

GRASSY MOUNTAIN MINE PROJECT

Safety Training Plan

Submitted to:

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ACRONYMS

Calico Calico Resources USA Corp.

CFR Code of Federal Regulations

CIL carbon-in-leach

dB decibel

DPM diesel particulate matter

EOU Eastern Oregon University

HazCom hazard communication

HAZWOPER Hazardous Waste Operations and Emergency Response

JSA job safety analysis

kV kilovolt

LO/TO lockout/tagout

MSHA Mine Safety and Health Administration

Mst million short tons

OAR Oregon Administrative Rules

ORS Oregon Revised Statutes

OSHA Occupational Safety and Health Administration

Paramount Gold Nevada Corp.

PPE personal protective equipment

Project Grassy Mountain Mine Project

ROM Run of Mine

SDS safety data sheet

stpd short tons per day

TSF Tailings Storage Facility

TWA time weighted average

TWRSF Temporary Waste Rock Storage Facility

1. INTRODUCTION AND PURPOSE

This Safety Training Plan has been prepared for the Grassy Mountain Mine Project (Project) located in Malheur County, Oregon. This Safety Training Plan identifies the health and safety training programs that will be implemented at the Project to comply with federal Mining Safety and Health Administration (MSHA) and Occupational Safety and Health Administration (OSHA) requirements, as well as Oregon-specific health and safety training¹.

This *Safety Training Plan* has been developed in accordance with applicable federal, state, and local provisions as follows:

- 30 CFR Part 48 Training and Retraining of Miners;
- 30 CFR Part 49 Mine Rescue Teams;
- Oregon Administrative Rules (OAR) Chapter 437, General Industry, Division 2: General Occupational Safety and Health Rules; and
- Oregon Revised Statutes (ORS) Chapter 654, Oregon Safe Employment Act.

1.1 PURPOSE

The Safety Training Plan provides a description of health and safety training requirements for Mine employees through identification of the occupational safety and health training requirements for employees at the Mine site and addressing known occupational safety and health risks for the planned activities onsite.

1.2 TRAINING PLAN SUBMITTAL AND APPROVAL

Following registration and receipt of the Mine Identification Number with the MSHA District Office, which must be obtained through MSHA no more than one month prior to initiation of work activities at the Mine site, Calico Resources USA Corp. (Calico) will contract with Eastern Oregon University (EOU) in LaGrande, Oregon, to develop the site-specific training program consistent with 30 CFR Part 48.3(a) and 48.3(e). This program will include the plan for training new miners, training experienced miners, training miners for new tasks, annual refresher training, and hazard training for miners. The plan will be submitted to, and approved by, the MSHA District Manager prior to opening the mine. Calico has been in contact with EOU regarding development of the required plan.

1.3 TRAINING IMPLEMENTATION

Per 30 CFR 48.3(g), all courses will be taught by MSHA-approved instructors. Calico will team with the State of Oregon MSHA program coordinator at EOU to deliver the MSHA safety training program for new miners, as well as the refresher program for experienced miners. EOU has an approved MSHA training

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¹ Interagency Agreement dated March 29, 1979, between the US Mine Safety and Health Administration (MSHA) US Department of Labor and the US Occupational Safety and Health Administration (OSHA) US Department of Labor provides coordination between MSHA and OSHA in all areas of mutual interest.

plan. MSHA requires a minimum of 40 hours for all new employees and an annual 8-hour refresher thereafter. EOU will conduct four of the five days of training. The fifth day will be directed by Calico health and safety personnel and will include site-specific hazards and/or on-the-job training components.

1.4 ROUTINE UPDATES

This is a preliminary version of the *Safety Training Plan*. This *Safety Training Plan* will be reviewed and updated on a regular basis to ensure it remains up-to-date with regard to:

- Personnel working conditions,
- Exposure to toxic or hazardous materials,
- Occupational health and safety risks at the facility and
- Changes to state or federal safety training regulations and requirements.

2. PROJECT DESCRIPTION

2.1 PROJECT LOCATION AND ACCESS

Calico Resources USA Corp. (Calico), a wholly owned subsidiary of Paramount Gold Nevada Corp. (Paramount), owns and controls 100 percent of the mineral tenure of the unpatented mining claims, patented mining claims, and mining leases that comprise the Grassy Mountain Project (Project). The Project consists of two claims groups that are situated near the western edge of the Snake River Plain in eastern Oregon, 22 miles south-southwest of the town of Vale, Oregon, and about 70 miles west of Boise, Idaho (Figures 1 and 2).

