



ANTELOPE POINT MARINA

Glen Canyon National Recreation Area

Risk Management Plan



Preface

This plan is intended for team members of Antelope Point Marina. APM provides assistance with implementation, performance improvements, and regulatory details through onsite visits and reviews. The General Manager, Kenneth Runnels, oversee specific health and safety requirements prescribed by the National Park Service, the Bureau of Reclamation, the Occupational Safety and Health Administration (OSHA), the National Fire Protection Agency (NFPA), the United States Coast Guard (USCG), and the state and county regulations of the state of Arizona. Requirements prescribed by the National Park Service and the Bureau of Reclamation include those dictated by any concession contract to which Antelope Point Holdings, LLC. is contractually obligated.

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Administration

The General Manager, Kenneth Runnels, is fully responsible for implementation of a health and safety plan. The Risk Management Plan covers general and administrative information related to health and safety and which may not be covered in the individual plans included in the APM Environmental and Safety Programs. The company is responsible for the following:

- The General Manager ensures all materials and safety devices are provided to all appropriate workers at no cost to the team member, and that all such materials and devices meet the requirements of the specific regulations.
- The General Manager ensures all team members receive training before they are assigned to work areas where such training is required. Evidence of such training will be documented.
- The General Manager may delegate certain responsibilities to other team members, but accountability cannot be delegated by the General Manager.

Risk Management Team Members

- Brian A. Harrison, HR/Risk Management – Oversees Environmental Management System and Risk Management Plan. *Safety and Health Official
- Environmental Management System/Safety Committee Team Members:
 - Kenneth Runnels – General Manager - Oversees marina safety and environmental responsibilities
 - Melvin Schoppmann – Corporate Representative
 - Brian A. Harrison – Management Representative/Team Lead/Training Specialist and Oversees all new hire training
 - Renzo Burns – Communications Specialist /Recordkeeping Custodian/Training Specialist *Safety and Health Official
 - Andrew Tom – Communications Specialist /Recordkeeping Custodian/Training Specialist *Safety and Health Official
 - Marita Crank – Team Member – Oversees MVR Store, Gift Shop and Fuel Dock Employee responsibilities
 - Jim Knapp – Team Member – Oversees APEX employee safety and environmental responsibilities
 - Steve Tappan – Team Member – Oversees The Point Restaurant safety and environmental responsibilities
 - Collin J. Ripka – Team Member – Oversees Turnaround safety and environmental responsibilities
 - Carlana Ruiz – Team Member – Oversees APM Boat Rentals Houseboat employee safety and environmental responsibilities

The Risk Management Department are APM's Safety and Health Officials

Disciplinary Procedures

Team members who work unsafely will be subject to disciplinary action up to and including termination. Serious safety violations which result in property damage or personal injury may result in immediate termination of employment. The General Manager determines disciplinary measures to be taken.

Inspections

The following inspections will be completed on a schedule, and the General Manager will delegate the inspections to those trained accordingly or contract the inspections with a qualified professional:

- Inspect exterior and interior fire suppression systems and extinguishers.
- Inspect emergency lighting and smoke detectors.
- Inspect all vessels in accordance with U.S. Coast Guard regulations by a certified or approved inspector.
- Inspect eyewash stations and first aid kits.
- Inspect work areas for hazards.
- Inspect marina to ensure life rings are in place. Pull-test the ropes to ensure they are in good condition.

Workplace Housekeeping Policy

Antelope Point Marina's Workplace Housekeeping policy is to improve and maintain the management of orderly storage and the movement of materials. APM's Workplace Housekeeping policy is to make sure that work areas are not used as storage areas. This ineffective or insufficient practice can result in materials being handled and stored in hazardous ways. Housekeeping order is "maintained" not "achieved". Cleaning and organizing must be done regularly, not just at the end of the shift. Integrating this process into our daily jobs can help ensure this is done.

Effective housekeeping can help control or eliminate workplace hazards. Poor housekeeping practices frequently contribute to incidents. If the sight of paper, debris, clutter and spills is accepted as normal, then other more serious hazards may be taken for granted.

