SITE SAFETY PLAN

CRYSTAL PEAK MINERALS
SEVIER PLAYA POTASH PROJECT

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ABBREVIATIONS

AO	Authorized Officer
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
CPM	Peak Minerals Inc. DBA “Crystal Peak Minerals”
Hwy	Highway
Hwy 50	U.S. Route 50
Hwy 6	U.S. Route 6
MSHA	Mine Safety and Health Administration
OHV	Off-Highway Vehicle
OSH Act	Occupational Safety and Health Act
OSHA	Occupational Safety and Health Administration
POD	Plan of Development
Project	Sevier Playa Potash Project
ROD	Record of Decision
SR	State Route

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1. INTRODUCTION

1.1. Background and Purpose

Crystal Peak Minerals (CPM) is proposing to construct and operate the Project on federal, state, and private lands in Millard County, Utah. The Project would be designed to produce an average of approximately 328,500 tons per year of potash in the form of potassium sulfate (K_2SO_4), also known as sulfate of potash (SOP), as well as other associated mineral products. CPM controls through agreement the right to develop and operate potassium mineral leases on approximately 118,000 acres of land administered by the Bureau of Land Management (BLM), and controls through agreement potash mineral leases on an additional approximately 6,400 acres of state lands administered by the Utah School and Institutional Trust Lands Administration.

In general, the on-lease mining design for the Project would consist of the following three major features: 1) a brine extraction system consisting of canals, trenches, and wells; 2) a recharge system consisting of canals and trenches; and 3) a series of evaporation ponds consisting of preconcentration and production ponds. The brines extracted from below the surface of the Sevier Playa would be concentrated by solar evaporation in a series of Preconcentration Ponds. The potassium-rich salts precipitated in the Production Ponds would be harvested and transported to an on-lease Processing Facility. The salts would be processed at the Processing Facility to produce saleable SOP, as well as other associated mineral products.

Infrastructure to support the Project would include 1) access roads; 2) communication towers; 3) power and communications lines; 4) a Natural Gas Pipeline; 5) a Rail Loadout Facility and associated Rail Spur; 6) water supply facilities; 7) groundwater monitoring wells; and 8) gravel pits. All of these components would be located on off-lease lands.

The safety of CPM staff, contractors, and the public is a top priority for CPM during Project construction, operation, and decommissioning. CPM would provide the appropriate resources to ensure that all CPM staff and contractors can always work in a safe environment and to protect public safety.

Before initiating construction of any Project component, CPM would finalize the plan to document the policies and procedures that would be put in place to implement the company's safety programs. The Final Site Safety Plan would address worker and public safety through CPM's zero injury safety policy, identify responsibilities and roles of workers, provide worker safety orientation and training, detail known hazards such as severe weather conditions, and identify accident and incident reporting procedures.

1.2. Plan Updates

This Site Safety Plan supports the Mining Plan (CPM 2019a) and the POD (CPM 2019b) to allow for completion and execution of the BLM's Record of Decision (ROD) for the Project. This plan would be updated and refined along with the Mining Plan and POD as final engineering design, additional workforce, and Project planning are completed, and as CPM develops the staff and contractors necessary to construct, operate, and decommission the Project. The contents of the Final Site Safety Plan must meet any stipulations of the ROD and BLM right-of-way grants and any other relevant conditions of approval before issuance of the notice(s) to proceed and commencement of construction. CPM and their contractors would be responsible for preparing and implementing the Final Site Safety Plan. The Final Site Safety Plan would be a living document and would be updated to include new safety policies, hazards, and procedures as they are identified and developed by CPM. The BLM would confirm that the Site Safety Plan has been developed but would not be responsible for approving the plan.

1.3. Regulatory Framework

The following provides a brief overview of federal and state laws, regulations, and agency policies applicable to the Project that have been considered in the development of this plan. All work performed in the Project would be subject to these and additional regulations as applicable.

1.3.1. Occupational Safety and Health Act of 1970

The Occupational Safety and Health Administration (OSHA) was created with the establishment of the Occupational Safety and Health Act (OSH Act) of 1970. The OSH Act gives OSHA the authority to enforce health and safety standards in workplaces throughout the nation. The OSH Act is implemented through regulations in 29 Code of Federal Regulations (CFR) 1910.

1.3.2. Federal Mine Safety and Health Act of 1977

The Mine Safety and Health Administration (MSHA) is responsible for enforcing the Federal Mine Safety and Health Act (Mine Act) of 1977. Under the Mine Act, the Secretary of Labor has the authority to develop, promulgate, and revise health or safety standards in order to protect life and prevent injuries in mines throughout the nation. Regulations implemented under the Mine Act include 30 CFR 1–199.