Access to the Project is provided by Twin Springs Road, a seasonally maintained unpaved road that originates at Russell Road, which is a paved two-lane county road that joins with US Highway 20 approximately 4 miles west of Vale, Oregon (Figure 2). The Project area may be reached from the Twin Springs Road via 2.5 miles of secondary unpaved roads. The access road will be upgraded for year-round activities during Mine construction and will be maintained by Calico during the Mine operations. Calico plans to control access at the Mine area and Process Plant by using fencing and gating.

2.2 PROJECT ACTIVITIES

Calico proposes to mine approximately 2.07 million tons (Mst) of mill-grade ore and 0.27 Mst of waste rock for a mine life of approximately 7.8 years; however, the Tailings Storage Facility (TSF) has been sized to contain 3.64 Mst should additional reserves be identified. The material (both ore and waste) will be extracted from the underground mine using conventional underground mining techniques including drilling, blasting, mucking, loading, and hauling at a rate of approximately 1,200 short tons per day (stpd), four days per week. Calico will use hydraulic loaders to load the ore and waste into the haul trucks. The haul trucks will transport the waste rock to the Temporary Waste Rock Storage Facility (TWRSF) near the TSF and transport the ore to the Run of Mine (ROM) ore stockpile adjacent to the crushing and milling facilities. The ore will be crushed and leached in a carbon-in-leach (CIL) processing plant a rate of 750 stpd, seven days per week. The leached tailings will go through a detoxification process, then be pumped in a slurry to the TSF, with supernatant solution recovered and pumped back to the Mill.

In general, the proposed mining and metal processing operations will consist of an underground mine and ore processing facilities, including a conventional mill and TSF, a TWRSF, and other support facilities. The Project will include the following major components:

- An underground mine, with Mine portal, decline, and ventilation shaft/secondary emergency egress;
- Tailings Storage Facility (TSF) with Tailings Embankment, Tailings Impoundment and Reclaim Pond:
- Temporary Waste Rock Storage Facility (TWRSF);

- Process Plant area, which includes the Process Plant building, control room, crushing facilities, conveyors, ore bins, control rooms, CIL processing plant, reagent storage building (including chemical and reagent storage), gold room, and Collection Pond;
- Infrastructure and ancillary facilities that include site main gate and guard house, administration office and change house, assay laboratory and sample preparation area, truck workshop and warehouse, wash pads, Process Plant workshop and warehouse, meteorological station, explosive magazines, parking areas, ore stockpiles, solid and liquid hazardous waste storage, and fuel storage and dispensing area;
- Roads, including upgrades to the Twin Springs and Cow Hollow roads, and construction of the Mine access, internal access, and Mine haul roads;
- Yards and laydown areas;
- Growth Media Stockpiles;
- Water supply, including Production Wellfield, water pipeline, raw water storage tank, and Potable Water Treatment Plant;
- Power supply that includes a power substation, upgraded 14.4 kilovolt (kV) overland power transmission system, new 14.4 kV overland power transmission system, onsite power lines, and generators;
- Permanent and temporary stormwater diversion channels;
- Other areas, including the exploration areas, septic system, and perimeter fence;
- · Quarry; and
- Reclamation Borrow Areas.

3. SAFETY TRAINING PROGRAMS

3.1 MSHA TRAINING PROGRAMS

3.1.1 NEW MINER TRAINING

In accordance with 30 CFR Part 48, new miners must receive MSHA new miner training. A new miner is one who is:

- Working in an underground mine and engaged in the extraction and production process,
- Engaged in shaft or slope construction,
- Regularly exposed to mine hazards,
- A maintenance or service worker employed by the operator, or
- A maintenance or service worker contracted by the operator to work at the mine for frequent or extended periods.