Housekeeping is not just cleanliness. It includes keeping work areas neat and orderly, maintaining work areas and floors free of slip and trip hazards, and removing waste materials (e.g., paper, cardboard) and other fire hazards from work areas. It also requires paying attention to important details such as the layout of the whole workplace, aisle marking, the adequacy of storage facilities, and maintenance. Good housekeeping is also a basic part of incident and fire prevention.

Effective housekeeping is an ongoing operation: it is not a one-time or hit-and-miss cleanup done occasionally. Periodic "panic" cleanups are costly and ineffective in reducing incidents.

All workplaces, point of sales and construction by-products and materials are to be kept clean throughout the day and maintained in a clean and orderly fashion.



Accident Management

All accidents must be reported to the General Manager. The following must be reported to NPS:

- Any accident involving team members or visitors where there are fatalities.
- Any accident involving team members or visitors where there are injuries requiring more than minor first aid.
- Any accident involving personal or real property damage estimated to be greater than \$500.
- All motor vehicle accidents.

Antelope Point Marina investigates all team member injury accidents. In addition to the property's investigation, a corporate investigation may also be conducted.

Communicating Hazards to All Employees and Visitors

- The Risk Management Plan is available to staff and customers in the Risk Management Office and a PDF version is available on the public server. Employees are briefed on the RMP, associated SOPs and emergency action plans through Annual OSHA required training (4 Hour) and orientation training for new hires and returning staff.
- The Risk Management Plan topics, Emergency Action Plan topics and natural hazards are communicated to visitors by boat (captain or mate) and orientation briefs (Instructors). Visitors also sign a NPS-approved Acknowledge of Risk form.

Reporting

Antelope Point Marina internal RMP reporting will be completed by the GM with information provided by Department managers and department supervisors as appropriate. APM will complete all required reports to regulatory agencies, NPS contract stipulated reports including the annual RMP, and any imminent danger or serious incident investigation reports. The following lists key APM safety reports:

- Certificate of Vessel Inspection to USCG will be reported by Tours manager annually, a copy will be provided to NSP
- OSHA 300A Form to OSHA will be reported by GM annually, a copy will be provided to NPS
- Imminent Danger Serious Accident Reports to NPS will be reported by Risk Management Department as they occur
- Initial Risk Management Plan and annual updates will be given to NPS by Risk Management Department
- Other Regulatory Agency Reports to Applicable Agency will be reported by Risk Management Department as they occur and a copy will be provided to NPS
- Internal Incident Reports will be reported by Risk Management Department as they occur, a copy will be provided to NPS



Emergency Preparedness

For emergency procedures, refer to the Emergency Action Plan in the APM Environmental and Safety Programs.

Each employee should be familiar with the following information:

- Be familiar with emergency alarms.
- Know who to call in an emergency.
- Know where fire extinguishers are located.
- Be familiar with evacuation diagrams.
- Know what systems, if any, need to be shut down.
- Know where your Muster Area (gathering place) is.

Eye Wash

Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use [1910.151(c)]. First aid kits can be supplemented with eye wash, but small quantities that fit in first aid kits are typically not sufficient to flush the eye long enough. Such eye wash can be used during transport to a plumbed eye wash or large-container eye wash.

First Aid Kits

First aid supplies are required to be readily available according to OSHA 1910.151(b). An example of the minimal contents of a generic first aid kit is described in American National Standard (ANSI) Z308.1-2009 **Minimum Requirements for Workplace First-aid Kits**. ANSI has updated its standard for first aid kits.

ANSI standards require first aid kits be labeled with a list of minimum requirements.

ANSI/SEA Z308.1-2009 Type I, II, III or IV	
Caution! This kit meets ANSI/SEA Z308.1-2009 only when the required minimum fill is maintained	
Required Minimum Fill 1 First Aid Guide 1 Absorbent Compress 4x8 in. min 16 Adhesive Bandages 1x3 in. 1 Adhesive Tape 2.5 yd. 10 Antiseptic Treatment Applications 0.5 gm. Each 6 Burn Treatment Applications 0.9 gm. Each 4 Sterile Pads 3x3 in. min 2 Pair Medical Exam Gloves 1 Triangular Bandage 40x40x56 in. min 6 Antibiotic Treatment Application 0.5 gm. each	Recommended Supplies Analgesic (oral) Bandage Compress 2 x 36 in. min Breathing Barrier single use Burn Dressing 12 sq in. min Cold Pack 4x5 in. min Eye Covering ¼ in. thick min Eye/Face Wash sterile 4 fl oz. min Roller Bandage 2 in. x 4 yd min Hand Sanitizer 0.9 gm. Min

