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			01	2021-03-22 Annually
 NORTH ATLANTIC PROJECTS GROUP Plan for ZERO HARM				

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Issue Codes: RC = Released for Execution, RD = Released for Design, RF = Released for Fabrication, RI = Released for Information, RP = Released for Purchase, RPA = Released for Permit Application, RQ = Released for Quotation, RR = Released for Review and Comments.





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1.0 PURPOSE & SCOPE

1.1 Purpose

The purpose of this procedure is to protect workers from the hazards of severe weather conditions that may be experienced on a NAPG project site. The intent of this procedure is to establish the minimum requirements, measures, and actions to be taken by each project.

1.2 Scope



NAPG recognizes that working in adverse or severe weather conditions may present additional hazards than those associated with the actual work tasks. This procedure provides mandatory requirements and guidelines to ensure that any additional hazards or risks have been identified and assessed, and that appropriate control mechanisms have been put in place to minimize the potential for injury or health impact. At all times, the Project Area Lead retains the authority to stop work because of adverse or pending adverse weather conditions. Weather conditions are to be identified in the Safe Work permit.

Adverse weather includes, but is not limited to:

- a) High winds or dust storms;
- b) Ice storms;
- c) Blizzard or high snowfall warnings;
- d) Tornado, hurricane/cyclone and thunderstorm warnings or watches;
- e) High lightning potential (within 10 km of controlled activities);
- f) Flood waters/heavy rains; and,
- g) Other severe weather warnings and watches.

This procedure applies to all NAPG Projects activities.

Note: This procedure does not cover extreme temperature hazards, which are specifically addressed in the *Thermal Management—Cold and Heat Stress* occupational health procedure.

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2.0 ROLES AND RESPONSIBILITIES

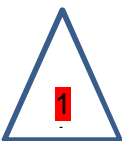
The following sections identify roles and responsibilities related to work in adverse weather conditions on NAPG Projects.

2.1 Construction Manager

- a) Ensures full implementation and compliance with the requirements of this procedure;
- b) Has the authority to authorize critical work to be conducted during times of “high-risk” i.e. severe or adverse weather, only due to emergency situations and/or the necessity to secure elements of the project or associated components for safety reasons;
- c) Issues stop work notices for severe weather warnings.



2.2 Contractors

- a) Contractors shall implement a system to identify, manage, respond and minimize the hazards associated with severe weather that pose a risk to the health and safety of personnel, assets and/or the environment.
- b) Contractor management shall ensure that education and training is provided to personnel that will equip them with the skills to identify the risks of severe weather, together with appropriate precautions and responses in the event of severe weather occurring
- c) Ensure that, where applicable, PMRAs and JHAs include the assessment of adverse and severe weather hazards associated;
- d) Implement required hazard controls;
- e) Provide personal protective equipment and clothing for adverse weather conditions.
- f) Inspect the workplace to ensure the effective implementation of this procedure.
- g) Participate and acquire Safe Work permit.
- h) include Weather unwanted events with preventative and JHA



2.3 HSE Advisors

- a) Monitor and verify compliance with this procedure;
- b) Ensure Contractors have received appropriate training to facilitate the effective implementation of this procedure;
- c) Audit the effective implementation of this procedure.

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- d) Identify corrective actions, as required, and verify corrective actions are complete;

2.4 Supervision

The Supervisor in control of the job has the following responsibilities:

- a) Watch for incoming electrical storms and when cited, suspend activities, removing workers from any danger of electrical storms
- b) Monitor road conditions on access roads to work site. Follow site requirements for snow removal, sanding etc. Ensure roads conditions can be accessed by Emergency Response Vehicles.
- c) Based upon changing weather conditions; consider early end of day to allow workers to safely travel from/to worksite.
- d) Ensures that all work in adverse weather complies with requirements of this procedure;
- e) Ensure JHAs are developed address hazards associated with this procedure;
- f) Ensure all personnel have signed onto the JHA prior to task commencement;
- g) As part of the daily tool box meeting, brief all personnel performing work on the specific requirements of this procedure as they relate to the work to be performed and the weather conditions to be expected;
- h) Verify all workers understand the requirements and have assessed weather in their FLHAs, and;
- i) Inspect all work areas during adverse weather to determine if risks are effectively managed.