The MSHA New Miner training plan will include:

- Company name, mine name, and MSHA identification number of the mine.
- Name and position of the person responsible for health and safety training.
- List of MSHA-approved instructors with whom the operator proposes to make arrangements to teach the courses, and the courses each instructor is qualified to teach.
- Location where training will be delivered for each course.
- Description of the teaching methods and the course materials that will be used in training.
- Approximate number of miners employed at the mine and the maximum number who will attend each session of training.
- Predicted time or periods of time when regularly scheduled refresher training will be given, including the titles of courses to be taught, the total number of instruction hours for each course, and the predicted time and length of each session of training.
- Calico will also submit:
 - Complete list of task assignments (job duties that occur on a regular basis, require physical abilities and job knowledge).
 - Titles of personnel conducting the training.
 - Outline of training procedures used in training miners in work assignments.
 - Evaluation procedures used to determine effectiveness of training per 30 CFR Part 48.7.

Calico will team with the State of Oregon MSHA program coordinator at EOU in LaGrande, Oregon, to develop the MSHA safety training program for new miners as well as the refresher program for experienced miners. This program will be submitted to the District Manager for MSHA and approved prior to the start of mining operations in accordance with 30 CFR Part 48. EOU has an approved MSHA training plan. MSHA requires a minimum of 40 hours for all new employees and an annual 8-hour refresher thereafter. EOU will conduct four of the five days of training. The fifth day will be directed by Calico health and safety personnel and will include site-specific hazards and/or on-the-job training

components. To assist with satisfying requirements for emergency preparedness, the facility's <u>Emergency Response Plan</u> will be referenced during the routine training program.

3.1.2 EXPERIENCED MINER TRAINING

According to 30 CFR Part 48, an experienced miner:

- Has completed MSHA-approved new miner training for underground mines and have had at least 12 months of underground mining experience;
- Is a supervisor certified under an MSHA-approved State certification program and employed as an underground supervisor as of October 6, 1998;
- Was an experienced underground miner on February 3, 1999;
- Was employed as an underground shaft or slope construction worked on June 28, 2006; or
- Had six months of underground shaft or slope experience within 24 months prior to June 28, 2006.

Each experienced miner returning to mining following an absence of five years or more, must receive at least eight hours of training. Experienced miners must complete the following training before beginning work duties at the Project:

- A visit and tour of the Mine. The methods of mining utilized at the Mine shall be observed and explained.
- Mandatory health and safety standards pertinent to assigned work tasks.
- Review and description of the line of authority of supervisors and miners' representatives and the responsibilities of such supervisors and miners' representatives.
- Introduction to the operator's rules and the procedures for reporting hazards.
- Procedures in effect for entering and leaving the Mine; the check-in and check-out system; the
 procedures for riding on and in Mine conveyances; the controls for the transportation of miners
 and materials; and the use of the Mine communication systems, warning signals, and directional
 signs.
- Mine emergency evacuation and firefighting approved by the District Manager, or the escape
 and evacuation plan shall be used for this course. The course shall include a review of the Mine
 map; the escapeway system; the escape, firefighting, and emergency evacuation plans in effect
 at the Mine; and the location of abandoned areas; and methods of barricading and the locations
 of barricading materials.
- Introduction to and instruction on the roof or ground control plan in effect at the Mine and procedures for roof and rib or ground control; and an introduction to and instruction on the ventilation plan in effect at the Mine and the procedures for maintaining and controlling ventilation.
- Recognition and avoidance of hazards present in the Mine.
- Review of the general causes of accidents applicable to the Mine environment, causes of specific accidents at the Mine, and instruction in accident prevention in the work environment.
- Instruction on the Mine's emergency medical arrangements and the location of the Mine's first aid equipment and supplies.

- Purpose of taking dust, noise, and other health measurements, where applicable; must review
 the health provisions of the Act; and must explain warning labels and any health control plan in
 effect at the Mine.
- Instruction in the health and safety aspects of the tasks assigned, including the safe work procedures of such tasks, information about the physical and health hazards of chemicals in the miner's work area, the protective measures a miner can take against these hazards, and the contents of the Mine's Hazard Communication (HazCom) program.
- Before the miner goes underground, the training will also include instruction and demonstration in the use, care, and maintenance of self-rescue and respiratory devices used at the Mine; hands-on training in the complete donning of all types of self-contained self-rescue devices used at the Mine, which includes assuming a donning position, opening the device, activating the device, inserting the mouthpiece, and putting on the nose clip; and hands-on training in transferring between all applicable self-rescue devices.

