worker Safety and Health Program Description*.

29 CFR 1910.120 is also incorporated by reference in the CERCLA National Contingency Plan at 40 CFR 300.150, which governs the safety of workers conducting CERCLA response actions, and it parallels the requirements for worker safety in the RCRA regulations governing TSD facilities at 40 CFR Part 264 and 265.

One of the elements that is required to be included as part of the written Safety and Health Program is a Health and Safety Plan (HASP). A HASP is an extension of a company's overall safety and health program and is utilized to protect employees at a specific site. The required elements of a HASP (per 29 CFR 1910.120(b)(4)(ii)) are:

- A safety and health hazard analysis identifying hazards and their mitigations;
- Employee training assignments;
- Personal protective equipment to be used by employees for tasks and operations;
- Medical Surveillance requirements;
- Frequency and types of air monitoring, personnel monitoring, and environmental sampling techniques;
- Site control measures;
- Decontamination procedures;
- Emergency response plan, including necessary PPE and other equipment;
- Confined space entry procedures; and
- Spill containment measures.

This document identifies how the Soil and Groundwater Remediation Project (S&GRP) meets each of the above required HASP elements.

2.0 HAZWOPER APPLICABILITY TO S&GRP

Those processes that involve the removal, characterization, and treatment of waste at the S&GRP are considered HAZWOPER activities. This would include the characterization and remediation of hazardous waste sites (e.g., landfills, burial grounds, trenches, and contaminated soils). It would also include the characterization, removal, and treatment of subsurface water or air. Characterization and removal of contaminated water or air at S&GRP is via the site wells, therefore any activities (e.g., drilling, development, maintenance, sampling, pumping, etc.)

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conducted by the Project at these wells would be considered HAZWOPER. One of S&GRP's primary functions is to remove contaminated air and water from the subsurface and treat in their Pump and Treat facilities. All these treatment processes are considered HAZWOPER. This would include sampling, maintenance, or any other intrusive activities into the systems that deliver or treat this waste. This HASP applies to each phase of site HAZWOPER activities.

Non-HAZWOPER work activities are those that do not occur at a Hazardous Waste Site and do not potentially expose personnel to hazardous contaminants. Thus activities conducted in S&GRP offices, warehouses, and shops where contaminants do not exist are not considered HAZWOPER.

Even though the Pump & Treat Facilities are not permitted under *Resource Conservation and Recovery Act of 1976* (RCRA), S&GRP considers them Treatment Storage and Disposal Facilities (TSDs). TSDs have both HAZWOPER and non-HAZWOPER type work activities. Work activities involving the treatment systems within a Pump & Treat are considered HAZWOPER. Activities at the facility that is not associated with the hazardous waste would not be considered HAZWOPER.

S&GRP does not consider the follow activities as HAZWOPER:

- Shipment of materials (supplies, chemicals, etc.) that are delivered to project sites or facilities where there is no access made into a Hazardous Waste Site.
- Construction activities that involve excavating through non-hazardous waste sites.
- Construction/remodeling activities that modify the structure of a Pump & Treat but does not involve intrusive activities into the treatment system.
- Installation of a clean/unused treatment component prior to tie-in into the existing treatment system. Tie-in activities would be considered HAZWOPER.
- Maintenance activities done on non-waste systems (e.g., eyewashes, lighting, etc.) inside S&GRP Pump & Treats.

3.0 SAFETY & HEALTH HAZARD ANALYSIS

All S&GRP field activities are conducted either via a work package, a procedure, or a statement of work (SOW). Work package documents are developed in accordance with PRC-PRO-WKM-12115, *Work Management*, and PRC-GD-WKM-12116, *Work Planning Guide*. Procedures are developed in accordance with PRC-PRO-MS-589, *CH2M HILL Plateau Remediation Company Procedures*. SOWs are developed in accordance with PRC-PRO-AC-40480, *Acquisition Planning*, and PRC-PRO-SH-40078, *Contractor Safety Process*. Each of these processes requires a hazard analysis.

Project hazards are identified and evaluated per the Job Hazard Analysis Process dictated in PRC-PRO-WKM-079, *Job Hazard Analysis*. Typical Job Hazard Analyses that the Project utilizes includes General Industrial Hazard Analyses (GHAs); Craft Specific Hazard Analyses (CHAs); Automated Job Hazard Analyses (AJHAs); Worksite Hazard Analyses (WHAs); and Subcontractor Job Hazard Analyses (JHAs/JSAs).