1.4. Relationship to the Project

Safety is a primary concern for CPM and is a constant focus of the Project. The Final Site Safety Plan would apply to all Project activities and Project facilities and components, including off-lease rights-of-way. This includes activities that would occur during Project design, construction, operation, and decommissioning.

The Final Site Safety Plan would contain the necessary best management practices, applicant committed design features, and company practices required to implement CPM's environmental commitments made during the Environmental Impact Statement (EIS) process. The applicant committed design features that were identified in Table K-1 (Applicant Committed Design Features) in Appendix K of the EIS (BLM 2019) for the Project that would be carried out through the development and implementation of the Final Site Safety Plan are listed in Table 1.

[Table 1 would be updated in the Final Site Safety Plan to contain all measures necessary to implement CPM's environmental commitments made during the EIS process and any additional requirements identified in BLM's ROD.]

2. ROLES AND RESPONSIBILITIES

All employees, contractors, and visitors to the Project would have important roles and responsibilities in implementing the Final Site Safety Plan. As CPM prepares to construct and operate the Project, the roles and responsibilities of all personnel involved with the Project would be identified and clearly defined to ensure all personnel understand and are accountable for their part in maintaining a safe work environment.

At a minimum, the responsibilities and roles discussed in the Final Site Safety Plan would include commitments to safety, pre-work training, on-site training, record keeping, reporting, plan maintenance and implementation, safety meetings, incident investigations, first aid care and equipment, and equipment maintenance and inspections. These responsibilities and roles may apply to either specific job positions or individuals as long as they are clearly conveyed.

Table 1. Applicant Committed Design Features

EIS Design Feature Number	Site Safety Plan Design Feature Number	Design Feature†	Applicability to the Project (* Not applicable within the playa boundary)			
			Design and Engineering	Construction	Operation and Maintenance	Decommissioning
9	1	All design, material, construction, operation, maintenance, and decommissioning activities would be in accordance with safe and proven engineering practices.	✔	✔	✔	✔
10	2	All work would be performed in compliance with Mine Safety and Health Administration (MSHA) or Occupational Safety and Health Administration (OSHA) regulations, as appropriate. Project personnel would be instructed in health and safety procedures and would participate in regular safety meetings during construction and operation. Adaptive management would be used to continuously monitor the safety of workers and the public during construction and operation of the project with a goal of zero injuries or accidents.		✔	✔	✔
11	3	CPM would develop and implement a Site Safety Plan (this plan) for construction, operation, maintenance, and decommissioning of the Project. The Site Safety Plan would include, at a minimum, sections on site safety, emergency response, and fire safety. CPM and its contractors would be responsible for implementing the Site Safety Plan, including compliance with applicable MSHA or OSHA standards.		✔	✔	✔
12	4	Adaptive management would be used to respond to local, recreational, OHV travel, hunting, and other public uses of BLM-administered lands to assure that multiple uses are continued without hazard to the health or safety of either the public or Project operators and workers.		✔	✔	✔
14	5	Speed limits for Project traffic would be set at a maximum of 30 mph on-road and 15 mph off-road to reduce the generation of fugitive dust and minimize the risk for collisions between Project traffic and livestock or wildlife. This design feature would apply on all unpaved roads authorized for use by Project traffic, including unpaved Millard County Class B roads. This design feature would not apply on paved roads, where Project traffic would follow posted speed limits. The Adaptive Wildlife Management Plan (CPM 2019c) (Design Feature #95) would include monitoring and adaptive measures to adjust speed limits to changes in road conditions or use, or for corrective actions (for example, fencing, or signage) in the event that Project traffic causes an unacceptable increase in collisions between Project vehicles and wildlife or livestock. In the event that vehicle traffic causes visible dust emissions, equipment operators would be instructed to reduce speed to a level that does not cause excessive dust in accordance with the Fugitive Dust Control Plan (CPM 2019d) (Design Feature #16).		✔	✔	✔
30	6	CPM would develop and implement a Site Safety Plan (this plan), which includes measures for prevention and suppression of fire. Project personnel would be instructed regarding individual responsibility in implementation of the plan.	✔	✔	✔	✔