To assist with satisfying requirements for emergency preparedness, the facility's <u>Emergency Response</u> <u>Plan</u> will be referenced during the routine training program.

3.1.3 MINE RESCUE TEAM TRAINING

Prior to serving on a mine rescue team, each member of the team must complete an initial 20-hour training as required by MSHA regarding the use, care, and maintenance of the type of breathing apparatus which will be used by the mine rescue team. After completion of the initial training, all team members will receive 40 hours of refresher training annually. This training will include a minimum of 4 hours per month for a period of 8 hours every two months.

Mine rescue team training will include:

- Underground sessions at least once every six months;
- Wearing and use of breathing apparatus used by team members for at least two hours while under oxygen every two months;
- Use, care, capabilities and limitation of auxiliary mine rescue equipment or a different breathing apparatus, if applicable;
- Advanced mine rescue training and procedures per MSHA; and
- Mine map training and ventilation procedures.

3.1.4 ADDITIONAL MINE TRAINING

In addition to the 30 CFR Part 48 New Miner and refresher training and Mine Rescue Training, other safety topics are offered by EOU and may be incorporated into the Grassy Mountain Mine *Safety Training Plan*, where needed, to sufficiently prepare personnel for safe working conditions as well as satisfy Oregon occupational safety and health training requirements.

- Powered Haulage Accident Prevention
- Hazard Recognition Training

- Job Safety Analysis (JSA)Training
- Health-related Topics: Dust and Silicosis, Noise, HazCom, Diesel Particulate Matter (DPM)
- Machinery and Equipment
- Energy Control, Lockout/Tagout (LO/TO)
- Electrical Safety
- Ground Control
- Blasting Safety
- Fall Hazard Awareness/ Fall Protection
- Confined Space Operations Awareness

3.2 OREGON OSHA TRAINING PROGRAMS

Oregon OSHA offers safety training classes to Oregon companies and its employees. Safety training topics that Calico may incorporate into its health and safety training program, if not already captured in the EOU MSHA training program include:

- Walking/Working Surfaces
- Means of Egress
- Powered Platform, Manlifts and Vehicle-Mounted Platforms
- Occupational Health and Environmental Control
- Hazardous Materials
- Personal Protective Equipment
- General Environmental Controls (sanitation, safety color code for physical hazards, accident prevention signs/tags, confined spaces, lockout/tagout)
- Medical/First Aid
- Fire Protection
- Compressed Gas/Air Equipment
- Material handling and storage
- Machinery and Machine Guarding
- Hand & Portable Powered Tools
- Welding, Cutting and Brazing
- Electrical Power Generation, Transmission and Distribution
- Electrical
- Toxic and Hazardous Substances

3.3 CYANIDE TRAINING

Calico follows the International Cyanide Management Code (Code), Principle 8.

Principle 8 of the code is as follows: *Train works and emergency response personnel to manage cyanide in a safe and environmentally protective manner.*

This principle is broken into standards of practice 8.1, 8.2, and 8.3.

Standard of Practice 8.1: Train workers to understand the hazards associated with cyanide use.

This section parallels the OSHA Hazard Communications Standard. Calico will educate personnel who may encounter cyanide with the appropriate tools to recognize cyanide material, health effects, symptoms of cyanide exposure and procedures to follow in the event of exposure.

Standard of Practice 8.2: Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and environment.

All personnel involved in the management of cyanide will be trained to perform the site-specific assigned tasks in a safe and environmentally sound manner. The focus is intended to instruct employees on how to accomplish assigned tasks safely and in a manner that prevents exposure and releases.

Standard of Practice 8.3: Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

Personnel involved in unloading, mixing, production and maintenance will be educated in release preparedness, and response. This training includes appropriate use of personal protective equipment, stopping a release, decontamination, first aid, drills, and coordination with outside responders.

4. SAFETY TRAINING SCHEDULE

4.1 MSHA TRAINING FREQUENCY

MSHA requires initial health and safety training upon hire for mining employees and annual refresher training thereafter. Personnel meeting the definition of new miner will be trained in accordance with new miner training requirements, while personnel that meet the definition of experienced miners will be trained in accordance with experienced miner training requirements. Calico will team with EOU to develop and deliver the MSHA training program. Forty hours of training over five days is planned. Four of the required five days will be led by EOU instructor and the fifth day will include site-specific safety topics. A proposed training schedule is provided in Table 1. This training schedule will be modified as needed after the mining operation is finalized.