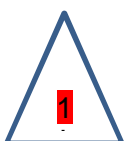
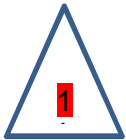
2.5 All Workers



- a) Follow the requirements of this procedure as it relates to the work to be performed.
- b) Respond to all weather warnings and advisors appropriately.
- c) 20-20-20; take a moment to assess; changing environmental conditions on the work activities

3.0 DEFINITIONS

At Risk Locations - Any location where employees working in the area are at a higher risk because of the adverse weather risk they may be exposed to. For example:

- a) Lightning strike due to elevation, the presence of high structures or open areas.



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- b) Low lying areas subject to flood waters and storm surges.
- c) Unsecured structures (seacans, trailers and so on) subject to high winds.
poor road conditions/visibility due to fog or blowing snow/icy conditions.



Examples include:

1.0 General:

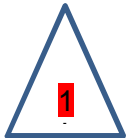
- a) All open Cab Vehicles
- b) Hi rise work
- c) Tower and Mobile cranes
- d) Light plants and poles
- e) Iron work
- f) Rebar work
- g) Electrical
- h) Drilling/piling rigs
- i) Water (lines and pools, lakes, etc.)
- j) Dewatering activities
- k) Hydrovac or related steaming activities.

2.0 Infrastructure, Light/Heavy Civil Work and Industrial (Mining/Extraction Work):

- a) Boats and barges
- b) Water retention ponds and wastewater treatment facilities.
- c) Power cable relocation activities
- d) Surveying work
- e) Blasting activities
- f) Exterior equipment steaming
- g) Sea-cans
- h) Unfinished concrete
- i) Open pit mine areas
- j) Tailings structures

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At Risk Work – Any outside work being done on, or in immediate proximity to “At Risk Locations” that could be hazardous to workers because of adverse weather.



Black Ice- Ice can sometimes be invisible. The road ahead may appear to be black and shiny asphalt. But be suspicious—it may be covered by a thin layer of ice known as black ice. In the winter, asphalt is usually a grey-white colour. If you see a black surface ahead, slow down and brake smoothly and gently. Proceed with caution.

Competent Worker - Means adequately qualified, suitably trained and with enough experience to safely perform work without supervision or with only a minimal degree of supervision.

Critical Work – Work required to attend to emergency situations, e.g., an injured worker, or to finish securing the plant/area for safety reasons, e.g. a volatile gas leak.

Flash-to-Bang – The time between the sight of a lightning flash to the resulting sound of thunder.

Safe Areas -- Typical “Safe Areas” are areas that have been designed, built and secured to protect workers from the effects of adverse weather, including:

- a) Suitably secured trailers, including lunch trailers;
- b) Large metal-framed and enclosed structures;
- c) Lightning protected buildings;
- d) Fully enclosed metal vehicles with windows rolled up;
- e) Underground shelters (i.e. refuge stations, tunnels, caves).



Storm Warning -- As certainty increases about the path and strength of a storm system, a watch may be upgraded to a **Warning**, which is an urgent message that severe weather is either occurring or will occur. Warnings are usually issued six to 24 hours in advance, although some severe weather (such as thunderstorms and tornadoes) can occur rapidly, with less than a half hour’s notice.

Storm Watch -- Alert about weather conditions that are favourable for a storm or severe weather, which could cause safety concerns.

30/30 Rule – A rule of thumb describing when a lightning hazard warrants suspension of work in “At Risk Locations” and the conditions upon which it is safe to return to work in the “At Risk Locations”.

4.0 COMPLIANCE OBLIGATIONS

All jurisdictions have legislative requirements to provide a safe workplace for all workers. In some cases, regulations will specifically mention inclement weather requirements.

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For example:

- *Mining Regulations*, O. Reg. 854—transportation and protection from inclement weather for remote locations on surface mines.
- *Construction Projects*, O. Reg. 213—weather conditions for cranes and working at heights.
- *Workplace Safety and Health Regulation*, Manitoba Reg. 217/2006—cranes and hoisting when weather poses a risk e.g. high wind/low temp. Weather provisions when working alone.