EIS Design Feature Number	Site Safety Plan Design Feature Number	Design Feature†	Applicability to the Project (* Not applicable within the playa boundary)			
			Design and Engineering	Construction	Operation and Maintenance	Decommissioning
31	7	CPM and its contractors would notify the BLM of any fires and comply with all rules and regulations administered by the BLM concerning the use, prevention, and suppression of fires on federal lands, including any fire prevention orders that may be in effect at the time of the permitted activity. CPM or its contractors may be held liable for the cost of fire suppression, stabilization, and rehabilitation, if they are the cause of the fire. In the event of a fire, personal safety would be the first priority of CPM and its contractors.		✔	✔	✔
32	8	CPM and its contractors would operate all internal and external combustion engines (for example, off-highway vehicles, chainsaws, generators, and heavy equipment) with a qualified spark arrester. Qualified spark arresters would be maintained and not modified, and meet the Society of Automotive Engineers Recommended Practices J335 or J350. Refer to 43 CFR §8343.1.		✔	✔	✔
33	9	CPM and its contractors would maintain and clean all equipment regularly to remove flammable debris buildup and prevent fluid leaks that can lead to ignitions.		✔	✔	✔
34	10	CPM and its contractors would carry at least one shovel, water, and a fire extinguisher rated at a minimum of ABC - 10 pound on each piece of equipment and each vehicle.		✔*	✔*	✔*
35	11	When welding, grinding, cutting or conducting other similar, spark-producing work outside of an enclosed building, choose an area large enough to contain the sparks that is naturally free of all flammable vegetation or remove the flammable vegetation in a manner compliant with the permitted activity. If adequate clearance cannot be made, wet an area large enough to contain all sparks prior to the activity and periodically throughout the activity to reduce the risk of wildfire ignition. Regardless of clearance, maintain readiness to respond to an ignition at all times. In addition, keep one shovel per person and at least one fire extinguisher ready, minimum, as specified above (Design Feature #34) during this activity.		✔	✔	✔

EIS Design Feature Number	Site Safety Plan Design Feature Number	Design Feature†	Applicability to the Project (* Not applicable within the playa boundary)			
			Design and Engineering	Construction	Operation and Maintenance	Decommissioning
36	12	CPM and its contractors would keep apprised of current and forecasted weather and fire conditions at http://www.wrh.noaa.gov/firewx/?wfo=slc and take additional fire precautions when fire danger is rated High or greater. Red Flag Warnings for high winds and low humidity are issued by the National Weather Service when fire conditions are most dangerous and ignitions escape control quickly. Extra precautions would be required during these warnings such as additional water, patrols, and tools. When fire danger is rated Extreme and a Red Flag Warning is forecasted, all off-playa activities, including any road improvements, would be shut down. All on-playa activities, activities that take place within the graveled areas at the Processing and Rail Loadout Facilities, and travel on established and regularly-maintained access roads would be exempt from this shutdown. Any exceptions must be approved in advance by the AO.		✔ *	✔ *	✔ *
37	13	CPM and its contractors would initiate fire suppression actions in the work area to prevent fire spread to or on federally administered lands. If a fire spreads beyond the capability of workers with the stipulated tools, all would cease fire suppression action and leave the area immediately via pre-identified escape routes.		✔	✔	✔
38	14	CPM and its contractors would call **911** or the **Richfield Interagency Fire Center at 435-896-8404** immediately with the location and status of any fire **AND** notify the **BLM Fillmore Field Office at 435-743-3100** immediately to report the incident.		✔	✔	✔
60	15	CPM would notify Project personnel and contractors when livestock are grazing along the roadway and that extra caution is required to avoid collisions. Speed limits would be reduced, if necessary, when livestock are present along Project roads. If a vehicle collision with livestock does occur, CPM would notify the BLM as soon as practical. The BLM would notify the permittee. CPM would be responsible for removing the carcass after the BLM is notified, to prevent attracting wildlife along the roadway and causing additional hazards. CPM would be responsible for compensating the permittee for the value of any livestock killed or injured by Project personnel and contractors.		✔	✔	✔
82	16	Nighttime travel would be minimized to reduce the potential for vehicle collisions with wildlife and livestock.		✔	✔	✔
89	17	CPM would plan for safe and accessible conditions at roadway crossings and access points during construction, operation, maintenance, and decommissioning of the Project.		✔ *	✔ *	✔ *

EIS Design Feature Number	Site Safety Plan Design Feature Number	Design Feature†	Applicability to the Project (* Not applicable within the playa boundary)			
			Design and Engineering	Construction	Operation and Maintenance	Decommissioning
90	18	For public safety, appropriate road signs such as “Caution Heavy Truck Traffic” or “Be Prepared to Stop” would be used during construction, operation, maintenance, and decommissioning of the Project. Flaggers would be used when required by existing law.		✔ *	✔ *	✔ *
108	19	Roadways would be monitored for carcasses of wildlife or livestock that have collided with vehicles. Carcasses would be removed immediately (within 24 hours of discovery) to the extent practical. CPM would coordinate in advance with the UDWR and USFWS to obtain all required permits to avoid delays in carcass removal.		✔ *	✔ *	✔ *

2.1. Corporate

[Specific roles and responsibilities would be identified in the Final Site Safety Plan prior to the initiation of construction.]

2.2. Project Safety Coordinator

[Specific roles and responsibilities would be identified in the Final Site Safety Plan prior to the initiation of construction.]

2.3. Project Manager

[Specific roles and responsibilities would be identified in the Final Site Safety Plan prior to the initiation of construction.]