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S&GRP documents their hazard assessment of industrial hygiene hazards via formal Industrial Hygiene Exposure Assessments. These hazard assessments are generated following the process outlined in PRC-PRO-SH-17916, *Industrial Hygiene Exposure Assessments*. Mitigative controls from these exposure assessments are incorporated into AJHAs, work packages, and procedures as appropriate.

S&GRP documents their radiological hazard assessments on Radiological Hazard Screening forms. This process is outlined in various procedures; PRC-PRO-RP-40109, *Radiological Work Planning*, SGRP-PRO-RP-50190, *SGRP Work Planning Process*, and PRC-PRO-RP-40021, *Radiological Work Permits*. Controls for these identified exposures are incorporated into procedures/work documents and the RWPs.

Appendix A contains a list of general hazards and their mitigations that can be encountered within the S&GRP. These hazards have been evaluated by Health & Safety and are considered “General” in nature meaning they are easily recognizable and mitigated by employee’s fundamental knowledge and training. General hazards are not typically included in work packages or procedures unless particular emphasis is needed.

4.0 EMPLOYEE TRAINING

The CHPRC training program ensures personnel are trained to safely, competently, and effectively perform their job function while protecting themselves, fellow workers, the public, and the environment. Personnel are trained to perform assigned tasks in accordance with federal, state, and local regulations, DOE directives, agreements, and management-directed training. The CHPRC training programs provide personnel with the training to meet the Integrated Safety Management System and Environmental Management System (ISMS/EMS) Guiding Principle of: Competence Commensurate with Responsibility. The CHPRC training program is described in PRC-MP-TQ-011, *CH2M HILL Plateau Remediation Company Qualification and Training Plan*. All employees exposed to hazardous substances, health hazards, or safety hazards and the site responsible managers receive the requisite training before they are permitted to engage in HAZWOPER activities.

CHPRC’s Training process requires the development of Individual Training Plans for all employees. These Individual Training Plans contain all initial and refresher training that is required for employees to perform their jobs safely and effectively. The Integrated Training Electronic Matrix (ITEM) provides management a method to track required training to ensure personnel remain current.

5.0 HAZWOPER TRAINING REQUIRMENTS FOR S&GRP

40-Hour Training and 3 days of documented field experience is required for activities where workers and supervisors regularly engage in the direct activity of hazardous substance removal or other hazardous waste related activities that may expose personnel to hazardous substances or health hazards. It is required by onsite management and supervisors who are responsible for directing workers. Health and safety professionals with on-site responsibilities for health and

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safety guidance also need this training. The following S&GRP Work Activities require 40-Hour Training:

- Characterization and remediation of hazardous waste sites (e.g., landfills, burial ground, trenches, and contaminated soils).
- Any activities conducted at well sites including drilling, development, maintenance, sampling, pumping, demolition, etc.

24-Hour Training and 1 day of documented field experience is required for workers who occasionally enter the hazardous waste activity area for a specific limited task and are unlikely to be exposed to hazardous substances greater than occupational exposure limits. The areas where these workers will work must be fully characterized to ensure no health hazards exist, no respiratory protection is required, and no possibility exists for an emergency arising.

24-Hour Training is also required for TSD (Pump & Treat) operations where hazardous waste work potentially exposes employees to hazardous substances or health hazards. Other work at a TSD that is not associated with hazardous waste would not require HAZWOPER Training. The following S&GRP Work Activities require 24-Hour Training:

- Pump and Treat Operations that treat contaminated subsurface air and/or water.

S&GRP does not consider the following activities HAZWOPER (no HAZWOPER Training is required):

- Shipment of materials (supplies, chemicals, etc.) that are delivered to project sites or facilities where there is no access made into a Hazardous Waste Site.
- Construction activities that involve excavating through non-hazardous waste sites.
- Construction/remodeling activities that modify the structure of a Pump & Treat but does not involve intrusive activities into the treatment system.
- Installation of a clean/unused treatment component prior to tie-in into the existing treatment system. Tie-in activities would be considered HAZWOPER.
- Maintenance activities done on non-waste systems (e.g., eyewashes, lighting, etc.) inside S&GRP Pump & Treats.

Visitors are not required to have HAZWOPER Training. S&GRP requires that visitors must be escorted by Project personnel while on site. Visitors are not allowed into contamination controlled areas or into areas where waste systems are breached. Visitors shall be briefed on the general hazards listed in Appendix A.

HAZWOPER Training needs are based on potential exposures to hazardous waste. Industrial Hygiene is responsible for evaluating work activities and determining HAZWOPER training needs.