4.2 OREGON OSHA TRAINING FREQUENCY

Oregon OSHA requires initial health and safety training upon hire for employees at facilities where safety hazards are present. New employees will be trained upon hire and refreshers held annually thereafter. A proposed training schedule is provided in Table 1. This training schedule will be modified as needed after the mining operation is finalized. Where possible, the MSHA training courses will be used to satisfy the Oregon OSHA training requirements.

5. REFERENCES

Memorandum of Understanding (1979). Interagency Agreement between Mine Safety and Health Administration US Department of Labor and Occupational Safety and Health Administration US Department of Labor.

Mining Safety and Health Administration 30 CFR Part 48. Training and Retraining of Miners.

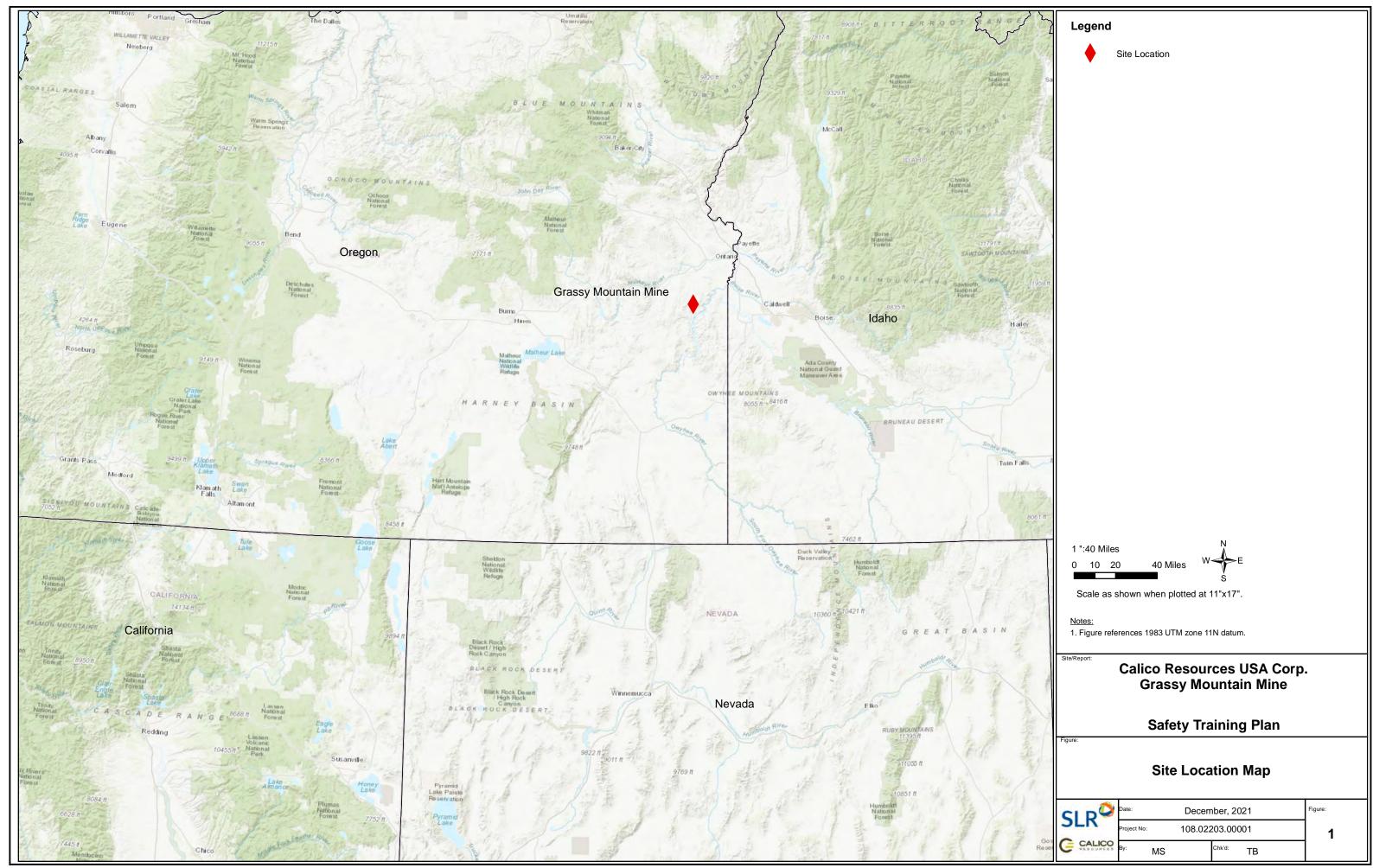
Mining Safety and Health Administration 30 CFR Part 49. Mine Rescue Training.

