Wisconsin Department of Natural Resources Superfund Site Integrated Assessment HEALTH AND SAFETY PLAN

April 30, 2015

- Site Name:Aniwa Arsenic SiteU.S. EPA ID#:WIN000505573Location:Tax Parcel ID#006192400000
SE1/4 of the NW1/4 Section 19, T29N, R11E, Shawano County
- **Directions to Site:** From Green Bay, WI, drive west on State Highway 29 to Wittenberg (approximately 61 miles). Then exit onto Highway 45 North and drive approximately 12 miles north to Marsh Road (between Birnamwood and Aniwa). Turn west onto Marsh Road and drive approximately 0.5 miles to the Site.
- Date of Removal: May 2015

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The designated work zones at the site are covered under the separate EPA Health and Safety Plan and will be explained by the EPA On-Scene Coordinator prior to DNR personnel entering the site.

ANTICIPATE

A. Objective

This plan was developed to help protect the health and safety of Department of Natural Resources (DNR) staff during their assistance to the Environmental Protection Agency (EPA) Removals On-Scene Coordinator (OSC) and EPA Removals Contractor during the removal that will be conducted at the Aniwa Arsenic Site in May 2015. EPA is the lead agency on the removal and is covered under a separate Health and Safety Plan. The primary purpose of this health and safety plan is to help DNR staff recognize and evaluate the chemical, physical, and biological hazards they may potentially encounter and implement controls to minimize the risks of these hazards.

B. Site Description and History

The Aniwa Arsenic Site is located on Marsh Road (address not specified; Parcel ID#006192400000), west of Highway 45, between the Towns of Aniwa and Birnamwood in Shawano County, WI. The legal description for the Site is T29N, R I IE, Section 19, SE1/4 of the NW1/4 in Shawano County.

The site is a 4.35 acre vacant lot that is heavily vegetated. It is located in a mixed residential and agricultural area between the Towns of Aniwa and Birnamwood in Shawano County, WI. The Site is bordered to the north by a marsh; to the east by farm land; to the south by farm land, woods, and a residence; and to the west by a State Recreation Trail (abandoned Chicago & NW Railroad line), with a residence beyond the trail, approximately 300 yards due west of the Site.

The Town of Aniwa purchased the property to use as a storage and distribution location for grasshopper pesticides in the 1930s. Arsenic-based pesticides were distributed by the United States Department of Agriculture and the Wisconsin Department of Agriculture at the time to control grasshopper infestation in potato crops. Records indicate that four types of arsenic pesticides were used during the 1930s. The most common type was sodium arsenite (NaAsO2), a white to grey powder that is highly water soluble. Other arsenic pesticides used at the time include arsenic trioxide (As2O3), copper acetoarsenite (C4H6O6Cu4As6), and lead arsenate (PbHAsO4). It is believed that the pesticides were stored in concentrations between 50%-90% pure. The pesticides were stored in a wooden shed (approximately 24'x12') at the Site and area farmers picked up a small supply for their use as needed. The farmers mixed the pesticides with molasses or sawdust and spread the mixture along the roadsides to attract grasshoppers from the fields.

The government recalled the arsenic pesticides after World War II; however, the pesticides stored at the Aniwa Site were not returned to the Department of Agriculture. The US Government prohibited the use of arsenic in and around homes in 1967.

In 1975, the remaining pesticide was buried in a pit approximately 8-10 feet below ground surface (bgs) adjacent to the storage shed. It is unknown how much pesticide remained and was buried at that time. A removal was completed in 1984 to remove the buried drums and surrounding contaminated soil. Post-removal data supports that a portion of the arsenic contamination source remains at the site.

C. Directions to Site and Site Access

Refer to Attachment 1 for directions to the site.

RECOGNIZE AND EVALUATE

D. Description of Work

The removal will consist of excavating and properly disposing surface and subsurface soils within the impacted area, collect and properly dispose contaminated groundwater generated during excavation activities (if applicable), field screen soil during the removal, sample to confirm extent of excavation, backfill the excavated area with clean material, and restore with a vegetative cover. Other actions include sampling of groundwater, surface water, sediment, and drinking water to assess environmental conditions before and after the excavation.