5.0 REQUIREMENTS

5.1 Planning



As part of the overall project execution planning process, site-specific contingency plans must be developed and continually updated during each phase of the Project to identify work areas and work scope that may not be performed safely during adverse weather conditions. The need for the plans is to be identified and formalized in the PMRA and JHA processes.

Projects on host Vale operational sites must be aware of operations adverse weather notifications and processes that may affect project work. For example; some areas of the site may be closed during adverse weather, e.g. Clarabelle Mill and Tailings, *Adverse Weather Closure of Central Tailings Area*, P42004C.

Each project must establish a process to notify contractors of adverse weather forecasts (lightning, storm watches and warnings), e.g., *CCM Project, Storm Warning/Lightning Strike Protocol*.

If a Storm Warning is forecast then Contractors must review work plans considering the type of storm, duration and increased risk of power failure and determine:

- a) What tasks can continue safely.
- b) What tasks can continue safely with added controls, e.g., back-up/emergency power, portable compressor/generator or additional resources
- c) What tasks cannot continue safely until the storm warning has been lifted.



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5.1.1 Basic Requirements for Workers

- Daily shift line-ups or Tool Box Meetings **will specify** an “Safe Area” to assembly or meeting point to discuss proposed activities should inclement or adverse weather conditions develop;
- Use the FLHA process to assess risk of lightning and other adverse weather. If there is the potential for severe weather, the Contractor Superintendent or a delegate will be responsible for monitoring weather conditions, communicating any updates on the storm activity, identifying “At Risk Locations” and “Critical Work” and notifying the work crew when they need to move to a “safe area.”
- Where essential or emergency work is to be performed (Critical Work) in exposed areas during inclement or adverse weather conditions, a JHA to manage the adverse weather risks shall be completed.
- Supervisor/Work crew workplace inspections to verify work areas and activities are safe (Involve of HSE Advisor, if agreement cannot be reached);
- Provision of wet weather clothing where safe but essential or emergency work continues during wet weather. Provide wide brims and neck flaps for helmets or hardhats;
- Review HSE requirements so that all personnel are aware of how to respond to inclement and adverse weather conditions;
- Rotation of personnel to reduce potential exposure whether the work activity cannot be rescheduled or relocated, subject to approval required for high risk work in emergencies or for site safety needs;
- The provision of training modules;

5.1.2 Basic Work Planning

- Relocate work activities inside or under the protection of buildings, sheds, structures or enclosures;
- Re-organize personnel to undertake other tasks, i.e. indoor work activities, inspection or maintenance of plant or equipment, area housekeeping activities etc.;
- Pre-assemble structural components and other equipment at ground level;
- Installing plant and equipment in covered areas;



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- Re-organizing some activities (e.g. concrete pours, confined space work) considering when weather condition will improve;
- Provide protected areas, for breaks and meals where appropriate and/or practicable;
- Ensuring that all loose material, equipment and structures are either removed or secured;
- Ensuring that the work area has good drainage or arrange for grading to prevent ingress of water;
- Erecting shelters or tarpaulins to protect from overhead as well as side ingress of water and direct sunlight;
- Erecting wind breaks; and
- Ensuring that all electrical equipment is protected from wet weather, including leads and grounding.
- Understand who is responsible for snow clearing and sanding of the access roadways and parking lot areas.
-

5.1.3 Work in Wet Weather

It is also important when planning work activities to ensure that the following activities are reviewed during periods of constant, intermediate or heavy rain and not performed where hazard and risks are identified until safe to do so.

- a) Any electrical work, including welding where employees are exposed to wet conditions, and especially live/switchyard work that is particularly hazardous;
- b) Working on open elevated wet steel,
- c) Working inside excavations and/or tanks, confined spaces, etc., where there is a possibility of electrical conductivity, collapse or significant water ingress.
- d) Slippery working surface, wet floors or steps, excessive mud;
- e) Wet electrical cords and power tools (use of GFCI's mandatory on-site)
- f) Slippery hand tools or hand grip surfaces;
- g) Reduced manual dexterity in some tasks;
- h) Flooding or water pooling that may create wash-outs obscure slip/trip hazards or release contamination; and

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- i) Reduced natural lighting due to cloudy/rain conditions.