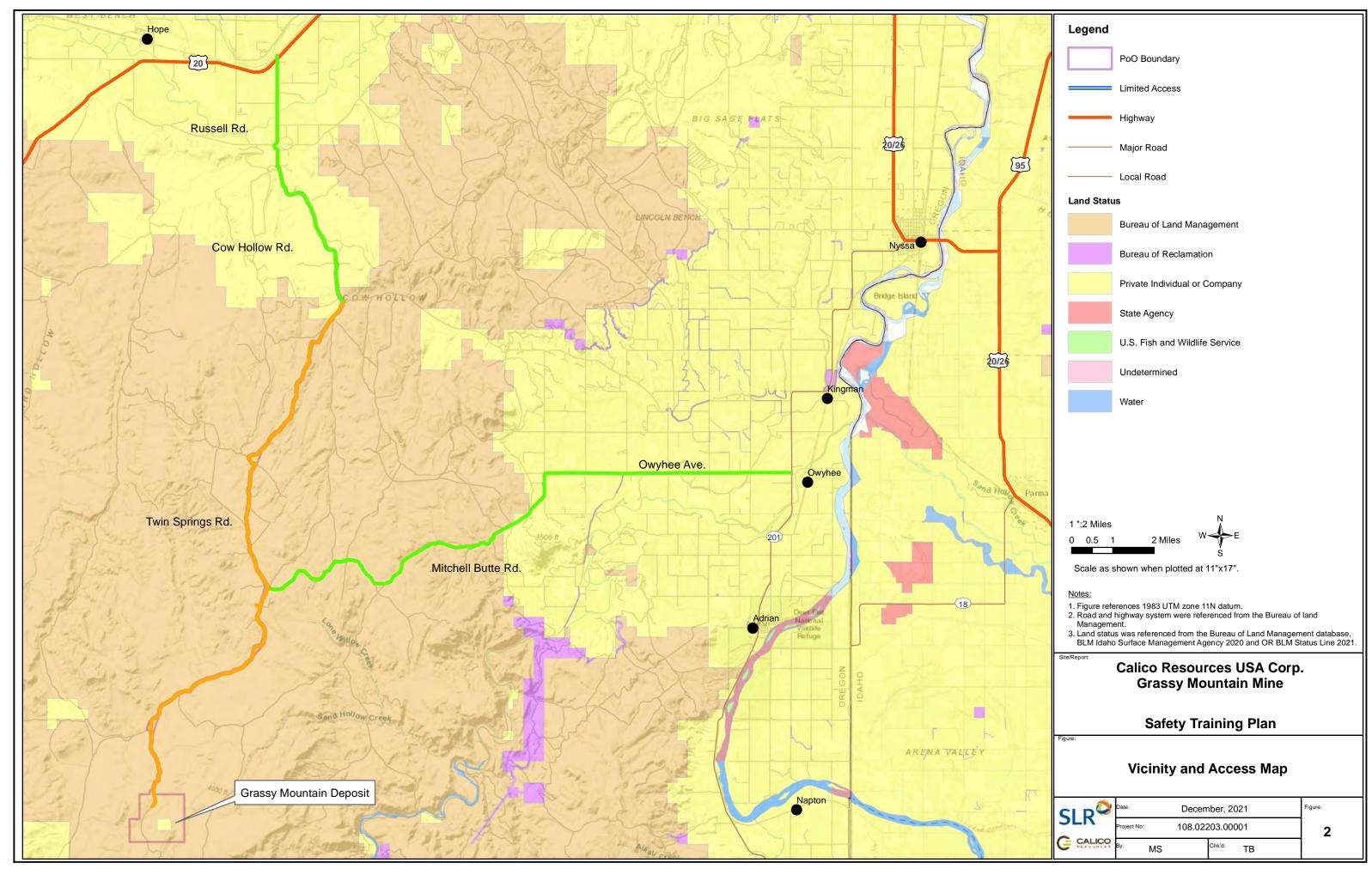
Oregon Administrative Rules (OAR) Chapter 437, General Industry, *Division 2: General Occupational Safety and Health Rules*.