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6.0 PERSONAL PROTECTIVE EQUIPMENT

As mentioned above, S&GRP evaluates safety and health hazards via the Job Hazard Analysis Process dictated in PRC-PRO-WKM-079, *Job Hazard Analysis*. This includes the determination of required PPE to safely perform work activities. PPE requirements are incorporated in hazard analyses (GHAs, CHAs, AJHAs, JHAs and WHAs), work packages, and procedures as appropriate.

General personal protective equipment requirements are outlined in PRC-STD-SH-40518, *Personal Protection*, and in program specific procedures such as those relating to respiratory protection, fall protection, hearing protection, radioactive contamination, and electrical safety. Minimum PPE requirements for S&GRP work activities are identified in S&GRP's general hazards (see Appendix A).

7.0 MEDICAL SURVEILLANCE

S&GRP uses the Employee Job Task Analysis (EJTA) system to identify medical surveillance requirements for their employees based on the job requirements, hazards, exposures, and overall risk associated with their assigned work scope. This process is detailed in PRC-PRO-SH-52755, *Employee Job Task Analysis*.

The EJTA includes medical surveillance requirements for specific work activities identified by Industrial Hygiene in their Industrial Hygiene Exposure Assessments as required by PRC-PRO-SH-17916, *Industrial Hygiene Exposure Assessments*.

8.0 MONITORING/SAMPLING

The frequency and types of air monitoring and sampling that is completed for S&GRP is detailed in their Industrial Hygiene Exposure Assessments and Industrial Hygiene Sampling Plans. Industrial Hygiene sampling/monitoring for the Project is conducted via an Industrial Hygiene Sampling Plan.

Industrial Hygiene Monitoring, Reporting, and Records Management are dictated by PRC-PRO-SH-409, *Industrial Hygiene Monitoring, Reporting and Records Management*.

Radiological monitoring performed by S&GRP is identified in Radiation Protection Technical Evaluations and includes contamination, dose rates, and air sampling surveys. The performance of radiological monitoring/sampling is conducted via company-wide instrument specific implementing procedures. Records generated from the radiological monitoring program are managed in accordance with PRC-PRO-IRM-10588, *Records Management Processes*.

9.0 SITE CONTROL

S&GRP evaluates safety and health hazards via the Job Hazard Analysis Process dictated in PRC-PRO-WKM-079, *Job Hazard Analysis*. This includes the determination of required site control tactics which limits access to potential exposures. Site control requirements (e.g., use of

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postings and boundaries) are incorporated in the Project's AJHAs, JHAs, work packages, and procedures as appropriate.

10.0 DECONTAMINATION

S&GRP evaluates safety and health hazards via the Job Hazard Analysis Process dictated in PRC-PRO-WKM-079, *Job Hazard Analysis*. This includes the determination of decontamination requirements. Decontamination requirements are incorporated into the Project's AJHAs, work packages, and procedures as appropriate.

11.0 EMERGENCY RESPONSE/SPILL CONTAINMENT

S&GRP utilizes Facility Emergency Response Information Boards (FERIBs) to communicate emergency response information to facility occupants. FERIBs are maintained per PRC-PRO-EM-7647, *Emergency Preparedness Program Requirements*. In lieu of FERIBs, there are Response Books located at each of the 100 Area Pump-and-Treats. These Response Books contain the same emergency response information as a FERIB. Emergency response actions for the 90-Day Accumulation Area are contained in HNF-IP-0603-GRP, *CH2M HILL, Soil and Groundwater Remediation Project Facility Response Plan for HS-00086 & HS-00087/200 W 90-Day Accumulation Area*.

Upset events within S&GRP that exhibit emergency conditions (e.g., fire, life threatening injuries, major spills, etc.) requires immediate notification and response of the Hanford Fire Department by calling 911 or (509)373-0911 (if using a cell phone). All upset conditions require notification of the Shift Office (Single Point of Contact) by calling 373-7207 or 373-7209.

Radiological/chemical hazard event response is governed by PRC-PRO-EM-40325, *Radiological/Chemical Hazard Event Response*.

Reporting, investigating, and managing health, safety and property/vehicle events are governed by PRC-PRO-SH-077, *Reporting, Investigating, and Managing Health, Safety and Property/Vehicle Events*.

S&GRP's response to abnormal odors is governed by SGRP-PRO-PM-50135 (GRP-PRO-044), *Abnormal Odor Response*.