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(I) of the NCP.

All hazardous substances, pollutants, or contaminants removed off-site pursuant to this removal action for treatment, storage, and disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by EPA, with the EPA Off-Site Rule, 40 C.F.R. § 300.440.

E. Work Assignments and Training/Medical Exam Confirmation

All personnel working on-site shall have completed, as required, a minimum of 24 hours of health and safety training plus 1 day of supervised in-field training or 40 hours of health and safety training plus 3 days of supervised in-field training. Annual refresher training will also be completed as required. The following personnel will be working at the Aniwa Arsenic Site:

- Tauren Beggs (DNR Project Manager) and Kathy Sylvester (DNR Site Assessment Sample Custodian)
 - Assist the EPA Removals contractor as needed or requested by the EPA OSC.
- EPA OSC and EPA contractors are covered under a separate Health and Safety Plan.

F. Known or Potential Hazards and Risk Analysis

Attachment 2. Risk Analysis Work Sheets for each task, have been completed and are included with this health and safety plan.

Chemical:

Arsenic and lead are the primary contaminants that will be encountered in the media on-site. Soil data available for the site indicates arsenic and lead are present at the surface down to a depth of at least 12 feet at concentrations as high as 8,360 parts per million (ppm) and 143 ppm, respectively. Groundwater data available for the site indicates arsenic and lead are present at concentrations as high as 72,000 µL and 76 µg/L, respectively. Sediment and surface water have not been assessed, but may also contain arsenic and lead. Nitrate may also be encountered in media on-site. Nitrate was detected in groundwater as high as 15.60 mg/L.

Information regarding chemical preservatives can be found in Section I.

Physical:

Typical slip, trip, and fall hazards may exist; however, there is little relief across the site. These hazards can be magnified for work in the marsh. Any personnel working in the river will wear adequate protective clothing including a life preserver. Heavy equipment will be on-site during the excavation, loading, and transport of contaminated media.

Biological:

Several biological hazards may exist on the heavily wooded site, especially near the marsh on the north side; these include poison ivy, mosquitos, ticks, snakes, or threatening individuals.

G. Air Monitoring

There are no known hazards in ambient air. Ambient air will be monitored as necessary during the removal.

CONTROL

H. Selection of Personal Protective Equipment and Action Levels

All site personnel will be provided eye protection, inner and outer gloves, coveralls, boots, outer boot covers, hard hat, ear protection (if other equipment operating on site), waders, life preservers, and weather protection as needed.

I. Site Control Procedures

The risks involved in conducting this removal are considered minimal. Nevertheless, a system will be used to limit the potential of spreading contamination. This is covered in the separate EPA Health and Safety Plan and will be explained to DNR personnel by the EPA OSC prior to entering the site.

J. Decontamination Procedures

All sampling equipment will be decontaminated according to procedures outlined in the site-specific sampling plan.

Site personnel will decontaminate as necessary according to standard operating procedures in the RR Safety Handbook.

K. Spill Containment and Investigative Waste

Preservatives for samples include methanol, hydrochloric acid, nitric acid, and/or sodium hydroxide. Material Safety Data Sheets for these preservatives and all other chemical products used on site and spill containment kits for acids and bases are available on-site from the EPA OSC and EPA Contractor.

Investigative derived wastes will consist of disposable Tyvek coveralls, aprons, disposable gloves, boot covers, decontamination waters, purge waters and excavated soil. All disposable personal protective equipment will be disposed of according to the EPA OSC's on-site specifications.