2.4. Superintendent

[Specific roles and responsibilities would be identified in the Final Site Safety Plan prior to the initiation of construction.]

2.5. Foremen

[Specific roles and responsibilities would be identified in the Final Site Safety Plan prior to the initiation of construction.]

2.6. Employees

[Specific roles and responsibilities would be identified in the Final Site Safety Plan prior to the initiation of construction.]

2.7. Contractors

[Specific roles and responsibilities would be identified in the Final Site Safety Plan prior to the initiation of construction.]

3. TRAINING PROGRAM

To ensure the safety of CPM staff, contractors, and the public at the Project, it is important that each person understands how to work safely in their environment. Effective training would not only educate the employees of the hazards at the Project and how to protect themselves and the public, but it would also motivate them to work safely even in stressful conditions (e.g., inclement weather).

CPM would prepare an environmental, health, and safety training program that would be required for all employees, contractors, and visitors at any CPM facility. The training would focus on health and safety policies, known hazards, environmental responsibilities, Project requirements associated with erosion and sediment control, spill prevention and control, wildlife and habitat resources, cultural resource avoidance measures, and general “ground rules” for working on the Project. Supporting training materials, such as a

quick-reference environmental handbook and handbooks highlighting the Project-specific design features and mitigation plans, would be provided.

The training would be required of each person before on- or off-lease Project work begins. Those receiving the training would have the opportunity to, and would be encouraged to, ask questions to ensure adequate understanding of the training.

3.1. Training Log

CPM would create a training log to document each employee and contractor's completion of the training program. The training log would be signed by each person that completed the training and would be kept at the administration offices. An item such as a hardhat decal would be issued upon completion of the training and would be required to be worn while working on the Project.

4. SAFE WORK PROGRAMS

The Final Site Safety Plan would contain employee safe work programs. These programs would cover a variety of issues and potential hazards that apply to the Project. For each safe work program, the Final Site Safety Plan would describe the existing hazards at the site and required safety measures designed and implemented to minimize the hazards for employees and the general public. If applicable, the programs would identify the locations of specific hazards and mitigation equipment in the Project. Specific applicant committed design features to protect the safety of the public would be noted in each program if applicable. The hazards and safety measures would be discussed in the training program. As new hazards are identified, they would be added to the training program and communicated to employees.

A preliminary list of safe work programs is provided below. Potential safety issues to be addressed in the safe work programs include site safety and security, fire control, safe work practices, heavy equipment transportation, hazardous materials, equipment requiring fall protection, and known confined spaces requiring permits for entry traffic management. Examples of specific hazards include storage locations. Examples of mitigation equipment include spill kits, fire extinguishers, and respirators. This list would be revised, and each safe work program would be further developed for the Final Site Safety Plan.

4.1. Health and Safety Plan

CPM would develop a Health and Safety Plan for its employees. It would address employee health resources, workplace safety, and first aid specific to CPM employees.

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

4.2. Drug and Alcohol Policy

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

4.3. Hazardous Materials

CPM has developed a S*olid and Hazardous Waste and Hazardous Materials Management Plan* that identifies Project-specific applicant committed design features and other specific stipulations and methods to be taken by CPM and its construction contractor(s) to address solid and hazardous waste and hazardous materials for the Project (CPM 2019e). The *Solid and Hazardous Waste and Hazardous Materials Management Plan* addresses waste and material management during construction, operation, maintenance, and decommissioning. Waste and material management would be addressed consistent with applicable federal, state, and local laws and regulations, such as the Comprehensive Environmental Response, Compensation, and Liability Act, the Resource Conservation and Recovery Act, relevant sections of the Utah Administrative Code, and the Millard County, Utah County Code.

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

4.4. Fire Protection

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

4.5. Respirator Use and Maintenance

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

4.6. Confined Workspaces

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

4.7. Blood-Borne Pathogens

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

4.8. Electrical Dangers

Electrical shock is a known hazard at the Project. This hazard would be in the form of power lines that would provide electricity for Project operations. To mitigate this hazard, the power lines would be protected with power circuit breakers and related line relay protection equipment. Existing fences, metal gates, and pipelines that cross or are within the power line right-of-way would be grounded to prevent electrical shock. Design and construction would be coordinated with utilities operating facilities along the Project alignment to ensure that prudent safety requirements are met.

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

4.9. Environmental Dangers

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

4.10. Fall Protection

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

4.11. Lock Out and Tag Out

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

4.12. Warning Signs

To minimize the potential for accidents at the Project, warning signs would be posted along the Access Roads to inform the public of construction activities and to deter entry to the site. With BLM approval, temporary fences would also be erected if needed to alert the public of hazards when site personnel are not present. The BLM may also approve fencing around material storage, staging, and laydown areas. CPM may use security guards, cameras, and/or additional fencing if necessary to protect public health and safety and Project facilities if approved by the BLM. The Processing Facility would be fenced and gated. The Rail Loadout Facility, water wells, and electrical substations would also be fenced and gated. Public access to the remainder of the Project would be restricted using no trespassing and other appropriate hazard warning signs posted at all access roads leading to the playa or other work areas.