Spill or leak response for the 100 Area Pump-and-Treats is governed by SGRP-PRO-OP-52729, *Spill or Leak Response for Pump-and-Treat Activities*. This procedure covers response to groundwater and chemical spills.

Spill or leak response for the 200-West Pump-and-Treat is governed by 2WPT-PRO-OP-7282, *Response to Groundwater, Process Solids and Chemical Spills and Releases at 200 West Pump and Treat Facilities*. This procedure covers response to groundwater, process solids, and chemical spills.

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12.0 CONFINED SPACES

All confined space work that is completed by S&GRP is done in accordance with DOE-0360, *Hanford Site Confined Space Procedure (HSCSP)*. Industrial Hygiene maintains an inventory of Project's confined spaces. Confined space controls that are needed to perform work safely are incorporated into the Project's AJHAs, JHAs, work packages, and procedures as appropriate.

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13.0 REFERENCES

42 USC 2282c, *Price Anderson Amendments Act*
10 CFR 851.23, *Nuclear Worker Health and Safety*
29 CFR 1910.120, *Hazardous Waste Operations and Emergency Response*
40 CFR 264 and 265, *RCRA Treatment Storage and Disposal Facilities*
40 CFR 300.150, *National Contingency Plan*
PRC-MP-SH-32219, *10 CFR 851 CHPRC Worker Safety and Health Program Description*
PRC-PRO-WKM-12115, *Work Management*
PRC-GD-WKM-12116, *Work Planning Guide*
PRC-PRO-MS-589, *CH2M HILL Plateau Remediation Company Procedures*
PRC-PRO-AC-40480, *Acquisition Planning*
PRC-PRO-SH-40078, *Contractor Safety Process*
PRC-PRO-WKM-079, *Job Hazard Analysis*
PRC-PRO-SH-17916, *Industrial Hygiene Exposure Assessment*
PRC-PRO-RP-40109, *Radiological Work Planning*
SGRP-PRO-RP-50190, *SGRP Work Planning Process*
PRC-PRO-RP-40021, *Radiological Work Permits*
PRC-MP-TQ-011, *CH2M HILL Plateau Remediation Company Qualification and Training Plan*
PRC-STD-SH-40518, *Personal Protection*
PRC-PRO-SH-52755, *Employee Job Task Analysis*
PRC-PRO-SH-409, *Industrial Hygiene Monitoring, Reporting and Records Management*
PRC-PRO-IRM-10588, *Records Management Processes*
PRC-PRO-EM-7647, *Emergency Preparedness Program Requirements*
HNF-IP-0603-GRP, CH2M HILL, *Soil and Groundwater Remediation Project Facility Response Plan for HS-00086 & HS-00087/200 W 90-Day Accumulation Area*
PRC-PRO-EM-40325, *Radiological/Chemical Hazard Event Response*
PRC-PRO-SH-077, *Reporting, Investigating, and Managing Health, Safety and Property/Vehicle Events*
SGRP-PRO-PM-50135 (GRP-PRO-044), *Abnormal Odor Response*
SGRP-PRO-OP-52729, *Spill or Leak Response for Pump-and-Treat Activities*
2WPT-PRO-OP-7282, *Response to Groundwater, Process Solids and Chemical Spills and Releases at 200 West Pump and Treat Facilities*
DOE-0360, *Hanford Site Confined Space Procedure (HSCSP)*

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14.0 APPENDIX A: S&GRP's GENERAL HAZARDS

Hazard	Mitigation/Control/Action	Discussion
General	PPE	<p>PPE that is required for field work (non-office) activities shall include:</p> <ul style="list-style-type: none"> • Safety Glasses with Side-Shields • Long Pants • Shirts with sleeves that cover the shoulder • Substantial Footwear <p>Note: Over the ankle boots are required when there is a potential for ankle sprains/strains due to uneven walking/working surfaces (e.g., large river rock)</p>
Dust from Windy Conditions (≥20 mph)	Dust goggles	Dust goggles are required for all outdoor activities whenever winds are sustained at 20 mph or greater.
Heat Stress	<ul style="list-style-type: none"> • Work/rest regimens • Buddy System • Provide fluids/water 	<p>Field Work Supervision is responsible for establishing work/rest regimens in accordance with PRC-PRO-SH-121, <i>Heat Stress Control</i>. Heat stress conditions should be considered whenever temperatures are greater than 80 °F or when personnel will be wearing additional layers of clothing (e.g., Tychem, Tyvek, or Work Coveralls). Industrial Hygiene should be contacted if assistance is needed in determining work/rest requirements. The Buddy System shall be used and</p>