L. Standard Work Practices

These initial procedures will be performed before any site work begins:

- The EPA OSC will brief the DNR support team regarding health and safety concerns associated with the site and confirm that all workers have read and understood this health and safety plan and the EPA Health and Safety Plan,
- All site workers will be shown how to use available cellular phones,
- A vehicle (with all emergency information, Attachment 4) will be designated for emergency use,
- Prevailing wind direction will be determined,
- Air monitoring equipment will be calibrated up wind and off site, and
- The exclusion, contamination reduction, and support/clean zones will be delineated as outlined in EPA's Health and Safety Plan.

The following standard work practices shall be adhered to at all times:

- No eating, drinking, smoking, or applying of cosmetics or personal hygiene products shall be permitted on site (drinking of water, etc., will be allowed off site),
- No ignition sources shall be permitted on site,
- The "buddy system" shall be in effect at all times in the exclusion zone,
- No one shall enter a confined space,
- No one shall enter areas that require the use of PPE Levels A or B,
- Gloves shall be worn until sample containers are thoroughly decontaminated,
- Work shall be restricted to daylight hours,
- Site work will cease during severe weather conditions, including when thunder and lightning are present,
- Air monitoring shall occur when personnel are in the exclusion zone, and
- Eye protection and gloves shall be worn while handling chemical preservatives.

M. Emergency Information

All emergency information specific to this site is in Attachment 4.

N. Check List of Safety Equipment and Supplies

Below is a checklist of safety equipment and related supplies:

Safety Equipment and Supplies:

Fire extinguisher First-aid kit "Strip" thermometers Air monitoring instrument (PID) and calibration gas Portable eye/face wash with sterile solutions Two-way communication system (walkie-talkies) Material Safety Data Sheets Personal Protective Equipment and Supplies:

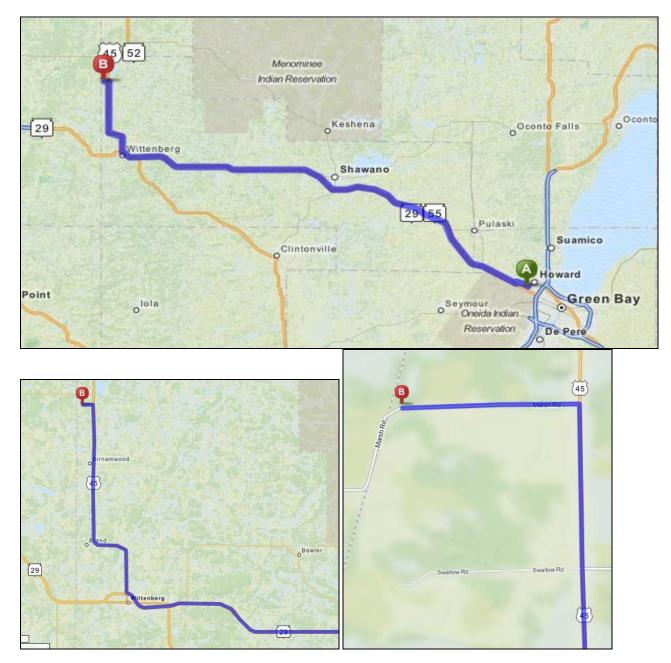
Air purifying respirators and appropriate canisters Hard hats Ear plugs or muffs Tyvek coveralls, suits, aprons, sleeve covers, boot covers Outer gloves (neoprene or other suitable material) Inner disposable gloves Safety boots (washable with steel toes/shanks) Eye protection (safety goggles of face shields) Duct tape Drinking water or "sports drinks" and vessels Hand and face soap, tap water, paper towels

Decontamination Supplies:

Alconox or equivalent Wash tubs Carboys of tap water Carboys of contaminant-free distilled water Hudson sprayer for contaminant-free distilled water Paper towels Trash bags Barrels/buckets for investigative waste

ATTACHMENT 1 Map: Directions to Site

From Green Bay, WI: drive west on State Highway 29 to Wittenberg (approximately 61 miles). Then exit onto Highway 45 North and drive approximately 12 miles north to Marsh Road (between Birnamwood and Aniwa). Turn west on Marsh Road and drive approximately 0.5 miles to the site. Entry to the site is via a gate on the south end of the property adjacent to Marsh Road.