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

4.13. Pipeline Safety

Buried water and natural gas pipelines co-located with overhead electrical transmission lines are subject to the influence of electromagnetic fields that may result in safety concerns for people making contact with the pipeline, as well as long-term corrosion damage to the pipeline. Site-specific analyses to determine proper mitigation requirements would be completed during final design and construction planning.

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

4.14. Public Safety Awareness

The Project has the potential to create public safety hazards, including increased traffic and vehicle collisions, interactions with industrial equipment and operations, unauthorized access to unsafe areas, and other hazardous situations. This section of the Final Site Safety Plan would address measures that Crystal Peak Minerals would take to protect public safety at and around the Project. It would address measures to inform the public of safety hazards, project traffic, and other measures (e.g., signing and fencing hazardous areas) to protect public safety and users of adjacent public lands.

The Processing Facility would be fenced and gated. The Rail Loadout Facility, water wells, and electrical substations would also be fenced and gated. Public access to the remainder of the Project would be restricted using no trespassing and other appropriate hazard warning signs posted at all access roads leading to the playa or other work areas.

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

4.15. Handling Injured or Problem Wildlife and Livestock

Specific permits and protocols are required when handling wildlife. This section of the Final Site Safety Plan would address measures that CPM would take to ensure compliance with these permits and protocols and would describe protocols for dealing with livestock in the Project.

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

5. EMERGENCY RESPONSE PROCEDURES

5.1. Introduction

In the event of an emergency, responders would be better able to control the event and protect workers if there is a plan in place with procedures to follow. Because of the numerous potential hazards and unique response actions required for each one, the Final Site Safety Plan would describe standard operating procedures to be followed. CPM would develop the procedures and ensure personnel identified in the plan are adequately trained in the procedures. The Final Site Safety Plan would detail emergency response procedures for emergencies at the Project. Emergency response procedures would vary depending on the location and type of emergency. These procedures would include chain of command and emergency communications protocols. More specific emergency procedures for blasting and hazardous materials management are included in the *Blasting Plan* (CPM 2019f) and the *Solid and Hazardous Waste Management Plan* (CPM 2019e). A Fire Safety Plan section is included in Section 6 of this document.

Emergency response procedures would be implemented for the following potential events, or similar events:

- Downed transmission lines, structures, or equipment failure
- Sudden loss of power
- Natural disasters
- Serious personal injury or medical incident
- Vehicle/train accidents
- Fires

If additional events are identified that require emergency response, the events and response procedures would be added to the Final Site Safety Plan.

5.2. Roles and Responsibilities

The Final Site Safety Plan and emergency response procedures would outline the roles and responsibilities of individuals in the event of an emergency. CPM would train these individuals on their roles and responsibilities and document the training. These individuals would be required to fill their responsibilities during an emergency.

5.2.1. Chain of Command

The Final Site Safety Plan would include a chain of command that would outline the responsibilities of those that identify the emergency, those that alert other personnel in the area, and those that contact external agencies. The plan would also describe incident documentation, investigation responsibilities, and post-emergency activities. The chain of command would determine what actions must be taken based on the following factors:

- Type of event (natural, environmental, electrical supply/outage, external forces)
- Severity and geographic area (multiple or combination of events)
- Anticipated duration
- Multi-division/discipline response required
- External agency coordination

The chain of command would follow all reporting requirements for emergencies.

CPM would develop the emergency response procedures section of the Final Site Safety Plan, but both CPM and its contractors would be responsible for implementing the emergency response procedures.

[Additional information would be provided in the Final Site Safety Plan prior to the initiation of construction.]

5.3. Emergency Communications

Effective communication is essential to efficiently respond to an emergency. Information conveyed must be easily understood, transmitted in a timely manner, include the appropriate information and details, and be communicated to the right people. The Final Site Safety Plan would describe the communication system that would be used to alert on-site personnel of an immediate or imminent danger and also the system used to contact outside agencies.

The Final Site Safety Plan would contain maps and diagrams of the facilities. These maps may be used to aid responders in emergency response efforts and would be kept current with each phase of the Project. The maps would be placed or posted in the facility.

The level of emergency response required would depend on the type of event, severity, geographic area, and anticipated duration. Less severe events with shorter anticipated durations would be handled by field staff. More severe events or those with longer anticipated durations would involve those identified in the chain of command. Incidents would be reported to the BLM and other agencies according to notification requirements identified in the Final Site Safety Plan; the Final Spill Prevention, Control, And Countermeasures Plan; and the Final Waste and Hazardous Materials Management Plan.