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Hazard	Mitigation/Control/Action	Discussion
		fluids/water provided whenever heat stress conditions exist. Industrial Hygiene input is required whenever protective clothing is utilized to ensure that adequate mitigative controls are in place for heat stress.
Cold Stress	Appropriate cold weather clothing.	Personnel shall dress appropriately for working in cold conditions to avoid cold related illnesses or injury.
Contact with untreated or pH adjusted water	<ul style="list-style-type: none"> • Prevent Contact • 4-mil Nitrile or Surgical Latex Gloves • Wash when exposed 	Industrial Hygiene (IH)/Safety has evaluated the work activities associated with working with and/or around untreated or pH adjusted water and determined that the use of a Face Shield and/or Chemical Goggles is not required. Untreated and pH adjusted water is a hygiene concern. 4-mil Nitrile or Surgical Latex Gloves are required when there is a potential for coming into contact with untreated and/or pH adjusted water. If an individual comes in contact with untreated or pH adjusted water, action should be taken to wash the exposed area and replace wetted clothing.
Abrasion, laceration, cut, or puncture hazards to the hands	Cut/Puncture Resistant Gloves	Cut/Puncture Resistant Gloves are required whenever abrasion, laceration, cut, or puncture hazards are associated with the task such as when using sharp knives and tools. ANSI/ISEA-105 or

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Hazard	Mitigation/Control/Action	Discussion
		<p>BS EN388 criteria shall be used when assessing cut resistant qualities of a glove. Cut resistant gloves shall have a rating of 5 unless otherwise evaluated and approved by OS/IH. Puncture resistant gloves shall have a minimum rating of 4 unless otherwise evaluated and approved by OS/IH.</p>
Scrapes to the hands	Work Gloves	<p>Work gloves are required when there is a potential for scrapes to the hands. Cut or puncture resistant gloves are required whenever abrasion, laceration, cut, or puncture hazards are associated with the task.</p>
Foot injury due to falling or rolling objects	Safety Rated Footwear	<p>Required where there is a potential danger of foot injury due to the hazards of falling or rolling objects. Safety toed shoes or boots are required during the routine handling of hard-edged/solid objects near or above waist level that weigh more than 15 pounds and have the potential for falling onto the feet.</p>
High Noise	<p>Personnel shall wear hearing protection (ear plugs or muffs) with a NRR equal to or greater than 23 dBs.</p>	<p>Personnel shall wear hearing protection when working in high noise work areas. Hearing protection is required for all workers within 25 feet of activities involving pneumatic tool operations, power equipment operations, drills, hammer drills, saws,</p>

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Hazard	Mitigation/Control/Action	Discussion
		<p>grinders, etc.</p> <p>A good "rule of thumb" for determining if your work area or activity requires hearing protection is if you have difficulty hearing or understanding a "normal" tone of voice at a distance of about three feet, noise levels are probably exceeding safe levels.</p> <p>Personnel are required to wear hearing protection when noise levels are suspected of being high.</p> <p>Personnel are also required to request evaluation by Industrial Hygiene when unevaluated noisy conditions are encountered.</p>
Head injury due to falling or flying objects, or electrical shock or burns	Protective head gear (hard hat)	Personnel shall wear hard hats when working in areas where there is a potential for head injury due to falling or flying objects, or electrical shock or burns.
Head bump hazard	Bump Caps	Personnel may wear bump caps in those areas where the potential for striking one's head against fixed or low-clearance objects is present (e.g., piping/pipe hangers at pump and treat facilities)
Bomb Threat/Suspicious Object/Written Threat Letter	Notify Building Warden and Hanford Patrol	Bomb Threat/Suspicious Object/Written Threat Letter are to reported immediately to

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Hazard	Mitigation/Control/Action	Discussion
		the Building Warden (BW) and Hanford Patrol by calling 911 or (509)373-0911 (if using a cell phone). Personnel shall evacuate to an area 300+ feet upwind of the bomb/suspicious Object/Written threat letter. Written Threat Letter is to be handled as little as possible.
Hostage Situation/Armed Intruder	Notify Building Warden and Hanford Patrol	Hostage Situation/Armed Intruder is to be reported immediately to the BW and to Hanford Patrol by calling 911 or (509)373-0911 (if using a cell phone).
Range Fire	Immediately leave the area and contact Supervisor	In the event of a wildland/range fire, employees shall leave the area immediately and contact their appropriate Supervisor to report accountability and receive further direction.