ATTACHMENT 2 Risk Analysis

The purpose of risk analysis is to identify conditions that may pose immediate danger to life or health (IDLH) or other conditions that may cause death or serious harm to staff at a worksite. If such conditions are noted, they need to be addressed in appropriate sections of the site safety plan. Site conditions need to be reviewed to determine if any real or potential physical, biological or chemical hazards exist at the site before entering the site. Below we have analyzed risks under three categories: Physical hazards, biological hazards and chemical hazards.

	Yes	No
Will the site activity at the time it is performed result in stress? Possible		
Is there a potential for a noise exposure in excess of 90 dBA? Possible		
Will site activity be performed in extreme temperature (> 70° F and < 40° F? Possible		
Will site activity be performed in windy conditions? (wind in excess of 10 mph)		
Will site activity be performed in severe weather? (rain or lightening)		
Will site activity require lifting of heavy objects (> 30 lbs)?		
Will site activity require repetitive twisting hand movements? Possible		
Will the work activity require repetitive elbow and shoulder movement? Poss	ible 🗆	
Will the site activity require arms outstretched or elbows high? Possible		
Is there a potential for site workers to be struck by moving objects?		
Will site activity include excessive physical effort (over exertion)		
Will site activity be performed on platforms or at elevated heights?		
Will site activity be performed in area with an increase potential for slip, trip or fall?		
Will site activity be performed between moving or stationary objects? Possible		
Will work activity be performed in Level 1 confined space?		

Physical Hazard

Department employees are forbidden to enter level 2 confined space

* If Yes to any of these questions please refer to Chapter 4 for appropriate risk evaluation and control alternatives.

Biological Hazard

	Yes	No
Do you know or suspect the presence of blood-borne pathogens and infections (Hepatitis A & B, HIV/AIDS)		
Do you know or suspect the presence of blastomycosis causing fungus on site?		
Is there potential for sharp rusty objects at work site (Is this addressed better under the medical monitoring?) Possible		
Do you know or suspect the presence of poisonous ivy, sumac or other poisonous plants at work site? Possible		
Do you know or suspect the presence of poisonous snakes at the worksite?		
Do you know or suspect the presence of dangerous spiders and insects (including ticks)? Possible		

* If yes to any of these questions please refer to Chapter 4 for the appropriate risk evaluation and control alternatives.

Chemical Hazard

	Yes	No
Are there any known or suspected containers/drums? Possible		
Are there any known or suspected vapor clouds?		
Are there any known or suspected dead or stressed animals or vegetation?		
Are there any known or suspected staining of surfaces or soils?		
Are there any known or suspected sheens on water other clue to the presence of chemicals?		
Are there any known or suspected manmade or naturally occurring pathways including storm or sanitary sewers, culverts, electrical race ways, gas pipes, telephone wires, cables, etc.?		

* If the answer is "YES" to any of the above questions, complete Table 1 and quantify concentration.

All possible risks will be addressed as necessary.

Та	ble	1
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	Know	vn or suspected subst	ances	
Waste Category (quantity and concentration) Solid Liquid Gas Multiphase				
Medium of Contamination Drinking water (private or municipal) Groundwater Surface Water Soils Air				
Physical Properties Soluble Infections Flammability Ignitable (Ignition point) Highly volatile (vapor pressure) Explosive				
Chemical Hazards Toxicity Corrosivity (acids/bases, pH) Reactivity Combustibility (flammability explosivity ignitibility) Radioactivity				

INSF --- Insufficient Data

If you entered INSF to any of the required data you must delineate the Work Zone as exclusion zone until further characterization is made.