Where non-weatherproof electrical components, i.e. distribution boards, leads, etc have been potentially exposed to wet weather conditions, all Contractors shall have a qualified electrician inspect all GFCIs.

This inspection of electrical components shall be in addition to the workplace inspection prior to the commencement of work.

All generators and welding machines shall be grounded and appropriately CSA/ESA certified. All circuits shall be GFCI protected;

5.1.4 Work During Risk of Flooding or Storm Surge

For coastal locations or areas prone to flooding, secure vessels and barges to a stationary source, allowing enough line for them to rise and fall with rising water levels.



Where appropriate, to protect the site from heavy driving rains and floodwater, the following preparations must be made:

- a) Place equipment on high ground or where it will be least affected;
- b) Protect entrances and openings subject to flooding with sand bags or sand dikes;
- c) Protect all stationary exterior equipment necessary for continuous site operation with tarpaulins and/or sand bags, or by similar means;
- d) Implement emergency procedures for electrical shutdown in parallel with normal shutdown procedures;
- e) Place office equipment, files, records, and other important items above expected flood level;
- f) Secure items that may float and pose a risk to personnel, assets or the environment, including tanks of flammable, caustic, acidic, gaseous, or corrosive materials that may float off their foundations; and
- g) Isolate welding and cutting gas lines at the source.

5.1.5 Working in High Winds

The hazards of adverse weather must be assessed when planning the lifting and placing of loads. Specific guidelines are addressed in the *Cranes and Lifting Equipment* procedure for both the lifting of loads and the securing of a crane. The following activities should not be performed during periods or potential periods of high winds without a risk assessment being performed.

- a) Crane lifting operations;

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- b) Work in elevated work platforms or crane hoisted work platforms (Refer to manufacturers / statutory requirements);
- c) Erection of scaffolding where planks may be difficult to handle or may be dislodged;
- d) Erection of tarpaulins or other covers that may dislodge or injure erection personnel;
- e) Erecting roof materials or other material, which may be difficult to handle/control in high winds or wind gusts; and
- f) Working on open/exposed elevated steel.

High winds have the potential to dislodge stacked or stored materials, creating the potential of falling objects, or projectiles. During periods of high wind stored materials must be sufficiently secured to prevent the material from becoming projectiles.

Sea-can doors must always be under control (latched closed or secured when open) and not allowed to swing freely. If sea-cans are stacked, they must be secured, or measures taken to prevent them from being blown over.

Wind can also dislodge trees, especially those in open areas.

Windblown sand can cause eye injuries. Smogglers or other similar personal protective equipment must be readily available to workers as supplementary eye protection.



Work on roofs shall be reassessed when winds exceed **25 km/hr**.

5.1.6 Tornado and Severe Weather Events

In the event of severe weather conditions, monitor local weather, paying attention to broadcasts of *“Watches”* and *“Warnings”*.

If a severe weather warning and/or tornado warning is issued, the Construction Manager or delegate will issue a notice to discontinue work and warn the affected workers. Employees and contractors must then seek shelter in a permanent structure and remain there until the threat has subsided (trailers, shops, sea containers, and/or garages are not permitted). The recommended shelter location should be:

- a) Lowest level of a building;
- b) Interior hallways, restrooms, or small rooms away from windows and glass doors;

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c) Avoid large rooms and areas that could become wind tunnels;

5.2 Responding to Adverse Weather

Contractors and supervisors shall watch for incoming electrical storms and adverse weather. They must suspend activities and remove personnel from any danger of electrical storms using the 30/30 Rule below.

Anyone who hears thunder or sees lightning shall tell their supervisor and their co-workers and respond accordingly.

5.2.1 Lightning and Thunder



The 30/30 Rule should be used to respond to lightning risk and applied as follows:

When there is 30 seconds or less (10 km) from "flash-to-bang", workers in "At Risk Locations" will move to "Safe Areas", as directed by their supervision or delegate. Work in open areas, open structures and elevated locations must cease and all personnel must immediately seek shelter.

When the storm has passed over the work site, the Supervisor or delegate must wait at least 30 minutes after the last lightning flash before allowing workers to leave the "Safe Area" are return to work.