Required Programs & Training

Refer to the APM Environmental Management Program

Hazard Communication

Refer to the APM Hazard Communication Program

Spill Prevention Control & Countermeasure Plan

Refer to the APM SPCC Program

Emergency Action Plan

Refer to the APM Emergency Action Plan & Response Procedures Manual

HAZWOPER Training

Refer to the APM Environmental Management Program

Energy & Water Conservation

Refer to the APM Environmental & Safety Programs

Respiratory Program

Refer to the APM Environmental & Safety Programs

Lock-Out/Tag-Out Program

Refer to the APM Environmental & Safety Programs

Bloodborne Pathogens

Refer to the APM Environmental & Safety Programs

Confined Space

Refer to the APM Environmental & Safety Programs

Personal Protection Equipment

Refer to the APM Environmental & Safety Programs

Hearing Protection

Refer to the APM Environmental & Safety Programs

Fire Safety

Fire response procedures are included in the Emergency Action Plan. Team members are not to fight or contain a fire without special, certified training and authorization from the General Manager. The General Manager is responsible for ensuring the following are completed:

- At least one fire drill will be conducted annually, at times of low visitation, to evaluate alarm system initiation and team member responses. The drill will be documented and retained as a record

Fire extinguishers can be inspected each time you walk by them by visually noting the pressure gauge needle is in the Green Zone. If it is not in the green zone, then notify a supervisor. The following acronym can help us remember how to operate a fire extinguisher: **P.A.S.S**

1. Pull the pin.
2. Aim the nozzle at the base of the fire.
3. Squeeze the handle.
4. Sweep the nozzle from side to side at the base of the fire.

Medical Preparedness

The National Park Service has established a balance of responsibilities between the local park and the facility operating in the national park. Medical supplies are pre-positioned in all appropriate locations for immediate response to emergency situations. The Bloodborne Pathogens Plan educates employees on how to prepare to initially respond to medical emergencies. The General Manager will coordinate with the National Park Service for Glen Canyon National Recreation Area for mutual aid assignments and agreements.

Personal Flotation Devices

Because of our proximity to water and the risk of drowning, personal flotation devices (PFDs) must be readily available when working over water. The following list is requirements for Antelope Point Marina: Employees working over or near water must have a U.S. Coast Guard-approved life jacket available [1926.106(a)].

- Throw-rings, with at least 90 feet of line, must be readily available for emergency rescue operations. Distance between rings shall not exceed 200 feet [1926.106(c)].
- PFDs must be worn at all times when working alone on the dock.
- PFDs must be worn at all times when on a chase or service call, regardless if alone or with another employee
- PFDs must be worn according to guidelines set in the Emergency Action Plan's Wind Event Emergency Procedures.
- Prior to use, the life preserver must be inspected for defects that would alter its strength or buoyancy. Defective jackets must be turned in to management [1926.106(b)].
- At least one lifesaving skiff shall be immediately available at locations where employees are working over or adjacent to water [1926.106(d)].

Safety Reminders

Employees must report all unsafe/unhealthful conditions immediately. Safety reminders are listed in the table on the next page.

Conduct:

- Do not wear loose clothing, jewelry or keep long hair in the down position when there is a danger of catching such articles in moving machinery.
- Closed-toe footwear is required on the marina (No open-toe sandals or flip flops). The use of protective footwear when employees are working in areas where there is a danger of foot injuries due to falling or rolling objects, or objects piercing the sole, and where there is a possibility of the employee's feet being exposed to an electrical hazard.
- Horseplay, running, fighting or any activity that may result in injury or waste is prohibited.
- Wear eye protection when performing any task that could produce flying particles.
- Do not operate any vehicle for which you do not have a valid license or without proper training.
- Do not distract others while working. When approaching a machine operator for any purpose, do so from the front or the side in a way that he or she will see you and not be shocked or surprised. If conversation is necessary, ensure the machine is turned off.