ATTACHMENT 3 Heat Stress and/or Cold Stress Information

Heat Stress

	10%	20%	30%	40%	50%	60%	70%	80%	90%	
104	98	104	110	120	132	*	*	*	*	
102	97	101	108	117	125	*	*	*	*	
100	95	99	105	110	120	132	*	*	*	
98	93	97	101	106	110	125	*	*	*	IV
96	91	95	98	104	108	120	128	*	*	
94	89	93	95	100	105	111	122	*	*	
92	87	90	92	96	100	106	115	122	*	
90	85	88	90	9 2	96	100	106	114	122	
88	82	86	87	89	93	95	100	106	115	III
86	80	84	85	87	90	92	96	100	109	
84	78	81	83	85	86	89	91	95	99	
82	77	79	80	81	84	86	89	91	95	Π
80	75	77	78	79	81	83	85	86	89	
78	72	75	77	78	79	80	81	83	85	Ι
76	70	72	75	76	77	77	77	78	79	
74	68	70	73	74	75	75	75	76	77	

RELATIVE HUMIDITY

		GENERAL H STRESS IN	
1	DANGER ATEGORY	HEAT INDEX	HEAT SYNDROME
IV.	EXTREME DANGER	GREATER THAN 130 DEGREES	Heat/sunstroke highly likely with continued exposure
III.	DANGER	105-130 DEGREES	Sunstroke, heat cramps or heat exhaustion likely. Heat stroke possible with prolonged exposure or physical activity.
II.	EXTREME CAUTION	90-105 DEGREES	Sunstoke, heat cramps and heat exhaustion possible with prolonged exposure and/or physical activity.
I.	CAUTION	80-90 DEGREES	Fatigue possible with prolonged exposure and/or physical activity.

HOW HOT DOES IT FEEL (Heat Index)

* Beyond the capacity of the Earth's atmosphere to hold water vapor

Protective clothing will increase the potential for **heat rash**, **heat cramps**, **heat exhaustion**, **and heat stroke**. The symptoms for each disorder are listed below:

Heat rash is caused by continuous exposure to heat and humid air and aggravated by chafing clothes. It decreases the ability to tolerate heat as well as being a nuisance.

Heat cramps are caused by profuse perspiration with inadequate fluid intake and chemical replacement (especially salts). Signs: muscle spasm and pain in the extremities and abdomen. Muscles fatigued from work are usually most susceptible to cramps.

Heat exhaustion is caused by increased stress on various organs to meet increased demands to cool the body. Signs: shallow breathing; pale, moist skin; profuse sweating; dizziness and lassitude.

Heat stroke is the most extreme form of heat stress. The body must be cooled immediately to prevent severe injury and/or death. Signs: red, hot, dry skin; no perspiration; nausea; dizziness and confusion; strong, rapid pulse; coma. Medical help must be obtained immediately.

TEMPERATURE (Fahrenheit)

Heat Stress Monitoring

For monitoring the body's recuperative ability to excess heat, one or both of the following techniques should be used as a screening mechanism. Monitoring of personnel wearing protective clothing should commence when the ambient temperature is 70 degrees Fahrenheit (F) or above. Frequency of monitoring should increase as ambient temperature increases or if slow recovery rates are indicated. When temperatures exceed 80 degrees F workers must be monitored for heat stress after every work period.

Heart rate (HR) should be measured by the radial pulse for 30 seconds as early as possible in the resting period. The HR at the beginning of the rest period should not exceed 110 beats per minute. If the HR is higher, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest period stays the same. If the HR is 100 beats per minute at the beginning of the next rest period, the following work cycle should be shortened by 33%.

Body temperature should be measured orally with a clinical thermometer (or forehead strip thermometer) as early as possible in the resting period. Oral temperature (OT) at the beginning of the rest period should not exceed 99 degrees F. If it does, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest period stays the same. However, if the OT exceeds 99.7 degrees F at the beginning of the next period, the following work cycle should be further shortened by 33%. OT should be measured again at the end of the rest period to make sure that it has dropped below 99 degrees Fahrenheit.