5.3.1. Contact List

If the emergency involves a serious injury or poses a threat to employees or the public, call 911 immediately. The Final Site Safety Plan would contain a table listing all of the contact information for external agencies. Table 2 provides a preliminary contact list.

Table 2. Preliminary Contact Information

Agency	Telephone Number
BLM Fillmore Office	(435) 743-3100
Richfield Interagency Fire Center	(435) 896-8404 (435) 979-8404 (after hours)
Millard County Sheriff	911 (435) 743-5302 (Fillmore) (435) 864-2755 (Delta)
Utah Poison Control Center	(800) 222-1222
Utah Division of Emergency Services & Homeland Security	(801) 538-3400
Delta Community Medical Center 126 White Sage Avenue, Delta, Utah 84624	(435) 864-5591
Fillmore Community Medical Center 674 South Highway 99, Fillmore, Utah 84631	(435) 743-5591
Milford Valley Memorial Hospital 850 North Main Street, Milford, Utah 84751	(435) 387-2411
Utah Division of Environmental Quality	(800) 458-0145
National Response Center	(800) 424-8802
OSHA (to report serious injury)	(800) 321-6742

Further guidance on emergency response, notification, and reporting protocols would be included in the *Spill Prevention, Control, and Countermeasures Plan* (CPM 2019g) and the *Solid and Hazardous Waste and Hazardous Materials Management Plan* (CPM 2019e).

5.3.2. Routes to Emergency Care Facilities

Figure 1 depicts routes to emergency care facilities from the Project.

[Figure 1 would be updated in the Final Site Safety Plan to identify routes to emergency care facilities from the various facilities associated with the Project.]

5.4. Post-Emergency Reporting and Documentation

Once the emergency has been controlled, CPM would document the incident. Proper documentation of the incident would include details regarding the cause, impacts, response actions, reporting, and lessons learned. If additional prevention measures were implemented as a result of the incident, these would be added to the training program to ensure current and future employees are aware of the potential hazard.

6. FIRE SAFETY PLAN

6.1. Introduction

Wildland fires and fires at industrial facilities can damage equipment, resources, buildings, and environmental quality, and can pose a risk to human health. The Project is located within the BLM's West Desert Lowlands Fire Management Unit. The BLM characterizes this fire management unit as a Category A risk area. In Category A risk areas, fires do not typically occur at regular intervals and are not a natural part of the ecosystem. In addition, fires in this type of risk area are generally more harmful to the ecosystem than are fires in other land categories. To minimize the potential for a human-caused fire, CPM would develop fire safety procedures that would address potential fire sources and appropriate safety and fire prevention measures. CPM and its contractors would notify the BLM of any fires and would comply with all rules and regulations administered by the BLM concerning the use, prevention, and suppression of fires on federal lands, including any fire prevention orders that may be in effect at the time of the permitted activity. CPM or its contractors may be held liable for the cost of fire suppression, stabilization, and rehabilitation, if they are the cause of the fire. In the event of a fire, personal safety would be the first priority of CPM and its contractors (refer to Table 1, EIS Design Feature 31).

6.2. Roles and Responsibilities

The Final Site Safety Plan and fire safety procedures would outline individuals' roles and responsibilities in the event of a fire. CPM would train these individuals on their roles and responsibilities and would document the training. Trained individuals would be required to fill their responsibilities during a fire.

6.3. Preparedness and Prevention

CPM and its contractors would keep themselves apprised of current and forecasted weather and fire conditions as published by the National Weather Service, Salt Lake City Forecast Office. The National Weather Service publishes daily fire danger ratings using a five-level rating scale. The ratings are low, moderate, high, very high, and extreme. Additionally, the National Weather Service publishes red flag warnings for high winds and low humidity when fire conditions are most dangerous and ignitions could escape control quickly (refer to Table 1. EIS Design Feature 36).

CPM and its contractors would take additional fire precautions when fire danger is rated high or greater and when red flag warnings are issued. Extra precautions would include measures such as having additional water on-site, wetting work areas, initiating patrols and using fire spotters, and using specialized tools. Certain activities (e.g., welding and blasting) may also be postponed, if necessary. When fire danger is rated extreme and a red flag warning is forecasted, all off-playa activities, including any road improvements, would be shut down. All on-playa activities, activities that take place within the graveled areas at the Processing and Rail Loadout Facilities, and travel on established and regularly-maintained access roads would be exempt from this shutdown.