Oregon Revised Statutes (ORS) Chapter 654, Oregon Safe Employment Act.

FIGURES

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TABLES

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Table 1: Safety Training Program- Duration and Frequency

Topic	Duration/Description	Frequency	Regulatory Citation	Employee Type		
MSHA Training Programs						
New Miner Training	40 hours with 8 hours at mine site	Upon Hire	30 CFR Part 48	New Miners		
	8 hours	Annual Refresher				
Experienced Miner Training	8 hours	Initial at new mine location	30 CFR Part 48	Experienced Miners		
	8 hours	Annual refresher				
Mine Rescue Training	20 hours	Initial	30 CFR Part 49.8	Rescue Team Member		
	40 hours	Annual refresher				
	Oregon OSH	IA Training Programs ¹				
Ladder Safety ¹	Classroom and hands-on; Sufficient duration to demonstrate competency	Prior to use of ladder	OAR 437-002-0022 and 0026	Personnel required to use ladders		
Emergency Evacuation and Egress	Sufficient duration to demonstrate competency	Prior to emergency evacuation assistance	OAR 437-002-0042	Personnel designated to assist others in safe evacuation		
Powered Platforms, Manlifts and Vehicle-Mounted Platforms	On-the-job and classroom	Prior to use of equipment and if equipment used or working conditions change	OAR 437-002-0060 and 1910.66	Personnel operating powered platforms, manlifts or vehicle mounted platforms		
Flammable Liquids, Process Safety Management (PSM)	Hands-on and classroom review; Sufficient duration to demonstrate competency.	Initial Hire At least every 3 years or when changes occur at facility	437-002-0118(6)	All affected personnel		
Personal Protective Equipment (PPE)	Classroom and hands-on; Sufficient duration to demonstrate competency	Prior to PPE use and annual refresher	OAR 437-002-0134 and 1910.120(g)(5)	All personnel required to wear PPE		
Confined Space Entry or	Awareness Level	Initial	OAR 437-002-0146	All Operations personnel		
Rescue ¹	Sufficient to demonstrate competency with Permit-required confined space entry: written program and permits	Before employee is assigned permit space duties.		Permit space entrant; attendant; supervisor		
	Same training and proficiencies as permit space entrant, attendant or supervisor	Before responding to incident		Rescue Team Member		

Table 1: Safety Training Program- Duration and Frequency (Continued)

Topic	Duration/Description	Frequency	Regulatory Citation	Employee Type
Medical and First Aid	Required if emergency medical services are not in proximity to the mine	Prior to initiating facility	437-002-0161	First aid trained personnel
Accident Prevention/ Fire Protection	Awareness of accident prevention and response actions during fire	Upon hire and annual refresher	437-002-0182 NFPA 1001 (2013) NFPA 1403 (2012)	All personnel
	Safe use of extinguishers and standpipe hoses	Upon hire and annual refresher		If expected to employ fire extinguisher
		Prior to membership on Fire Brigade		All Fire Brigade Members
		At least annual refresher		
	Educational session or hands on fire- fighting and first aid training	At least quarterly		Brigade Members engaged in interior structural fire fighting
Industrial Truck Operator	Classroom and Hands-on demonstration of competency	Prior to operating truck	OAR 437-002-0227 1910.178(I)	Industrial Truck Operators
	Recertification of skills	At least every 3 years]	
Labels and Safety Data Sheets (SDS)	Classroom	Upon hire Annual refresher	OAR 437-002-0289	All personnel
Rope Descent and Rope Access	Hands-on demonstration of skill	Initial Annual Refresher	OAR 437-002-2027	Personnel required to use ropes for descent or access
Fall Protection ¹	Use of fall protection systems; classroom and hands-on demonstration of competency	Prior to exposure to a fall hazard Annual refresher	OAR 437-002-2031, 1910.30 and 1910.132	Personnel using fall protection equipment
Welding, Cutting and Brazing	Demonstrate competency in safe use, operation and maintenance of tools, equipment, and machinery	Prior to independent welding, cutting or brazing activity	OAR 437-002- 2253(3)	Personnel that perform welding, cutting, or brazing
Occupational Noise Exposure ¹	Hearing conservation program for personnel exposed to noise at or above 85 dB as 8-hour time-weighted average (TWA)	Initial hire and Annual refresher	1910.95	Personnel exposed to noise at or above 85 dB as 8-hour TWA
Material Handling and Storage	Classroom and hands-on instruction on hazards involving servicing rim wheels	Prior to rim wheel servicing employment	1910.117(c)	Personnel that service rim wheels
	Sufficient to demonstrate competency in safe operation of cranes	Prior to crane operations	OAR 437-002- 0228(2)	Crane operators