The following steps will be taken to reduce the potential for heat stress if temperature extremes are reached:

- 1. **Gatorade** will be available as a source of electrolytes. Water will also be available. Personnel should be sure that they have decontaminated their hands and faces prior to consuming liquids. The liquids will be kept in a cooler in the van.
- For temperatures between 70 and 90 degrees F a minimum of one ten minute rest break for each hour work period is planned. For temperatures exceeding 90 degrees F the planned rest break will be increased to 15 minutes. Monitoring for heat stress will be performed after each work period when temperatures exceed 80 degrees F with rest periods being modified as necessary,
- 3. Shade will be provided and an **air conditioned car will be available**. When possible, overheated personnel will cool down in the shade prior to entering an air conditioned car.
- 4. The team members will use the **buddy system** while working. They should report any potential symptoms immediately to their partner.

Cold Stress

Although samplers may not be exposed to extreme cold conditions for prolonged periods, there are several different kinds of cold injuries which can occur, even at temperatures above freezing. This section describes exposure conditions which may cause cold injuries, and methods to prevent or care for such injuries.

Local Cold Injuries

Chilblains can result from prolonged exposures of bare skin to temperatures in the low sixties or below. The injury usually affects the extremities as a chronic injury of the skin and peripheral

capillary circulation. Protecting the skin against exposure to cold for prolonged periods is the method for prevention and for treatment of chilblains.

Immersion foot results from wet cooling of the extremities. Although more common in wet feet exposed over hours or days at temperatures slightly above freezing, it can occur at higher temperatures if wet feet are exposed to cooling over prolonged periods. Prevention depends upon dry shoes and socks, and limited exposures with wet feet. Severe exposures will require emergency treatment.

Frostbite can affect hands, feet, ears and exposed parts of the face, and the severity of the frostbite can range from incipient frostbite, to superficial, to deep frostbite. Incipient frostbite, or frostnip, appears as a sudden blanching or whiteness of the skin, and often is not noticed by the person affected because it comes on slowly and is painless. If identified early, incipient frostbite can be treated effectively by warm hands or breath or by holding the nipped fingers in the armpits. No type of frostbite should be rubbed, and snow should not be used to rub frostbite.

Superficial frostbite causes the skin to have a white, waxy appearance and firm touch, with the tissue beneath soft and resilient. Treatment is protection from the cold and steady and careful rewarming of the frostbitten area. Do not rub any frostbitten area.

Deep frostbite usually involves the hands and feet, and is an extremely serious injury. Tissues are pale, cold, and solid, and emergency medical treatment is urgent. The injured person must be kept dry, given external warming, and watched to see if cardiopulmonary resuscitation is necessary.

Systemic Hypothermia

Severe and general body cooling, known as systemic hypothermia, can occur at temperatures well above freezing by exposure to low or rapidly dropping temperatures, or cold moisture, or to snow and ice. Fatigue, exertion, and hunger are contributing factors.

Generalized body cooling can progress through five stages: Shivering; apathy, sleepiness, listlessness, and indifference; unconsciousness, with slow respiratory rate and very slow pulse rate; freezing of the extremities; and death. Sustained shivering begins when the body core temperature falls below 95 degrees Fahrenheit. With continued cooling there will be stumbling, fumbling, clumsiness, slow reactions, mental confusion, and difficulty in speaking. If the cold conditions are extremely severe, death may occur within two hours of the first symptoms. Emergency treatment of hypothermia requires moving the person out of the wind, replacing wet clothing and providing external heat in any way possible, because the person is unable to generate sufficient body heat. Warm liquids and nourishing food should be provided if the person is conscious. However, since hypothermia is such a severe emergency, emergency medical treatment is needed promptly.

Wind Chill: (The Wind Chill Factor Table in the R&R H&S Handbook is not current. A revised table can be obtained electronically.)