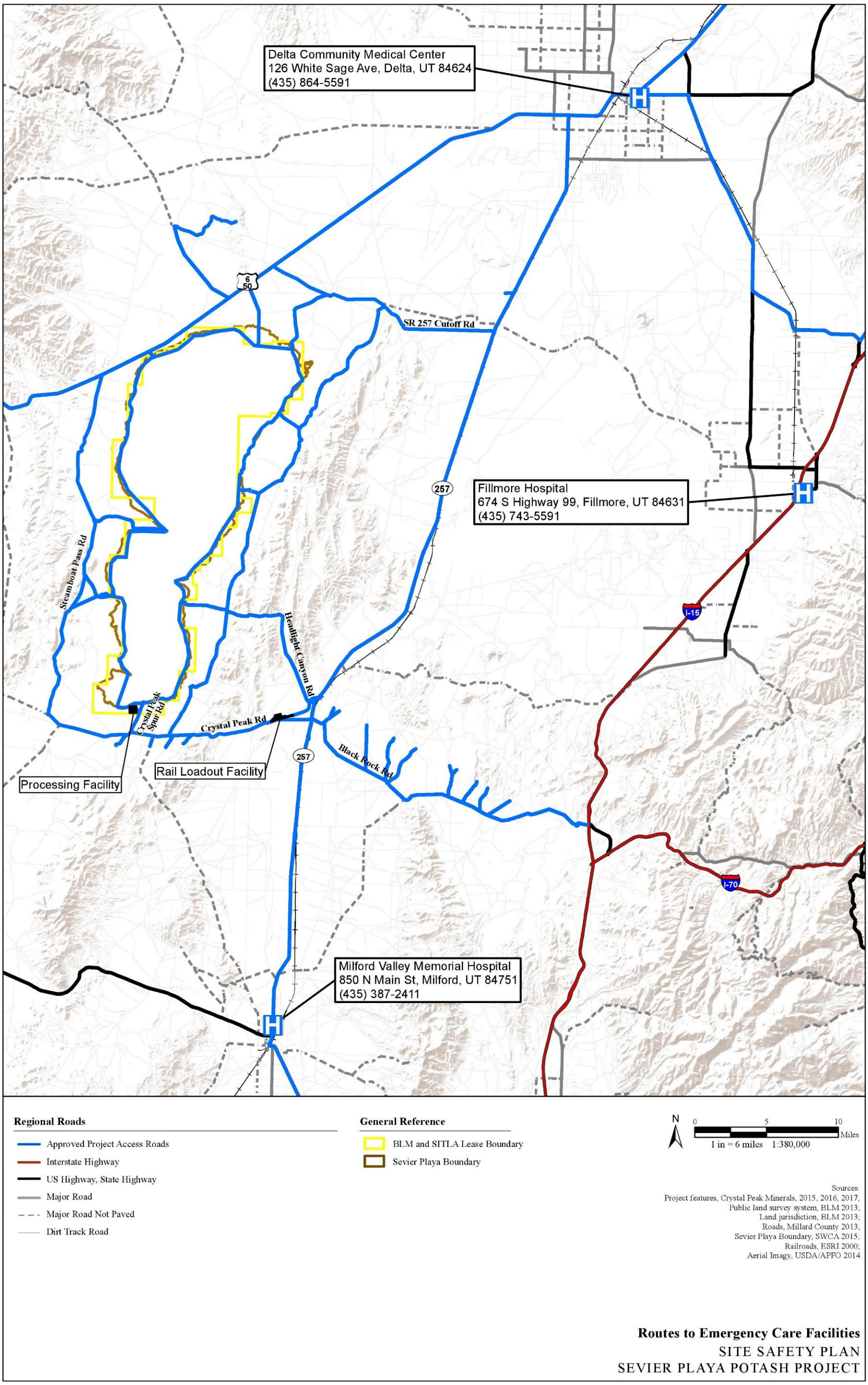

Figure 1. Routes to Emergency Care Facilities from the Project.

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6.3.1. Fire Safety Vehicle Procedures

The following measures would apply to all vehicles used by CPM and its contractors:

- Construction equipment and vehicles would be equipped with approved exhaust mufflers or spark arrestors to prevent accidental wildfires. Qualified spark arresters would be maintained and not modified, and would meet the Society of Automotive Engineers Recommended Practices J335 or J350. CPM and its contractors would carry at least one shovel, 5 gallons of water, and, at minimum, a 10-pound, ABC-rated fire extinguisher on each piece of equipment and vehicle to minimize the potential for the spread of wildfires (refer to Table 1. EIS Design Features 32 and 34).

- CPM and its contractors would maintain and clean all equipment regularly to remove flammable debris buildup and prevent fluid leaks that can lead to ignitions (refer to Table 1. EIS Design Feature 33).

- Vehicles would always be parked on surfaces that are free of dry vegetation or other fire hazards that could lead to ignitions.

6.3.2. Other Combustion Engines

Operation of internal and external combustion engines (including off-highway vehicles, chainsaws, generators, and heavy equipment, etc.) would only be permitted with a qualified spark arrester. Qualified spark arresters are maintained and not modified, and meet the Society of Automotive Engineers Recommended Practices J335 or J350. Refer to 43 CFR 8343.1 (refer to Table 1. EIS Design Feature 32).