Table 1: Safety Training Program- Duration and Frequency (Continued)

Topic	Duration/Description	Frequency	Regulatory Citation	Employee Type
Hazardous Waste Operations and Emergency Response	40 hrs offsite + 3 days field experience under direct supervision	Initial	1910.120(b) and 1910.120(e)	General site worker
(HAZWOPER)	8 hours	Annual refresher		
	40 hrs offsite + 3 days field experience under direct supervision + 8 hours of specialized training	Initial		Management and Supervisors
	8 hours	Annual refresher		
Emergency Preparedness	Sufficient training or experience to demonstrate competency	Per team involvement and annual refresher	1910.120(q)(6)	Awareness Level
	8 hours or sufficient experience to demonstrate competency	Per team involvement and annual refresher		Operations Level
	24 hours and demonstrate competency	Per team involvement and annual refresher		Technician Level
	24 hours and demonstrate competency0	Per team involvement and annual refresher		Hazardous Materials Specialist Level
	24 hours and demonstrate competency	Per team involvement and annual refresher		Incident Commander
Respiratory Protection Program	To demonstrate competency in use of respirators	Initial and Annual refresher	1910.134(c)	Personnel required to use respirators
Lockout/Tagout (LO/TO) ¹	Trained in specific procedures for individual employee responsibilities related to LO/TO	Prior to initiating LO/TO activity	1910.147	Affected employee, Authorized employee
Machinery and Machine Guarding ¹	Demonstrate competency in operation and maintenance of power presses	Initial Annual Refresher	1910.217	Power Press Operator or Maintenance Personnel
	Demonstrate competency in operation and maintenance of stationary compactors and bailers	Initial Annual Refresher	OAR 437-002-0256	Compactor Operator or Maintenance Personnel
Electrical Safety ¹	Classroom or on-the-job training to familiarize employee with safety-related work practices required by 1910.331 through 1910.335	Initial Refresher at least every 3 years	1910.332(b)(1) and (2)	Personnel facing risk of electrical shock not reduced to a safe level

Table 1: Safety Training Program- Duration and Frequency (Continued)

Topic	Duration/Description	Frequency	Regulatory Citation	Employee Type			
Electrical Safety ¹ , continued	Additional skills and techniques necessary to distinguish exposed live parts from other electric equipment, determine the voltage of exposed live parts, and clearance distances and corresponding voltages to which the qualified person will be exposed	Initial Refresher at least every 3 years	1910.332(b)(3), 1910.333(c)	Qualified personnel working on energized equipment			
Hazard Communication (HazCom) ¹	Program to communicate potential hazards at facility	Initial hire and Annual refresher	1910.1200	All personnel			
	Specific chemical usage and exposures at facility	New chemical introduction		Personnel exposed to chemicals above action level			
	Cyanide Management Code, Principle 8						
Hazards associated with Cyanide	Follows the HazCom approach for those employees handling cyanide or working in cyanide areas.	Initial hire and Annual refresher	Cyanide Management Code, Principle 8.1	Personnel working with cyanide or responding to incidents in cyanide areas of the facility			
Safe Cyanide Operations	Train on project to operate of a mae	Initial hire and Annual refresher	Cyanide Management Code, Principle 8.2	Personnel working with cyanide or responding to incidents in cyanide areas of the facility.			
Cyanide Exposure and Releases	The same of the sa	Initial hire and Annual Refresher	Cyanide Management Code, Principle 8.3	Emergency response and medical personnel			

Notes: 1. Where appropriate, MSHA training program will be used to fulfill Oregon OSHA training requirements, per the Interagency Agreement.