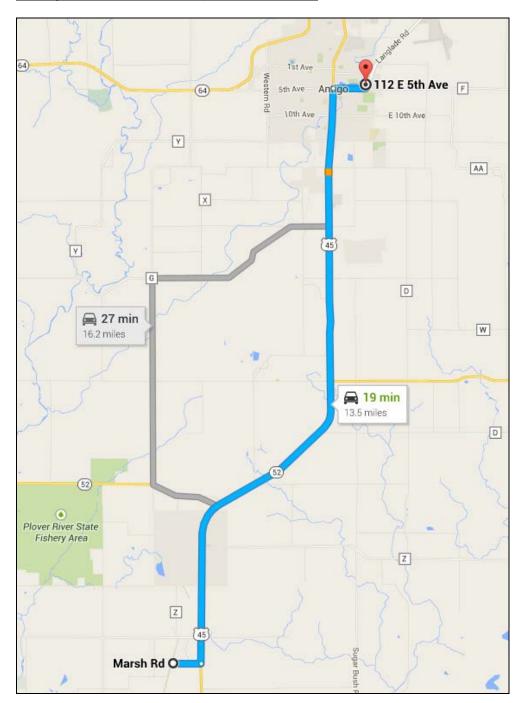
http://www.usatoday.com/weather/winter/windchill/wind-chill-chart.htm

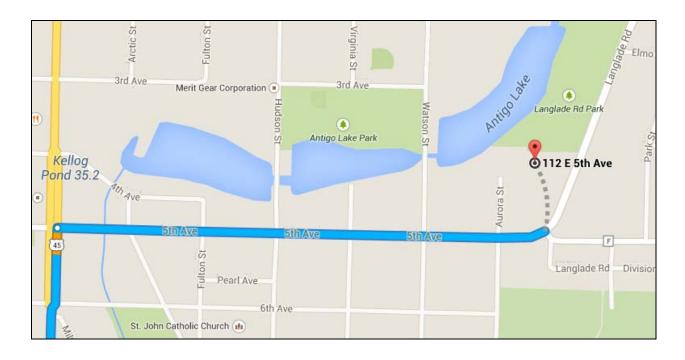
The two important factors which contribute to cold injuries are the temperature of the environment and the velocity of the wind. Thermal conductivity of the environment is the mechanism that allows for the effects of the extreme cold. The most common conductors of cold to samplers are moisture, such as wet hands, and metal, such as ladders and railings. Still air is a very poor conductor, but increased velocity increases the wind chill factor. Sampling operations should not generally be conducted when the wind chill temperature is below -20 degrees Fahrenheit.

ATTACHMENT 4 Map with Directions to the Site with Highlighted Route to the Hospital And Emergency Information

Nearest Hospital: Langlade Hospital 112 E 5th Ave Antigo, WI (715) 623-2331

Driving Directions to the Hospital from the site:





🚔 via US-45 N	19 min
18 min without traffic · Show traffic	13.5 miles

Marsh Rd

Birnamwood, WI 54414

t	Head east on Marsh Rd toward US-45 S
٦	Turn left onto US-45 N
r⁺	Turn right onto 5th Ave 0.6 mi

112 E 5th Ave

Antigo, WI 54409

Fire/Rescue/Police: 9-1-1

The street address of the site and directions to the site are included on this sheet in case you have to direct emergency personnel to find *you*.)

<u>Complete Street Address of Site:</u> No specific address point, approximately 0.5 miles west on Marsh Road from Highway 45, Birnamwood, WI 54414

Mobile/Cell Phone Number at Site: EPA OSC Kathy Halbur (920) 634-9072

Driving Directions to the Site:

Poison Control Center: (800) 222-1222

Chemtrec: (800) 4249300

MED-TOX: (501) 370-8203

ATTACHMENT 5 Observation Note Sheet

The Project Manager or other site workers may use this sheet to note any observations made related to health and safety. For example, in extreme weather, work periods may be shortened to protect workers from the hazards of heat and cold. You may record the duration of work periods here. In cases of medical concerns or emergencies, health care professionals may find information, such as the persons body temperature, or other observed conditions, helpful. This sheet should not take the place of filing an incident report or a Workman's Compensation claim, but information recorded here may be useful in remembering events at a work site.