Energy Control:

- Electrical equipment must never be cleaned, adjusted or repaired until the circuit is broken at the power source and the equipment is properly locked out.
- Defects in materials, machinery, tools and equipment must be reported to a supervisor immediately.

Tripping, Slipping Hazards and Lifting Procedures:

- Do not leave tools, materials or other objects on the floor or docks where they may cause danger to others.
- Do not block exits, fire doors, aisles, docks, fire extinguishers, gas meters, electrical panels, emergency shut offs or traffic lanes.
- Avoid risk of rupture, internal injury or back injury by attempting to lift or push heavy loads. If an item is too heavy to move without strain, ask for help.
- Observe the correct position for lifting: stand with feet slightly apart, assume a squatting position (do not bend over at the waist) with knees bent and tuck the chin. Tilt forward, grasp the load with both hands and slowly push up with the legs, keeping the back straight and avoiding sudden movement.
- Do not allow oil, wax, water, or any other material to remain on the floor, dock, or boat deck where you or others may slip. Report any hazardous material spills to your supervisor.

Hazardous Materials:

- When handling hazardous materials, ensure safety procedures are followed and use the proper safety equipment.
- Do not use items that have been placed in secondary containers unless the contents are properly labeled.
- Ensure the use of proper handling and transport materials when handling items with sharp or jagged edges. No smoking in any area where fuel or other flammable or combustible materials are used or stored.

Office Operations:

- Office equipment shall be arranged in a manner to provide the safest possible conditions.
- Cords on vacuums and other equipment frequently used in different locations must be inspected prior to each use. Any defect in these cords must be reported to a supervisor immediately; do not use them.
- Equipment or machines in need of repair are to be removed from service immediately and not returned to use until properly repaired.
- Cutting equipment will be stored with the blade protected or the appropriate guard in place.

Storage Procedures:

- Care shall be taken when storing items on shelving over shoulder height. The weight of these items must be the prime consideration.
- Only OSHA approved ladders will be used by any employee. Ladders of adequate design and construction to support the employee's weight and the materials to be raised or loaded will be used. No employee will stand above the floor on any device other than the proper ladder.

Training

Each employee receives environmental and safety orientation upon hire. The orientation includes training on the following:

- The plans included in the Environmental & Safety Programs
- The Hazard Communication Program
- Miscellaneous Safety and Environmental Topics:
 - Muster Areas
 - Evacuation Routes
 - Slips, Trips, and Falls
 - Ladder Safety
 - Housekeeping in the Workplace
 - Hantavirus and Pest Management
 - Hand and Power Tools, as applicable
 - Boating and Driving Safety, as applicable
 - Back Safety
 - HAZWOPER Awareness

Annual OSHA required training (4 Hour) for all employees includes:

- Elevation Work Platforms
- Lockout/Tagout
- Gas & Cylinder Safety
- Confined Spaces
- Understanding Welding Hazards
- Hazardous Atmospheres & Respirators
- Electrical Safety
- Safety Data Sheets (SDS) Overview – Hazard Communication Plan
- Personal Protective Equipment (PPE)
- Principles of Safe Lifting and Carrying
- Preventing Slips, Trips, & Falls
- The Safe Use of Ladders
- Bloodborne Pathogens

Some jobs or sites require additional, more specific training. Here is a list of additional training agendas available:

• Asbestos	• Cart Safety	• Hot Work	• Barge
• Diving	• Forklift		

Training for Safety Officers and Other Personnel

- Manager of Risk Management, Brian A. Harrison – Certifications
 - 30-Hour OSHA General Industry Safety and Health Training
 - 24-Hour OSHA HAZWOPER Level III Technician
 - 8-Hour OSHA HAZWOPER Level III Technician (Annual)
 - Boat Captain – USCG Captain’s License (5-Year Renewal)

- Risk Management Specialist, Renzo Burns – Certification
 - 24-Hour OSHA HAZWOPER Level III Technician
 - 8-Hour USDOT 49 CFR Highway Transportation of Hazardous Materials and Waste (RCRA)

- Risk Management Specialist, Andrew Tom - Certification
 - 24-Hour OSHA HAZWOPER Level III Technician
 - 8-Hour USDOT 49 CFR Highway Transportation of Hazardous Materials and Waste (RCRA)

Refer to the Environmental Management Program binder regarding all training program records