6.3.3. Fueling Operations

CPM would follow the refueling plan detailed in the *Spill Prevention, Control, and Countermeasures Plan* (CPM 2019g). The plan requires that refueling operations are completed in designated areas with spill kits present and spill protection measures in place prior to refueling.

Fuel trucks would have, at minimum, a 35-pound fire extinguisher charged with necessary chemicals to control electrical and gas fires. If necessary, helicopter fuel trucks would be grounded to the helicopter during refueling.

6.3.4. Smoking

Smoking signs and fire rules regarding the Project would be posted on the Project bulletin board at the Project office, at all show-up locations, and on all portable toilet doors during the fire season. CPM and its contractors are responsible for and would require supervisory personnel to enforce all posted rules, would prohibit smoking except in designated areas, and would prohibit smoking during any season while operating equipment, walking, or working in areas of vegetation.

Smoking areas would be provided in locations where the potential for fire is minimized. This includes locations away from flammable materials such as fuels and dry vegetation. Smoking areas would be clearly marked with posted signs. “No smoking” signs would be posted in areas of higher potential for fire (e.g., fueling areas). Smoking would be prohibited while personnel are operating equipment or are walking or working in areas with vegetation. In areas where smoking is allowed, all tobacco products and matches would be completely extinguished and discarded in ashtrays, not on the ground.

6.3.5. Flammable Liquid Storage

Flammable liquids would be stored in areas where risk of wildfire is reduced by the removal of vegetation, such as in graveled areas of the Processing Facility or other project facilities. Flammable liquids would be stored in appropriate containers per the storage and maintenance requirements detailed in the *Spill Prevention, Control, and Countermeasures Plan* (CPM 2019g). This includes ensuring the bulk storage containers are compatible with the materials stored, providing adequate secondary containment for each container, conducting routine inspections and testing, and promptly cleaning up visible discharges.

6.4. High-Risk Activities

For welding, grinding, cutting, or other similar, spark-producing work, an area would be chosen that is large enough to contain the sparks. The area would be naturally free of flammable vegetation, or the flammable vegetation would be removed in a manner compliant with the permitted activity. If adequate clearance cannot be made, an area large enough to contain all sparks would be wetted prior to the activity and periodically throughout the activity to reduce the risk of wildfire ignition. Regardless of clearance, CPM and its contractors would be ready to respond to an ignition at all times. In addition, one shovel per person and at least one fire extinguisher would be kept on hand during this activity (refer to Table 1. EIS Design Feature 35).

6.5. Fire Suppression

As part of the environmental compliance training program, CPM employees and contractors would receive training on initial fire suppression techniques and reporting requirements. They would also be trained to determine if a fire is manageable, the control measures that should be implemented by on-site field crews, and when field crews should evacuate. The training would address how to respond to wildfires in the area and how to maintain knowledge of and plans for evacuation routes.

[More information on wildland fire prevention, suppression, and training procedures will be added to the Final Site Safety Plan.]

If a fire starts in the Project vicinity, CPM or its contractors would call 911 or the Richfield Interagency Fire Center immediately with the location and status of any fire and would report the incident immediately to the BLM Fillmore Field Office (refer to Table 1 EIS Design Feature 38). Contact information is provided in Table 2.

If a fire is manageable, CPM or their contractors would safely attempt to control it with a fire extinguisher or other available equipment (e.g., using a shovel to throw dirt on the fire or remove small patches of vegetation). If the fire is unmanageable, field crews would evacuate. They would first call 911 and then the district dispatch for the area (refer to emergency contacts listed in Table 2). All fires must be reported to the jurisdictional fire agency regardless of size and actions taken.

A 634,000-gallon freshwater tank would be located at the Processing Facility (of which 330,000 gallons would be dedicated to firewater), and a second 500,000-gallon firewater storage tank would be located at the Rail Loadout Facility. Both tanks would be installed within the respective fenced perimeter. The freshwater tank at the Processing Facility would not be allowed to be drawn down by uses not associated with fire suppression below the 330,000 gallons dedicated to fire suppression. Once the firewater storage tank located at the Rail Loadout Facility is filled, the tank would be periodically topped off as needed but would not require any significant, ongoing annual demand. Potable water required at the Rail Loadout Facility would be trucked from the Processing Facility as necessary.

7. REFERENCES

Bureau of Land Management (BLM). 2019. *Sevier Playa Potash Project Final Environmental Impact Statement*. Fillmore Field Office.

Crystal Peak Minerals (CPM). 2019a. *Mining Plan for the Sevier Playa Potash Project.* Salt Lake City, Utah: Crystal Peak Minerals.

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