It is also safe to return to work when the storm has not passed over the worksite but has moved beyond the 30-second (10 km) range. Upon determining that the storm has moved past the 10 km range the Supervisor or delegate may allow workers to return to work.



Contractors may consult with Project site management to determine when the time interval flash-to-bang is less than 30 seconds.

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Lighting and thunder continued:

Specific precautions depending on work area for lightning flash-to-bang less than 30 seconds include:

- a) All drilling rigs shall stop working and the rig masts shall be lowered, if practicable, and the crews shall evacuate to a safe location;
- b) All elevated work platforms shall be lowered, and crew located to safe areas
- c) Crane operators shall stop work and lower booms shall, if practicable, and then evacuate to a safe location;
- d) Personnel shall shut down any powered mobile equipment and then evacuate to a safe location.
- e) All electrical and working at height activities shall cease;
- f) Avoid water, high ground and open spaces and move to a safe location;
- g) Avoid all metal objects, including electric wires, fences, machinery, motors, power tools, etc.
- h) Where possible, find shelter in a substantial building or in a fully enclosed metal vehicle, such as a car, truck or a van, with the windows completely shut. *Unsafe places* include: underneath canopies, small picnic or rain shelters, or near trees;
- If indoors:
 - a) Close and stay away from doors and windows;
 - b) Avoid contact with anything that conducts electricity (i.e. metal pipes or electrical wiring).
 - c) Do not use the telephone unless it is a cordless or cellular phone;
 - d) Take off headsets;
 - e) Turn off, unplug, and stay away from appliances, computers, power tools and televisions. Unplug any sensitive electronic equipment as surge protectors will not be effective if the power line is struck by lightning;

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5.2.2 No Shelter

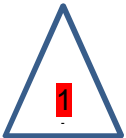
In the event of an approaching electrical storm and there is no shelter all personnel must follow these steps:



- a) Avoid equipment, trees and water as they attract lightning;
- b) If you're on a roof or a ladder, get down to the ground;
- c) Crouch down on the balls of your feet immediately, with feet together, place your arms around your knees and bend forward. Be the smallest target possible, and at the same time, minimize your contact with the ground. Don't lie flat.
- d) Remove your tool belt and don't hold any objects in your hands;
- e) Do not lay down on the ground as the current could flow through you causing a heart attack, internal injuries and burns;
- f) Do not huddle in a group, stay at least 15 feet away from others.



5.2.3 Snowy conditions:

Specific precautions depending on work area for work in winter weather:

- a) Refer to NAPG-SAF-SPI-0007 for winter PPE requirements.
- b) Schedule work/rest regime based upon the NAPG -thermal management procedure. Provide adequate shelter for workers to warm during rest periods.
- c) Clear all windows and mirrors allow for proper visibility while operating a light mobile vehicle.
- d) Drive according to conditions.
 - i. It takes 3 to 12 times the distance to stop on ice and snow-covered roads than on dry roads. Test studies show that the heavier the vehicle, the greater the stopping distance.
 - ii. The action of tires spinning and sliding on snow and ice polishes the surface. This greatly decreases traction on road surfaces that are already hazardous. This happens most often at intersections, on curves, and on hills.



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6.0 REFERENCE

- IPT-VBME-0000-72-PCD-00039 Severe Weather Conditions*
- NAPG-SAF-SPI-0005 NAPG Health and Safety Plan,*
- NAPG-SAF-SPI-0014 NAPG Working Near Electrical Equipment and Power Lines,*
- NAPG-SAF-SPI-0009 NAPG Cranes and Lifting Equipment*
- NAPG-OH-SPI-00003 NAPG Procedure for Contractor Thermal Stress Management,*
- Clarabelle Mill and Tailings, Adverse Weather Closure of Central Tailings Area, P42004C*
- CCM Project, Storm Warning Lightning Strike Protocol*
- Totten Mine, Storm Warning, Proc. #38LG93*
- Construction Projects, O. Reg. 213/91*
- ISHA publication B010- To Safe, Efficient winter driving.*
- Workplace Safety and Health Regulation, Manitoba Reg. 217/2006*
- Occupational Health and Safety Regulations, Newfoundland and Labrador Reg. 5/12*

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